

Agoura Hills Bicycle Master Plan

Draft Environmental Impact Report

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prepared by

City of Agoura Hills
Public Works Department
30001 Ladyface Court
Agoura Hills, California 91301
Contact: Charmaine Yambao, Senior Civil Engineer

prepared with the assistance of

Rincon Consultants, Inc.
250 East 1st Street, Suite 1400
Los Angeles, California 90012

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RINCON CONSULTANTS

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Acronyms and Abbreviations

AB	Assembly Bill
ACM	asbestos-containing materials
AHMC	Agoura Hills Municipal Code
Amendments	General Plan Amendments
APN	Assessor's Parcel Number
AQMP	Air Quality Management Plan
BERD	Built Environment Resources Directory
BMP	best management practice
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
Cal/OSHA	California Division of Occupational Safety and Health Administration
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CFGC	California Fish and Game Code
CGS	California Geological Survey
CHRIS	California Historical Resources Information System
CO	carbon monoxide
COA	Conditions of Approval
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
Connection	Agoura High School Connection

CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
CY	cubic yards
CWA	Clean Water Act
db	decibel
dBA	decibel using the A-weighted sound pressure level
DBH	diameter at breast height
DNL or Ldn	Day-Night Level
DOC	Department of Conservation
DOF	Department of Finance
DPM	diesel particulate matter
DPR	Department of Parks and Recreation
DTSC	Department of Toxic Substances Control
DWR	Department of Water Resources
E-bikes	Electric bicycles
EIR	Environmental Impact Report
°F	degrees Fahrenheit
FAC	Facultative
FACW	Facultative Wetland
FEMA	Federal Emergency Management Agency
FESA	federal Endangered Species Act
FHWA	Federal Highway Administration
FIRM	Flood Insurance Rate Map
FR	Federal Register
FRA	Federal Responsibility Area
FTA	Federal Transit Administration
FTBMI	Fernandeño Tataviam Band of Mission Indians
GHG	greenhouse gas
GSP	Groundwater Sustainability Plan
HABS	Historic American Building Survey
HAER	Historic American Engineering Record
HRA	Health Risk Assessment
HRE	Historical Resources Evaluation

HA	Hydrological Area
HAS	Hydrological Sub-Area
HU	Hydrologic Unit
Hz	Hertz
in/sec	inches per second
IRWM	Integrated Regional Water Management
LACFCD	Los Angeles County Flood Control District
LADOT	Los Angeles Department of Transportation
LARWQCB	Los Angeles Regional Water Quality Control Board
LBP	lead-based paint
Ldn	day-night level
Leq	equivalent noise level
LID	low-impact development
Lmax	Maximum Noise Level
Lmin	Minimum Noise Level
LRA	Local Responsibility Area
LST	Localized Significance Threshold
LUST	leaking underground storage tank
LVMCOG	Las Virgenes-Malibu Council of Governments
LVMWD	Las Virgenes Municipal Water District
MBTA	Migratory Bird Treaty Act
Metro	Los Angeles County Metropolitan Transportation Authority
MLD	Most Likely Descendant
mph	miles per hour
MRZ	Mineral Resource Zone
MS4	municipal separate storm sewer system
CA MUTCD	California Manual on Uniform Traffic Control Devices
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NOC	Notice of Completion

NOD	Notice of Determination
NOP	Notice of Preparation
NO	nitric oxide
NO_2	nitrogen dioxide
NO_x	nitrogen oxide
NPDES	National Pollutant Discharge Elimination System
NPPA	Native Plant Protection Act
NPS	National Park Service
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
O_3	ozone
OBL	Obligate Wetland
OHP	Office of Historic Preservation
OHWM	ordinary high-water mark
OPR	Office of Planning and Research
OSHA	Occupational Health and Safety Administration
OS-R	Restricted Open Space
Path	Medea Creek Path
Pb	lead
PEIR	Programmatic Environmental Impact Report
Plan	Bicycle Master Plan
$PM_{2.5}$	particulate matter with diameters of up to 2.5 microns
PM_{10}	particulate matter with diameters of up to 10 microns
PPV	peak particle velocity
PRC	Public Resources Code
Program	VMT Mitigation Exchange and Banking Program
ROG	reactive organic gas
ROW	right-of-way
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SAA	Streambed Alteration Agreement
SARA	Superfund Amendments and Reauthorization Act
SB	Senate Bill

SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal information Center
SDC	Seismic Design Category
SEA	Significant Ecological Areas
SFHA	Special Flood Hazard Area
SGMA	Sustainable Groundwater Management Act
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan
SLF	Sacred Lands File
SMMNRA	Santa Monica Mountains National Recreation Area
SMP	Soil Management Plan
SO_2	sulfur dioxide
SO_3	sulfur trioxide
SO_x	sulfur oxide
SOI PQS	Secretary of the Interior's Professional Qualifications Standards
SOI Standards	Secretary of the Interior's Standards for the Treatment of Historic Properties
sp.	species (singular)
spp.	species (plural)
SRA	State Responsibility Area
sq ft	square feet
SVP	Society of Vertebrate Paleontology
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TMDL	total maximum daily load
TSCA	Toxic Substances Control Act
US	United States
U.S.C.	United States Code
U.S. EPA	United States Environmental Protection Agency
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service

USGS	United States Geological Survey
VHFHSZ	Very High Fire Hazard Severity Zone
VOC	volatile organic compound
VMT	vehicle miles traveled
WDR	Waste Discharge Requirement
WEAP	Worker Environmental Awareness Program
WUI	Wildland Urban Interface

Executive Summary

This document is a Programmatic Environmental Impact Report (PEIR) analyzing the environmental effects of the proposed Bicycle Master Plan (BMP), Vehicle Miles Traveled (VMT) Mitigation Exchange and Banking Program (Program), and General Plan Amendments (Amendments) in the City of Agoura Hills. This section summarizes the characteristics of the proposed Project, alternatives to the proposed project, and the environmental impacts and mitigation measures associated with the proposed project.

Lead Agency Contact Person

Charmaine Yambao, PE
City of Agoura Hills
Public Works Department
30001 Ladyface Court
Agoura Hills, California 91301
(818) 597-7360

Project Description

This PEIR has been prepared to examine the potential environmental effects of the proposed BMP, Program, and Amendments (hereafter referred to as the "proposed Project" or "Project"). The following is a summary of the full project description, which can be found in Chapter 2, *Project Description*.

The proposed Project covers the entirety of the city of Agoura Hills. Refer to Figure 2-1 and Figure 2-2 in Chapter 2, *Project Description,* for a map of the project location. The Bicycle Master Plan proposes 30.1 miles of new bikeways and bikeway improvements, including Class I, Class II, Class III, and Class IV facilities, to build upon the city's existing 1.3 miles of bicycle routes and 9.2 miles of bicycle lanes. The BMP proposes a vision of a diverse network of interconnected bicycle corridors, support facilities, and programs that aim to link local and regional destinations and make biking more practical and desirable for a broader range of people. The City seeks to prioritize implementation of two projects within the BMP: the Medea Creek Path (Path), a two-mile bicycle path along the Medea Creek Channel, and the Agoura High School Connection (Connection), a 0.35-mile bicycle path connecting two intersections adjacent to Agoura High School. The proposed Project also includes the Program, which would establish a mitigation opportunity for projects exceeding the VMT threshold by allowing a developer or project proponent to purchase VMT reduction credits, which would in turn be used to fund the implementation of bicycle improvement projects identified within the BMP. To ensure the city's General Plan is consistent with the BMP, the Project would also amend the existing General Plan Infrastructure and Community Services Element.

Project Characteristics

Bicycle Master Plan

The purpose of the BMP is to provide safer streets for city residents who are dependent on bicycling for everyday transportation. Recommended actions included within the BMP are meant to support

and increase bicycling in the city, to enhance non-motorized travel infrastructure, and to create options to support the existing and future population. The BMP includes an inventory of existing bicycle infrastructure that identifies deficiencies, develops and prioritizes improvements, and provides a recommended path for implementation.

The BMP is organized into four chapters:

1. **Introduction.** This chapter includes an overview of the BMP, the purpose of the BMP, an overview of the BMP area and its context, goals of the Plan, and guidance and legislation applicable to the BMP.
2. **Existing Conditions and Analysis.** This chapter discusses the existing roadway conditions, land use, and other context-sensitive information within the city. This chapter includes sections on relevant datasets including bicycling mode share, existing and previously proposed bicycle facilities, and bicycle collisions.
3. **Community Engagement.** This chapter describes the community engagement process with stakeholders. Stakeholders included residents, city staff, local bicycling advocacy groups, the Las Virgenes Unified School District, the Los Angeles Sheriff's Department, and local businesses.
4. **Recommendations.** This chapter addresses the physical improvements recommended to enhance bicycling in the city. Planned bikeway projects included within Chapter 4 are identified in Table 2-1 in Chapter 2, *Project Description.*

VMT Mitigation Exchanges and Banking Program

The Program would establish a new mitigation opportunity for projects exceeding the VMT threshold by allowing a developer or project proponent to purchase VMT reduction credits, which would in turn be used to fund the implementation of bicycle improvement projects identified within the BMP. The exchange concept relies on the applicant of a discretionary project agreeing to implement a predetermined, unfunded, and planned VMT-reducing project or project component. Like all VMT mitigation, substantial evidence would be necessary to demonstrate that the projects covered by the bank would achieve expected VMT reductions, and some form of monitoring may be required (Fehr and Peers 2020).

General Plan Amendments

The City must amend Chapter 3, *Infrastructure and Community Services*, of the existing City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. The General Plan Amendments primarily shift the focus from prioritizing automobile mobility to reducing VMT through alternative transportation modes like walking and biking, as guided by the BMP.

Project Objectives

As discussed in Chapter 2, *Project Description*, the objectives for the proposed Project are as follows:

- Increase transportation choices by providing viable alternatives to driving and improved equity to include all bikers, those who choose not to drive and those who cannot drive.
- Improve accessibility through local and regional connectivity. Local connections include residential communities, schools, commercial centers, and parks whereas regional connections include the surrounding communities and recreational trail network.

- Improve safety by providing separate biking facilities, reducing bicycle collisions, creating greater visibility for bikers, and raising awareness to both bicyclists and road users.
- Improve the public health by creating facilities that allow for more biking.
- Enhance sustainability and environmental benefits by reducing air pollution, greenhouse gas emissions, and noise pollution.
- Enhance community character by constructing bicycle facilities near areas of high scenic value, such as along greenbelts or near surface waters.
- Provide a mechanism for developers to mitigate VMT impacts from development projects.

Alternatives

As required by the California Environmental Quality Act (CEQA), this PEIR examines alternatives to the proposed Project. Studied alternatives include the following three alternatives. Based on the alternatives analysis, Alternative 3 was determined to be the environmentally superior alternative.

- **Alternative 1: No Project Alternative**. The No Project Alternative is a scenario in which the Bicycle Master Plan (Plan), including Medea Creek Path (Path) and Agoura High School Connection (Connection), would not be implemented, the VMT Mitigation Exchange and Banking Program (Program) would not be established, and General Plan Amendments (Amendments) would not be adopted. As a result, no construction activities related to bicycle infrastructure would occur, and the city's existing network of 1.3 miles of bicycle routes and 9.2 miles of bicycle lanes would remain unchanged. The General Plan would continue to prioritize auto mobility rather than reducing VMT. As such, the No Project Alternative would not fulfill any Project Objectives, as the No Project Alternative would not improve transportation choices, accessibility, bicycle safety, public health, sustainability, or community character through the construction of bicycle facilities near areas of high scenic value, or the provision of a mechanism for developers to mitigate VMT impacts from development projects.
- **Alternative 2: Project Minus Medea Creek Path and Agoura High School Connection.** Alternative 2 would implement the Plan, Program, and Amendments of the proposed Project. However, the BMP implemented under Alternative 2 would remove the Medea Creek Bike Path and the Agoura High School Connection from the list of bicycle facilities. All Class II, Class III, and Class IV facilities, and enhanced bicycle treatments would be included within the BMP under Alternative 2. The Program would be revised to only fund individual projects identified under this alternative, excluding the Path and Connection. The Amendments would also be revised to exclude the Path and Connection from the City's planned additions to its system of bikeways but would still shift the focus of Chapter 3 of the General Plan to prioritize VMT reduction through improved active transportation modes like walking and biking. Under Alternative 2, approximately 29 miles of bicycle facilities would be implemented. Alternative 2 would fulfill the Project Objectives, but to a lesser extent given the reduced miles of bicycle facilities implemented and improved under this Alternative. Additionally, Alternative 2 would not fulfill the Project Objective that aims to enhance community character by constructing bicycle facilities near areas of high scenic value.
- **Alternative 3: Only Class II and Class III Facilities**. Alternative 3 would involve implementation of the Plan, Program, and Amendments; however, the BMP would only include Class II and Class III facilities. All Class I facilities, including the Path and Connection, and Class IV facilities would be removed from the Plan, while all Class II and Class III facilities would be included in the BMP under Alternative 3. The Program would be revised to only fund individual projects identified

under this alternative, excluding the Path and Connection. The Amendments would also be revised but would still shift the focus of Chapter 3 of the General Plan to prioritize VMT reduction through active transportation modes like walking and biking. Under Alternative 3, approximately 25.6 miles of bicycle facilities would be implemented. Similar to Alternative 2, Alternative 3 would fulfill Project Objectives, though to a lesser extent given the reduced miles of bicycle facilities implemented and improved, and the Project Objective that aims to enhance community character would not be fulfilled.

Refer to Section 6, *Alternatives*, for the complete alternatives analysis.

Areas of Known Controversy

The EIR scoping process did not identify any areas of known controversy for the proposed Project. Responses to the Notice of Preparation and input received at the PEIR scoping meeting held by the City are summarized in Section 1, *Introduction*.

Issues to be Resolved

Required permits and approvals for most projects identified within the BMP are not known at this time, though they may include permits for regulatory agencies, encroachment permits, easement approvals, and property acquisitions. Issues to be resolved include the acquisition of such permits and approvals, the choice among alternatives, formal adoption of the General Plan Amendments, and the nature of mitigation measures to be adopted.

Issues Not Studied in Detail in the EIR

Section 4.13, *Effects Found Not to be Significant,* includes a discussion of agricultural and forestry resources, energy, greenhouse gas emissions, mineral resources, population and housing, public services, utilities and service systems, and wildfire.

Summary of Impacts and Mitigation Measures

Table ES-1 summarizes the direct environmental impacts of the proposed Project, proposed mitigation measures, and residual impacts (the impact after application of mitigation, if required). Impacts are categorized as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given feasible mitigation measures.
- **Less than Significant.** An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures.
- **No Impact.** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Table ES-1 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measure(s)	Impact
Aesthetics		
Impact AES-1. Implementation of the Bicycle Master Plan would result in temporary obstruction of views during construction activities. The proposed Project would not result in the construction of new structures that could permanently disrupt existing views. This impact would be less than significant.	None required.	Less than significant.
Impact AES-2. There are no officially designated state scenic highways within the City of Agoura Hills. Therefore, the proposed Project would not substantially damage scenic resources within a state scenic highway. There would be no impact.	None required.	No impact.
Impact AES-3. The proposed Project would be consistent with applicable General Plan goals and policies, and would comply with applicable regulations contained within the Agoura Hills Municipal Code. This impact would be less than significant.	None required.	Less than significant.
Impact AES-4. The proposed Project would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area. This impact would be less than significant.	None required.	Less than significant.
Air Quality		
Impact AQ-1. Implementation of the proposed Project would not generate population growth. Therefore, the Project would not exceed the growth forecasts on which the 2022 AQMP is based or delay the timely attainment of air quality standards. Impacts related to AQMP consistency would be less than significant.	None required.	Less than significant.
Impact AQ-2. Construction of the proposed Project would not exceed SCAQMD's regional thresholds of significance and would not result in operational emissions; therefore, the proposed Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment under applicable federal or State ambient air quality standards, and impacts would be less than significant.	None required.	Less than significant.
Impact AQ-3. Project construction would not expose sensitive receptors to substantial toxic air containments. The Project would not increase carbon monoxide concentrations such that it would create carbon monoxide hotspots, and the Project is not considered a land use that would generate substantial toxic air contaminants emissions. impacts would be less than significant.	None required.	Less than significant.
Impact AQ-4. The Project would not generate odors adversely affecting a substantial number of people during construction or operation. Impacts would be less than significant.	None required.	Less than significant.
Biological Resources		
Impact BIO-1. The Project area is largely urbanized, and individual Project components would be located on previously developed and/or disturbed lands. Implementation of the Medea Creek Path could adversely impact special-status species or their habitat. Furthermore, local special-status species and nesting birds are expected to occur within the overall Project area and could be affected by construction activities. With implementation of MM BIO-1A through MM BIO-1C, this impact would be less than significant.	**BIO-1(a) Pre-Construction Biological Resources Assessment and Reporting.** Prior to approval of final design for individual projects identified within the BMP that involve ground disturbance and/or vegetation trimming or removal, the City shall retain a qualified biologist to conduct a focused assessment of the environmental limits of the individual project boundary to identify sensitive biological resources that may be impacted by implementation of the project, including special-status plants, animals, and their habitats, as well as sensitive natural communities, regulated waters, and protected trees. If the biologist identifies protected biological resources that may be affected by implementation of the project, the City shall first prepare alternative designs that seek to avoid and/or minimize impacts to the biological resources. If the project cannot be redesigned without complete avoidance, the City shall retain the qualified biologist to identify the specific impacts to the biological resource (i.e., special-status species, sensitive natural communities, regulated waters, and/or protected trees), identify any state or federal listed species that would necessitate coordination with the appropriate regulatory agency (i.e., USFWS, CDFW, USACE) to obtain regulatory permits, develop project-specific avoidance and mitigation procedures prior to initiating construction activities, and implement project-specific avoidance and mitigation measures prior to and during any construction activities. Mitigation actions that may be required if impacts to sensitive biological resources be identified during implementation of individual projects include: ▪ Pre-construction surveys to identify the presence of special-status species, nesting birds, and roosting bats, within and adjacent to work areas; ▪ Worker Environmental Awareness Program training for all construction personnel; ▪ Complete avoidance of special-status species where and if possible. Avoidance measures may include: ▫ Delimiting and flagging of special-status species avoidance buffer areas (Environmentally Sensitive Areas), ▫ Monitoring of construction activity near Environmentally Sensitive Areas, and ▫ Installation of special-status species exclusion fencing;	Less than significant with mitigation incorporated.

Impact	Mitigation Measure(s)	Impact
	▪ Relocation of special-status species out of work areas (with applicable permits and authorizations as necessary); ▪ Restoration of temporarily disturbed special-status species' habitat; and, ▪ Compensatory mitigation for impacts to special-status species habitat at a minimum ratio appropriate for extent and quality of permanently disturbed habitat. Mitigation ratios may vary from 1:1 to 5:1. **BIO-1(b) Pre-Construction Nesting Bird Surveys, Avoidance, and Reporting**. Future construction activities initiated during the raptor and passerine bird nesting season (January 1 – August 31) involving removal of vegetation or other nesting bird habitat, including abandoned structures and other manmade features, shall be preceded by a pre-construction nesting bird survey conducted no more than one week prior to initiation of ground disturbance and vegetation removal activities. The nesting bird preconstruction survey shall be conducted on foot and shall include up to a 200-foot buffer around the construction site depending on the specific area being surveyed, where publicly accessible. The survey shall be conducted by a qualified biologist familiar with the identification of avian species known to occur in southern California. If nests are found, an avoidance buffer shall be determined by a qualified biologist dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site, which shall be demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to demarcate the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to check with the qualified Biologist before entering the buffer zone during the nesting season. Encroachment into the buffer shall occur only at the discretion of the qualified biologist on the basis that the encroachment will not be detrimental to an active nest. No ground or vegetation disturbing activities shall occur within the buffer until the biologist has confirmed that breeding/ nesting is completed, and the young have fledged the nest. An email summarizing the preconstruction survey(s) shall be prepared by a qualified biologist and shall be submitted to the city prior to the commencement of construction activities. Individual project plans shall include a statement acknowledging compliance with the MBTA and CFGC that includes avoidance of active bird nests and identification of BMPs to avoid impacts to active nests, including checking for nests prior to construction activities during the nesting bird season and what to do if an active nest is found so that the nest is not inadvertently impacted during grading or construction activities. **BIO-1(c) Construction Best Management Practices**. The following construction BMPs shall be incorporated into all grading and construction plans for individual projects: ▪ A 20 mile-per-hour speed limit shall be designated in all construction areas where applicable. ▪ All vehicles and equipment shall be parked on pavement, existing roads, and previously disturbed areas, and clearing of vegetation for vehicle access shall be avoided to the greatest extent feasible. ▪ The number of access routes, number, and size of staging areas, and the total area of the activity shall be limited to the minimum necessary to achieve the goal of the Project. ▪ Equipment washout and fueling areas shall be located within the limits of grading at a minimum of 100 feet from waters, wetlands, or other sensitive resources as identified by a qualified biologist to the greatest extent feasible. Washout areas shall be designed to fully contain polluted water and materials for subsequent removal from the site. ▪ Daily construction work schedules shall be limited to daylight hours where adjacent to natural areas capable of supporting wildlife, and shall be consistent with local noise ordinances. ▪ Mufflers shall be used on all construction equipment where work will be conducted within or adjacent to natural areas capable of supporting wildlife, and vehicles shall be in good operating condition. ▪ Drip pans shall be placed under all stationary vehicles and mechanical equipment within 100 feet of a drainage, creek, or stream. ▪ All trash shall be placed in sealed containers and shall be removed from project sites a minimum of once per week. ▪ No pets are permitted on Project sites during construction.	
Impact BIO-2. Future construction activities could adversely impact riparian habitat or other sensitive natural communities. With implementation of MM BIO-1A through MM BIO-2C, this impact would be less than significant.	**BIO-1(a) Pre-Construction Biological Resources Assessment and Reporting.** See Impact BIO-1 for mitigation measure. **BIO-1(b) Pre-Construction Nesting Bird Surveys, Avoidance, and Reporting**. See Impact BIO-1 for mitigation measure. **BIO-1(c) Construction Best Management Practices**. See Impact BIO-1 for mitigation measure. **BIO-2(a) Riparian Habitat and Sensitive Natural Communities Protection**. If sensitive natural communities, wetlands, or riparian habitats are identified within individual project limits, the City shall design or modify the project to avoid direct and indirect impacts on these habitats, if feasible. At a minimum, the City shall implement the following measures to minimize the loss of riparian vegetation, where feasible. ▪ Protect sensitive habitat areas from harmful exposure to light. If an individual project identified within the BMP is located within or adjacent to sensitive habitat areas or habitat for sensitive species, and lighting is proposed, then the facility will be designed to protect such areas from harmful exposure to light by shielding light sources, redirecting light sources, or using low intensity lighting.	Less than significant with mitigation incorporated.

Impact	Mitigation Measure(s)	Impact
	▪ Delineate sensitive habitat areas. Sensitive habitat areas to be avoided, including appropriate buffers (determined by a qualified biologist), will be flagged by a qualified biologist prior to the onset of construction activities. Where indicated by the biologist, these areas will be fenced or otherwise protected from direct and indirect impacts. All such areas to be avoided with be clearly marked on construction plans and designated as "no construction" zones. ▪ Slope stabilization. Where construction will occur on bare soil or on slopes, the contractor shall stabilize exposed soil/slopes immediately upon completion of construction activities. On highly erodible soils/slopes, the contractor shall use a non-vegetative material that binds the soil initially and breaks down within a few years. If more intensive erosion control treatments are needed, geotextile mats, excelsior blankets, or other soil stabilization products shall be used. ▪ Install signage and fencing, vegetation, or other natural barriers to prevent impacts on adjacent areas during operation. Fencing, vegetation, or other natural barriers will be constructed to prevent impacts on sensitive habitat areas adjacent to the Facilities during operation. Signs will be erected in appropriate locations to inform users of the need to stay within designated bike paths, lanes, routes, or boulevards. **BIO-2(b) Jurisdictional Delineation Survey and Report.** Before approving any individual project involving ground disturbance, the City shall retain a qualified biologist to conduct a site-specific assessment of the individual project area to identify sensitive natural communities, wetlands, or riparian habitats. The field delineation shall include a survey effort within the individual project area. During the field survey, sample points shall be established to document wetland and non-wetland aquatic resources, using the appropriate agency-approved methodology and data forms. The sample points shall focus on identifying indicators of an OHWM, wetland hydrology, hydric soils, and hydrophytic vegetation. Using this information, a "wetland edge" shall be discerned between the wetland and non-wetland points, and the boundary of the aquatic resources shall be mapped with a sub-meter global position system unit. The survey shall be conducted in accordance with USACE Wetlands Delineation Manual (1987) and Arid West Regional Supplement to the manual, as well as the latest guidance from the CDFW and Los Angeles RWQCB. This methodology is the acceptable methodology for delineating the boundaries of federal and state jurisdictions. A delineation report shall be prepared in accordance with the USACE Los Angeles District's 2017 Minimum Standards for Acceptance of Aquatic Resources Delineation Reports and shall be used to support necessary permit applications. The report shall include a discussion of methodologies and results that detail the background information; field observations and data collected; and a summary of findings. The report shall contain narrative descriptions of all aquatic features identified, including jurisdictional resources and their boundaries within the Project component's work area. The report shall quantify lengths and acreages of each aquatic feature, provide high-quality figures, site photographs, and completed data forms, and geographic information system (GIS) data. The report shall be used to support permitting requirements and shall be submitted to the City for review and approval prior to the issuance of grading permits. **BIO-2(c) Compensatory Mitigation.** If sensitive natural communities, state or federally protected wetlands, and/or riparian habitats are disturbed due to implementation of an individual project identified within the Plan, the City shall compensate for the disturbance to ensure no net loss of habitat functions and values. Compensation ratios shall be based on site-specific information and determined through coordination with state, federal, and/or local agencies as part of the permitting process for the individual project prior to the issuance of a grading permit and/or initiation of construction activities. Unless determined otherwise by the regulatory/permitting agency, the compensation shall be at a minimum ratio of two acres restored, created, and/or preserved for every one acre disturbed (2:1). Compensation may comprise on-site restoration/creation off-site restoration, preservation, or purchase of mitigation credits (or a combination of these elements). If compensatory mitigation involves restoration, the City shall develop and implement a Restoration and Monitoring Plan that describes how the habitat shall be created and monitored over a minimum period of time. In broad terms, the Restoration and Monitoring Plan shall at a minimum include: ▪ Description of the Project/impact and mitigation sites ▪ Information related to riparian habitat impacts ▪ Specific objectives ▪ Success criteria ▪ Plant palettes for each vegetation community ▪ Implementation plan ▪ Maintenance activities ▪ Monitoring plan ▪ Contingency measures	

Impact	Mitigation Measure(s)	Impact
	The plant palette shall include a diversity of appropriate native species that occur in the communities in the surrounding area. The performance standards for the Restoration and Monitoring Plan shall be, at a minimum, the following: ▪ Within five years after introducing the native plants to the mitigation site, the acreage of restored native grassland habitat shall be no less than two times the acreage lost to Project construction. ▪ Within five years after introducing the native plants to the mitigation site, the absolute cover of the target species and other native species shall be no less than 50 percent within the restoration area. ▪ Restoration will be considered successful after the success criteria have been met for a period of at least 2 years without any maintenance or remediation activities other than invasive species control. The restoration project shall be initiated prior to development of the individual project and shall be implemented at most over a five-year period, unless success criteria is met sooner. The restoration project shall incorporate an iterative process of annual monitoring and evaluation of progress, and allow for adjustments to the restoration plan, as necessary, to achieve desired outcomes and meet success criteria. Annual reports discussing the implementation, monitoring, and management of the restoration Project shall be submitted to the City. Five years after start of the restoration project, a final report shall be submitted to the City, which shall at a minimum discuss the implementation, monitoring, and management of the restoration project over the five-year period and indicate whether the restoration project has been successful based on established success criteria. The annual reports and the final report shall include as-built plans submitted as an appendix to the report. If the loss of the sensitive habitat types is to be mitigated by a contribution of an in-lieu fee, the City shall provide evidence of payment of the in-lieu fee prior to issuance of the grading permit. The fee shall be based on the cost per acre to restore or create in-kind habitat and the acreage of sensitive communities impacted. In-lieu fees shall be used for the restoration of in-kind habitat.	
Impact BIO-3. Future construction activities could adversely impact state or federally protected wetlands defined by Section 404 of the Clean water act. With implementation of MM BIO-2A through MM BIO-2C, this impact would be less than significant	**BIO-1(a) Pre-Construction Biological Resources Assessment and Reporting.** See Impact BIO-1 for mitigation measure. **BIO-1(c) Construction Best Management Practices**. See Impact BIO-1 for mitigation measure. **BIO-2(a) Riparian Habitat and Sensitive Natural Communities Protection**. See Impact BIO-2 for mitigation measure. **BIO-2(b) Jurisdictional Delineation Survey and Report.** See Impact BIO-1 for mitigation measure.. **BIO-2(c) Compensatory Mitigation.** See Impact BIO-1 for mitigation measure.	Less than significant with mitigation incorporated.
Impact BIO-4. Construction and operational activities could result in temporary impacts to wildlife movement or nursery sites; impacts would be less than significant.	None required.	Less than significant.
Impact BIO-5. Future construction activities could conflict with local policies protecting biological resources. With implementation of MM BIO-1a, MM BIO-1c, MM BIO-2a through MM BIO-2c, and MM BIO-5a, this impact would be less than significant	**BIO-1(a) Pre-Construction Biological Resources Assessment and Reporting.** See Impact BIO-1 for mitigation measure. **BIO-1(c) Construction Best Management Practices**. See Impact BIO-1 for mitigation measure. **BIO-2(a) Riparian Habitat and Sensitive Natural Communities Protection**. See Impact BIO-2 for mitigation measure. **BIO-2(b) Jurisdictional Delineation Survey and Report.** See Impact BIO-1 for mitigation measure.. **BIO-2(c) Compensatory Mitigation.** See Impact BIO-1 for mitigation measure. **BIO-5(a) Tree Protection**. The City shall procure all necessary tree removal permits prior to impacting a protected oak tree. A tree protection and replacement plan shall be developed by a certified arborist for any protected oak tree(s) or other naturally occurring native tree that has a trunk diameter (at 4.5 feet above grade; diameter at breast height [DBH]) that will be affected by implementation of an individual project identified within the Plan. The tree protection and replacement plan shall include, but would not be limited to, an inventory of protected oak trees and naturally occurring native trees with a DBH of four inches or more within the individual construction site, setbacks from trees and protective fencing, restrictions regarding grading and paving near trees, direction regarding pruning and digging within the root zone of trees, and requirements for replacement and maintenance of trees. If protected oak trees or other naturally occurring native trees with a DBH of four inches or more will be removed, replacement tree plantings of like species in accordance with the city standards, but at a minimum ratio of 4:1 (trees planted to trees impacted) for protected oak trees in accordance with the City of Agoura Hills Oak Tree Preservation Guidelines and Oak Tree Ordinance (Municipal Code Article IX, Chapter 6, Part 2., Division 7) and a minimum ratio of 1:1 replacement for other naturally occurring native trees with a DBH of four inches or more, and shall be installed on-site or at an approved off-site location and a restoration and monitoring program shall be developed and implemented for a minimum of seven years. If the protective zone (as defined per the Agoura Hills Oak Tree Preservation Guidelines) of a protected oak tree is disturbed by more than 30 percent, the tree shall be retained and mitigated at a ratio of 4:1 as described above, because long-term impacts that may lead to decline or mortality may not be visible for several years. Any protected oak tree that will be encroached within its protective zone during construction shall have a certified arborist present to oversee the work activities. Any trimming of roots and branches shall be performed or directly supervised by a certified arborist and shall be done in accordance with the American National Standards Institute A300 Tree Care standards	Less than significant with mitigation incorporated.

Impact	Mitigation Measure(s)	Impact
Impact BIO-6. The proposed Project would not conflict with an adopted habitat conservation plan. No impact would occur.	None required.	No impact.
Cultural Resources		
Impact CUL-1. The proposed Project has the potential to result in significant impacts if development carried out under the Project would cause a substantial adverse change in the significance of a historical resource. this impact would be significant and unavoidable.	**CUL-1 Prepare Historical Resources Evaluation Prior to Approval of Project Involving Structures 45 Years or Older and Implement Mitigation Prior to and During Construction**. Prior to approval of individual Class I facilities, Class II facilities, Class IV facilities, and enhanced bicycle treatments that include construction activities which could result in direct/indirect impacts to historical resources, including those that could result in direct impacts to structures/objects and/or indirect impact to buildings 45 years or older, the City shall retain a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards (SOI PQS) in architectural history and/or history as defined in CFR Title 36, Part 61 to oversee the following steps: ▪ Prior to proceeding with the historical resources evaluation (HRE) described below, a qualified architectural historian or historian (who meets the Secretary of the Interior's Professional Qualifications Standards (SOI PQS) in architectural history and/or history as defined in CFR Title 36, Part 61) shall conduct a review of the applicable registers of previously documented built environment resources qualifying as historical resources to determine the presence of such resources within or immediately adjacent to a Class I, II, or IV project footprint or enhanced bicycle facility, and to confirm its condition is consistent with that presented in associated designation documentation. This effort, which may include a field survey, shall be documented in a report (that may be combined with the report described in the third bullet below as necessary and appropriate) that shall be submitted to the City for review and approval prior to initiation of a project component. ▪ Based on guidance provided by the California Office of Historic Preservation (OHP), not all built environment resources merit recordation. Therefore, the professional judgement of an architectural historian (that meets the SOI PQS in architectural history or history as defined in Code of Federal Regulations, Title 36, Part 61) shall be relied upon to determine if built environment resources with potential significance requiring recordation are present within a given project component site or its immediate surroundings. If a project component site or property in its immediate surroundings includes a building, structure, or other built environment feature that is 45 years of age or older that merits recordation and has the potential to be significantly impacted by the project, the City shall prepare a HRE for the property containing said building, structure, or other built environment feature. The evaluation shall consider the eligibility of the resource for listing in the National Register of Historic Places and California Register of Historical Resources, in addition to any applicable local register of historical resources. ▪ The HRE shall be prepared by a SOI PQS architectural historian or historian. The HRE shall include an intensive-level evaluation prepared in accordance with the guidelines and best practices promulgated by the California OHP. The building, structure or other built environment feature shall be evaluated within an appropriate historic context and documented in a report that meets the California OHP guidelines. All evaluated resources shall be documented on California Department of Parks and Recreation Series 523 Forms (DPR forms) in accordance with the guidance included in the OHP's Instruction for Recording Historical Resources. The report with attached DPR forms shall be submitted to the City for review and approval prior to proceeding with construction of the project component. ▪ If built environment resources qualifying as historical resources having the potential to be significantly impacted by a proposed project component are identified within a proposed project component site or its immediate surroundings, efforts shall be made to ensure that impacts are mitigated. In such instances, the above-noted HRE report shall be amended or supplemented with a report that identifies the resource's character-defining features and recommends treatment methods for character-defining features. The report shall demonstrate how the proposed project component complies with the Secretary of the Interior's Standards for the Treatment of Historic Properties (SOI Standards) and avoids impacts to historical resources pursuant to CEQA. The report shall be submitted to the City for review and approval prior to proceeding with construction the project. ▪ If built environment historical resources are identified and compliance with the SOI Standards is not possible, appropriate site-specific mitigation measures that reduce impacts to historical resources to the greatest extent feasible shall be established and undertaken. Mitigation measures may include, but would not be limited to, documentation of the historical resource in the form of a Historic American Building Survey (HABS) or Historic American Engineering Record (HAER) report that complies with the Secretary of the Interior's Standards for Architectural and Engineering Documentation, or development of an interpretative display or educational opportunity that relates the history and significance of the resource to the public.	Significant and unavoidable.

Impact	Mitigation Measure(s)	Impact
Impact CUL-2. The proposed Project has the potential to result in significant impacts if development carried out under the Project would cause a substantial adverse change in the significance of an archaeological resource. this impact would be significant and unavoidable.	**CUL-2 Prepare Archaeological Resources Assessment Prior to Project Approval and Implement Mitigation Prior to and During Construction**. Prior to approval of individual Class I facilities, Class II facilities, Class IV facilities, and enhanced bicycle treatments that involve ground disturbing activities, the City shall retain an archaeologist that meets the SOI PQS in either prehistoric or historic archaeology (qualified archaeologist as defined in CFR, Title 36, Part 61) to oversee the preparation of an archaeological resources assessment). ▪ Archaeological Resources Assessments shall include a CHRIS records search at the SCCIC with a minimum 0.5-mile radius and a Sacred Lands File search through the California Native American Heritage Commission. The records searches will characterize the results of previous cultural resource surveys and disclose any cultural resources that have been recorded and/or evaluated in and around a Class I facilities, Class II facilities involving road widening, Class IV facilities, or enhanced bicycle treatments. A Phase I pedestrian survey shall be undertaken at Class I facilities, Class II facilities involving road widening, Class IV facilities, or enhanced bicycle treatments to locate any surface evidence of cultural materials. A geoarchaeological review (examination of CHRIS and ethnographic data, historical, geological, and soil maps, aerial imagery, geotechnical reports) shall be conducted to assess the potential for the project to encounter unknown archaeological resources during construction. A qualified archaeologist shall identify known archaeological resources and classify the Class I facilities, Class II facilities involving road widening, Class IV facilities, or enhanced bicycle treatments as having high, medium, or low sensitivity for unknown archaeological resources. The assessment shall also include recommendations for additional studies and/or mitigation, as necessary, such as monitoring during construction-related ground disturbance. Construction monitoring shall be recommended when archaeological resources are present and/or the assessment identifies a moderate or high likelihood of archaeological resources being present. ▪ If the CHRIS search or Phase I archaeological survey identifies resources that may be impacted by Class I facilities, Class II facilities involving road widening, Class IV facilities, or enhanced bicycle treatments, the archaeological resources assessment shall also include Phase II testing and evaluation. If resources are determined significant (i.e., eligible for the CRHR and/or NRHP) or unique the City shall first consider whether avoidance and preservation in place is feasible. If resource avoidance and preservation in place is not feasible, appropriate site-specific mitigation measures shall be identified in the Phase II evaluation. ▪ For archaeological resources found eligible under CRHR Criterion 4/NRHP Criterion D (data potential) that cannot be avoided and will be impacted by Class I facilities, Class II facilities involving road widening, Class IV facilities, or enhanced bicycle treatments, mitigation shall include, but would not be limited to, a Phase III data recovery program. The data recovery program shall make provisions for adequately recovering the scientifically consequential information from and about the resource. The qualified archaeologist and City shall consult with appropriate Native American representatives regarding the data recovery program in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource, beyond those that are scientifically important, are considered. For archaeological resources that are found eligible under CRHR Criteria 1/NRHP Criteria A (events), 2/B (persons), and/or 3/C (design/craftsmanship) that cannot be avoided and will be impacted by Class I facilities, Class II facilities involving road widening, Class IV facilities, or enhanced bicycle treatments, other appropriate mitigation shall be determined by a qualified archaeologist in consultation with the City and, if the resource is of indigenous origin, local interested Tribes. Mitigation may include but would not be limited to development of interpretive or educational materials or preservation of all or portions of the archaeological site. ▪ Final disposition of any recovered artifacts or samples, which could include but would not be limited to curation or onsite reburial, shall occur as specified by the qualified archaeologist in consultation with the City and, if the resource is of indigenous origin, local interested Tribes. Artifacts and samples include material recovered from all phases of work, including the Phase I survey, Phase II testing, Phase III data recovery, and construction monitoring.	Significant and unavoidable.
Impact CUL-3. Future development facilitated by the proposed Project would comply with California Health and Safety Code Section 7050.5, which would ensure impacts to human remains are less than significant.	None required.	Less than significant.
Geology and Soils		
Impact GEO-1. There are no faults or Alquist-Priolo Special Studies Zones within or immediately adjacent to the Project area. Therefore, implementation of the proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. This impact would be less than significant.	None required.	Less than significant.
Impact GEO-2. The Project area is not located within or adjacent to an active fault and the Project does not include the construction of buildings or habitable structures. The Project would not exacerbate the risk of loss, injury, or death involving strong seismic ground shaking. This impact would be less than significant.	None required.	Less than significant.
Impact GEO-3. Portions of the Project would be located within liquefaction zones. With compliance with applicable regulatory requirements under the California Building Code, the Project would not exacerbate the risk of loss, injury, or death involving liquefaction. This impact would be less than significant.	None required.	Less than significant.

Impact	Mitigation Measure(s)	Impact
Impact GEO-4. Portions of the Project would be located within areas identified as at risk of landslides. With adherence with applicable regulatory requirements under the California Building Code, the Project would not exacerbate the risk of loss, injury, or death involving landslides. This impact would be less than significant.	None required.	Less than significant.
Impact GEO-5. The Project would not result in substantial soil erosion or the loss of topsoil. This impact would be less than significant.	None required.	Less than significant.
Impact GEO-6. Portions of the Project would be located on geologic units or soils that are unstable. However, the Project would not exacerbate soil instability, nor would the Project result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. Impacts would be less than significant.	None required.	Less than significant.
Impact GEO-7. The Project may be located upon expansive soils. Compliance with applicable City requirements would minimize potential risks associated with expansive soils. This impact would be less than significant.	None required.	Less than significant.
Impact GEO-8. The Project would not require the use of septic tanks or alternative wastewater disposal systems. No impact would occur.	None required.	No impact.
Impact GEO-9. Ground disturbance during construction activities could encounter geologic units with high or undetermined paleontological sensitivity. With implementation of Mitigation Measure GEO-9, this impact would be less than significant.	**GEO-9 Paleontological Resources Assessment.** Prior to approval of final design for individual projects identified within the BMP that involve ground disturbance, the City shall require preparation of a Paleontological Resources Assessment. This assessment may be prepared as a standalone report or incorporated into a larger environmental review document. The Paleontological Resources Assessment shall be prepared by an individual meeting the standards of a Qualified Professional Paleontologist as defined by the SVP. The assessment shall summarize the results of a records search of the Natural History Museum of Los Angeles County, summarize the results of a desktop review of available literature and geologic maps of the individual project site, characterize the paleontological sensitivity of the geologic unit(s) present within the project site using the SVP paleontological sensitivity scale, assess the potential for significant impacts to paleontological resources, and provide mitigation recommendations for avoiding or reducing impacts to paleontological resources from project construction, if necessary.	Less than significant with mitigation incorporated.
Hazards and Hazardous Materials		
Impact HAZ-1. By following applicable legislation and through implementation of a Soil Management Plan when required, the proposed Project would not create a significant hazard to the public or the environment through either the routine transport, use, or disposal of hazardous materials, or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials. With implementation of Mitigation Measure HAZ-1, this impact would be less than significant.	**HAZ-1 Soil Management Plan**. Prior to commencement of ground-disturbing activities for proposed facilities within 1,000 feet of a known hazardous release site, the City shall retain a qualified consultant (i.e., professional geologist or professional engineer) to prepare a Soil Management Plan (SMP) for the project. The SMP shall address: 1. On-site handling and management of unanticipated contaminated soils or other contaminated wastes (e.g., stained soil, soil with solvent or chemical odors) if encountered during ground disturbance, and 2. Specific actions to reduce hazards to construction workers and off-site receptors during construction (e.g., personal protective equipment, dust control, and/or air monitoring). The SMP must establish remedial measures and soil management practices to ensure construction worker safety and prevent the off-site migration of contaminants from the project site. These measures and practices may include, but are not limited to: ▪ Proper transportation and disposal procedures for contaminated materials in accordance with applicable regulations, including CCR Title 22. ▪ A requirement to halt work in the immediate area and contact a qualified consultant (i.e., professional geologist or professional engineer) immediately to evaluate the project site conditions if odorous or visually stained soils, other indications of piping or equipment (including hydrocarbon piping or equipment), or debris are encountered during ground-disturbing activities. ▪ A health and safety plan for contractors working at the project site that addresses the safety and health hazards of each phase of project construction activities with the requirements and procedures for employee protection and outlines proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction. ▪ Reporting on monitoring activities. The Director of Public Works shall the SMP prior to construction (grading/excavation) activities at and prior to issuing grading permits for proposed facilities within 1,000 feet of a known hazardous release site. The City shall implement the SMP during grading and construction activities.	Less than significant with mitigation incorporated.
Impact HAZ-2. Compliance with applicable regulations and implementation of a Soil Management Plan when required would minimize the potential for construction to create a significant hazard involving hazardous emissions or the handling of hazardous materials within one-quarter mile of a school. With implementation of Mitigation Measure HAZ-1, this impact would be less than significant.	**HAZ-1 Soil Management Plan**. See Impact BIO-1 for mitigation measure.	Less than significant with mitigation incorporated.

Impact	Mitigation Measure(s)	Impact
Impact HAZ-3. Individual facilities identified in the Bicycle Master Plan would not be located on an active site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Through compliance with applicable regulations, this impact would be less than significant.	None required.	Less than significant.
Impact HAZ-4. The city is not located within an airport land use plan or within two miles of a public airport or public use airport. No impact would occur.	None required.	No impact.
Impact HAZ-5. With compliance with the California Manual of Uniform Traffic Control Devices during construction activities, implementation of the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. This impact would be less than significant.	None required.	Less than significant.
Impact HAZ-6. The proposed Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. This impact would be less than significant.	None required.	Less than significant.
Hydrology and Water Quality		
Impact HYD-1. Through compliance with existing regulatory requirements, the Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. This impact would be less than significant.	None required.	Less than significant.
Impact HYD-2. The Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the Russell Valley Groundwater Basin. Impacts would be less than significant.	None required.	Less than significant.
Impact HYD-3. The proposed Project would not substantially alter the existing drainage pattern of the Project area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site, would result in flooding on or off site, would provide substantial additional sources of polluted runoff, or would impede or redirect flood flows. Impacts would be less than significant.	None required.	Less than significant.
Impact HYD-4. The proposed Project would not risk the release of pollutants due to Project inundation in flood hazard, tsunami, or seiche zones. Impacts would be less than significant.	None required.	Less than significant.
Impact HYD-5. The proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.	None required.	Less than significant.
Land Use and Planning		
Impact LU-1. The proposed Project would result in the addition of new and improved bicycle and pedestrian pathways in the City of Agoura Hills, which would enhance local and regional connectivity. This impact would be less than significant.	None required.	Less than significant.
Impact LU-2. The proposed Project would be consistent with Connect SoCal 2024, the City of Agoura Hills General Plan 2035, and the Agoura Village Specific Plan. This impact would be less than significant.	None required.	Less than significant.
Noise		
Impact NOI-1. Construction of individual bicycle facilities identified in the Bicycle Master Plan would temporarily produce high noise levels, potentially impacting nearby noise-sensitive land uses. Operation of the bicycle facilities is not anticipated to increase on-site noise levels or result in additional transportation noise. Impacts would be less than significant with mitigation.	**N-1 Construction Noise Reduction Measures.** The following construction noise reduction measures shall be included as standard conditions of approval for projects involving construction within 125 feet of a sensitive receptor: ▪ Properly muffle and maintain all construction equipment powered by internal combustion engines; ▪ Prohibit unnecessary idling of combustion engines; ▪ Locate all stationary noise-generating construction equipment (such as air compressors) as far as practical from existing nearby residences and other noise-sensitive land uses; ▪ Select quiet construction equipment, particularly air compressors, whenever possible; ▪ Fit motorized equipment with proper mufflers in good working order; ▪ Residences, schools, libraries, hospitals or other medical care facilities adjacent to individual project sites shall be notified, in advance and by writing, of the proposed construction schedule before construction activities commence, including details for the noise disturbance coordinator; and, ▪ Construction of each individual project identified within the Plan shall have a designated “noise disturbance coordinator” responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of noise complaints and shall require that reasonable measures be implemented to correct the problem. A telephone number for the disturbance coordinator shall be posted at the construction site.	Less than significant with mitigation incorporated.

Impact	Mitigation Measure(s)	Impact
Impact NOI-2. Construction of individual bicycle facilities identified in Bicycle Master Plan would temporarily generate groundborne vibration, potentially affecting adjacent sensitive land uses. Operation activities are not anticipated to increase on-site vibration levels. Impacts would be less than significant with mitigation.	**N-2 Construction Vibration Control Plan.** Prior to the issuance of any Grading Permit, the Public Works Department shall verify that the Project plans and specifications include provisions that require that paving activities within 37 feet of off-site structures utilize a static roller in lieu of a vibratory roller.	Less than significant with mitigation incorporated.
Impact NOI-3. City of Agoura Hills Bicycle Master Plan would facilitate new development that would be exposed to aircraft noise associated with Van Nuys Airport. Noise-sensitive receptors in Agoura Hills would be located outside of noise contours associated with nearby airports.	None required.	No impact.
Recreation		
Impact REC-1. Bicycle facilities implemented under the proposed BMP would not increase the use of recreational facilities such that physical deterioration would occur or be accelerated. This impact would be less than significant.	None required.	Less than significant.
Impact REC-2. Implementation of the proposed Project would result in the construction or expansion of recreational facilities that could adversely affect the environment. Those impacts are identified throughout this Programmatic Environmental Impact Report. Impacts would be significant and unavoidable.	**BIO-1(a) Pre-Construction Biological Resources Assessment and Reporting.** See Impact BIO-1 for mitigation measure. **BIO-1(b) Pre-Construction Nesting Bird Surveys, Avoidance, and Reporting**. See Impact BIO-1 for mitigation measure. **BIO-1(c) Construction Best Management Practices**. See Impact BIO-1 for mitigation measure. **BIO-2(a) Riparian Habitat and Sensitive Natural Communities Protection**. See Impact BIO-2 for mitigation measure. **BIO-2(b) Jurisdictional Delineation Survey and Report.** See Impact BIO-1 for mitigation measure.. **BIO-2(c) Compensatory Mitigation.** See Impact BIO-1 for mitigation measure. **BIO-5(a) Tree Protection**. See Impact BIO-5 for mitigation measure. **CUL-1 Prepare Historical Resources Evaluation Prior to Approval of Project Involving Structures 45 Years or Older and Implement Mitigation Prior to and During Construction**. See Impact CUL-1 for mitigation measure. **CUL-2 Prepare Archaeological Resources Assessment Prior to Project Approval and Implement Mitigation Prior to and During Construction**. See Impact CUL-2 for mitigation measure. **GEO-9 Paleontological Resources Assessment.** See Impact GEO-9 for mitigation measure. **HAZ-1 Soil Management Plan**. See Impact HAZ-1 for mitigation measure. **N-1 Construction Noise Reduction Measures.** See Impact NOI-1 for mitigation measure. **N-2 Construction Vibration Control Plan.** See Impact NOI-2 for mitigation measure.	Significant and unavoidable.
Transportation		
Impact TRA-1. The proposed Project would be consistent with Connect SoCal 2024, the City of Agoura Hills General Plan 2035, and the Agoura Village Specific Plan. This impact would be less than significant.	None required.	Less than significant.
Impact TRA-2. Construction activities associated with the proposed Project would not result in long-term trip generation, and any temporary increase in VMT would not substantially impact regional VMT. Active transportation projects generally reduce VMT. Therefore, the proposed Project is presumed to result in a less-than-significant impact.	None required.	Less than significant.
Impact TRA-3. Due to the implementation of a traffic control plan during activities occurring within the roadway, construction would not substantially increase hazards due to a geometric design feature or incompatible use. Individual projects identified within the BMP would be designed to comply with the Caltrans Highway Design Manual. This impact would be less than significant.	None required.	Less than significant.
Impact TRA-4. Due to the implementation of a traffic control plan during activities occurring within the roadway, construction would not result in inadequate emergency access. Coordination with the Agoura Hills Fire Department prior to design review and future project approval would ensure emergency access is maintained during operation. This impact would be less than significant.	None required.	Less than significant.
Tribal Cultural Resources		
Impact TCR-1. No tribal cultural resources were identified as a result of the City's required AB 52 and SB 18 consultation processes. This impact would be less than significant.	None required.	Less than significant.

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1 Introduction

This document is a Programmatic Environmental Impact Report (PEIR) for a proposed Bicycle Master Plan (BMP), VMT Mitigation Exchange and Banking Program (Program), and General Plan Amendments (Amendments) in the City of Agoura Hills. The proposed BMP, Program, and Amendments (hereafter referred to as the "proposed Project" or "Project") are described in detail in Chapter 2, *Project Description*.

This chapter of the PEIR discusses the (1) EIR purpose and legal authority; (2) EIR scope, content, and format; (3) Project background; (4) public review and participation process; (5) lead, responsible, and trustee agencies; and (6) the environmental review process under the California Environmental Quality Act (CEQA).

1.1 PEIR Purpose and Legal Authority

The proposed Project requires discretionary approval by the Agoura Hills City Council; therefore, the Project is subject to the environmental review requirements of CEQA. In accordance with State CEQA Guidelines Section 15121(a) (California Code of Regulations [CCR], Title 14), the purpose of this PEIR is to serve as an informational document that:

> "[…] will inform public agency decisionmakers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.[…]"

This PEIR has been prepared pursuant to State CEQA Guidelines Section 15168(a). As stated therein,

> "[…] A Program EIR [PEIR] is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: (1) Geographically, (2) As logical parts in the chain of contemplated actions; (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways."

State CEQA Guidelines Section 15151 provides the following standards related to the adequacy of a PEIR:

> "An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among experts. The courts have looked not for perfection; but for adequacy, completeness, and a good faith effort at full disclosure. "

1.1.1 Streamlining Opportunities

Once a PEIR has been prepared, subsequent activities under the adopted program must be evaluated to determine what, if any, additional CEQA documentation needs to be prepared. If the

PEIR addresses the program's effects as specifically and comprehensively as possible, many subsequent activities could be found to be within the PEIR scope and additional environmental documentation may not be required (State CEQA Guidelines Section 15168(c)). When a PEIR is relied upon for a subsequent activity, the Lead Agency must incorporate feasible mitigation measures and alternatives developed in the PEIR into the subsequent activities (State CEQA Guidelines Section 15168(c)(3)). If a subsequent activity would result in additional impacts not addressed in the PEIR, the Lead Agency must prepare a new Initial Study leading to a Negative Declaration, Mitigated Negative Declaration, or project-level EIR. In this case, the PEIR still serves a valuable purpose as the first-tier of environmental analysis. This tiering method helps streamline the CEQA process for future projects proposed in the BMP.

Other future streamlining opportunities include the following Categorical and Statutory Exemptions:

1.1.1.1 Categorical Exemptions

1. Class 1 (Section 15301): Covers the operation, repair, maintenance, or minor alteration of existing public or private structures, facilities, or topographical features, including existing bike trails.
2. Class 4 (Section 15304): Includes minor alterations to land, such as the creation of bicycle lanes on existing roadways, provided they do not involve the removal of mature, scenic trees.

1.1.1.2 Statutory Exemptions

1. Section 21080.20: As amended by Senate Bill 922, exempts bicycle transportation plans prepared pursuant to the Streets and Highways Code Section 891.2, situated in urban areas. This includes plans for restriping roadways for bike lanes, bicycle parking and storage, signal timing, and related signage.
2. Section 21080.20.5: Specifically covers highway restriping for bike lanes done pursuant to a bicycle transportation plan.
3. Section 21080.25: As amended by Senate Bill 922, applies to projects in urbanized areas and along public rights-of-way, including pedestrian and bicycle facilities, transit prioritization projects, and conversion of existing highway lanes to bus-only lanes.

1.2 EIR Scope, Content, and Format

This PEIR includes discussions of environmental impacts related to several issue areas. The analysis of environmental impacts identifies impacts by category: significant and unavoidable, significant but mitigable, less than significant, and no impact. It proposes mitigation measures, where feasible, for identified significant environmental impacts to reduce such impacts. The responsible agency for each mitigation measure is identified. It is the responsibility of the lead agency implementing specific projects to conduct the necessary environmental review consistent with CEQA and, where applicable, incorporate the mitigation measures provided herein and developed to minimize environmental impacts and/or reduce impacts to less than significant.

This PEIR has been organized into seven sections, which include:

1. **Introduction.** Provides the statement of purpose, a description of the type of environmental document, and information about the PEIR content, format, and public review process.
2. **Project Description.** Discusses the Project objectives, Project locations, and specific Project components.

3. **Environmental Setting.** Provides a description of the existing physical setting of the city, a description of the city transportation system, and the PEIR baseline and approach to direct and cumulative analyses.
4. **Environmental Impact Analysis.** Describes existing conditions found in the Project area and assesses environmental impacts that may be generated by implementing the proposed Project and cumulative development in and near the Project area. These Project impacts are compared to "thresholds of significance" in order to determine the nature and severity of the direct and indirect impacts. Mitigation measures, intended to reduce adverse significant impacts below threshold levels, are proposed where feasible. Impacts that cannot be avoided or mitigated to less-than-significant levels are also identified.
5. **Other CEQA-Required Discussions.** Analyzes the spatial, economic, or population growth-inducing impacts that may result from implementation of the proposed Project, as well as long-term effects of the Project and significant irreversible environmental changes.
6. **Alternatives.** Presents and assesses the environmental impacts of three alternatives including a no Project alternative and up to two Project alternatives that would achieve most of the Project objectives.
7. **References/Preparers.** Lists all published materials, federal, State, and local agencies, and other organizations and individuals consulted during the preparation of this PEIR. It also lists the PEIR preparers.

1.3 Project Background

In the Fall of 2021, the City of Agoura Hills began developing the draft BMP to build upon the city's existing bicycle routes and bicycle lanes. In August 2022, a draft of the BMP was released to the public for review and input. The final draft BMP was released in August 2025. The final draft BMP proposes a vision of a diverse network of interconnected bicycle corridors and support facilities that aim to link local and regional destinations and make biking more practical and desirable for a broader range of people. Following certification of this PEIR, the City of Agoura Hills would implement the proposed BMP in an effort to achieve the following goals:

1) Increase transportation choices,
2) Improve accessibility,
3) Improve safety,
4) Improve public health,
5) Enhance sustainability and environmental benefits, and
6) Enhance community character.

The BMP is consistent with regional, citywide, and neighborhood-specific plans, and proposes new bicycle facility projects to enhance the safety and connectivity of existing bicycle infrastructure. Proposed bicycle facilities included within the BMP are categorized into classes defined by the California Department of Transportation (Caltrans) as the following (Caltrans 2020):

- **Class I Bikeway (Bike Path).** Bike paths are used to serve corridors not served by streets and highways or where wide right-of-way exists, permitting such facilities to be constructed away from the influence of parallel streets. Bike paths offer opportunities not provided by the road system. They can either provide a recreational opportunity, or in some instances, can serve as direct commute routes if cross flow by motor vehicles and pedestrian conflicts can be

minimized. The most common applications are along rivers, ocean fronts, canals, utility right-of-way, abandoned railroad right-of-way, within school campuses, or within and between parks. Another common application of Class I facilities is to close gaps to bicycle travel caused by construction of freeways or because of the existence of natural barriers (rivers, mountains, etc.). Type 1[1] and Type 2[2] electric bicycles (E-bikes) are allowed on Class I facilities under California law.

- **Class II Bikeway (Bike Lane).** Bike lanes are established along streets in corridors where there is significant bicycle demand, and where there are distinct needs that can be served by them. Bike lanes are intended to delineate the right-of-way assigned to bicyclists and motorists and to provide for more predictable movements by each. Bike lanes can also better accommodate bicyclists through corridors where insufficient room exists for side-by-side sharing of existing streets by motorists and bicyclists. Type 1, Type 2, and Type 3[3] E-bikes are allowed on Class II facilities under California law.
- **Class III Bikeway (Bike Route).** Bike routes are shared facilities which serve either to provide continuity to other bicycle facilities (usually Class II bikeways) or to designate preferred routes through high demand corridors. Normally, bike routes are shared with motor vehicles. The use of sidewalks as Class III bikeways is strongly discouraged. Type I, Type II, and Type III E-bikes and mopeds are allowed on Class III facilities under California law.
- **Class IV Bikeway (Separated Bikeway).** A separated bikeway is a bikeway for the exclusive use of bicycles and includes a separation required between the separated bikeway and the through vehicular traffic. The separation may include, but is not limited to, grade separation, flexible posts, inflexible posts, inflexible barriers, or on-street parking. Type I and Type II E-bikes are allowed on Class IV facilities under California law.

1.4 Public Review and Participation Process

In compliance with State CEQA Guidelines Section 21092, the City, as the Lead Agency responsible for the proposed Project, solicited preliminary public comments through distribution of a Notice of Preparation (NOP) of the PEIR for a 30-day agency and public review period starting on January 13, 2025, and ending on February 12, 2025. In addition, the City held a PEIR Scoping Meeting on February 6, 2025. The meeting was aimed at providing information about the proposed Project to members of public agencies, interested stakeholders, residents, and community members. The meeting was held during the Planning Commission Hearing at the City of Agoura Hills Civic Center, Council Chambers.

The city received letters from four agencies in response to the NOP during the public review period. The NOP is presented in **Appendix A** of this EIR, along with the NOP responses received. Table 1-1, below, summarizes the content of each letter and indicates where the issues raised are addressed in the PEIR. Comments that only indicated support or concern for the Project, but did not identify issues to be considered within the EIR, are not included in Table 1-1, but can be reviewed in **Appendix A**.

[1] Type 1 E-bikes have a motor but must be pedaled to operate; the motor ceases to provide assistance when the E-bike reaches a top speed of 20 miles per hour (mph)

[2] Type 2 E-bikes can be operated by a motor without pedaling through the use of a throttle mounted on the handlebars; the motor ceases to provide assistance when the E-bike reaches a top speed of 20 mph.

[3] Type 3 1 E-bikes have a motor but must be pedaled to operate; the motor ceases to provide assistance when the E-bike reaches a top speed of 28 mph. These E-bikes must be equipped with a speedometer.

Table 1-1 NOP Comments and PEIR Response

Commenter	Comment/Request	Where It Was Addressed
Agency Comments		
California Department of Fish and Wildlife (CDFW)	The commenter requests disclosure and explains that the PEIR should provide an adequate, complete, and detailed disclosure about the effects which a proposed Project is likely to have on the environment (Pub. Resources Code, Section 20161; State CEQA Guidelines Section 15151).	In accordance with Public Resources Code Section 20161 and State CEQA Guidelines Section 15151, this EIR provides an adequate, complete, and detailed disclosure of the Project's environmental impacts in Sections 4.1 through 4.13. Significant and unavoidable impacts would occur for the following topics: Cultural Resources. Less than significant impacts with mitigation would occur for the following topics: Biological Resources, Geology and Soils, Hazards and Hazardous Materials, and Noise. Less than significant impacts would occur for the following topics: Aesthetics, Agriculture and Forestry Resources, Air Quality, Energy, Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, Recreation, Transportation, Utilities and Service Systems, and Wildfire.
	The commenter recommends the Project Description include a discussion of purpose and need and a description of the proposed Project.	The Project's objectives, as well as a description of proposed Project activities, are discussed in Chapter 2, *Project Description*.
	The commenter recommends the Alternatives be thoroughly evaluated in accordance with State CEQA Guidelines Section 15126.6; consider a range of feasible alternatives to the Project location to minimize or avoid direct and indirect impacts to sensitive biological resources; consider appropriate setbacks from sensitive and special status biological resources and minimize Project footprint to retain unobstructed spaces; and consider designs and alternatives that fully avoid impacts to aquatic and riparian resources.	Project alternatives, which include a range of feasible alternatives that would minimize environmental impacts, including impacts related to biological resources, are discussed in Chapter 6, Alternatives. Direct and indirect impacts to sensitive biological resources are discussed in Section 4.3, *Biological Resources.*
	The commenter recommends the biological baseline assessment include information on regional setting, Sensitive Natural Communities, and a minimum nine-quadrangle search of CDFW's California Natural Diversity Database to identify potential special-status plant and wildlife species. The commenter also recommends the biological baseline assessment include a thorough, recent, floristic-based assessment of special-status plants and	The biological baseline assessment, including information about regional setting, Sensitive Natural Communities, and special-status species, can be found in Section 4.3, *Biological Resources.* Given the programmatic nature of this EIR, field surveys were not conducted as a part of the biological baseline assessment.

Commenter	Comment/Request	Where It Was Addressed
	natural communities conducted multiple times throughout the growing season, floristic alliance- and/or association-based mapping, and a recent wildlife and rare plant survey.	
	The commenter recommends the PEIR should address direct and indirect impacts to biological resources including potential impacts from lighting, noise, temporary and permanent human activity, and exotic species; discussion of both the short-term and long-term effects of the Project on species population distribution and concentration, as well as alterations of the ecosystem supporting those species impacted; and impacts on, and maintenance of, wildlife corridor/movement areas	Direct and indirect impacts and short-term and long-term effects to biological resources, as well as the mitigation measures required to offset such impacts, are discussed in Section 4.3, *Biological Resources.*
	The commenter recommends the PEIR should address direct and indirect impacts to biological resources including a discussion of post-Project fate of drainage patterns, surface flows, and soil erosion and/or sedimentation in streams and water bodies.	Impacts to wetlands, streams, and riparian habitats are discussed in Section 4.3, *Biological Resources.* Impacts related to drainage patterns, surface flows, and soil erosion and sedimentation are discussed in Section 4.7, *Hydrology and Water Quality.*
	The commenter recommends the PEIR should address direct and indirect impacts to biological resources including analysis of impacts from proposed changes to land use designations and zoning located near areas that may inadvertently contribute to wildlife-human interactions.	Impacts to biological resources are discussed in Section 4.3, *Biological Resources.* Impacts related to land use and zoning are discussed in Section 4.8*, Land Use and Planning.*
	The commenter recommends that cumulative impacts to biological resources be analyzed.	Cumulative impacts to Biological Resource are discussed in Section 4.3.4, *Biological Resources, Cumulative Impacts.*
	The commenter recommends that to avoid impacts to nesting birds, clearing of vegetation occur outside of the peak avian breeding season; If Project construction is necessary during the bird breeding season, a qualified biologist with experience in conducting breeding bird surveys should conduct a nesting bird survey within three days prior to work in the area and if an active nest is identified, a buffer shall be established between the construction activities and the nest so that nesting activities are not interrupted	Impacts to nesting birds during construction and operation, as well as recommended mitigation to protect nesting birds, are discussed in Section 4.3, *Biological Resources.*

Commenter	Comment/Request	Where It Was Addressed
	The commenter states that mitigation measures must be feasible, effective, implementable, and fully enforceable/imposed by the lead agency through permit conditions, agreements, or other legally binding instruments (State CEQA Guidelines, § 15126.4). Mitigation measures should be specific and detailed (CEQA Guidelines, § 15097) and include discussion of significant effects of proposed mitigation measures if applicable (State CEQA Guidelines, § 15126.4(a)(1)).	In accordance with State CEQA Guidelines Sections 15126.4, 15097, and 15126.4(a)(1), the necessary mitigation measures identified in Section 4.3, *Biological Resources,* are feasible, effective, implementable, fully enforceable, and specific. The mitigation measures identified in Section 4.3, *Biological Resources,* would not result in secondary significant impacts.
	The commenter states that the PEIR should include compensatory mitigation measures for the Project's significant and unavoidable impacts prioritizing avoidance and minimization of impacts, on-site habitat restoration or enhancement, and then off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity via a conservation easement.	Impacts to biological resources are discussed in Section 4.3, *Biological Resources.* As identified therein, there would be no significant and unavoidable impacts to biological resources associated with implementation of the BMP. Mitigation Measure BIO-1 describes the need for compensatory mitigation at a minimum ratio appropriate for the extent and quality of permanently disturbed habitat, should implementation of future bicycle facilities result in impacts to special-status species habitat. Further, Mitigation Measure BIO-6 describes the need for compensatory mitigation if implementation of future bicycle facilities results in impacts to riparian habitat, sensitive natural communities, and/or state or federally protected wetlands.
	The commenter states that the PEIR should include measures to protect proposed mitigation lands' habitat values in perpetuity.	Impacts to biological resources and necessary mitigation measures are discussed in Section 4.3, *Biological Resources.*
	The commenter states that take of any endangered, threatened, candidate species, or NPPA-listed plant species that results from the Project is prohibited, except as authorized by state law. CDFW considers adverse impacts to a species protected by California Endangered Species Act (CESA) to be significant.	Impacts to endangered, threatened, candidate species, or NPPA-listed plant species are discussed in Section 4.3, *Biological Resources.*
	The commenter states that CDFW does not support the use of translocation and transplantation of salvage plant and animal species as the primary mitigation strategy for unavoidable impacts to endangered, rare, or threatened plants and animals.	Impacts to biological resources and necessary mitigation measures are discussed in Section 4.3, *Biological Resources*. The act of translocation or transportation of salvage plant and animal species would not be used as a Mitigation Measure for the proposed Project.

Commenter	Comment/Request	Where It Was Addressed
	The commenter states that a qualified biologist(s) must obtain a Scientific Collecting Permit to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project-related activities.	Impacts to biological resources and necessary mitigation measures are discussed in Section 4.3, *Biological Resources*. The Project would not require the capture, temporary possession, or relocation of wildlife.
	The commenter states that if the Project will require diversion or obstruction of the natural flow, bed, channel, or bank, the Project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSAA) is required prior to conduction proposed activities.	Required Permits and Approvals are identified in Chapter 2, *Project Description.*
	The commenter states that CDFW, as described in Fish and Game Code section 703(a), is guided by the Fish and Game Commission's (Commission) policies. Through its Wetlands Resources policy, the commission prefers mitigation which would achieve expansion and enhancement of wetland acreage and values, and at least meet a "no net loss" of wetland acreage and values. Recommends prioritizing avoidance and minimization of impacts first, then mitigation measures that assure a "no net loss" of either wetland habitat values or acreage.	Impacts to biological resources and necessary mitigation measures are discussed in Section 4.3, *Biological Resources*.
	The commenter 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.	Impacts related to water use and water quality control are discussed in Section 4.7, *Hydrology and Water Quality.*
	The commenter recommends the City provide a native plant and high-pollinator value palette for the Project. The Project's landscaping plan should be disclosed and evaluated in the PEIR for potential impacts on biological resources such as natural communities adjacent to the Project site.	Impacts to biological resources and necessary mitigation measures are discussed in Section 4.3, *Biological Resources*. Given the programmatic nature of the BMP and this PEIR, and given that existing design plans of proposed improvements are still conceptual, landscaping pallets are not currently available. However, Mitigation Measure BIO-6 requires the use of a native plant palette.

Commenter	Comment/Request	Where It Was Addressed
City of Calabasas	The commenter requests to be invited to any public Project meetings related to the Project or the environmental document.	The City of Agoura Hills will invite City of Calabasas to any future public Project meetings related to the document. The City of Agoura Hills will provide copies of the draft BMP and draft PEIR to the City of Calabasas.
	The commenter requests copies of the draft Bicycle Master Plan and the draft environmental document for review when available.	
County of Ventura Planning Division	The commenter requests to be contacted to coordinate striping, signage, and wayfinding for bicyclists when there is a transition from a Class ll to a Class lV bike facilities between County and City portions of Kanan Road in accordance with County Policy CTM-3.8.	The City of Agoura Hills will coordinate transition striping, signage, and wayfinding with the County of Ventura Planning Division, and will notify VCTC when improvements along Kanan Road are completed.
	The commenter requests notification be provided to Ventura County Transportation Commission (VCTC) when improvements along Kanan Road are completed.	
Ventura County Air Pollution Control District	Due to the proximity of the Project to the City of Thousand Oaks residential neighborhoods and unincorporated Oak Park residential areas, the commenter requests the EIR consider the potential for fugitive dust generated from grading/construction activities in constructing bike paths near these areas in the Project DEIR's Air Quality Section. The commenter requests the EIR identify what measures will be taken to ensure impacts remain low, including the potential for compliance-driven violations of VCAPCD Rules 50, Opacity, Rule 51, Nuisance, and Rule 55, Fugitive Dust	Impacts related to Air Quality, including impacts related to fugitive dust from Project grading and construction activities, and necessary mitigation measures are discussed in Section 4.2, *Air Quality*.

1.5 Lead, Responsible, and Trustee Agencies

The *CEQA Guidelines* require the identification of "lead," "responsible," and "trustee" agencies. The City of Agoura Hills is the "Lead Agency" for the proposed Project because it has the principal responsibility for approving the Project.

A "responsible agency" is a public agency other than the "Lead Agency" that has discretionary approval authority over certain components of a project (the *State CEQA Guidelines* define a public agency as a State or local agency, but specifically exclude federal agencies from the definition). Caltrans is a responsible agency for the proposed Project.

A "trustee agency" refers to a State agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California. CDFW is a trustee agency for the proposed Project.

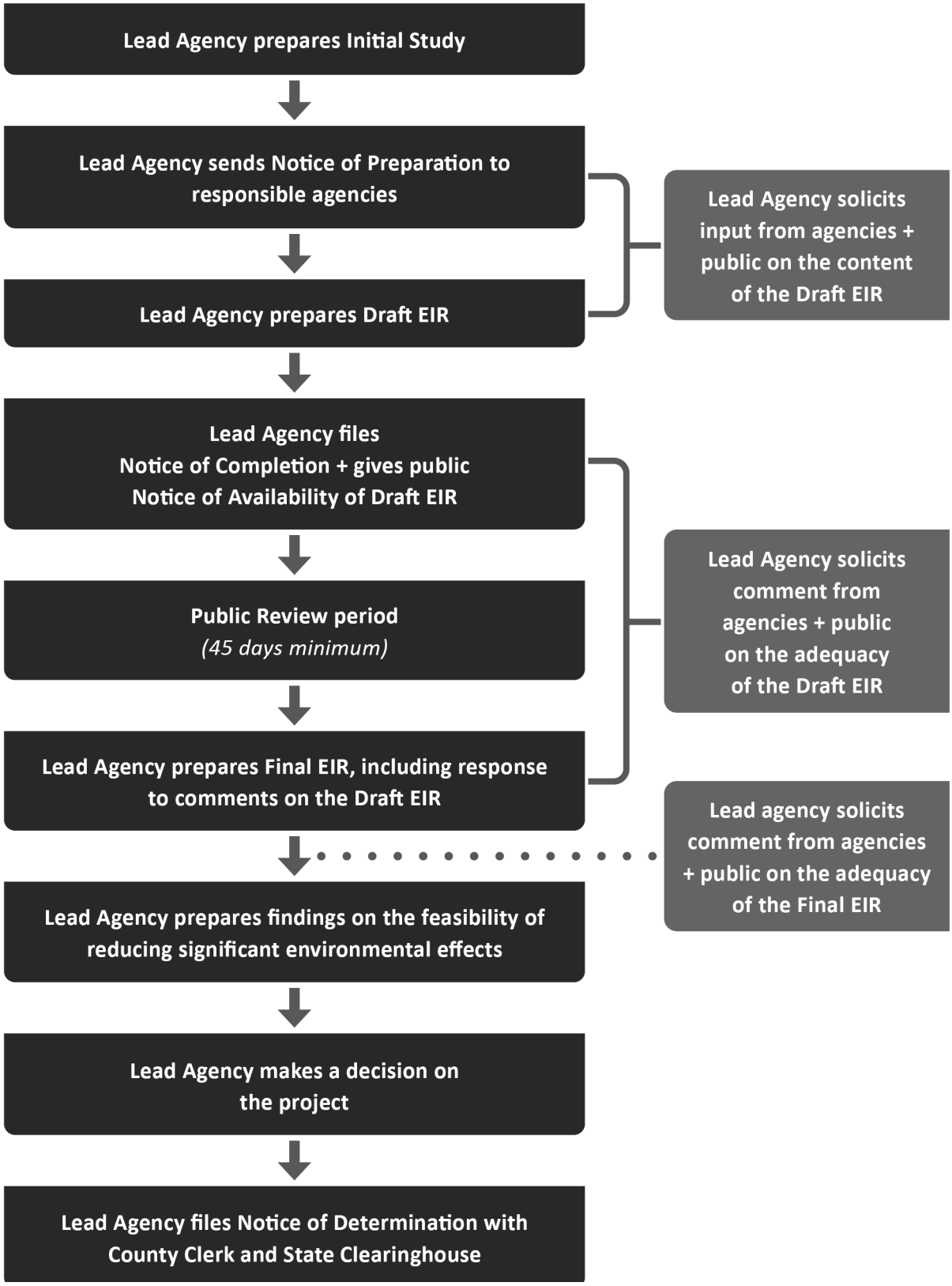
1.6 Environmental Review Process

The environmental impact review process, as required under CEQA, is summarized below and illustrated in Figure 1-1. The steps are presented in sequential order.

1. **Notice of Preparation**. After deciding that a PEIR is required, the lead agency (City of Agoura Hills) must file an NOP soliciting input on the PEIR scope to the State Clearinghouse, other concerned agencies, and parties previously requesting notice in writing (State CEQA Guidelines Section 15082; Public Resources Code [PRC] Section 21092.2). The NOP must be posted in the County Clerk's office for 30 days.
2. **Draft PEIR Prepared.** The Draft PEIR must contain: a) table of contents or index; b) summary; c) project description; d) environmental setting; e) discussion of significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts); f) a discussion of alternatives; g) mitigation measures; and h) discussion of irreversible changes.
3. **Notice of Completion.** The lead agency must file a Notice of Completion (NOC) with the State Clearinghouse when it completes a Draft PEIR and prepare a Public Notice of Availability of a Draft PEIR. The lead agency must place the NOC in the County Clerk's office for 30 days (PRC Section 21092) and send a copy of the NOC to anyone requesting it (State CEQA Guidelines Section 15087). Additionally, public notice of Draft PEIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site; and c) direct mailing to owners and occupants of contiguous properties. The lead agency must solicit input from other agencies and the public and respond in writing to all comments received (PRC Sections 21104 and 21253). The public review period for a Draft PEIR is 45 days.
4. **Final PEIR.** A Final PEIR must include: a) the Draft PEIR; b) copies of comments received during public review; c) list of persons and entities commenting; and d) responses to comments.
5. **Certification of Final PEIR.** Prior to making a decision on a proposed project, the lead agency must certify that: a) the Final PEIR has been completed in compliance with CEQA; b) the Final PEIR was presented to the decision-making body of the lead agency; and c) the decision-making body reviewed and considered the information in the Final PEIR prior to approving a project (State CEQA Guidelines Section 15090).

6. **Lead Agency Project Decision.** The lead agency may a) disapprove a project because of its significant environmental effects; b) require changes to a project to reduce or avoid significant environmental effects; or c) approve a project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (State CEQA Guidelines Sections 15042 and 15043).
7. **Findings/Statement of Overriding Considerations**. For each significant impact of a project identified in the PEIR, the lead agency must find, based on substantial evidence, that either: a) a project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to a project are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (State CEQA Guidelines Section 15091). If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision.
8. **Mitigation Monitoring Reporting Program.** When the lead agency makes findings on significant effects identified in the PEIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects.
9. **Notice of Determination.** The lead agency must file a Notice of Determination (NOD) within five days of deciding to approve a project for which an PEIR is prepared (State CEQA Guidelines Section 15094). A local agency must file the NOD with the County Clerk. The NOD must be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD within five days starts a 30-day statute of limitations on CEQA legal challenges (PRC Section 21167[c]). Posting of the NOD after five days, or failure to post the NOD, results in a 180-day statute of limitations on CEQA legal challenges (PRC Section 21167[d]).

Figure 1-1 Environmental Review Process



2 Project Description

This section describes the proposed Project, including the Project proponent, lead agency contact, major Project components, Project location, Project objectives, and discretionary actions needed for approval.

2.1 Project Proponent

City of Agoura Hills (City)
Public Works Department
30001 Ladyface Court
Agoura Hills, California 91301

2.2 Lead Agency Contact Person

Charmaine Yambao, Senior Civil Engineer
City of Agoura Hills, Public Works Department
30001 Ladyface Court
Agoura Hills, California 91301
CYambao@agourahillscity.org

2.3 Overview of Project Components

The proposed Project includes the following components:

1. **Bicycle Master Plan (BMP).** This Plan proposes 30.1 miles of new bikeways and bikeway improvements to build upon the city's existing 1.3 miles of bicycle routes and 9.2 miles of bicycle lanes. The BMP proposes a vision of a diverse network of interconnected bicycle corridors, support facilities, and programs that aim to link local and regional destinations and make biking more practical and desirable for a broader range of people. Impacts associated with the BMP are assessed programmatically throughout this environmental document. The individual projects included within the BMP would be reviewed on a project-by-project basis as they are proposed and as the extent of their impacts becomes better understood through development of project design to determine if additional CEQA analysis is required.
    a. **Medea Creek Path (Path).** The Medea Creek Path consists of a two-mile bicycle path along the Medea Creek Channel. As the City seeks to prioritize implementation of the Medea Creek Path, conceptual design plans have been developed which allow for a more specific assessment of environmental impacts.
    b. **Agoura High School Connection (Connection).** Similar to the Path, the City seeks to prioritize implementation of the Agoura High School Connection, which consists of a 0.2-mile bicycle path from the intersection of Argos Street and Thousand Oaks Boulevard to the intersection of Easterly Road and Fountain Place. As such, conceptual design plans have been developed which allow for a more specific assessment of environmental impacts.

2. **VMT Mitigation Exchange and Banking Program (Program).** The Program would establish a mitigation opportunity for projects exceeding the vehicle miles traveled (VMT) threshold by allowing a developer or project proponent to purchase VMT reduction credits, which would in turn be used to fund the implementation of bicycle improvement projects identified within the Bicycle Master Plan. Impacts associated with the Program (i.e., implementation of the Bicycle Master Plan) are assessed programmatically throughout this environmental document.
3. **General Plan Amendments (Amendments).** To ensure the City of Agoura Hills General Plan is consistent with the Bicycle Master Plan, the Project would amend Chapter 3, *Infrastructure and Community Services*, of the existing General Plan. Impacts associated with the Amendments are assessed programmatically throughout this environmental document.

The BMP, Path, Connection, Program, and Amendments collectively are referred to as the Project or the proposed Project.

2.4 Project Location

The City of Agoura Hills (city) is located within the southwest portion of Los Angeles County in the region of Southern California. The city is bordered by unincorporated portions of Ventura County and the City of Thousand Oaks to the north and northwest, the City of Westlake Village to the west, the City of Calabasas to the east, and unincorporated portions of Los Angeles County to the south. The United States Highway 101 (Ventura Freeway) provides regional access and bifurcates the southern portion of the city. The Project's regional location is shown in Figure 2-1.

The BMP, Program, and Amendments envisioned under the proposed Project would encompass all of the City of Agoura Hills. Specific improvements within the BMP would be located in the areas identified in Figure 2-2. As shown in Figure 2-3 through Figure 2-10, the Path would extend along two miles of the Medea Creek Channel, from Agoura Road to the northern City of Agoura Hills and county of Los Angeles limits. As shown in Figure 2-11 and Figure 2-12, the Connection would extend for 0.35 mile from the intersection of Argos Street and Thousand Oaks Boulevard to the intersection of Easterly Road and Fountain Place.

Figure 2-1 Regional Location

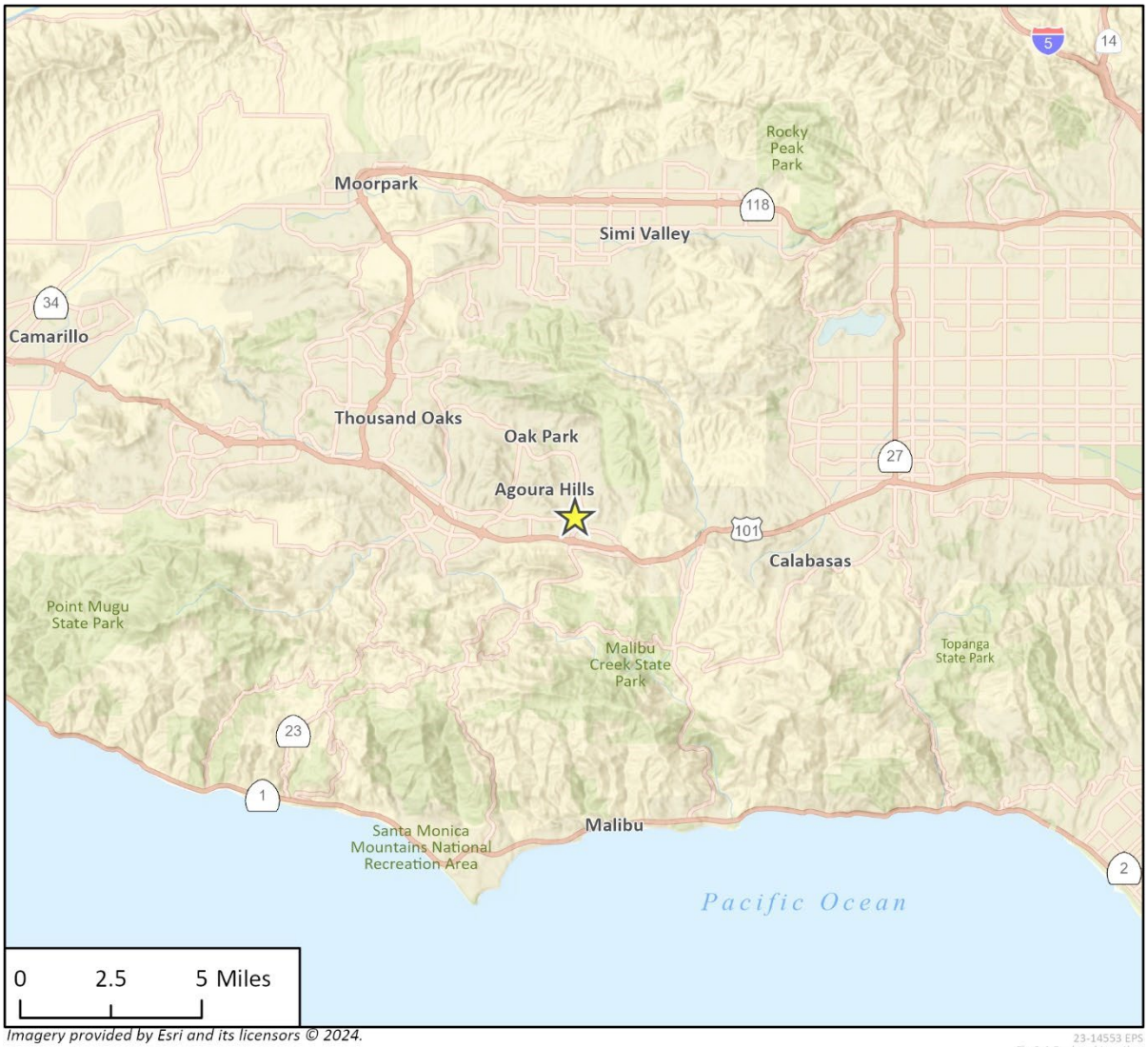
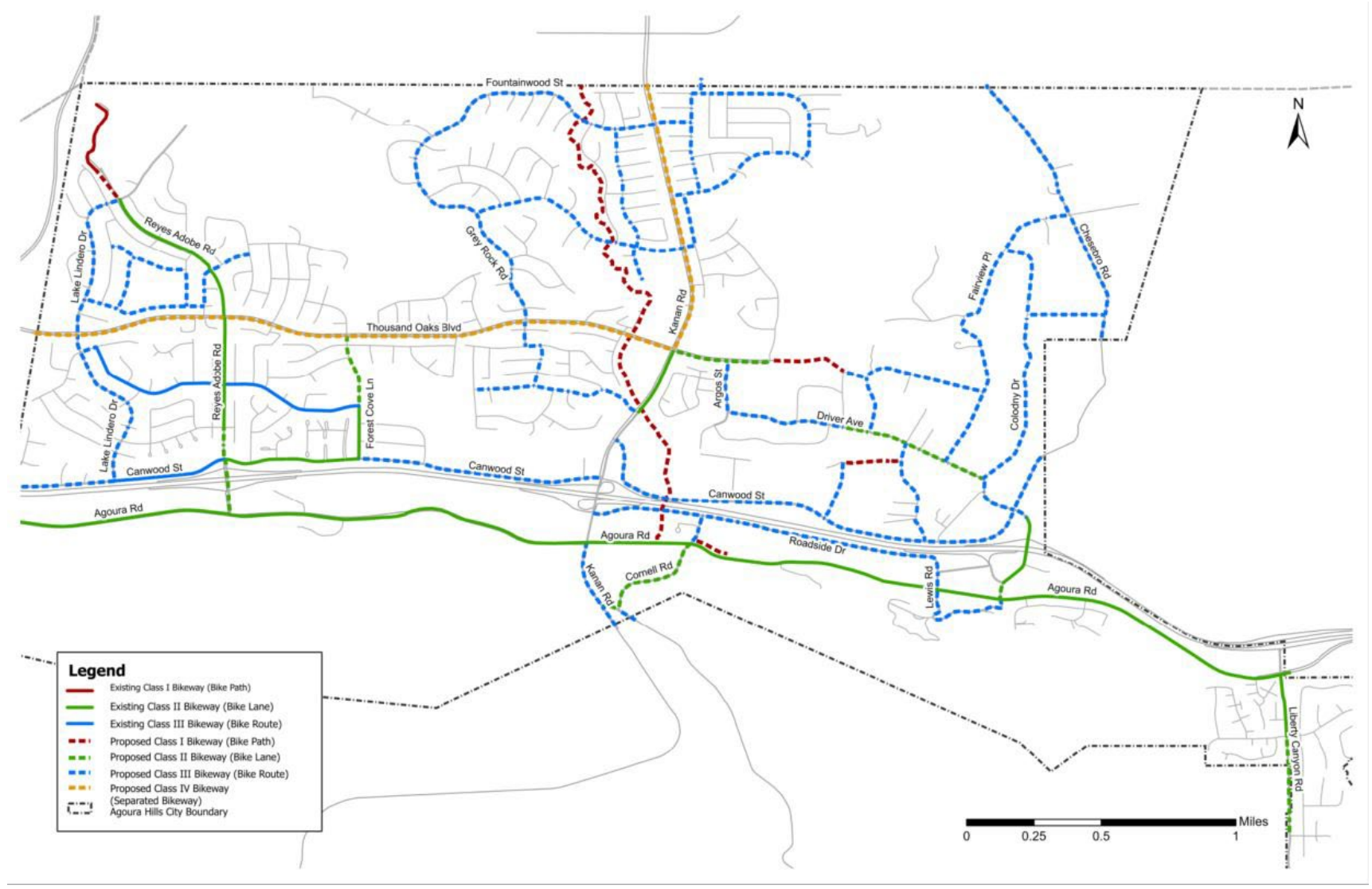
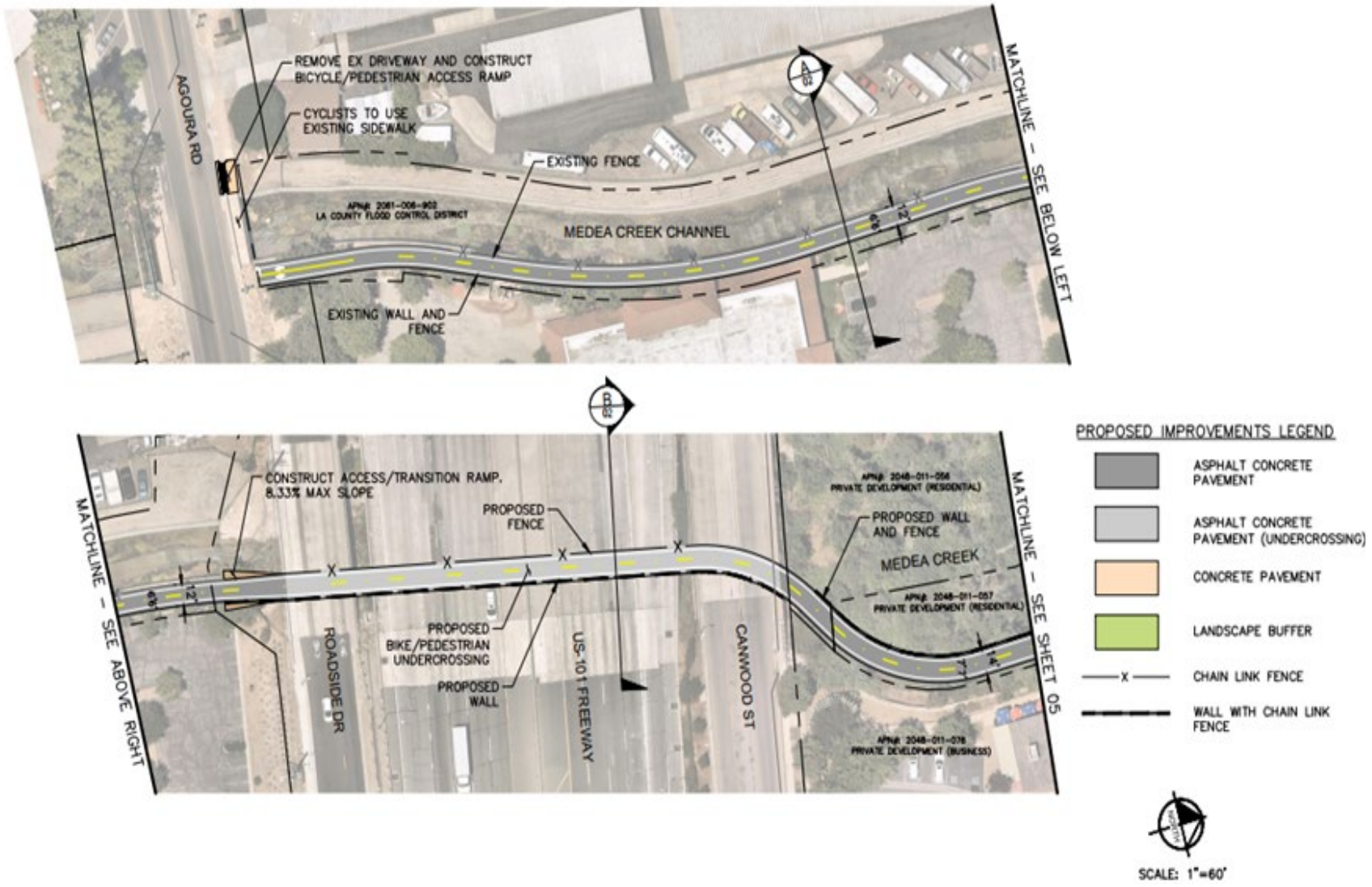


Figure 2-2 Project Location



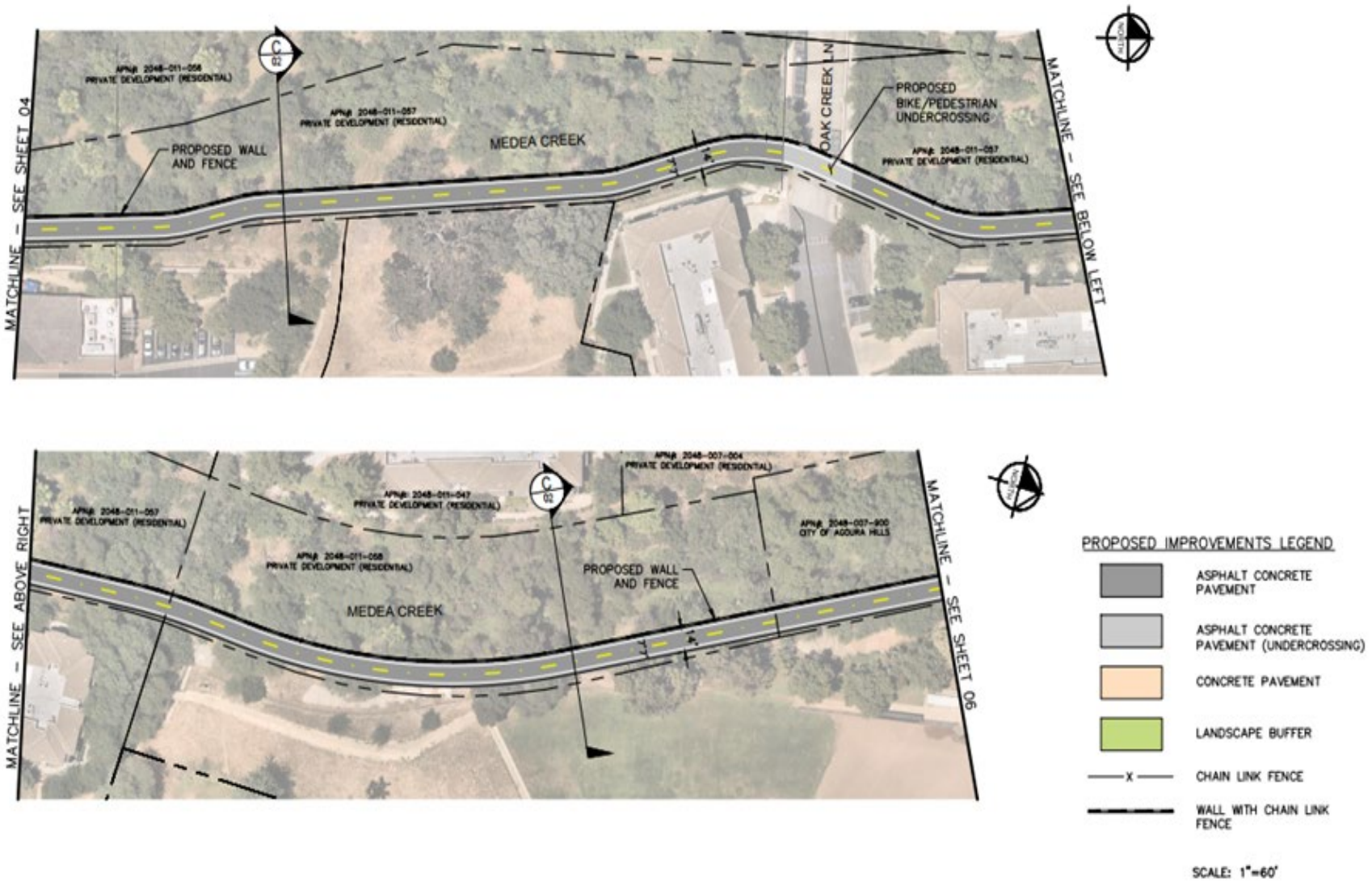
Source: City of Agoura Hills 2024

Figure 2-3 Project Location Map - Medea Creek Path, Segment 1 of 8



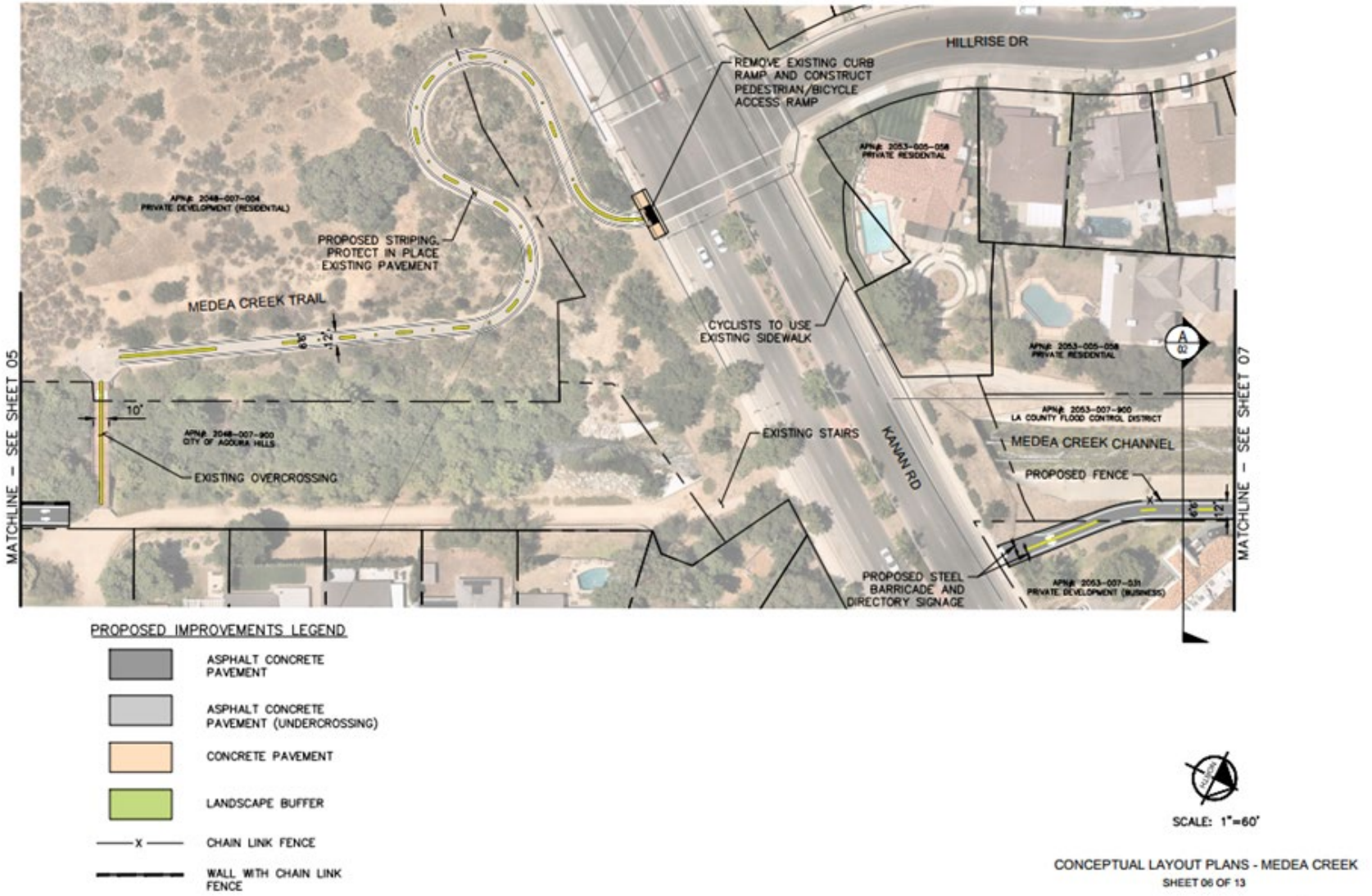
Source: City of Agoura Hills 2024

Figure 2-4 Project Location Map - Medea Creek Path, Segment 2 of 8



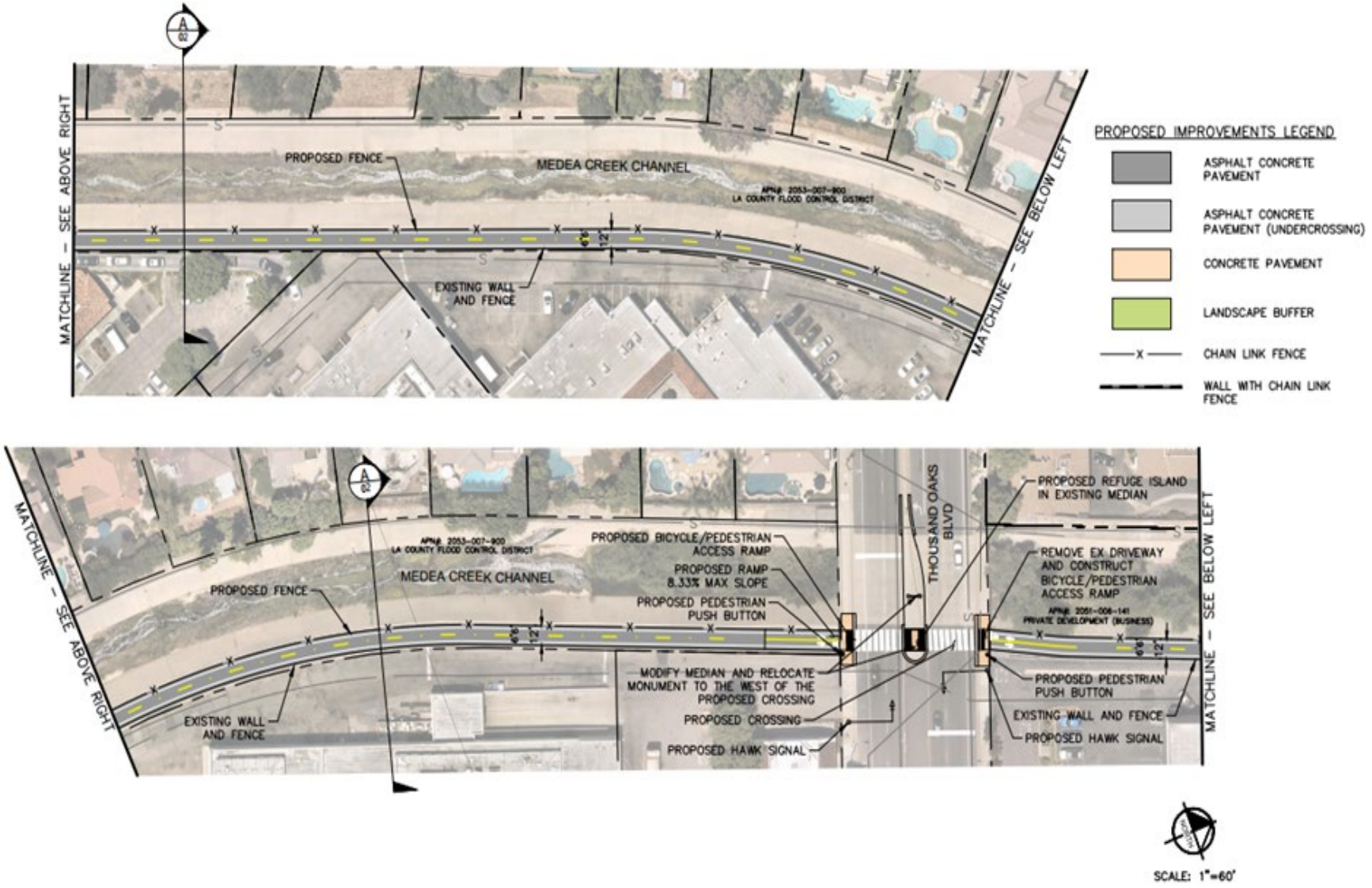
Source: City of Agoura Hills 2024

Figure 2-5 Project Location Map - Medea Creek Path, Segment 3 of 8



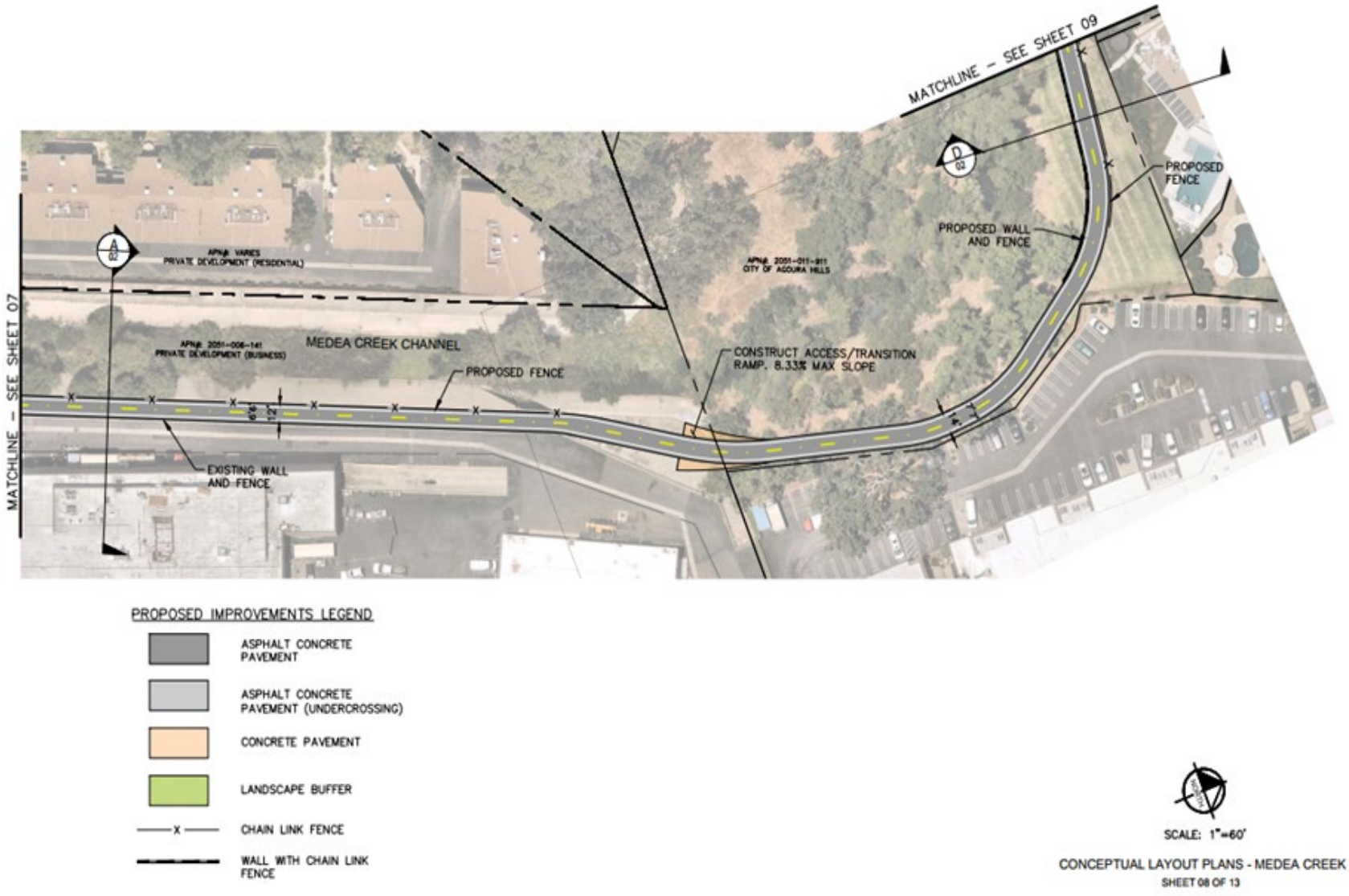
Source: City of Agoura Hills 2024

Figure 2-6 Project Location Map - Medea Creek Path, Segment 4 of 8



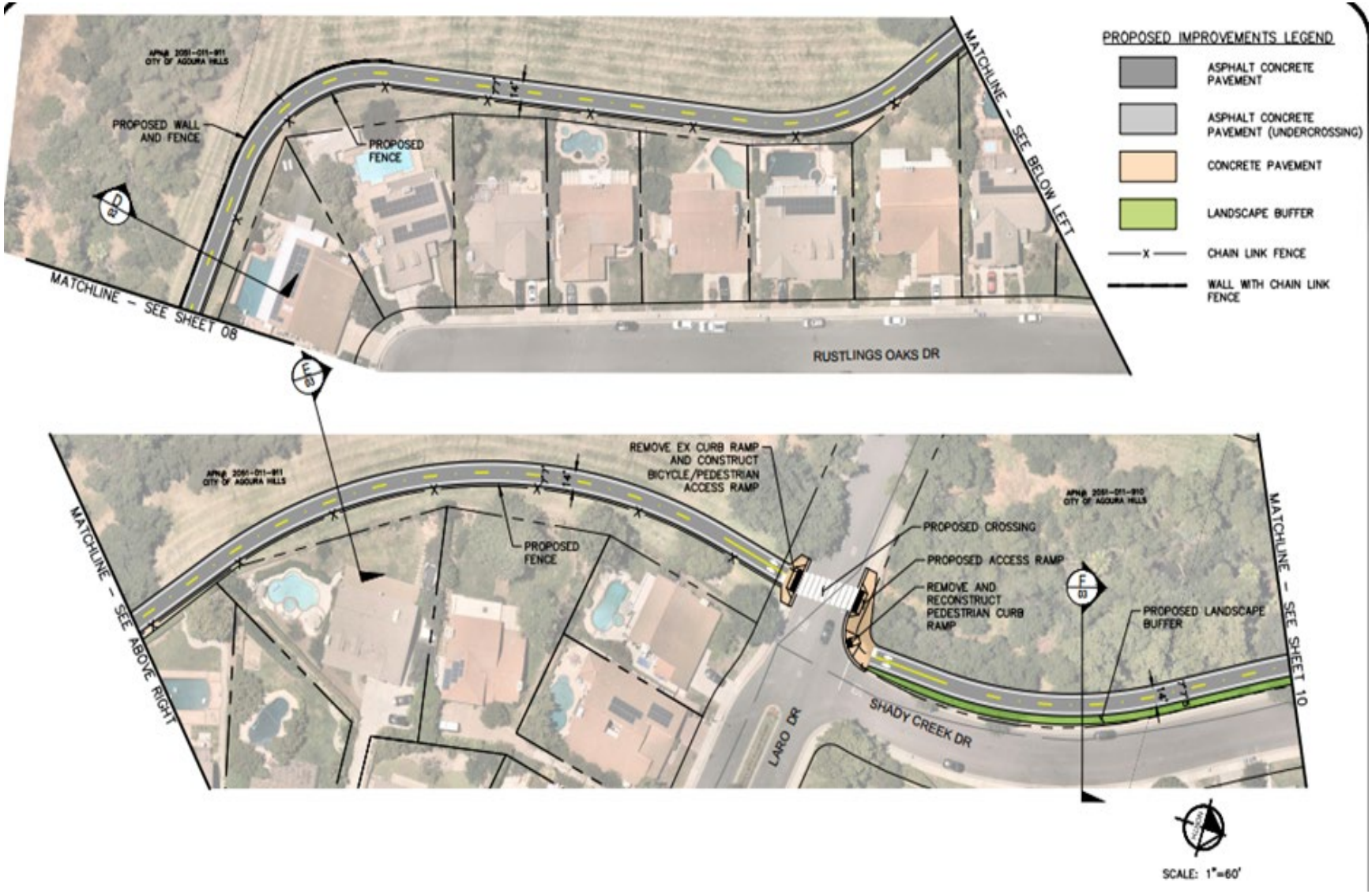
Source: City of Agoura Hills 2024

Figure 2-7 Project Location Map - Medea Creek Path, Segment 5 of 8



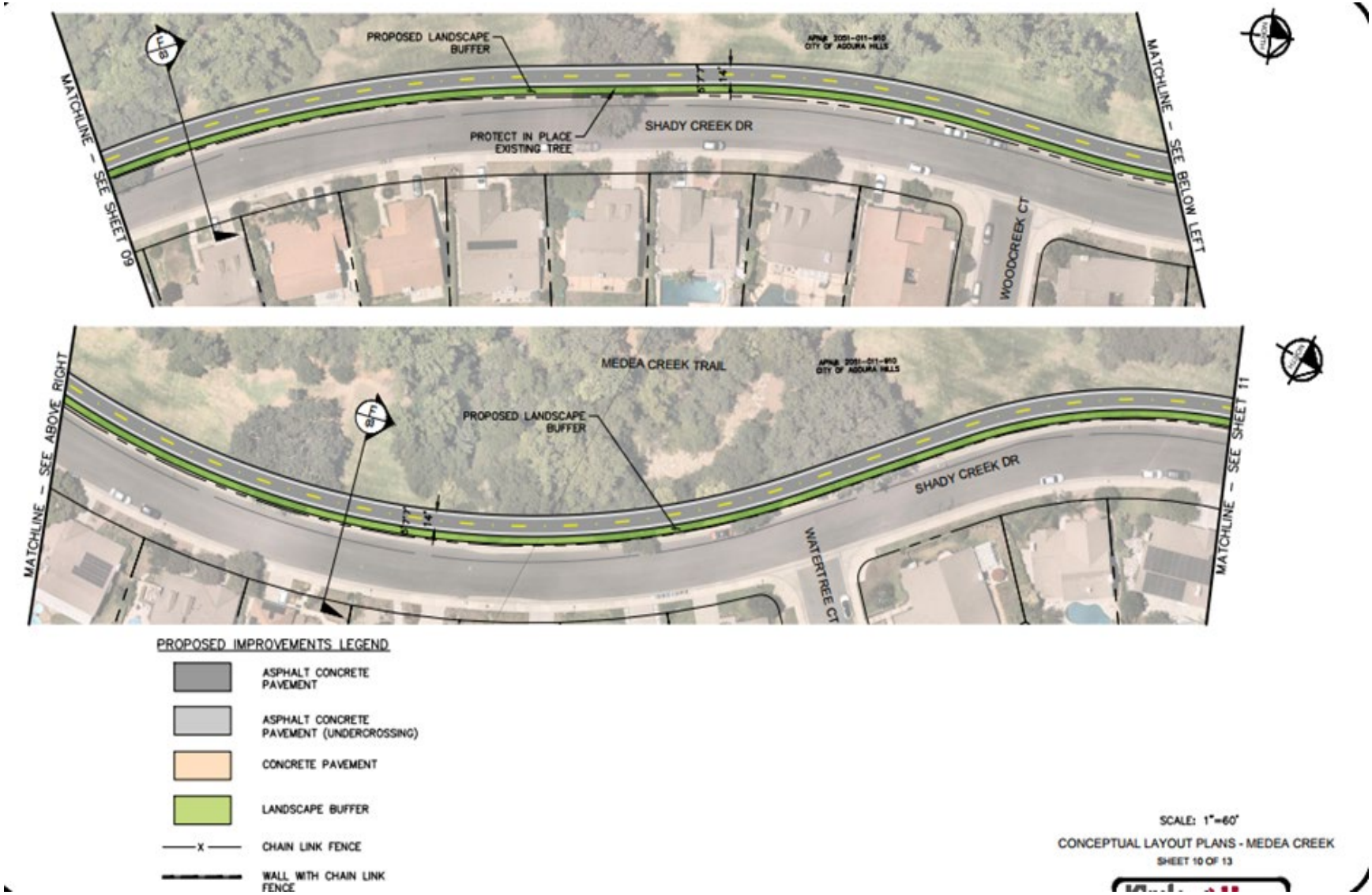
Source: City of Agoura Hills 2024

Figure 2-8 Project Location Map - Medea Creek Path, Segment 6 of 8



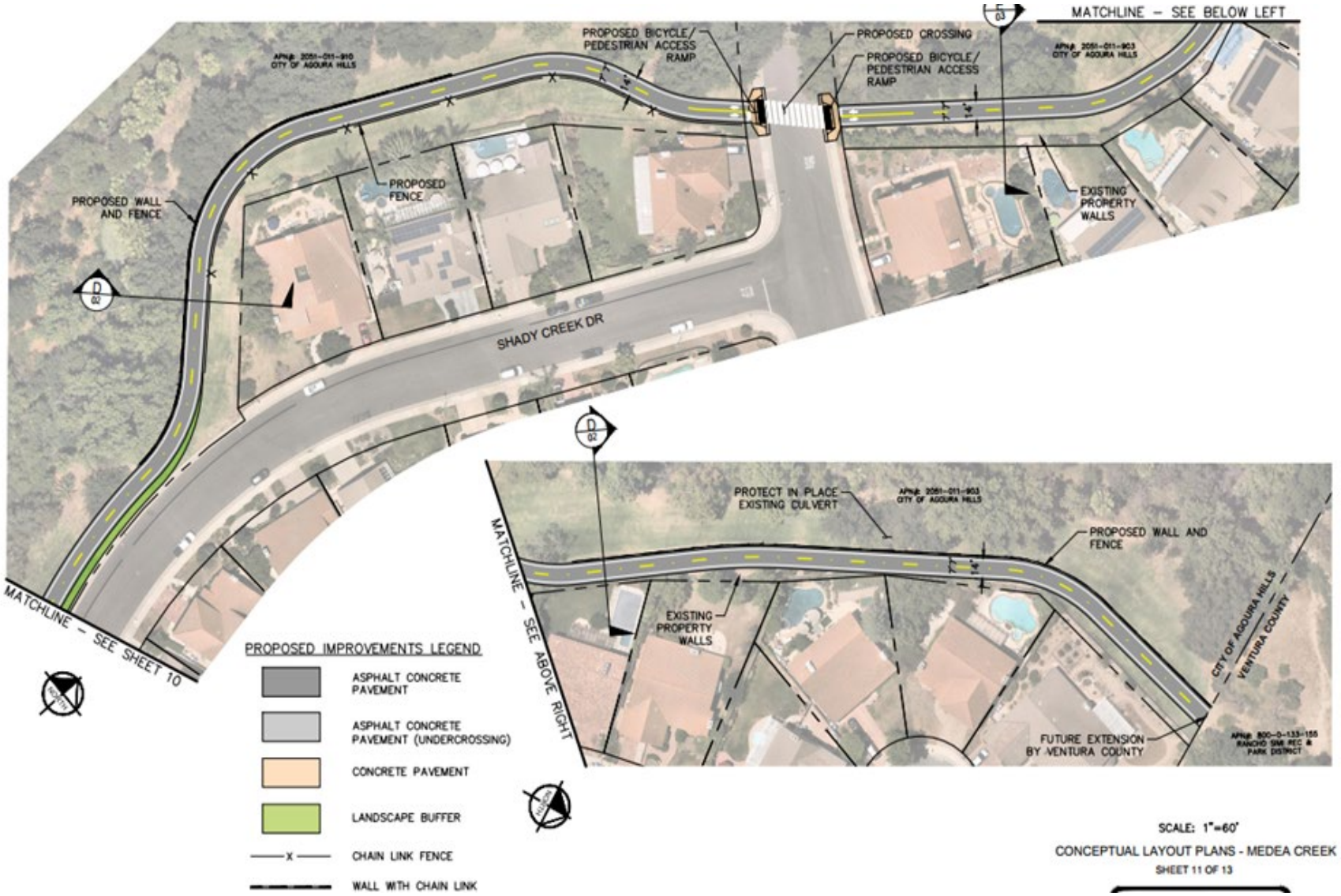
Source: City of Agoura Hills 2024

Figure 2-9 Project Location Map - Medea Creek Path, Segment 7 of 8



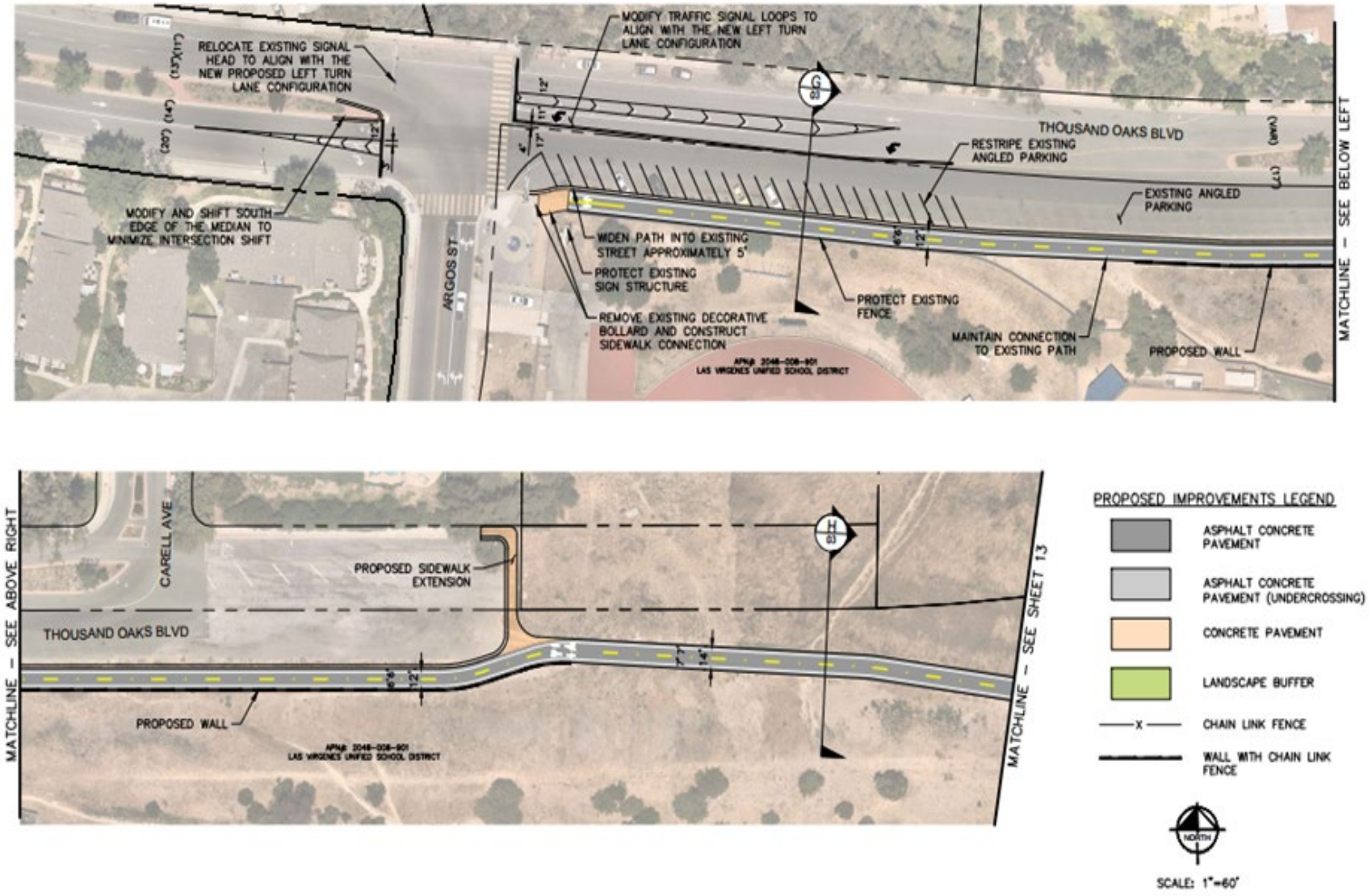
Source: City of Agoura Hills 2024

Figure 2-10 Project Location Map - Medea Creek Path, Segment 8 of 8



Source: City of Agoura Hills 2024

Figure 2-11 Project Location Map - Agoura High School Connection, Segment 1 of 2



Source: City of Agoura Hills 2024

Figure 2-12 Project Location Map - Agoura High School Connection, Segment 2 of 2



Source: City of Agoura Hills 2024

2.5 Project Characteristics

2.5.1 Bicycle Master Plan

In the fall of 2021, the City of Agoura Hills began development of a Bicycle Master Plan, which proposes 30.1 miles of new bikeways and bikeway improvements to build upon the city's existing 1.3 miles of bicycle routes and 9.2 miles of bicycle lanes (Figure 2-2). The purpose of the BMP is to provide safer streets for city residents who are dependent on bicycling for everyday transportation. Recommended actions included within the BMP are meant to support and increase bicycling in the city, to enhance non-motorized travel infrastructure, and to create options to support the existing and future population. The BMP includes an inventory of existing bicycle infrastructure that identifies deficiencies, develops and prioritizes improvements, and provides a recommended path for implementation.

The BMP is organized into four chapters:

1. **Introduction.** This chapter includes an overview of the BMP, the purpose of the BMP, an overview of the BMP area and its context, goals of the Plan, and guidance and legislation applicable to the BMP.
2. **Existing Conditions and Analysis.** This chapter discusses the existing roadway conditions, land use, and other context-sensitive information within the city. This chapter includes sections on relevant datasets including bicycling mode share, existing and previously proposed bicycle facilities, and bicycle collisions.
3. **Community Engagement.** This chapter describes the community engagement process with stakeholders. Stakeholders included residents, city staff, local bicycling advocacy groups, the Las Virgenes Unified School District, the Los Angeles Sheriff's Department, and local businesses.
4. **Recommendations.** This chapter addresses the physical improvements recommended to enhance bicycling in the city.

Of these four chapters in the BMP, Chapter 4, *Recommendations*, includes provisions with the potential to create physical changes to the environment and is the primary focus for analysis in this EIR. This chapter delineates the improvement locations, extent, and type of physical improvements to enhance bicycling within the city. Included are both "programmed" projects and "planned" projects. For purposes of analysis in this EIR, "programmed" projects include programmatic engineering, education, encouragement, enforcement, equity, and evaluation needs, while "planned" projects are those recommended for implementation within the next decade as funding becomes available. Planned bikeway projects included within Chapter 4, *Recommendations*, are identified in Table 2-1, below. In addition to the planned bikeway projects identified in Table 2-1, the following planned enhanced bicycle treatments are also included within Chapter 4, *Recommendations*:

- Street Striping and Restriping
- Signage and Wayfinding
- Bicycle Signals and Detection at Traffic Signals
- Bicycle Parking
- Bicycle Repair Facilities

Table 2-1 Bicycle Master Plan Improvements

Facility	From Street	To Street	Length (miles)	Improvement Type
Class I Facilities				
Medea Creek Bike Path	Agoura Road	Northern City Limits	2.0	New Facility
Agoura High School Connection	Thousand Oaks Boulevard	Fountain Place	0.2	New Facility
Ladyface Greenway	Cornell Road	Whizin Market Square Driveway	0.1	New Facility
Reyes Adobe Road	Lake Lindero Road	700 feet north of Lake Lindero Road	0.1	New Facility
Medfield Path	Derry Avenue	Lewis Road	0.2	New Facility
Class II Facilities				
Driver Avenue	Easterly Road	Colodny Drive	0.5	New Facility
Agoura Road	Western City Limits	Eastern City Limits	4.2	Class II Striping Improvements
Thousand Oaks Boulevard	Kanan Road	Carell Avenue	0.3	New Facility in the Eastbound direction between Argos Street and Carell Avenue, New Facility in the Westbound direction between Carell Avenue and Kanan Road
Liberty Canyon Road	Country Glen Road	Southern City Limits	0.4	New Facility
Reyes Adobe Road	Agoura Road	Passageway Lane	0.3	New Facility
Reyes Adobe Road	Thousand Oaks Boulevard	Passageway Lane	0.4	Class II Striping Improvements
Forest Cove Lane	Thousand Oaks Boulevard	Rainbow Crest Drive	0.3	New Facility in Southbound Direction
Cornell Road and Cornell Way	Agoura Road	Kanan Road	0.4	New Facility
Chesebro Road	Agoura Road	Palo Comado Canyon Road	< 0.1	New Facility
Class III Facilities				
Chesebro Road	Palo Comado Canyon Road	Northern City Limits	1.7	New Facility
Lake Lindero Road	Canwood Street	Reyes Adobe Road	1.1	New Facility
Roadside Drive	Kanan Road	Lewis Road	1.1	New Facility
Driver Avenue and Argos Street	Thousand Oaks Boulevard	Easterly Road	0.6	New Facility
Driver Avenue/Palo Comado Canyon Road	Colodny Road	Chesebro Road	0.2	New Facility
Grey Rock Road and Fountainwood Street	Quail Run Drive	Acadia Avenue	1.9	New Facility
Lewis Road	Driver Avenue	Canwood Street	0.4	New Facility
Lewis Road and Laura la Plante Dr	Roadside Drive	Agoura Road	0.5	New Facility
Balkins Drive	Colodny Drive	Chesebro Road	0.2	New Facility

Facility	From Street	To Street	Length (miles)	Improvement Type
Foothill Drive	Driver Avenue	Fairview Place	0.6	New Facility
Fountain Place	Easterly Road	Foothill Drive	0.1	New Facility
Fairview Place	Chesebro Road	Driver Avenue	1.1	New Facility
Colodny Drive	Fairview Place	Driver Avenue	0.9	New Facility
Hillrise Drive	Meadow Vista Way	Kanan Road	0.5	New Facility
Laro Drive and Calmfield Avenue	Grey Rock Road	Eagleton Street	0.9	New Facility
Rustling Oaks Drive	Fountainwood Street	Southern Cul De Sac	0.5	New Facility
Derry Avenue	Canwood Street	Medfield Street	0.2	New Facility
Eagleton Street	Kanan Road	Timberlane Street	0.5	New Facility
Timberlane Street	Eagleton Street	Acadia Avenue	0.6	New Facility
Cornell Road	Roadside Drive	Agoura Road	0.1	New Facility
Kanan Road	Agoura Road	Southern City Limits	0.3	New Facility
Rainbow View Drive and Stonecrest Drive	Ridgebrook Drive	Lake Lindero Drive	0.7	New Facility
Larboard Lane	Rainbow View Drive	Sandtrap Drive	0.2	New Facility
Sandtrap Drive	Wheelhouse Lane	Rainbow Hill Road	0.3	New Facility
Rainbow Hill Road	Sandtrap Drive	Rainbow View Drive	0.1	New Facility
Mainmast Drive	Lake Lindero Drive	Rainbow Crest Drive	< 0.1	New Facility
Acadia Avenue and Pinewood Avenue	Eagleton Street	Tamarind Street	0.4	New Facility
Quail Run Drive and Bridle Glen Street	Grey Rock Road	Hillrise Drive	0.2	New Facility
Canwood Street	Lake Crest Drive	Driver Avenue/Palo Comado Canyon Road	2.9	New Facility and Improvements to Existing Facilities
Class IV Facilities				
Kanan Road	Thousand Oaks Boulevard	Northern City Limits	1.0	Proposed Change from Class II to Class IV
Thousand Oaks Boulevard	Western City Limits	Kanan Road	2.0	Proposed Change from Class II to Class IV

*Class I (Bike Path): two-way facilities dedicated to nonmotorized users independent of the roadway.

*Class II (Bike Lane): one-way facilities that dedicate some of the roadway right-of-way to bicyclists.

*Class III (Bike Route): designated routes on low-speed, low-volume roadways.

*Class IV (Separated Bikeway): on-street bicycle facilities that include horizontal and vertical buffer separation from vehicles.

2.5.1.1 Medea Creek Path

The Medea Creek Path would connect Agoura Road to the northern city and county limits. The Path would be constructed from asphalt concrete pavement for the length of the path between Agoura Road and the northern city and county limits, and trail widths along the entirety of the Path would range from 12 feet to 14 feet. The Path would require permanent easements and/or maintenance (land use) agreements from private development, the Los Angeles County Flood Control District (LACFCD), and the Las Virgenes Unified School District between Agoura Road and the Ventura

Freeway bridge. The City would acquire portions of the following rights-of-way to construct the Path:

- Assessor's Parcel Number (APN) 2048-011-056. This parcel is zoned as Restricted Open Space (OS-R) and consists of vacant land.
- APN 2048-011-057. This parcel is partially zoned as OS-R and partially zoned as Commercial Retail/Service and consists of vacant land.
- APN 2048-011-058. This parcel is zoned as OS-R and consists of vacant land.
- APN 2048-007-004. This parcel is zoned as Open Space - Deed Restricted and consists of vacant land.

Construction of the Path would involve the following activities, summarized by location. Refer to Figure 2-3 through Figure 2-10 for an overview of the conceptual plans showing detailed project activities for each section of the Path.

Agoura Road

- Partial removal of an existing driveway and construction of a bicycle/pedestrian access ramp on the north side of Agoura Road.
- Construction of a 12-foot-wide Class I Bike Path along Medea Creek Channel from Agoura Road to Roadside Drive.

Roadside Drive, Ventura Freeway, Canwood Street

- Construction of an access/transition ramp on the southern side of Roadside Drive.
- Construction of a bicycle/pedestrian undercrossing under Roadside Drive, Ventura Freeway, and Canwood Street.
- Installation of chain link fencing along the western side of the undercrossing.
- Construction of a wall on the eastern side of the undercrossing.
- Construction of a 14-foot-wide Class I Bike Path along Medea Creek Channel from Canwood Street to Oak Creek Lane, with a wall and fencing on the western side of the path.

Oak Creek Lane

- Construction of a bicycle/pedestrian undercrossing under Oak Creek Lane.
- Construction of a 14-foot-wide Class I Bike Path along Medea Creek Channel from Oak Creek Lane to the northeastern side of an existing overcrossing on APN 2048-007-004.

Kanan Road

- Protect existing pavement in place with new striping on Medea Creek Trial, resulting in a12-foot-wide Class I Bike Path from the southwestern side of an existing overcrossing on APN 2048-007-004 to Kanan Road.
- Removal of an existing curb ramp on the eastern side of Kanan Road.
- Construction of a bicycle/pedestrian access ramp on the eastern side of Kanan Road.
- Construction of a steel barricade and directory signage on the western side of Kanan Road.
- Construction of a 12-foot-wide Class I Bike Path along Medea Creek Channel from Kanan Road to Thousand Oaks Boulevard, with chain link fencing on the western side of the path.

Thousand Oaks Boulevard

- Construction of a bicycle/pedestrian access ramp and installation of a pedestrian push button on the southern side of Thousand Oaks Boulevard.
- Partial removal of existing driveway, construction of a bicycle/pedestrian access ramp, and installation of a pedestrian push button on the northern side of Thousand Oaks Boulevard.
- Restriping of Thousand Oaks Boulevard to include a new crosswalk.
- Modification of the median and relocation of the median monument to the west of the proposed crosswalk to allow for construction of a refuge island within the existing median.
- Installation of hawk signals in the northern and southern sidewalks, east of the proposed crosswalk.
- Construction of a 12-foot-wide Class I Bike Path from Thousand Oaks Boulevard to a proposed access/transitional ramp in the southern portion of APN 2051-011-911, with chain link fencing on the western side of the path.
- Construction of a 14-foot-wide Class I Bike Path from the proposed access/transitional ramp in the southern portion of APN 2051-011-911 to Laro Drive, with a wall and fence on the western side of the path and chain link fencing on the eastern side of the path.

Laro Drive

- Partial removal of an existing curb ramp and construction of bicycle/pedestrian access ramp on the southern side of Laro Drive.
- Partial removal and reconstruction of a pedestrian curb ramp and construction of an access ramp on the northern side of Laro Drive.
- Restriping of Laro Drive to include a new crosswalk.
- Construction of a 14-foot-wide Class I Bike Path along Shadycreek Drive with a landscape buffer on the eastern side of the path from Laro Drive to the residences near the intersection of Shadycreek Drive and Fountainwood Street. The landscape buffer would end near these residences, and the path would continue around the west side of the residences to Fountainwood Street, with a wall and fence on the western side of the path.

Shadycreek Drive and Fountainwood Street

- Construction of bicycle/pedestrian access ramps on the northern and southern sides of Fountainwood Street.
- Restriping of Fountainwood Street to include a new crosswalk.
- Construction of a 14-foot-wide Class I Bike Path from Fountainwood Street to the northern city and county limits, with a wall and fence on the western side of the path.

2.5.1.2 Agoura High School Connection

The Agoura High School Connection would extend from the intersection of Argos Street and Thousand Oaks Boulevard to the intersection of Easterly Road and Fountain Place. Trail widths along the entirety of the Class I Bike Path would range from 12-feet to 14-feet. An easement from Las Virgenes Unified School District property (APN 2048-008-901) would be required for the Connection. Construction of the Connection would involve the following activities, summarized by

location. Refer to Figure 2-11 and Figure 2-12 for an overview of the conceptual plans showing detailed project activities for each section of the Connection.

Argos Street and Thousand Oaks Boulevard

- Modification of the median, and shifting of the southern median edge, on Thousand Oaks Boulevard, west of Argos Street, to minimize intersection shift.
- Relocation of the existing signal head in the westbound travel lanes on Thousand Oaks Boulevard west of Argos Street to align with the new proposed left turn lane configuration.
- Reconfiguration and restriping of the westbound left turn lane on Thousand Oaks Boulevard east of Argos Street.
- Modification of the westbound traffic signal loops to align with the new left turn lane configuration.
- Construction of a 12-foot-wide Class I Bike Path along Thousand Oaks Boulevard from Argos Street to the eastern end of Thousand Oaks Boulevard, with a wall and fencing on the southern side of the path. Near the southeastern corner of the Argos Street and Thousand Oaks Boulevard intersection, the proposed path would extend into the existing street by approximately five feet. Existing angled parking would remain along the southern side of Thousand Oaks Boulevard but would be restriped to accommodate this widening.
- Removal of the existing decorative bollard and construction of a sidewalk connection to the proposed path on the southeastern corner of the Argos Street and Thousand Oaks Boulevard intersection.

Thousand Oaks Boulevard and Carell Avenue

- Construction of a concrete sidewalk extension parallel to the eastern end of Thousand Oaks Boulevard, connecting to the existing sidewalk on the northern side of Thousand Oaks Boulevard.
- Construction of a 14-foot-wide Class I Bike Path from the proposed sidewalk extension to Easterly Road.

Easterly Road

- Construction of a bicycle/pedestrian access ramp on the western side of Easterly Road.

2.5.2 VMT Mitigation Exchanges and Banking Program

The VMT Mitigation Exchanges and Banking Program would establish a new mitigation opportunity for projects exceeding the VMT threshold by allowing a developer or project proponent to purchase VMT reduction credits, which would in turn be used to fund the implementation of bicycle improvement projects identified within the BMP. The exchange concept relies on the applicant of a discretionary project agreeing to implement a predetermined, unfunded, and planned VMT-reducing project or project component. Like all VMT mitigation, substantial evidence would be necessary to demonstrate that the projects covered by the bank would achieve expected VMT reductions, and some form of monitoring may be required (Fehr and Peers 2020).

The only projects that are currently planned, unfunded, and could potentially be funded by this Program are those currently included within the BMP. Therefore, this EIR analyzes the impacts of both the BMP and the Program, as the individual project list for the BMP and the Program are identical.

2.5.3 General Plan Amendments

The City must amend Chapter 3, *Infrastructure and Community Services*, of the existing City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. The following revisions would be proposed as part of the Amendments, with additions shown in underline and deletions shown in ~~strikethrough~~. In addition to these textual revisions, Figure M-7 would be revised to Figure 2-2 of this EIR to provide an updated overview of the existing and proposed bicycle network within the City of Agoura Hills.

- **Page 3-1.** The goals and policies in this element are closely correlated with Land Use and Economic Development goals and policies. The policies are intended to create a well-connected network that supports a mix of uses, walking or bicycling for short trips, conserving energy resources, reducing greenhouse gas emissions and air pollution, and reducing vehicle miles traveled ~~and doing so while preserving auto mobility.~~
- **Page 3-16.** LOS standards will continue to be used for City public works projects and for private development projects that include frontage improvements (bike lanes, turn lanes) leading into an intersection. Intersection and roadway traffic deficiencies adjacent to ~~impacts from~~ new development projects shall be mitigated to meet appropriate service levels, but at least to the extent where the post-development level of service shall not be less than the LOS existing prior to development. (Imp M-2, M-3)
- **Page 3-17.** M-1.10 Transportation Demand Management. Development projects shall be evaluated following the methodology of the City of Agoura Hills: Transportation Assessment Guidelines, adopted June 24, 2020.
- **Page 3-20.** Future developments can provide the necessary amenities, such as expanding the existing bicycle network and adding bicycle racks to promote travel by alternative modes.
- **Pages 3-20 and 3-21.** People walk and ride bicycles in Agoura Hills on a daily basis, for both commuting and recreational purposes. The local mountain biking trails are popular for residents and attract many visitors to the area. In addition to the trails, designated bikeways are available in the City. The bikeways within the City are comprised of Class II and Class III facilities, which are shared facilities on the roadways, and, respectively, delineated by either signage and striping or signage only. Figure M-7 (Bikeways) displays the existing and proposed bikeways in the City of Agoura Hills. The City's bikeway facilities are classified using the Caltrans bikeway facility classification system as follows:
    - Class I Bikeway (Bike Path) provides a completely separate right-of-way, two-way facility, and is designated for the exclusive use of non-motorized users independent of the roadway ~~bicycles and pedestrians~~ with vehicle and pedestrian cross-flow minimized. Bike Paths are generally minimum 10 feet wide to preferred 14 feet wide for two-way travel.
    - Class II Bikeway (Bike Lane) provides a restricted right-of-way and is designated for the use of bicycles with a striped lane on a street or highway. Bicycle lanes are generally minimum four ~~five~~ feet wide to preferred six feet wide for one-way travel. Vehicle parking and vehicle/pedestrian cross-flow are permitted.
    - Class III Bikeway (Bike Route) provides for a right-of-way designated by signs or pavement markings for shared use with pedestrians or motor vehicles.

- Class IV Bikeway (Separated Bikeway) provides on-street bike facilities that include a vertical and horizontal separation buffer and includes bollards, posts, or a raised island to separate the bicycle lane from vehicles.

- **Page 3-25.** Recommendations to improve the safety and connectivity of bikeways throughout Agoura Hills and to adjacent areas are made in the Agoura Hills Bicycle Master Plan (2025). These recommendations and standards align with the overarching goals of the General Plan to further the use of alternative modes of transportation by expanding the existing bike routes and improving the safety and connectivity of the network. Existing bicycle facilities in Agoura Hills are: ~~The following describes the existing facilities:~~
  - Kanan Road—A Class II facility between the northern City limits and Hillrise Drive.
  - Reyes Adobe Road—A mixed Class I, Class II and Class III facility between ~~Lake~~ Lindero Canyon Road and Canwood Street. The Class II facility comprises the majority of the bicycle route on Reyes Adobe Road between ~~Lake~~ Lindero Canyon Road and Passageway Place; the Class III section lies between Passageway Place and Canwood Street.
  - Forest Cove Lane—A mixed Class II and Class III facility between Trail Creek Drive and Canwood Street. The Class II facility is available between Rainbow Creek Drive and Canwood Street. The Class III facility is provided between Trail Creek Drive and Rainbow Crest Drive.
  - Thousand Oaks Boulevard—A Class II facility that spans between the western City limits and Argos Street (eastbound only) or Kanan Road (westbound only).
  - Agoura Road—A Class II facility spanning the entire width of the City between the western and eastern City limits.
  - Rainbow Crest Drive—A Class III facility that crosses Reyes Adobe Road and provides access between Forest Cove Lane and Mainmast Drive.
  - Canwood Street—A mixed Class II and Class III facility that crosses Reyes Adobe Road. The Class II facility is provided east of Reyes Adobe Road to Forest Cove Drive; the Class III facility is available west of Reyes Adobe Road to Lake Lindero Road.
  - Palo Comado Canyon Road – A Class II facility between Chesebro Road and Agoura Court, crossing the Palo Comado Canyon Interchange; this was implemented after the General Plan Update and coincided with the Palo Comado Canyon Interchange improvement.

    Planned additions to the City's system of bikeways are included in the Agoura Hills Bicycle Master Plan (2025), as amended. ~~include.:~~

    ~~Reyes Adobe Road—Extension of the existing Class II facility across the Reyes Adobe bridge; this will coincide with the Reyes Adobe Interchange improvement.~~

    ~~Palo Comado Canyon Road—Addition of a Class II facility across the Palo Comado Canyon bridge; this will coincide with the Palo Comado Canyon Interchange improvement.~~

- **Page 3-27.** Alternative Transportation. Reduced reliance on single-occupancy vehicle travel and vehicle miles traveled through the provision of alternative travel modes and enhanced system design.
- **Page 3-27.** M-6.7 Vehicle Miles Traveled. Development projects shall minimize vehicle miles travelled (VMT), and shall be required to submit a VMT analysis pursuant to the City's Transportation Assessment Guidelines as part of a development application. (Imp M-34)

2.5.4 Construction

Given the programmatic nature of the BMP, individual projects included within the BMP would be subject to additional project-level environmental review and analysis at the time the individual projects are ready for implementation, and as the extent of impacts become known through development of project design, to determine if additional CEQA analysis is required. It is assumed that construction activities for each facility type would include:

- **Class I:** Clearing and grubbing, pavement demolition, grading, utility relocation, retaining wall or fencing installation, asphalt paving or repaving, street and undercrossing improvements, striping, and revegetation;
- **Class II:** Restriping and reconfiguration of lane widths to accommodate new dedicated bike lanes; pavement widening on Driver Avenue, between Easterly Road and Colodny Drive, and on Cornell Road, between Agoura Road and Cornell Way, which would require clearing and grubbing, subgrade stabilization, base course installation, and asphalt paving;
- **Class III:** Restriping to identify bike routes;
- **Class IV:** Pavement demolition, minor grading, bollard or fencing installation, asphalt paving or repaving, and striping.

Specific construction details have been identified for the Path and the Connection, which would both be Class I facilities. Construction of the Path and construction of the Connection would occur over the course of 24 months, during daytime hours of 8:00AM to 5:00PM. Some construction phases may run concurrently, when possible. Site preparation, including mobilization, clearing and grubbing, would each occur over two months. Demolition would occur over one month. Grading and utility relocation phases would each occur over three months. Retaining wall and fencing installation would occur over six months. Asphalt paving, street improvements, and construction of the pedestrian undercrossing would each occur over four months. Concrete transition construction would occur over two months, and finishing would occur over three months. Construction staging and laydown areas would be contained within the identified project boundary. At the time of construction, should the construction contractor require additional staging and laydown areas, they would be responsible for identifying and securing long-term staging areas on previously disturbed storage yards, the locations of which are currently unknown.

The total disturbance area for construction of the Path and the Connection would be approximately 6.12 acres, and the maximum depth of excavation would be 12 feet. In total, these improvements would involve the removal of 38,700 square feet (sq ft) of existing asphalt concrete, the demolition of 600 cubic yards (CY) of median areas, and the demolition of 1,640 CY of curb ramps and driveways.

2.5.5 Operation

Similar to construction, given the programmatic nature of the BMP, individual projects included within the BMP would be subject to additional project-level environmental review and analysis at the time the individual projects are ready for implementation, and as the extent of impacts become known through development of project design, to determine if additional CEQA analysis is required. Operational details for projects included within the BMP are not known at this time. However, operational details have been identified for the Path and the Connection.

Operational activities for the Path and the Connection would include regular inspection and maintenance, such as repairing surface damage, clearance of debris, and management of vegetation growth to ensure the bicycle improvements remain unobstructed. The City currently performs these types of operational activities for maintenance of existing bicycle infrastructure.

2.6 Project Objectives

The objectives for the proposed Project are as follows:

- Increase transportation choices by providing viable alternatives to driving and improved equity to include all bikers, those who choose not to drive and those who cannot drive.
- Improve accessibility through local and regional connectivity. Local connections include residential communities, schools, commercial centers, and parks whereas regional connections include the surrounding communities and recreational trail network.
- Improve safety by providing separate biking facilities, reducing bicycle collisions, creating greater visibility for bikers, and raising awareness to both bicyclists and road users.
- Improve the public health by creating facilities that allow for more biking.
- Enhance sustainability and environmental benefits by reducing air pollution, greenhouse gas emissions, and noise pollution.
- Enhance community character by constructing bicycle facilities near areas of high scenic value, such as along greenbelts or near surface waters.
- Provide a mechanism for developers to mitigate VMT impacts from development projects.

2.7 Required Permits and Approvals

The City of Agoura Hills is the lead agency with responsibility for approving the Project. Given the programmatic nature of the BMP, individual projects included within the BMP would be subject to additional environmental review and analysis at the time the individual projects are ready for implementation, and as the extent of impacts become known through development of project design. Details regarding the required permits and approvals for most projects included within the BMP are not known at this time. It is anticipated that such required permits and approvals could include regulatory permits, encroachment permits, easement approvals, and property acquisitions.

Based on the conceptual design plans that have been developed, it is anticipated that construction of the Path would require regulatory permits from the United States Army Corps of Engineers (USACE), the Regional Water Quality Control Board (RWQCB), and the California Department of Fish and Wildlife (CDFW), as the Path is assumed to result in impacts, either temporary or permanent, to the Medea Creek Channel. The following permits and approvals are also anticipated to be required to support the Path:

- A Construction Permit and User Agreement would be required from Ventura County for the proposed Path improvements.
- An encroachment permit would be required from Caltrans for the proposed Path improvements under Ventura Freeway bridge, between Medea Creek and Medea Creek Channel.
- Easement approvals would be required from LAFCD for the proposed Path improvements along the channel in the following locations:
    - Between Agoura Road and Interstate 101 bridge,

  - Between Kanan Road and Thousand Oaks Boulevard, and
  - North of Thousand Oaks Boulevard, within APN# 2051-006-141.
- Easement approvals would be required from private development for the proposed Path improvements along the channel within the following properties:
  - APN 2053-007-031
  - APN 2051-006-141
- Easement approvals would be required from Las Virgenes Unified School District for the proposed Path improvements within the following property:
  - APN 2048-008-901

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3 Environmental Setting

This chapter provides a general overview of the environmental setting in the City of Agoura Hills. This section also outlines the Programmatic Environmental Impact Report (PEIR) baseline and describes the approach to both direct and cumulative impact analyses. More detailed descriptions of the environmental setting for each environmental issue area can be found throughout Chapter 4, *Environmental Impact Analysis*.

3.1 Regional Setting

The City of Agoura Hills is located in the northwestern portion of Los Angeles County and is bordered by unincorporated Ventura County to the north, the City of Calabasas to the east, unincorporated Los Angeles County to the south, and the City of Westlake Village to the west (City of Agoura Hills 2010). The city sits in the eastern Conejo Valley, between the Simi Hills to the north and the Santa Monica Mountains to the south, and covers approximately 7 square miles. The Mediterranean climate of the region and the coastal influence produce moderate temperatures year-round, with rainfall concentrated in the winter months.

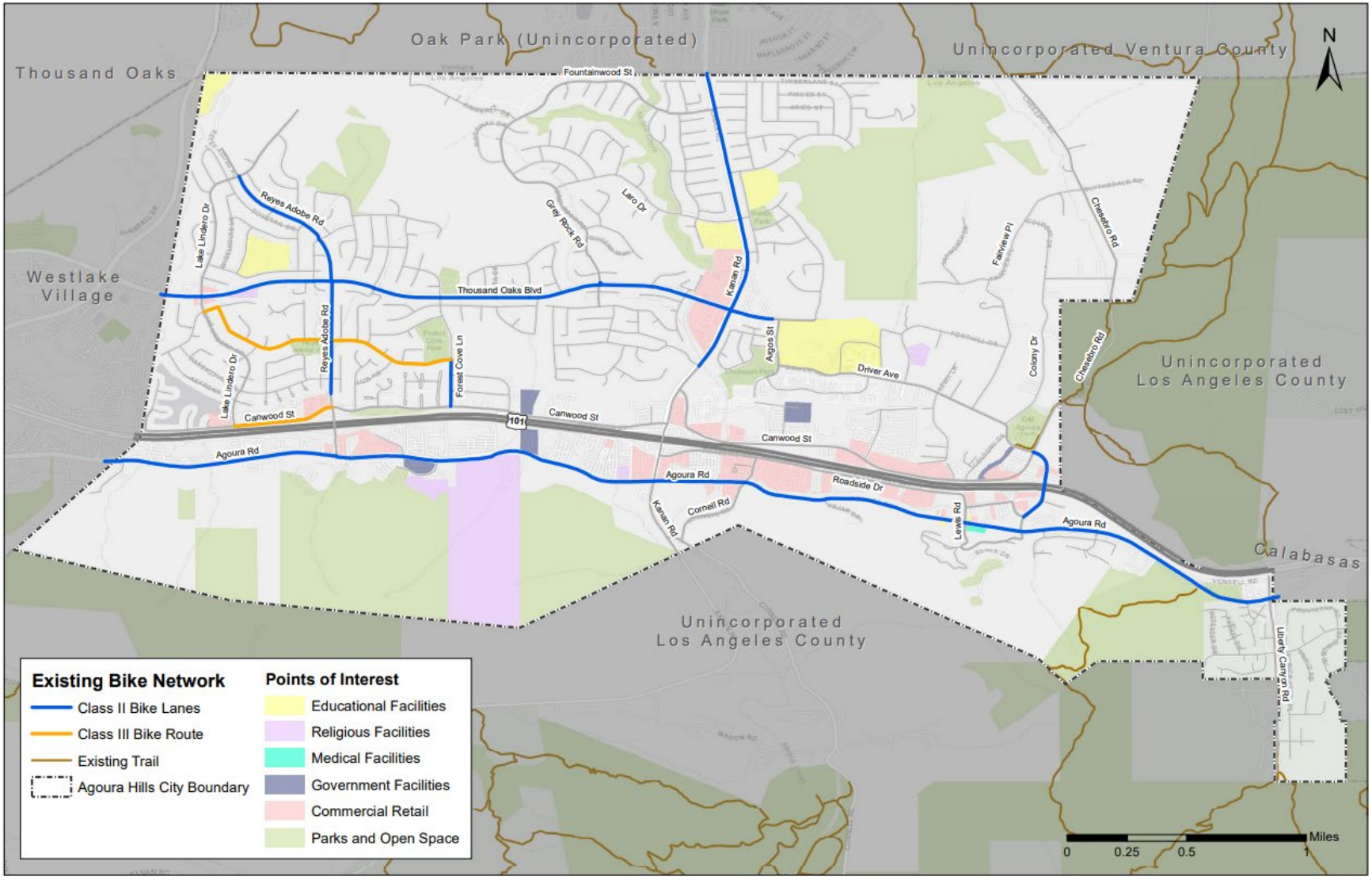
3.2 Citywide Transportation System

The City of Agoura Hills is bisected east-west by United States Highway 101 (US 101). The local roadway network in the city allows for access to residential neighborhoods, neighborhood-serving businesses and commercial uses, and US 101. There are four interchanges along US 101 that provide access to the city including the Reyes Adobe Interchange, the Kanan Interchange, the Chesebro/Palo Comado Canyon Interchange, and the Liberty Canyon Interchange. Other major arterial streets that aid in regional connection include Kanan Road, which runs north-south, Thousand Oaks Boulevard, which runs east-west, and Agoura Road which also runs east-west. Arterials that only carry intracity traffic include Reyes Adobe Road and Canwood Street (City of Agoura Hills 2010).

The existing bicycle network in the city is made up of 1.3 miles of bicycle routes and 9.2 miles of bicycle lanes. Class III bike lanes (shared car and bike lane) make up 13 percent of bicycle facilities while the remaining 87 percent are Class II bike lanes (dedicated on-street bike lanes; City of Agoura Hills 2022). Existing bicycle infrastructure is located on Kanan Road, Thousand Oaks Boulevard, Agoura Road, Reyes Adobe Road, Canwood Street, and Rainbow Crest Drive. The existing bicycle network is shown in Figure 3-1.

Transit services in the City of Agoura Hills include fixed-route, local, dial-a-ride, and rideshare operations. Fixed route services are offered by the Park & Ride Commuter Express and the MTA Bus, while local services are offered by the Summer Beach Bus. The AH-GO rideshare program is an expansion of the city's Dial-A-Ride service (City of Agoura Hills 2025).

Figure 3-1 Agoura Hills Existing Bicycle Network



Source: Agoura Hills 2024.

3.3 PEIR Baseline, Approach to Analysis, and Approach to Mitigation

3.3.1 PEIR Baseline

State CEQA Guidelines Section 15125 states that an EIR "must include a description of the physical environmental conditions in the vicinity of the project … as they exist at the time the notice of preparation [NOP] is published." Section 15125 states that this approach "normally constitute[s] the baseline physical conditions by which a lead agency determines whether an impact is significant."

This PEIR evaluates impacts against existing conditions at the time of the release of the NOP (January 2025). Comparison to current, existing baseline conditions provides the most relevant information for the public, responsible agencies, and City decision-makers.

3.3.2 Approach to Analysis

The programmatic nature of the proposed Project necessitates a general approach to the evaluation of existing conditions and associated impacts. As a programmatic document, this PEIR presents a city-wide assessment of Project impacts. Because the PEIR is a long-term document intended to guide actions and individual project implementation occurring at a future date, program-level and qualitative evaluation is involved. Quantitative analyses are provided where applicable with available information. During future stages in planning and implementation, specific elements of the BMP will be examined and compared against the PEIR to determine whether an additional environmental document must be prepared; if future implementation of specific projects identified within the BMP would have impacts that were not examined or identified in this PEIR, preparation of project-specific California Environmental Quality Act (CEQA) documents will be necessary.

3.3.3 Approach to Mitigation

This PEIR includes mitigation measures to reduce impacts and identifies responsible parties for implementation of those mitigation measures. The City of Agoura Hills is the lead agency for the proposed Project, thus it is the City's responsibility to implement specific proposed projects, to conduct environmental review consistent with CEQA, and where applicable, to incorporate mitigation measures provided herein and developed specifically for the Project and its components to reduce impacts. Future project-specific environmental documents may adjust the mitigation measures identified in this PEIR as necessary to respond to site-specific conditions at the time implementation is proposed.

3.4 Cumulative Development

A project's cumulative impacts are the possible environmental effects that are individually limited but cumulatively considerable. State CEQA Guidelines Section 15065[a][3]) states that: *"Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.* State CEQA Guidelines Section 15355 states that: *"Cumulative impacts" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts:*

a. The individual effects may be changes resulting from a single project or a number of separate projects.

b. The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

According to State CEQAQ Guidelines Section 15130, the discussion of cumulative impacts must reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by standards of practicality and reasonableness and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects that do not contribute to the cumulative impact. Impacts that do not result in part from the Project evaluated in this PEIR need not be discussed.

Table 3-1 identifies the list of cumulative projects considered for the purposes of the cumulative analyses within this PEIR based on recently completed, planned, pending, and reasonably foreseeable projects at the time the NOP was published in January 2025. Projects proposed following the release of the NOP in January 2025 are not considered. Each cumulative project considered within this PEIR has, at a minimum, begun the process of completing a development application.

Table 3-1 Cumulative Projects List

Project No.	Project Location[1]	Description
1	28000 Dorothy Drive	Construction of a 60-unit multi-family townhouse development
2	Northwest corner of Agoura Road/Chesebro Road	Construction of a senior care facility with 76 rooms
3	28721 Canwood Street	Construction of two industrial buildings with a total of 35,532 square feet
4	5066 Chesebro Road	Construction of a 2,545-square-foot, two-story office building
5	28902 Agoura Road	Construction of a mixed-use development with 33 dwelling units and 1,200 square feet of commercial space
6	29045 Agoura Road	Construction of a mixed-use development with 278 dwelling units, a 140,357-square-foot parking garage, and 5,258 square feet of commercial space
7	28912 Roadside Drive	Addition of outdoor dining areas to five eating/drinking establishments in the Whizin Market
8	Southwest corner of Agoura/Kanan Roads	Construction of a mixed-use development with 238 multi-family units, a parking structure, and 9,000 square feet of commercial space
9	29900 Ladyface Court	Construction of a 0.5-mile, two-foot-wide trail loop beginning at the Agoura Hills Recreation and Event Center and leading into Ladyface Mountain
10	6500 Chesebro Road	Modifications to existing structures and operations of a private equestrian facility, including construction or two accessory structures
11	28260 Dorothy Drive	Construction of a 4,495-square-foot veterinary clinic

[1] Cumulative project details were provided by the City of Agoura Hills Community Development Department.

4 Environmental Impact Analysis

The individual sections of this chapter each discuss the environmental effects of the proposed Project, which includes the Bicycle Master Plan (BMP) and all of its associated components (Medea Creek Path [Path], Agoura High School Connection [Connection], VMT Mitigation Exchange and Banking Program [Program], and General Plan Amendments [Amendments]). A *significant effect* as defined by the *California Environmental Quality Act* (CEQA*) Guidelines* Section 15382 is:

> a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.

The assessment of each environmental issue area begins with a discussion of the environmental setting related to the issue, which is followed by the impact analysis. In the impact analysis, all Project components are analyzed at the programmatic level. Individual projects included within the BMP are grouped into Class I facilities, Class II facilities, Class III facilities, Class IV facilities, and enhanced bicycle treatments, as identified in Section 2.5, *Project Characteristics*, and in Table 1 of Chapter 2, *Project Description*. The impact analysis contained herein provides a programmatic analysis of anticipated impacts for each of the five facility classes, which vary with regard to the number and type of improvements, amount of construction disturbance and excavation, duration of construction period, and operational characteristics. While the impacts associated with the individual projects in each facility class are expected to be similar, special consideration is being given to two identified projects that contain more specificity. Because the City seeks to prioritize implementation of the Path and the Connection, conceptual design plans have been developed for those two projects. Therefore, the Path and the Connection have their own subheadings within the Class I Facilities impact analysis subsection to provide a more specific assessment of their environmental impacts. Impacts associated with the Amendments are analyzed within their own subsection.

As discussed in Chapter 2, *Project Description*, the only projects that are currently planned, unfunded, and could potentially be funded by the Program are those currently included within the BMP. Therefore, the impact analysis contained herein does not include a subsection with programmatic analysis to identify a separate set of impacts associated with the Program, as the individual project list for the BMP and the Program are identical and impacts associated with the BMP would encompass impacts associated with the Program.

The first subsection of the impact analysis identifies the methodologies used and the “significance thresholds,” which are those criteria universally recognized, or developed specifically for this analysis, to determine whether potential effects are significant. The next subsection describes each impact of the proposed project, mitigation measures for potentially significant impacts, and the level of significance after mitigation. Each effect under consideration for an issue area is separately listed in bold text with the discussion of the effect and its significance. Each bolded impact statement also contains a statement of the significance determination for the environmental impact as follows:

- **Significant and Unavoidable**. An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per State CEQA Guidelines Section 15093.
- **Less than Significant with Mitigation Incorporated**. An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under State CEQA Guidelines Section 15091.
- **Less than Significant**. An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact.** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Following each environmental impact discussion is a list of mitigation measures (if required) and the residual effects or level of significance remaining after implementation of the measure(s). In cases where the mitigation measure for an impact could have a significant environmental impact in another issue area, this impact would discussed and evaluated as a secondary impact. No secondary impacts are identified in this Programmatic Environmental Impact Report (PEIR). As this is a PEIR, project-specific environmental documents may adjust these mitigation measures as necessary to respond to site-specific conditions. The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the proposed Project in conjunction with other planned and pending developments listed in Section 3, *Environmental Setting*. The *Executive Summary* of this PEIR summarizes all impacts and mitigation measures that apply to the proposed Project.

4.1 Aesthetics

The analysis in this section considers potential impacts to aesthetics. Specifically, this section discusses the environmental and regulatory setting; the criteria used to determine the significance of environmental impacts related to aesthetics; and potential impacts related to aesthetics that would result from implementation of the proposed Project.

4.1.1 Setting

a. Scenic Resources

The Project area encompasses all of the City of Agoura Hills. The City of Agoura Hills General Plan 2035 categorizes visual resources within the city into both hillsides and scenic resources (City of Agoura Hills 2022). The General Plan designates six primary ridgelines as hillsides that dominate the community's landscape, including:

- Ladyface Mountain ridgeline between Kanan Road and the western City limits on the southern border of Agoura Hills,
- A ridgeline in the northwestern portion of Agoura Hills above Thousand Oaks Boulevard and west of Kanan Road,
- Two ridgelines in the northeastern corner of Agoura Hills,
- A ridgeline in the southeast corner of Agoura Hills between Kanan and Liberty Canyon Roads, which creates the city's southern boundary, and
- A ridgeline northeast of the Agoura Hills boundary within the Santa Monica Mountains National Recreation Area.

These primary ridgelines are generally undeveloped and are the primary topographical features viewed from the U.S. Highway 101 (Ventura Freeway) corridor and major arterials within the city. The City of Agoura Hills General Plan 2035 also identifies secondary ridgelines as visual form-giving and space-defining features. Secondary ridgelines are differentiated from primary ridgelines because views of these features are partially blocked or because their hillsides have been developed with urban land uses (City of Agoura Hills 2022).

In addition to hillsides and ridgelines, the City of Agoura Hills General Plan 2035 identifies Ladyface Mountain as a scenic resource and the focal point of community pride. Ladyface Mountain is located within the Santa Monica Mountain, parallel to the Ventura Freeway corridor. Other important scenic resources in the city include (City of Agoura Hills 2022):

- Strawberry Hill, located north of Canwood Street and south of Thousand Oaks Boulevard, east of Forest Cove Park,
- Morrison Ranch Hills, located north of Thousand Oaks Boulevard and generally between Reyes Adobe Road and Kanan Road,
- Palo Comado Hills, located in the northeastern corner of the City, and
- Simi Hills that border the City on the north.

b. Scenic Vistas and Views

For the purposes of this analysis, a scenic vista is a view from a public place (roadway, designated scenic viewing spot, etc.) that is expansive and considered by the City of Agoura Hills to be important. It can be obtained from an elevated position (such as from a trail near the top of a hillside) or it can be seen from a roadway with a longer-range view of the landscape. Public views of the hillsides and scenic resources identified in Section 4.1.1.a, *Scenic Resources,* are considered scenic vistas. The hills of the Santa Monica Mountains also provide panoramic vistas of majestic oak trees and dramatic backdrops of picturesque canyons and hillsides, all of which are considered valuable visual resources (City of Agoura Hills 2022). Views of these features can generally be enjoyed from public rights-of-way (ROW), including roadways throughout Agoura Hills. Scenic views, particularly of open spaces and natural features, are also available from the trail network in and around the city. For example, the Zuma Ridge, or Simi-to-Sea, Trail that connects the national parklands north and south of the Ventura Freeway corridor provides scenic views of the Santa Monica Mountains (City of Agoura Hills 2022).

c. Scenic Corridors and Roads

A scenic highway is defined by the California Department of Transportation (Caltrans) as a public highway that traverses an area of outstanding scenic quality, containing striking views, flora, geology, or other unique natural attributes. Caltrans identifies the Ventura Freeway as an Eligible State Scenic Highway, from Topanga Canyon Boulevard to State Route (SR-) 33 in Ventura, though this segment has not been formally designated.

The City of Agoura Hills General Plan 2035 designates four local roadway segments as scenic corridors within the city. These roadways are considered valuable scenic resources that provide scenic views of the Santa Monica Mountains, including Ladyface Mountain. Specifically, the General Plan identifies the following scenic corridors (City of Agoura Hills 2022):

- Reyes Adobe Road, from Thousand Oaks Boulevard to Agoura Road,
- Thousand Oaks Boulevard, from the western city limits to the eastern city limits,
- Agoura Road, from the western city limits to the eastern city limits, and,
- Kanan Road, from Agoura Road to the southern city limits.

d. Light and Glare

Existing sources of light and glare in the city include glass building facades, building windows, streetlights, parking lot lighting, security and way-finding lighting at existing non-residential uses, and automobile headlights. Areas with the heaviest amount of light and glare in the city include the commercial centers at freeway interchanges such as Kanan Road and Ventura Freeway, and the office and business park developments located south of Ventura Freeway and west of Kanan Road (City of Agoura Hills 2010a).

4.1.2 Regulatory Setting

a. Federal Regulations

There are no federal regulations related to aesthetics applicable to the proposed Project.

b. State Regulations

Caltrans Scenic Highway Program

The State Scenic Highways Program identifies and designates certain portions of the state highway system as scenic highways to establish the State's responsibility for the protection and enhancement of California's natural scenic beauty. Designated state scenic highways represent portions of the state highway system which, together with the adjacent scenic corridors, require special scenic conservation treatment. Scenic highway designation establishes specific planning and design standards and procedures, while continuing careful coordination of planning, design, construction, and regulation of land use and development, by state and local agencies as appropriate, to protect the social and economic values provided by the State's scenic resources. Although there are no officially designated state scenic highways within the city, Caltrans identifies the Ventura Freeway as an Eligible State Scenic Highway (Caltrans 2018).

c. Local Regulations

City of Agoura Hills General Plan 2035

The City of Agoura Hills General Plan 2035 was adopted on March 24, 2010 (updated on August 10, 2022) by the City Council (City of Agoura Hills 2022). The City of Agoura Hills General Plan 2035 is a strategic document designed to guide the physical development of the city until the year 2035. Among other things, the City of Agoura Hills General Plan 2035 sets out the pattern of land uses, including residential, commercial, and industrial. It also establishes the system of streets, bikeways, and trails. The City of Agoura Hills General Plan 2035 addresses a wide variety of subject areas, including housing, traffic, natural resources, land uses, economic development, noise, and public safety.

The City of Agoura Hills General Plan 2035 contains the following goals and policies related to aesthetics, which would apply to the Project.

Goal LU-3. Open space lands that are preserved to maintain the visual quality of the city and provide recreational opportunities, protect the public from safety hazards, and conserve natural resources.

> **Policy LU-3.1.** Provide for the preservation of significant scenic areas and corridors, significant plant and animal habitat and riparian areas, and physiographic features within the city.
>
> **Policy LU-3.2**. Preserve ridgelines, natural slopes, and bluffs as open space, minimize hillside erosion, and complement natural landforms through sensitive grading techniques in hillside areas.
>
> **Policy LU-3.4.**Continue to sustain oak trees, which are an integral part of the city's character, and consider the protection of other valuable tree species.
>
> **Policy LU-3.6.** Encourage development to be located and designed to respect Agoura Hill's natural environmental setting and preserve public views, including scenic hillside areas. Regulate building height and location to avoid obtrusive breaks in the natural skyline.
>
> **Policy LU-3.7.** Whenever possible, preserve vistas of the community from public use areas.
>
> **Policy LU-3.8.** Preserve view of the night sky through control of outdoor lighting.

Goal LU-4. Structure and form of development that respects Agoura Hill's natural setting; maintains distinct and interconnected places for residents to live, shop, work, and play; and is more compact to reduce automobile dependence.

Policy LU-4.9. Incorporate sufficient open areas in development projects to maintain a sense of openness, such as paths, sidewalks, gathering areas, and/or passive and active recreation.

Goal LU-7. Neighborhoods that provide a variety of housing types, densities, and design, and a mix of uses and services that support the needs of their residents.

Policy LU-7.7. Protect and enhance the unique features of Agoura Hill's residential neighborhoods that have contributed to a high-quality aesthetic environment, including the preservation of scenic and visual resources, a quality built environment, open space resources, and attractive streetscapes.

Goal LU-19. Open space lands that provide an attractive environmental setting for Agoura Hills and visual relief from development, protect the viability of natural resources and habitat, offer passive recreational opportunities for residents and visitors, and protect residents from the risks of natural hazards.

Goal NR-2. Preservation of significant visual resources as important quality of life amenities for residents, and as assets for commerce, recreation, and tourism.

Policy NR-2.2. Provide public trails, recreation areas, and viewing areas near significant visual resources, where appropriate.

Policy NR-2.3. Maintain the community's primary and secondary ridgelines.

Policy NR-2.4. Require development within visually sensitive areas to minimize impacts to scenic resources and to preserve unique or special visual features, particularly in hillside areas, through the following: creative site planning, integration of natural features into the project, appropriate scale, materials, and design to complement the surrounding natural landscape, clustering of development so as to preserve open space vistas and natural features, minimal disturbance of topography, and creation of contiguous open space networks.

Goal NR-3. Maintenance and enhancement of the visual quality of city roads that have valuable scenic resources in order to create a special awareness of the environmental character and natural and man-made resources of the community.

Policy NR-3.1. Ensure a quality visual experience along the entire length of the scenic roads through protection and enhancement of views and development of appropriate landscaping.

Policy NR-3.2. Preserve the hillside backdrop and natural landforms visible from the scenic roads in their present state to the extent possible.

Goal NR-4. Protection and enhancement of open space resources, other natural areas, and significant wildlife and vegetation in the city as an integral component of a sustainable environment.

Policy NR-4.8. Link open space to activity centers, parks, other open space, and scenic routes to help define urban form and beautify the city.

Policy NR-4.10. Continue to sustain the city's oak trees, which are an integral part of the character of the city, and continue to plant and maintain these trees in a manner that will allow them to mature and thrive.

City of Agoura Hills Municipal Code

Article IX, Chapter 1, Part 4 of the Agoura Hills Municipal Code (AHMC) defines the general development standards for the city. Section 9132 of the AHMC specifically states that all development must be compatible with the rural character of the community, including preservation of views from existing development, and the preservation and protection of natural features, including terrain and landscaping in the neighborhood and community.

Article IX, Chapter 6, Part 2 of the AHMC defines hillside management and significant ecological areas, and requires the preservation of the scenic viewshed including provisions for site design in hillside areas and special regulations to protect hillside areas and special ecological areas from incompatible development. This section serves to preserve the natural terrain, quality environment, and aesthetic character of the city's hillside and ecological features. Section 9652.13.C.(h) specifically requires street lighting be designed to lessen impacts on views of hillsides and ridgelines; Section 9655.3 prohibits signs that create a safety hazard by obstructing the view of pedestrian or vehicular traffic; and Section 9663.5 sets forth regulations for connectivity and pedestrian accommodation, requiring that all pedestrian pathways be lit by low, ground-mounted, shielded and downward facing lighting fixtures at set intervals.

Oak trees are also protected by the City of Agoura Hills Oak Tree Ordinance, contained in Article IX, Chapter 6, Part 2, Division 7 of the AHMC. The preservation of oak trees is further guided by the City's Oak Tree Preservation Guidelines, contained in Appendix A of the AHMC, and remains a high priority in recognition of their historical, environmental, and aesthetic values to the community, present and future.

Agoura Village Specific Plan

The Agoura Village Specific Plan, adopted in 2008 and updated in 2024, is a long-range planning effort intended to guide the revitalization, appropriate uses, and beautification of the Agoura Village (City of Agoura Hills 2024b). The Specific Plan area encompasses approximately 135 acres of developed and underveloped land running along both sides of Agoura Road, one block west of Kanan Road to approximately two blocks east of Cornell Road. Roadside Drive and the Ventura Freeway border the Specific Plan area to the north, and open space borders the Specific Plan area to the south.

Chapter 2, *Land Use, Regulations, & Guidelines*, of the Agoura Village Specific Plan identifies Viewshed Standards to allow the view of Ladyface Mountain from the public ROW. Viewsheds can consist of driveways or paseos. Standards include viewshed width minimums of 50 feet, maximum distances between viewsheds of 250 feet, six-foot limitations of vertical elements within paseos, 12-foot height maximums for vertical building elements, and height restrictions for buildings adjacent to paseos of one-story or twenty-four feet (whichever is less).

Chapter 2, *Land Use, Regulations, & Guidelines*, of the Agoura Village Specific Plan also identifies lighting standards. These lighting standards apply to on-site lighting for private development projects in parking areas, and lights associated with the building and landscaping. The following lighting standards would apply to the proposed Project.

- Low-voltage lighting conserves energy and shall be used in the landscape. The use of energy-efficient fixtures incorporating light emitting diode lamps is encouraged.
- Pedestrian light poles along sidewalks or pathways and parking lot light standards shall be 10 to 15 feet high unless bollards are used.

4.1.3 Impact Analysis

a. Methodology and Significance Thresholds

As discussed in Section 4.0, *Environmental Impact Analysis*, all Project components are analyzed at the programmatic level. Project components include the Bicycle Master Plan (BMP), the vehicle miles traveled (VMT) Mitigation Exchange and Banking Program (Program), and the General Plan Amendments (Amendments). Projects included within the BMP are grouped into Class I facilities, Class II facilities, Class III facilities, Class IV facilities, and enhanced bicycle treatments, as identified in Section 2.5, *Project Characteristics,* and in Table 1 of Chapter 2, *Project Description.* The impact analysis contained herein provides a programmatic analysis of anticipated impacts for each of the five facility classes, as the individual project impacts associated with each class of facility are expected to be similar. Because the City seeks to prioritize implementation of the Medea Creek Path (Path) and the Agoura High School Connection (Connection), the Path and the Connection have their own subheadings within the Class I Facility impact analysis subsection to provide a more specific assessment of the environmental impacts of those two specific projects included within the BMP. Impacts associated with the Amendments are analyzed within their own subsection.

As discussed in Chapter 2, *Project Description*, the only projects that are currently planned, unfunded, and could potentially be funded by the VMT Mitigation Exchange and Banking Program are those currently included within the BMP. Therefore, the impact analysis contained herein does not include a subsection for impacts associated with the Program, as the individual project list for the BMP and the Program are identical and impacts associated with the BMP would encompass impacts associated with the Program.

Within the following environmental analysis, impacts associated with each Project component are explicitly identified under the respective heading.

According to Appendix G of the *California Environmental Quality Act* (CEQA) *Guidelines*, impacts related to aesthetics would be significant if the proposed Project would:

1. Have a substantial adverse effect on a scenic vista;
2. Substantially damage scenic resources, including, but not limited to, unique mature trees, unique rock outcroppings, and historic buildings within a state scenic highway;
3. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from publicly accessible vantage point). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality; or,
4. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

b. Project Impacts and Mitigation Measures

Threshold 1: Would the Project have a substantial adverse effect on a scenic vista?

Impact AES-1 Implementation of the Bicycle Master Plan would result in temporary obstruction of views during construction activities. The proposed Project would not result in the construction of new structures that could permanently disrupt existing views. This impact would be less than significant.

As discussed in Section 4.1.1.b, Scenic Vistas and Views, scenic vistas in the City of Agoura Hills include public views of hillsides, scenic resources, and the Santa Monica Mountains. These views are generally available from public ROWs and scenic corridors, including portions of Reyes Adobe Road, Thousand Oaks Boulevard, Agoura Road, and Kanan Road (City of Agoura Hills 2022). Views of scenic vistas are also available from the trail network in and around the city.

Class I Facilities

Construction of the proposed Class I facilities would require clearing and grubbing, pavement demolition, grading, utility relocation, retaining wall or fencing installation, asphalt paving or repaving, street and undercrossing improvements, striping, and revegetation. Storage, staging, and active work areas would be established during the construction period for Class I facilities. These areas would be fenced for security, and fencing would include opaque mesh screening in some locations.

The Class I bikeway proposed along Agoura Road would be constructed adjacent to a City-designated scenic corridor. Storage, staging, and active work areas established near Agoura Road would result in minor, temporary effects to publicly-accessible views of the hillsides and other scenic resources, including the Santa Monica Mountains. Storage and staging areas would be contained within the identified project boundary and outside of the primary view corridor where feasible. Nonetheless, these established areas could disrupt long-range views of hillsides and mountains, including views from or near the City-designated scenic corridor. At the time of construction, should the construction contractor require additional staging areas, they would be responsible for identifying and securing long-term staging areas on previously disturbed storage yards, the locations of which are currently unknown. Impacts to scenic vistas would be short term in nature, and fencing, construction equipment, and materials would be low profile. Therefore, construction of the Class I facilities would not substantially obscure views from publicly-accessible vantage points.

Implementation of Class I facilities would not result in the construction of new structures that could disrupt existing views. Furthermore, implementation of new Class I facilities would make scenic vistas more accessible to residents and visitors by providing a separated ROW for these users that are not currently served by the existing street system. Therefore, implementation of Class I facilities would not substantially affect scenic vistas, and may instead enhance the accessibility of scenic vistas. This impact would be less than significant.

Medea Creek Path

The proposed Path would result in construction of a Class I bikeway along Medea Creek from Agoura Road to the northern limit of the city. Construction activities, including the establishment of storage, staging, and active work areas, could temporarily block existing views of scenic resources, particularly where the Path would intersect two City-designated scenic corridors on Thousand Oaks

Boulevard and Agoura Road. These impacts would be short term in nature, and fencing, construction equipment, and materials would be low profile. Therefore, construction of the Path would not substantially obscure views from publicly-accessible vantage points.

Implementation of the Path would not result in the construction of new structures that could disrupt existing views. The Path's proposed alignment would run north-south through the central portion of the city, and both primary and secondary ridgelines would be intermittently visible to the east and west of the Path's alignment. As such, the Path would provide new vantage points of these designated visual resources, as well as new views of the natural habitat surrounding Medea Creek. Therefore, the proposed Path would not substantially affect scenic vistas, and may instead provide new vantage points and views of scenic resources. This impact would be less than significant.

AGOURA HIGH SCHOOL CONNECTION

The proposed Connection would result in construction of a Class I bikeway connecting Thousand Oaks Boulevard to Fountain Place along the northern border of Agoura High School. This bikeway would be implemented approximately 0.1 mile south of a primary ridgeline and between two secondary ridgelines located approximately 0.4 mile and 0.2 mile east and west, respectively. The Connection would also abut the City-designated scenic corridor on Thousand Oaks Boulevard. Construction activities, including the establishment of storage, staging, and active work areas, could temporarily block existing views of the nearby ridgelines, particularly from Thousand Oaks Boulevard. These impacts would be short term in nature, and fencing, construction equipment, and materials would be low profile. Therefore, construction of the Connection would not substantially obscure views from publicly-accessible vantage points.

Implementation of the Connection would not result in the construction of new structures that could disrupt existing views from Thousand Oaks Boulevard. Rather, the Connection would provide new vantage points of the nearby ridgelines, where are designated visual resources. Therefore, the proposed Connection would not substantially affect scenic vistas, and may instead provide new vantage points of scenic resources. This impact would be less than significant.

Class II Facilities

Class II facilities are proposed along portions of the City-designated scenic corridors on Reyes Adobe Road and Thousand Oaks Boulevard. The establishment of Class II facilities on these roadways would generally require roadway restriping and reconfiguration of lane widths to accommodate new dedicated bike lanes. Restriping can be completed within a single work period and does not require the establishment of storage, staging, or work areas. Therefore, restriping activities would not substantially obscure views from publicly-accessible vantage points.

Pavement widening would be necessary on Driver Avenue and on Cornell Road to allow for the addition of bicycle lanes. Pavement widening would not occur on a City-designated scenic corridor. Nonetheless, construction activities would require the creation of storage, staging, and active work areas. These areas would be fenced for security, and fencing would include opaque mesh screening in some locations. The storage, staging, and construction work areas would be visible from public ROWs and could result in minor, temporary effects to publicly-accessible views of the hillsides and other scenic resources. These established areas could disrupt long-range views of hillsides and mountains. These impacts would be short term in nature, and fencing, construction equipment, and materials would be low profile. Therefore, construction of the Class II facilities would not substantially obscure views from publicly-accessible vantage points.

Implementation of Class II facilities would not result in the construction of new structures that could disrupt existing views. The proposed improvements along Cornell Road would occur adjacent to publicly owned or preserved open space, as designated by the City of Agoura Hills General Plan 2035. Though improvements along Cornell Road have potential to impact adjacent scenic resources within the open space area, these disturbances would be minimal relative to the total share of open space present in and around the city. Furthermore, implementation of Class II facilities would be required to comply with the City of Agoura Hills Oak Tree Ordinance, which would result in the preservation of oak trees and their aesthetic values to the community. By providing enhanced multimodal access along Cornell Road, this specific Class II facility would provide an opportunity for new users to view the scenic resources present in the adjacent public open space. Furthermore, all Class II facilities would provide the opportunity for new users to view the primary ridgelines and open space areas in the southern portion of the city. Therefore, implementation of Class II facilities would not substantially affect scenic vistas, and may instead enhance the accessibility of scenic vistas. This impact would be less than significant.

Class III Facilities

Class III facilities are proposed along portions of the City-designated scenic corridors on Kanan Road and Agoura Road. Establishment of the Class III facilities would be limited to the restriping of existing roads to identify bike routes. Restriping can be completed within a single work period and does not require the establishment of storage, staging, or work areas. Therefore, establishment of the Class III facilities would not substantially obscure views from publicly-accessible vantage points.

Implementation of Class III facilities would not result in the construction of new structures that could disrupt existing views. Implementation of Class III facilities would provide an opportunity for new users to view ridgelines and other scenic resources. Therefore, implementation of Class III facilities under the proposed BMP would not substantially affect scenic vistas, and may instead enhance the accessibility of scenic vistas. This impact would be less than significant.

Class IV Facilities

Construction of Class IV facilities would require pavement demolition, minor grading, bollard or fencing installation, asphalt paving or repaving, and striping. Storage, staging, and active work areas would be established during the construction period for Class IV facilities. These areas would be fenced for security, and fencing would include opaque mesh screening in some locations.

Storage, staging, and active work areas established for the Class IV facility proposed along portions of the City-designated scenic corridor on Thousand Oaks Boulevard would result in minor, temporary effects to publicly accessible views of the hillsides and other scenic resources. Storage and staging areas would be contained within the identified project boundary and outside of the primary view corridor where feasible. Nonetheless, these established areas could disrupt long-range views of hillsides and mountains, including views from or near the City-designated scenic corridor. At the time of construction, should the construction contractor require additional staging areas, they would be responsible for identifying and securing long-term staging areas on previously disturbed storage yards, the locations of which are currently unknown. Impacts to scenic vistas would be short term in nature, and fencing, construction equipment, and materials would be low profile. Therefore, construction of the Class IV facilities would not substantially obscure views from publicly-accessible vantage points.

The implementation of Class IV facilities would result in incorporation of barriers to create a separated and protected bicycle lane. These barriers would be low in vertical profile and would not substantially obscure views from the public ROW. Rather, implementation of Class IV facilities would provide an opportunity for new users to view ridgelines and other scenic resources. Therefore, implementation of Class IV facilities would not substantially affect scenic vistas, and may instead enhance the accessibility of scenic vistas. This impact would be less than significant.

Enhanced Bicycle Treatments

Enhanced bicycle treatment would be implemented at various locations throughout the city. These facilities could include street striping and restriping, signage and wayfinding, bicycle signals and detection at traffic signals, bicycle parking, and bicycle repair facilities. Construction and implementation of these facilities would be completed within a single work period and would not require the establishment of storage, staging, or work areas. These facilities would be located within or adjacent to existing, new, or improved bikeways and would not result in the development of large-scale structures within previous undeveloped areas that could impact views of ridgelines, hillsides, or other scenic resources. Furthermore, implementation of wayfinding signage and bicycle would be required to comply with Section 9655.3 of the AHMC; therefore, signage and signals would not obstruct views of pedestrian or vehicular traffic. Implementation of the enhanced bicycle treatment would not substantially affect scenic vistas. This impact would be less than significant.

General Plan Amendments

As part of the proposed Project, the City must amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. These General Plan Amendments shift the focus from prioritizing automobile mobility to reducing VMT alternative transportation modes like walking and biking, guided by the BMP. The proposed General Plan Amendments would not result in construction or operation activities beyond existing conditions. Furthermore, the Amendments would not alter any existing goals, policies, or regulations contained within the City of Agoura Hills General Plan 2035 related to the protection of scenic resources. Therefore, the Amendments would not have a substantial adverse effect on a scenic vista. No impact would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 2:	Would the Project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Impact AES-2 THERE ARE NO OFFICIALLY DESIGNATED STATE SCENIC HIGHWAYS WITHIN THE CITY OF AGOURA HILLS. THEREFORE, THE PROPOSED PROJECT WOULD NOT SUBSTANTIALLY DAMAGE SCENIC RESOURCES WITHIN A STATE SCENIC HIGHWAY. THERE WOULD BE NO IMPACT.

As identified in Section 4.1.1.c, *Scenic Corridors and Roads,* there are no officially designated State Scenic Highways in the City of Agoura Hills. Although a portion of the Ventura Freeway, located in the southern portion of the city, is an Eligible State Scenic Highway, this roadway has not yet been

officially designated (Caltrans 2018). Therefore, implementation of the proposed Project would not substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. No impact would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

No impact would occur.

Threshold 3:	Would the Project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the Project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?

Impact AES-3 THE PROPOSED PROJECT WOULD BE CONSISTENT WITH APPLICABLE GENERAL PLAN GOALS AND POLICIES, AND WOULD COMPLY WITH APPLICABLE REGULATIONS CONTAINED WITHIN THE AGOURA HILLS MUNICIPAL CODE. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

State CEQA Guidelines Section 21071 defines an urbanized area as:

- An incorporated city that has either:
  - A population of at least 100,000 persons, or
  - A population of less than 100,000 persons if the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons.

According to the California Department of Finance (DOF), the City of Agoura Hills had a population of 19,904 on January 1, 2025 (DOF 2025). Agoura Hills is contiguous with the City of Thousand Oaks to the west; the City of Thousand Oaks had a population of 122,468 on January 1, 2025 (DOF 2025). Therefore, pursuant to State CEQA Guidelines Section 21071, the City of Agoura Hills is considered an urbanized area and this analysis considers whether the proposed Project would conflict with applicable zoning and other regulations governing scenic quality.

As identified in Section 4.1.2, *Regulatory Setting,* the City of Agoura Hills General Plan 2035 contains a variety of goals and policies that pertain to scenic quality. The AHMC also includes general development standards that govern the preservation of views from existing development, hillside management standards that require preservation of the aesthetic character or the city's hillside and ecological features, and an Oak Tree Ordinance that requires preservation of oak trees due to their aesthetic values to the community. The Agoura Village Specific Plan identifies viewshed standards to protect the view of Ladyface Mountain from the public ROW, and pedestrian lighting standards along pathways.

Class I Facilities

Construction of Class I facilities identified within the BMP would require use of delivery trucks, vehicles, and other construction equipment, as well as the creation of storage, staging, and active work areas. The construction period for each Class I facility would be temporary in nature, and the location and use of construction equipment in active work areas would change during the

construction period depending on which portions of projects identified in the BMP were under active construction. Construction activities could cause a change in the existing visual character and quality of the Project area by introducing a level of activity, vehicles, and construction equipment that is greater than typical conditions. The use of delivery trucks, vehicles, and construction equipment would be similar to the use of such vehicles and other equipment during other construction activities associated with development within the city. Furthermore, although construction activities would result in a degree of change to visual quality within the Project area, construction would not permanently impair or block any sensitive or unique visual resources or landscapes. Therefore, impacts to the area's visual character during construction would be less than significant.

Implementation of Class I facilities would not result in the construction of new structures that could disrupt existing views. All Class I facilities would be required to comply with applicable scenic quality zoning and other regulations identified in Section 4.1.2, *Regulatory Setting*, including the goals and policies of the City of Agoura Hills General Plan 2035, the design standards and Oak Tree Ordinance identified in the AHMC, and the viewshed standards and lighting requirements outlined in the Agoura Village Specific Plan. Design review would ensure the design of these individual facilities would meet these regulations. Furthermore, implementation of new Class I facilities would make scenic vistas more accessible to residents and visitors by providing a separated ROW for these users that are not currently served by the existing street system. Therefore, implementation of Class I facilities would not conflict with applicable zoning and other regulations governing scenic quality. This impact would be less than significant.

MEDEA CREEK PATH

Similar to the impacts associated with Class I facilities, implementation of the Path could cause a change in the existing visual character and quality of the individual project area by introducing a level of construction activity, construction vehicles, and construction equipment that is greater than typical conditions. The use of such vehicles and equipment would be temporary in nature and would be similar to the use of vehicles and equipment during other construction activities associated with development within the city. Furthermore, construction would not permanently impair or block any sensitive or unique visual resources or landscapes. Therefore, impacts to the area's visual character during construction would be less than significant.

Implementation of Path would not result in the construction of new structures that could disrupt existing views. The Path would be required to comply with applicable scenic quality zoning and other regulations identified in Section 4.1.2, *Regulatory Setting*, including the goals and policies of the City of Agoura Hills General Plan 2035, the design standards and Oak Tree Ordinance identified in the AHMC design standards, and the viewshed standards and lighting requirements outlined in the Agoura Village Specific Plan. Design review requirements would ensure the Path meets all applicable regulations. Furthermore, implementation of the Path would make scenic vistas more accessible to residents and visitors. Therefore, implementation of the Path would not conflict with applicable zoning and other regulations governing scenic quality. This impact would be less than significant.

AGOURA HIGH SCHOOL CONNECTION

Implementation of the Connection could cause a change in the existing visual character and quality of the project area by introducing a level of construction activity, construction vehicles, and construction equipment that is greater than typical conditions. The use of such vehicles and

equipment would be temporary in nature and would be similar to the use of vehicles and equipment during other construction activities associated with development within the city. Furthermore, construction would not permanently impair or block any sensitive or unique visual resources or landscapes. Therefore, impacts to the area's visual character during construction would be less than significant.

Implementation of the Connection would not result in the construction of new structures that could disrupt existing views. The Connection would be required to comply with applicable scenic quality zoning and other regulations identified in Section 4.1.2, *Regulatory Setting*, including the goals and policies of the City of Agoura Hills General Plan 2035, the design standards and Oak Tree Ordinance identified in the AHMC, and the viewshed standards and lighting requirements outlined in the Agoura Village Specific Plan. Design review would ensure the Connection meets such regulations. Furthermore, implementation of the Connection would make scenic vistas more accessible. Therefore, implementation of the Connection would not conflict with applicable zoning and other regulations governing scenic quality. This impact would be less than significant.

Class II Facilities

Implementation of the Class II facilities could cause a change in the existing visual character and quality of individual project areas by introducing a level of construction activity, construction vehicles, and construction equipment during roadway widening that is greater than typical conditions. The use of such vehicles and equipment would be temporary in nature and would be similar to the use of vehicles and equipment during other construction activities associated with development within the city. Furthermore, construction would not permanently impair or block any sensitive or unique visual resources or landscapes. Therefore, impacts to the area's visual character during construction would be less than significant.

Implementation of Class II facilities would not result in the construction of new structures that could disrupt existing views. Class II facilities would be required to comply with applicable scenic quality zoning and other regulations identified in Section 4.1.2, *Regulatory Setting*, including the goals and policies of the City of Agoura Hills General Plan 2035, the design standards and Oak Tree Ordinance identified in the AHMC, and the viewshed standards and lighting requirements outlined in the Agoura Village Specific Plan. Design review would ensure the facilities meet such regulations. Furthermore, implementation of the Class II facilities would provide the opportunity for new users to view existing scenic vistas. Therefore, implementation of the Class II facilities would not conflict with applicable zoning and other regulations governing scenic quality. This impact would be less than significant.

Class III Facilities

Implementation of the Class III facilities could cause a change in the existing visual character and quality of individual project areas by introducing a level of vehicular activity during roadway restriping that is greater than typical conditions. The use of such vehicles would be temporary in nature and would be similar to the use of trucks and other vehicles during other construction and maintenance activities occurring within the city. Furthermore, use of these vehicles would not permanently impair or block any sensitive or unique visual resources or landscapes. Therefore, impacts to the area's visual character during construction would be less than significant.

Implementation of Class III facilities would not result in the construction of new structures that could disrupt existing views. As implementation of Class III would be limited to reconfiguration of

existing ROWs, implementation of the Class III facilities would not conflict with applicable zoning and other regulations governing scenic quality. This impact would be less than significant.

Class IV Facilities

Implementation of the Class IV facilities could cause a change in the existing visual character and quality of individual project areas by introducing a level of construction activity, construction vehicles, and construction equipment that is greater than typical conditions. The use of such vehicles and equipment would be temporary in nature and would be similar to the use of vehicles and equipment during other construction activities associated with development within the city. Furthermore, construction would not permanently impair or block any sensitive or unique visual resources or landscapes. Therefore, impacts to the area's visual character during construction would be less than significant.

Implementation of Class IV facilities would result in incorporation of barriers to create a separated and protected bicycle lane. These barriers would be low profile and would not substantially obscure views from the public ROW. The design of these barriers would be required to comply with applicable scenic quality zoning and other regulations identified in Section 4.1.2, *Regulatory Setting*, including the goals and policies of the City of Agoura Hills General Plan 2035, the design standards and Oak Tree Ordinance identified in the AHMC, and the viewshed standards and lighting requirements outlined in the Agoura Village Specific Plan. Design review would ensure the facilities and the barriers meet such regulations. Furthermore, implementation of the Class IV facilities would provide the opportunity for new users to view existing scenic vistas. Therefore, implementation of the Class IV facilities would not conflict with applicable zoning and other regulations governing scenic quality. This impact would be less than significant.

Enhanced Bicycle Treatments

Implementation of the enhanced bicycle treatments could also cause a change in the existing visual character and quality of individual project areas by introducing a level of construction activity, construction vehicles, and construction equipment that is greater than typical conditions. The use of such vehicles and equipment would be temporary in nature and would be similar to the use of vehicles and equipment during other construction activities associated with development within the city. Furthermore, construction would not permanently impair or block any sensitive or unique visual resources or landscapes. Therefore, impacts to the area's visual character during construction would be less than significant.

The enhanced bicycle treatments could include components such as street striping and restriping, signage and wayfinding, bicycle signals and detection at traffic signals, bicycle parking, and bicycle repair facilities. These facilities would be located within or adjacent to existing, new, or improved bikeways and would not result in the development of large-scale structures within previous undeveloped areas. These facilities would be required to comply with applicable scenic quality zoning and other regulations identified in Section 4.1.2, *Regulatory Setting*, including the goals and policies of the City of Agoura Hills General Plan 2035, the design standards and Oak Tree Ordinance identified in the AHMC, and the viewshed standards and lighting requirements outlined in the Agoura Village Specific Plan. Design review would ensure the facilities meet such regulations. Therefore, implementation of the Class IV facilities would not conflict with applicable zoning and other regulations governing scenic quality. This impact would be less than significant.

General Plan Amendments

As part of the proposed Project, the City must amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. The proposed General Plan Amendments would not result in construction or operation activities beyond existing conditions. Furthermore, the Amendments would not alter any existing goals, policies, or regulations contained within the City of Agoura Hills General Plan 2035 related to the protection of scenic resources. Therefore, the Amendments would not conflict with applicable zoning and other regulations governing scenic quality. No impact would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 4:	Would the Project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

Impact AES-4 THE PROPOSED PROJECT WOULD NOT CREATE A NEW SOURCE OF SUBSTANTIAL LIGHT OR GLARE THAT WOULD ADVERSELY AFFECT DAYTIME OR NIGHTTIME VIEWS IN THE AREA. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Class I Facilities

As discussed in Chapter 2, *Project Description*, specific construction details have been identified for the Medea Creek Path, a two-mile bicycle path and the longest new facility proposed in the BMP. Construction of the Path would result in the largest area of disturbance with the most construction activities. Construction of the Path would occur over the course of 24 months, during daytime hours of 8:00AM to 5:00PM. All other facilities included within the BMP would be expected to result in less intensive construction. Therefore, it can be assumed that construction of the remaining Class I facilities would occur over the course of 24 months or less, and construction would be limited to daytime hours of 8:00AM to 5:00PM.

Construction of Class I facilities identified within the BMP would require use of delivery trucks, vehicles, and other construction equipment, as well as the creation of storage, staging, and active work areas. Temporary and intermittent glare would be generated during daytime construction by sunlight reflecting from equipment or vehicle windshields in the storage, staging, and active work areas. These areas would be located outside of existing roadways within the individual project boundaries. At the time of construction, should the construction contractor require additional staging areas, they would be responsible for identifying and securing long-term staging areas on previously disturbed storage yards, the locations of which are currently unknown. Storage, staging, and work areas would be fenced for security. Fencing would include opaque mesh screening in visually sensitive locations, such as adjacent to residential development, to reduce glare. Temporary nighttime lighting may be used for additional security within the fenced areas. Nighttime security lighting would be shielded and directed downward and inward toward the work, storage, or staging areas to prevent light spill onto adjacent properties. Given the temporary and intermittent nature of construction, the use of directional shielding on nighttime lighting, and the presence of fencing and screening in visually sensitive areas, construction of the Class I facilities would not create a new

source of substantial light or glare that would adversely affect daytime or nighttime views in the area.

Proposed Class I facilities are generally located away from existing roadways. Current sources of light and glare along the Class I facility alignments are from adjacent roadways or cross streets, adjacent residential development, and adjacent commercial development. Specifically, existing sources of light and glare include streetlights, traffic lights, headlights and taillights from vehicles on nearby roadways, building lighting, and windows from nearby development. The BMP does not currently identify any operational lighting requirements for the Class I facilities. Nonetheless, in accordance with AHMC Section 9663.5, any pedestrian path, including the Class I multi-use bike paths proposed within the BMP, must be lit by lighted bollards or similar low, ground-mounted lighting fixtures at intervals of a minimum of 200 feet. As required by the AHMC, all lighting fixtures would be shielded and downward facing. Therefore, implementation of the Class I facilities would require the installation of ground-mounted lighting fixtures, and adherence to the AHMC requirements would ensure this new source of lighting would not adversely affect daytime or nighttime views in the area.

Once operational, glare could be produced by the sun shining on bicycles when cyclists utilize the new facilities; the amount of glare from bicycles would not be substantial given the existing sources of glare, including from vehicles traveling on nearby. Therefore, implementation of the Class I facilities would not create a new source of substantial glare that would adversely affect daytime or nighttime views in the area. Overall, this impact would be less than significant.

MEDEA CREEK PATH

Construction of the Path would occur over 24 months during daytime hours of 8:00AM to 5:00PM. Construction would require use of delivery trucks, vehicles, and other construction equipment, as well as the creation of storage, staging, and active work areas. Temporary and intermittent glare would be generated during daytime construction by sunlight reflecting from equipment or vehicle windshields in the storage, staging, and active work areas. These areas would be located within the identified project boundary away from existing roadways and, in some places, adjacent to residential and commercial development. At the time of construction, should the construction contractor require additional staging areas, they would be responsible for identifying and securing long-term staging areas on previously disturbed storage yards, the locations of which are currently unknown. Storage, staging, and work areas would be fenced for security. Fencing would include opaque mesh screening in visually sensitive locations, such as adjacent to residential development, to reduce glare. Temporary nighttime lighting may be used for additional security within the fenced areas. Nighttime security lighting would be shielded and directed downward and inward toward the work, storage, or staging areas to prevent light spill onto adjacent properties. Given the temporary and intermittent nature of construction, the use of directional shielding on nighttime lighting, and the presence of fencing and screening in visually sensitive areas, construction of the Path would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area.

Current sources of light and glare along the Path alignment include streetlights on intersecting roadways, headlights and taillights from vehicles traveling on intersecting roadways, and building lighting and windows from nearby residential and commercial development. Operational lighting requirements are not currently identified for the Path. Nonetheless, the AHMC requires ground-mounted, shielded, and downward facing lighting fixtures at regular intervals along pedestrian paths. Therefore, implementation of the Path would include the installation of ground-mounted

lighting fixtures. With adherence to the AHMC requirements, this new source of lighting would not adversely affect daytime or nighttime views in the area.

Once operational, glare could be produced by the sun shining on bicycles utilizing the Path; the amount of glare from bicycles on the Path would not be substantial given the existing sources of glare from vehicles traveling on intersecting roadways and windows from nearby commercial and residential buildings. Therefore, implementation of the Path would not create a new source of substantial glare that would adversely affect daytime or nighttime views in the area. This impact would be less than significant.

AGOURA HIGH SCHOOL CONNECTION

Construction of the Connection would occur over the course of 24 months or less, and construction would be limited to daytime hours of 8:00AM to 5:00PM. Construction would require use of delivery trucks, vehicles, and other construction equipment, as well as the creation of storage, staging, and active work areas. Temporary and intermittent glare would be generated during daytime construction by sunlight reflecting from equipment or vehicle windshields in the storage, staging, and active work areas. These areas would be located within or adjacent to the identified project boundary away from existing roadways. At the time of construction, should the construction contractor require additional staging areas, they would be responsible for identifying and securing long-term staging areas on previously disturbed storage yards, the locations of which are currently unknown. Storage, staging, and work areas would be fenced for security. Fencing would include opaque mesh screening to reduce glare at Agoura High School. Temporary nighttime lighting may be used for additional security within the fenced areas. Nighttime security lighting would be shielded and directed downward and inward toward the work, storage, or staging areas to prevent light spill onto adjacent properties. Given the temporary and intermittent nature of construction, the use of directional shielding on nighttime lighting, and the presence of fencing and screening in visually sensitive areas, construction of the Connection would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area.

Current sources of light and glare along the Connection include streetlights on Thousand Oaks Boulevard, existing traffic lights on Thousand Oaks Boulevard, headlights and taillights from vehicles traveling on Thousand Oaks Boulevard and Carell Avenue, building lighting and windows from Agoura High School, overhead lighting for the athletic fields at Agoura High School, and building lighting and windows from nearby residential development. Operational lighting requirements are not currently identified for the Connection. Nonetheless, the AHMC requires ground-mounted, shielded, and downward facing lighting fixtures at regular intervals along pedestrian paths. Therefore, implementation of the Connection would include the installation of ground-mounted lighting fixtures. With adherence to the AHMC requirements, this new source of lighting would not adversely affect daytime or nighttime views in the area.

Once operational, glare could be produced by the sun shining on bicycles utilizing the Connection; the amount of glare from bicycles would not be substantial given the existing sources of glare from vehicles traveling on nearby roadways, windows from Agoura High School, and windows from nearby residential development. Therefore, implementation of the Connection would not create a new source of substantial glare that would adversely affect daytime or nighttime views in the area. This impact would be less than significant.

Class II Facilities

Construction of Class II facilities would generally consist of roadway restriping and reconfiguration of lane widths. These activities would require the use of paint trucks and similar equipment along existing roadways. Restriping can be completed within a single work period and does not require the establishment of storage, staging, or work areas. Temporary and intermittent glare would be generated during daytime restriping by sunlight reflecting from paint trucks and equipment operating within active traffic lanes, moving linearly along an individual project site. In some cases, nighttime restriping may occur, which would involve mobile work zones with vehicle-mounted lights and directional beacons. Vehicle lighting would be forward-facing to minimize spillover onto adjacent properties. Given the temporary and intermittent nature of these activities and the use of forward-facing directional lighting during nighttime activities, roadway restriping would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area.

Construction of Class II facilities would also require pavement widening on Driver Avenue and Cornell Road to allow for the addition of bicycle lanes. Construction activities for pavement widening would occur over the course of 24 months or less, and construction would be limited to daytime hours of 8:00AM to 5:00PM. Construction would require use of delivery trucks, vehicles, and other construction equipment, as well as the creation of storage, staging, and active work areas. Temporary and intermittent glare would be generated during daytime construction by sunlight reflecting from equipment or vehicle windshields in the storage, staging, and active work areas. These areas would be located within or adjacent to the identified project boundaries. At the time of construction, should the construction contractor require additional staging areas, they would be responsible for identifying and securing long-term staging areas on previously disturbed storage yards, the locations of which are currently unknown. Storage, staging, and work areas would be fenced for security. Fencing would include opaque mesh screening in visually sensitive locations, such as adjacent to residential development, to reduce glare. Temporary nighttime lighting may be used for additional security within the fenced areas. Nighttime security lighting would be shielded and directed downward and inward toward the work, storage, or staging areas to prevent light spill onto adjacent properties. Given the temporary and intermittent nature of construction, the use of directional shielding on nighttime lighting, and the presence of fencing and screening in visually sensitive areas, pavement widening would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area.

Current sources of light and glare along the Class II facility alignments include streetlights, traffic lights, headlights and taillights from vehicles traveling on the roadways, and building lighting and windows from adjacent development. Operational lighting requirements for Class II facilities are not currently identified in the BMP. Given that Class II facilities are proposed along existing roadways with existing streetlights, it is assumed that additional overhead lighting would not be required. Once operational, glare could be produced by the sun shining on bicycles utilizing the new facilities; the amount of glare from bicycles would not be substantial given the existing sources of glare from vehicles on the roadway and windows from adjacent development. Therefore, implementation of the Class II facilities would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area. This impact would be less than significant.

Class III Facilities

Construction of the Class III facilities would be limited to the restriping of existing roads to identify bike routes. These activities would require the use of paint trucks and similar equipment along

existing roadways. Restriping can be completed within a single work period and does not require the establishment of storage, staging, or work areas. Temporary and intermittent glare would be generated during daytime restriping by sunlight reflecting from paint trucks and equipment operating within active traffic lanes, moving linearly along an individual project site. In some cases, nighttime restriping may occur, which would involve mobile work zones with vehicle-mounted lights and directional beacons. Vehicle lighting would be forward-facing to minimize spillover onto adjacent properties. Given the temporary and intermittent nature of these activities and the use of forward-facing directional lighting during nighttime activities, roadway restriping to establish the Class III facilities would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area.

Current sources of light and glare along the Class III facility alignments include streetlights, traffic lights, headlights and taillights from vehicles traveling on the roadways, and building lighting and windows from adjacent development. Operational lighting requirements for Class III facilities are not currently identified in the BMP. Given that Class III facilities are proposed along existing roadways with existing streetlights, it is assumed that additional overhead lighting would not be required. Once operational, glare could be produced by the sun shining on bicycles utilizing the new facilities; the amount of glare from bicycles would not be substantial given the existing sources of glare from vehicles on the roadway and windows from adjacent development. Therefore, implementation of the Class III facilities would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area. This impact would be less than significant.

Class IV Facilities

Construction of the Class IV facilities would occur over the course of 24 months or less, and construction would be limited to daytime hours of 8:00AM to 5:00PM. Construction would require use of delivery trucks, vehicles, and other construction equipment, as well as the creation of storage, staging, and active work areas. Temporary and intermittent glare would be generated during daytime construction by sunlight reflecting from equipment or vehicle windshields in the storage, staging, and active work areas. These areas would be located within the individual project boundaries. At the time of construction, should the construction contractor require additional staging areas, they would be responsible for identifying and securing long-term staging areas on previously disturbed storage yards, the locations of which are currently unknown. Storage, staging, and work areas would be fenced for security. Fencing would include opaque mesh screening in visually sensitive locations, such as adjacent to residential development, to reduce glare. Temporary nighttime lighting may be used for additional security within the fenced areas. Nighttime security lighting would be shielded and directed downward and inward toward the work, storage, or staging areas to prevent light spill onto adjacent properties. Given the temporary and intermittent nature of construction, the use of directional shielding on nighttime lighting, and the presence of fencing and screening in visually sensitive areas, construction of the Class IV facilities would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area.

Current sources of light and glare along the Class IV facility alignments include streetlights, traffic lights, headlights and taillights from vehicles traveling on adjacent roadways, and building lighting and windows from adjacent development. Operational lighting requirements for Class IV facilities are not currently identified in the BMP. Given that Class IV facilities are proposed along existing roadways with existing streetlights, it is assumed that additional overhead lighting would not be required. Once operational, glare could be produced by the sun shining on bicycles utilizing the new

facilities and by vehicle headlights shining on reflective elements of barriers that would be installed to provide a separated bikeway; the amount of glare from bicycles and barriers would not be substantial given the existing sources of glare from vehicles on the roadway and windows from adjacent development. Therefore, implementation of the Class IV facilities would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area. This impact would be less than significant.

Enhanced Bicycle Treatments

Enhanced bicycle treatments would include street striping and restriping, signage and wayfinding, bicycle signals and detection at traffic signals, bicycle parking, and bicycle repair facilities. Construction and implementation of these facilities would be completed within a single work period and would not require the establishment of storage, staging, or work areas. Temporary and intermittent glare would be generated during daytime construction and implementation activities by sunlight reflecting from construction equipment or vehicle windshields. In some cases, nighttime restriping may occur, which would involve mobile work zones with vehicle-mounted lights and directional beacons. Vehicle lighting would be forward-facing to minimize spillover onto adjacent properties. Given the temporary and intermittent nature of these activities and the use of forward-facing directional lighting during nighttime activities, implementation of the enhanced bicycle treatments would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area.

Enhanced bicycle treatments would be implemented at various locations throughout the city, but these facilities would generally be placed within or adjacent to existing, new, or improved bikeways. Current sources of light and glare near these facilities would include streetlights, existing traffic lights, headlights and taillights from vehicles traveling on nearby roadways, and building lighting and windows from adjacent development. Specific operational lighting requirements for the enhanced bicycle treatments are not currently identified in the BMP. Bicycle signals and detection at traffic signals would constitute a new source of light. Once operational, glare could be produced by reflective elements, by the sun shining on new signage, and by the sun shining on bicycles utilizing the parking and repair facilities. The amount of glare from these facilities and from bicycles utilizing these facilities would not be substantial given the existing sources of light and glare from existing streetlights, traffic lights, headlights and taillights, building lighting, and building windows. Therefore, implementation of the enhanced bicycle treatments would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area. This impact would be less than significant.

General Plan Amendments

As part of the proposed Project, the City must amend Chapter 3, *Infrastructure and Community Services*, of the City Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. These General Plan Amendments shift the focus from prioritizing automobile mobility to reducing VMT through alternative transportation modes like walking and biking, guided by the BMP. Although the proposed General Plan Amendments would not result in construction or operation activities beyond existing conditions, the prioritization of VMT reduction through alternative transportation modes could result in a shift in the types of light and glare occurring within the city. Nonetheless, the Amendments would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area. This impact would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.1.4 Cumulative Impacts

The geographic scope for cumulative impacts related to aesthetics is the Project area, which encompasses all of the City of Agoura Hills. This geographic scope is appropriate because impacts to views of scenic vistas and potential lighting or glare impacts associated with cumulative development could collectively contribute to a cumulative impact in the Project area.

Past, present, and reasonably foreseeable future projects, including the projects listed in Table 3-1, could result in impacts to public viewsheds or scenic vistas due to the heights of proposed structures. These impacts could be potentially significant. Cumulative projects would be required to undergo design review to ensure compliance with the City of Agoura Hills General Plan 2035 and the AHMC, which would ensure consistent building heights and siting were maintained. Cumulative projects would also undergo and environmental review to identify and subsequently mitigate impacts to scenic resources to the extent feasible. Therefore, cumulative impacts to public viewsheds and vistas would be less than significant. Furthermore, individual projects identified in the BMP would primarily occur at grade and would not include the development of new structures. Therefore, the Project would not contribute to a significant cumulative impact.

There are no officially designated state scenic highways within the Project area. Therefore, there would be no cumulative impact to scenic resources within a state scenic highway.

Cumulative development within the Project area would be required to comply with applicable zoning and development regulations, General Plan and Specific Plan policies, and the AHMC requirements. Compliance with the aforementioned plans, policies, and regulations would mitigate environmental impacts where feasible. Additionally, individual development projects, including projects identified within the BMP, would undergo environmental review where required, including consideration of whether the projects would conflict with applicable zoning or other regulations governing scenic quality. With these considerations prior to project approval, cumulative impacts related to a conflict with applicable zoning and other regulations governing scenic quality would be less than significant, and the Project would not contribute to a significant cumulative impact.

An increase in light and glare could become cumulatively significant as the cumulative project area continues to be built out due to an increase in exterior and interior building lighting, illuminated signs, and reflective building materials. These impacts could be potentially significant. No lighting is currently proposed related to the BMP, and implementation of the BMP would not result in the development of new buildings, structures, or design features that would contribute to sources of light and glare. Therefore, the Project would not result in a considerable contribution to cumulative impacts related to light and glare.

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4.2 Air Quality

The analysis in this section considers potential impacts to air quality. Specifically, this section discusses the environmental and regulatory setting; the criteria used to determine the significance of environmental impacts related to air quality; and potential impacts related to air quality that would result from implementation of the proposed Project. Construction and operational emissions associated with project buildout were calculated using the California Emissions Estimator Model (CalEEMod), version 2022.1. Results of the calculations (refer to **Appendix B**) were compared to South Coast Air Quality Management District (SCAQMD) thresholds to determine impacts.

4.2.1 Setting

a. Climate and Topography

The Project area, which encompasses all of the City of Agoura Hills, is located in the South Coast Air Basin (SCAB), which is under the jurisdiction of the SCAQMD. The SCAB is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The SCAB includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the San Gorgonio Pass area in Riverside County (SCAQMD 2025). The regional climate in the SCAB is semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The air quality in the SCAB is primarily influenced by meteorology and a wide range of emission sources, such as dense population centers, substantial vehicular traffic, and industry.

Most annual rainfall in the SCAB occurs between November and April. Summer rainfall is minimal and is generally limited to scattered thundershowers in coastal regions and slightly heavier showers in the eastern portion of the SCAB and along the coastal side of the mountains. Agoura Hills has a Mediterranean climate with moderate, dry summers. The warmest month of the year is September, and the coldest month of the year is January. The annual average maximum temperature is 70.1 degrees Fahrenheit (°F), while the annual average minimum temperature is 50.0°F. Rainfall is concentrated in the winter months. Local climate conditions are summarized below in Table 4.2-1**.**

Table 4.2-1 Agoura Hills Climate Conditions

Temperature Condition	Amount
Average annual rainfall	14.82 inches
Annual average maximum temperature	70.1°F
Annual average minimum temperature	50.0°F
Warmest month	September
Coolest month	January

°F = degrees Fahrenheit

Note: Averages are based on the period of record from June 1, 1923 to December 31, 2003, at the approximately 27 miles-away Oxnard Station, west of the Project area.

Source: Western Regional Climate Center 2003

The SCAB experiences a persistent temperature inversion (increasing temperature with increasing altitude) as a result of the Pacific High-pressure system. This inversion limits the vertical dispersion of air contaminants, holding them relatively near the ground. As the sun warms the ground and the lower air layer, the temperature of the lower air layer approaches the temperature of the base of the inversion layer (i.e., the upper layer) until the inversion layer finally breaks, allowing vertical mixing with the lower layer. This phenomenon is observed in mid- to late afternoons on hot summer days. Winter inversions frequently break by mid-morning.

The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. On days of no inversion or high wind speeds, ambient air pollutant concentrations are lowest. During periods of low inversions and low wind speeds, air pollutants generated in urbanized areas are transported predominantly onshore into Riverside and San Bernardino counties. In the winter, the greatest pollution problems are the accumulation of carbon monoxide and nitrogen oxides (NO_X) due to low inversions and air stagnation during the night and early morning hours. In the summer, the longer daylight hours and brighter sunshine combine to cause a reaction between hydrocarbons and NO_X to form photochemical smog.

b. Air Pollutants of Primary Concern

Air pollutant emissions in the SCAB are generated primarily by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and include such sources as residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products. Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, and self-propelled construction equipment. Air pollutants can also be generated by the natural environment, such as when high winds suspend fine dust particles.

The federal and State Clean Air Acts (CAA), discussed in greater detail under 4.2.2, *Regulatory Setting,* mandate the control and reduction of certain air pollutants. Under these laws, the United States Environmental Protection Agency (U.S. EPA) and the California Air Resources Board (CARB) have established the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for "criteria pollutants" and other pollutants. Some pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere, including carbon monoxide (CO), volatile organic compounds (VOC)/reactive organic gases (ROG),[1] nitrogen oxides (NO_X), particulate matter with diameters of up to ten microns (PM_{10}) and up to 2.5 microns ($PM_{2.5}$), sulfur dioxide (SO_2), and lead. Other pollutants are created indirectly through chemical reactions in the atmosphere, such as ozone (O_3), which is created by atmospheric chemical and photochemical reactions primarily between VOC and NO_X. Secondary pollutants include oxidants, ozone, and sulfate and nitrate particulates (smog). The following subsections describe the characteristics, sources, and health and atmospheric effects of air pollutants of primary concern.

[1] CARB defines VOC and ROG similarly as, "any compound of carbon excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate," with the exception that VOC are compounds that participate in atmospheric photochemical reactions. For the purposes of this analysis, ROG and VOC are considered comparable in terms of mass emissions, and the term VOC is used in this analysis.

Carbon Monoxide

CO is a localized pollutant found in high concentrations only near its source. The primary source of CO, a colorless, odorless, poisonous gas, is automobile traffic's incomplete combustion of petroleum fuels. Therefore, elevated concentrations are usually only found near areas of high traffic volumes. When CO levels are elevated outdoors, they can be of particular concern for people with some types of heart disease. These people already have a reduced ability to get oxygenated blood to their hearts in situations where they need more oxygen than usual. As a result, they are especially vulnerable to the effects of CO when exercising or under increased stress. In these situations, short-term exposure to elevated CO may result in reduced oxygen to the heart accompanied by chest pain, also known as angina (U.S. EPA 2024b).

Ozone

O_3 is a highly oxidative unstable gas produced by a photochemical reaction (triggered by sunlight) between NO_X and VOC. VOC is composed of non-methane hydrocarbons (with specific exclusions), and NO_X is composed of different chemical combinations of nitrogen and oxygen, mainly nitric oxide and NO_2. NO_X is formed during the combustion of fuels, while VOC is formed during the combustion and evaporation of organic solvents. As a highly reactive molecule, O_3 readily combines with many different atmosphere components. Consequently, high O_3 levels tend to exist only while high VOC and NO_X levels are present to sustain the O_3 formation process. Once the precursors have been depleted, O_3 levels rapidly decline. Because these reactions occur on a regional rather than local scale, O_3 is considered a regional pollutant. In addition, because O_3 requires sunlight to form, it mainly occurs in concentrations considered serious between April and October. People most at risk from O_3 include people with asthma, children, older adults, and people who are active outdoors, especially outdoor workers. In addition, people with reduced intake of certain nutrients, such as vitamins C and E, are at greater risk from O_3 exposure. Depending on the level of exposure, O_3 can cause coughing and a sore or scratchy throat; make it more difficult to breathe deeply and vigorously and cause pain when taking a deep breath; inflame and damage the airways; make the lungs more susceptible to infection; aggravate lung diseases such as asthma, emphysema, and chronic bronchitis; and increase the frequency of asthma attacks (U.S. EPA 2024a).

Nitrogen Dioxide

The primary sources of NO_x are motor vehicles, industrial boilers, and furnaces. The principal form of NO_x produced by combustion is nitric oxide (NO), but NO reacts rapidly to form NO_2, creating the mixture of NO and NO_2, commonly called NO_x. Nitrogen dioxide (NO_2) is a reactive, oxidizing gas and an acute irritant capable of damaging cell linings in the respiratory tract. Breathing air with a high concentration of NO_2 can irritate airways in the human respiratory system. Such exposures over short periods can aggravate respiratory diseases leading to respiratory symptoms (such as coughing, wheezing, or difficulty breathing), hospital admissions, and visits to emergency rooms. Longer exposures to elevated concentrations of NO_2 may contribute to the development of asthma and potentially increase susceptibility to respiratory infections. People with asthma and children and the elderly are generally at greater risk for the health effects of NO_2. The nitrate particles that result from NO_X make the air hazy and difficult to see though. It can also contribute to the formation of O_3, smog, and acid rain (U.S. EPA 2024c).

Particulate Matter

Suspended atmospheric PM_{10} and $PM_{2.5}$ are comprised of finely divided solids and liquids such as dust, soot, aerosols, fumes, and mist. Both PM_{10} and $PM_{2.5}$ are emitted into the atmosphere as by-products of fuel combustion and wind erosion of soil and unpaved roads. The atmosphere, through chemical reactions, can form particulate matter. The characteristics, sources, and potential health effects of PM_{10} and $PM_{2.5}$ can be very different. PM_{10} is generally associated with dust mobilized by wind and vehicles. In contrast, $PM_{2.5}$ is generally associated with combustion processes and formation in the atmosphere as a secondary pollutant through chemical reactions. PM_{10} can cause increased respiratory disease, lung damage, cancer, premature death, reduced visibility, surface soiling. For $PM_{2.5}$, short-term exposures (up to 24-hours duration) have been associated with premature mortality, increased hospital admissions for heart or lung causes, acute and chronic bronchitis, asthma attacks, emergency room visits, respiratory symptoms, and restricted activity days. These adverse health effects have been reported primarily in infants, children, and older adults with preexisting heart or lung diseases (CARB 2024a).

Sulfur Dioxide

SO_2 is the component of greatest concern and is used as the indicator for the larger group of gaseous sulfur oxides (SO_x). Other gaseous SO_x (such as SO_3) are found in the atmosphere at concentrations much lower than SO_2. The largest source of SO_2 in the atmosphere is the burning of fossil fuels by power plants and other industrial facilities. Smaller sources of SO_2 emissions include: industrial processes such as extracting metal from ore; natural sources such as volcanoes; and locomotives, ships and other vehicles and heavy equipment that burn fuel with a high sulfur content. Short-term exposures to SO_2 can harm the human respiratory system and make breathing difficult. People with asthma, particularly children, are sensitive to these effects of SO_2 (U.S. EPA 2024d).

Lead

Lead (Pb) is a metal found naturally in the environment, as well as in manufacturing products. The major sources of Pb emissions historically have been mobile and industrial. Due to the U.S. EPA ’s regulatory efforts to remove Pb from gasoline, atmospheric Pb concentrations have declined substantially over the past several decades. The most dramatic reductions in Pb emissions occurred before 1990 due to the removal of Pb from gasoline sold for most highway vehicles. Pb emissions were further reduced substantially between 1990 and 2008, with reductions occurring in the metals industries at least partly due to national emissions standards for hazardous air pollutants (U.S. EPA 2014). As a result of phasing out leaded gasoline, metal processing is currently the primary source of Pb emissions. The highest Pb level in the air is generally found near Pb smelters. Other stationary sources include waste incinerators, utilities, and Pb-acid battery manufacturers. Pb can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and cardiovascular system depending on exposure. Pb exposure also affects the oxygen-carrying capacity of the blood. The Pb effects most likely encountered in current populations are neurological in children. Infants and young children are susceptible to Pb exposures, contributing to behavioral problems, learning deficits, and lowered IQ (U.S. EPA 2024e).

Toxic Air Contaminants

In addition to the criteria pollutants discussed above, Toxic Air Contaminants (TAC) are a diverse group of airborne substances/air pollutants that may cause or contribute to an increase in deaths or serious illness, or that may pose a present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. One of the main sources of TACs in California is diesel engine exhaust that contains solid material known as diesel particulate matter (DPM). More than 90 percent of DPM is less than one micron in diameter (about 1/70th the diameter of a human hair) and thus is a subset of $PM_{2.5}$. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lungs (CARB 2024a). TACs are different than criteria pollutants because ambient air quality standards have not been established for TACs. TACs occurring at extremely low levels may still cause health effects and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC impacts are described by carcinogenic risk and by chronic (i.e., long duration) and acute (i.e., severe but of short duration) adverse effects on human health. People exposed to TACs at sufficient concentrations and durations may have an increased chance of getting cancer or experiencing other serious health effects. These health effects can include damage to the immune system, as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory, and other health problems (U.S. EPA 2024f).

c. Current Air Quality

The SCAQMD operates a network of air quality monitoring stations throughout the SCAB. The purpose of the monitoring stations is to measure ambient concentrations of pollutants and determine whether ambient air quality meets California and federal standards. The following is a summary of the monitoring stations closest to the Project area.

The monitoring station closest to the Project area in the SCAB is the Reseda monitoring station, located at 18330 Gault Street in Reseda, approximately 12 miles east of the Project area. The Reseda station collected 1-hour and 8-hour O_3, NO_2, and $PM_{2.5}$ concentrations from 2021 to 2023. The Santa Clarita station, located at 22224 Placerita Canyon in Santa Clarita, is approximately 19 miles northeast of the Project area. The Santa Clarita station collected PM_{10} concentrations from 2021 to 2023. No nearby station provides CO concentrations, which is often the case for pollutants for which the area is in attainment with. Attainment with the CAA NAAQS and CAAQS means that a geographic area meets (i.e., does not exceed) the national limits set by the U.S. EPA for certain air pollutants.

Table 4.2-2, below, indicates the number of days that each of the federal and State standards have been exceeded at monitoring stations near the Project area in each of the last three years for which data is available. At these stations, the State 1-hour O_3 standard was exceeded between 2021 and 2023, and the federal 1-hour O_3 standard was exceeded in 2023. In addition, the federal and State 8-hour O_3 standards were exceeded between 2021 and 2023. The PM_{10} State standard was exceeded in 2021, 2022 and 2023, and the $PM_{2.5}$ federal standard was exceeded in 2021 and 2023.

Table 4.2-2 Annual Ambient Air Quality Data from Nearest Monitoring Stations

Pollutant	2021	2022	2023
Ozone (ppm), Worst 1-Hour[1]	0.110	0.110	0.104
Number of days above CAAQS (>0.09 ppm)	4	7	10
Number of days above NAAQS (>0.12 ppm)	0	0	0
Ozone (ppm), Worst 8-Hour Average[1]	0.083	0.096	0.096
Number of days above CAAQS (>0.070 ppm)	31	23	28
Number of days above NAAQS (>0.070 ppm)	31	23	28
Carbon Monoxide (ppm), Highest 8-Hour Average[2]	*	*	*
Number of days above CAAQS or NAAQS (>9.0 ppm)	*	*	*
Nitrogen Dioxide (ppm), Worst 1-Hour[1]	0.054	0.055	0.048
Number of days above CAAQS (>0.180 ppm)	0	0	0
Number of days above NAAQS (>0.100 ppm)	0	0	0
Particulate Matter <10 microns (μg/m^3), Worst 24 Hours[2]	47.1	36.9	41.5
Number of days above CAAQS (>50 μg/m^3)	0	0	0
Number of days above NAAQS (>150 μg/m^3)	0	0	0
Particulate Matter <2.5 microns (μg/m^3), Worst 24 Hours[1]	55.5	20.5	21.9
Number of days above NAAQS (>35 μg/m^3)	9	0	0

ppm = parts per million; μg/m^3 = micrograms per cubic meter; CAAQS = California Ambient Air Quality Standard; NAAQS = National Ambient Air Quality Standard

[1] Data sourced from the CARB at the nearest monitoring station with available data at the Reseda station in Reseda.

[2] Data sourced from the CARB at the nearest monitoring station with available data at the Santa Clarita station in Santa Clarita.

Source: CARB 2024b

d. Sensitive Receptors

Ambient air quality standards have been established to represent the levels of air quality considered sufficient, with a margin of safety, to protect public health and welfare. They are designed to protect the segment of the public most susceptible to respiratory distress, such as children under 14, the elderly (over the age of 65), people engaged in strenuous work or exercise, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, other sensitive receptors include residences, long-term health care facilities, rehabilitation centers, convalescent centers, hospitals, retirement homes, and schools, playgrounds, and childcare centers (SCAQMD 2005).

The Project area, which encompasses all of the City of Agoura Hills, includes each type of sensitive receptors specified by SCAQMD. For the Medea Creek Path, sensitive receptors nearest to the Path consist of single-family residences directly adjacent to the Path's alignment. Additionally, the Agoura High School Connection is located directly adjacent to Agoura High School, which is also considered a sensitive receptor.

4.2.2 Regulatory Setting

a. Federal Regulations

Federal Clean Air Act

The federal and State governments have established ambient air quality standards for the protection of public health. The U.S. EPA is the federal agency designated to administer air quality regulation. The U.S. EPA has set primary National Ambient Air Quality Standards (NAAQS) for O_3, CO, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and Pb. Primary standards are those levels of air quality deemed necessary, with an adequate margin of safety, to protect public health. Table 4.2-3 lists the current federal standards for regulated pollutants.

To derive the NAAQS, the U.S. EPA reviews data from integrated science assessments and risk/exposure assessments to determine the ambient pollutant concentrations at which human health impacts occur, then reduces these concentrations to establish a margin of safety (U.S.EPA 2024h). As a result, human health impacts caused by the air pollutants discussed above may affect people when ambient air pollutant concentrations are at or above the concentrations established by the NAAQS. The closer a region is to attainting a particular NAAQS, the lower the human health impact is from that pollutant (San Joaquin Valley Air Pollution Control District 2015). Accordingly, ambient air pollutant concentrations below the NAAQS are considered to be protective of human health (CARB 2024c and 2024d). The NAAQS and the underlying science that forms the basis of the NAAQS are reviewed every five years to determine whether updates are necessary to continue protecting public health with an adequate margin of safety (U.S. EPA 2015).

The U.S. EPA classifies specific geographic areas as either “attainment” or “nonattainment” areas for each pollutant based on the comparison of measured data with the NAAQS. States are required to adopt enforceable plans, known as a State Implementation Plan (SIP), to achieve and maintain air quality meeting the NAAQS. State plans also must control emissions that drift across state lines and harm air quality in downwind states. If an air basin is not in either federal or State attainment for a particular pollutant, the basin is classified as a nonattainment area for that pollutant. Under the federal and State CAA, once a nonattainment area has achieved the air quality standards for a particular pollutant, it may be redesignated to an attainment area for that pollutant. To be redesignated, the area must meet air quality standards and have a 10-year plan for continuing to meet and maintain air quality standards, as well as satisfy other requirements of the federal CAA. Areas that have been redesignated to attainment are called maintenance areas.

The Project area is within Los Angeles County, which currently exceeds the NAAQS for 8 and 1-hour O_3, $PM_{2.5}$, and Pb. Los Angeles County is classified an attainment/maintenance area under the CAAQS for CO, and attainment for $PM_{2.5}$. Los Angeles County is currently classified as a nonattainment area under the CAAQS for O_3, $PM_{2.5}$, and PM_{10} (CARB 2023).

Table 4.2-3 Federal Ambient Air Quality Standards

Pollutant	NAAQS
Ozone	0.070 ppm (8-hr avg)
Carbon Monoxide	35.0 ppm (1-hr avg) 9.0 ppm (8-hr avg)
Nitrogen Dioxide	0.100 ppm (1-hr avg) 0.053 ppm (annual avg)
Sulfur Dioxide	0.075 ppm (1-hr avg) 0.5 ppm (3-hr avg) 0.14 ppm (24-hr avg) 0.030 ppm (annual avg)
Lead	0.15 μg/m^3 (rolling 3-month avg) 1.5 μg/m^3 (calendar quarter)
Particulate Matter (PM_{10})	150 μg/m^3 (24-hr avg)
Particulate Matter ($PM_{2.5}$)	35 μg/m^3 (24-hr avg) 9 μg/m^3 (annual avg)
Visibility-Reducing Particles	No Federal Standards
Sulfates	No Federal Standards
Hydrogen Sulfide	No Federal Standards
Vinyl Chloride	No Federal Standards

NAAQS = National Ambient Air Quality Standards; ppm = parts per million; avg = average; μg/m^3 = micrograms per cubic meter
Source: U.S EPA 2024g

b. State Regulations

California Clean Air Act

CARB is the state entity designated to administer air quality regulation. CARB has established State-level air quality standards and is responsible for the control of mobile emission sources. Regional-level air quality management districts, including the SCAQMD, provide local management of air quality, while the local air districts are responsible for enforcing standards and regulating stationary sources. California is also divided geographically into 15 air basins, including the SCAB, for managing the air resources of the State on a regional basis.

Under the California CAA, the State has established health-based ambient air quality standards (known as the California Ambient Air Quality Standards), some of which are more stringent than the federal standards. Table 4.2-4, below, lists the current State standards for regulated pollutants. In addition to the federal criteria pollutants, the CAAQS also specify standards for visibility-reducing particles, sulfates, hydrogen sulfide, and vinyl chloride. Similar to the federal CAA, the CCAA classifies specific geographic areas as either “attainment” or “nonattainment” areas for each pollutant, based on the comparison of measured data within the CAAQS.

Table 4.2-4 State Ambient Air Quality Standards

Pollutant	CAAQS
Ozone	0.09 ppm (1-hr avg) 0.070 ppm (8-hr avg)
Carbon Monoxide	20.0 ppm (1-hr avg) 9.0 ppm (8-hr avg)
Nitrogen Dioxide	0.18 ppm (1-hr avg) 0.030 ppm (annual avg)
Sulfur Dioxide	0.25 ppm (1-hr avg) 0.04 ppm (24-hr avg)
Lead	1.5 μg/m^3 (30-day avg)
Particulate Matter (PM_{10})	50 μg/m^3 (24-hr avg) 20 μg/m^3 (annual avg)
Particulate Matter ($PM_{2.5}$)	12 μg/m^3 (annual avg)
Visibility-Reducing Particles	Extinction coefficient of 0.23 per kilometer – visibility of ten miles or more (0.07 - 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape. (8-hr avg)
Sulfates	25 μg/m^3 (24-hr avg)
Hydrogen Sulfide	0.03 ppm (1-hr avg)
Vinyl Chloride	0.01 ppm (24-hr avg)

NAAQS = CAAQS = California Ambient Air Quality Standards; ppm = parts per million; avg = average; μg/m^3 = micrograms per cubic meter

Source: CARB 2024e

State Implementation Plan

The SIP is a collection of documents that set forth a state's strategies for achieving the AAQS. In California, the SIP is a compilation of new and previously submitted plans, programs (such as monitoring, modeling, and permitting), district rules, State regulations, and federal controls. CARB is the lead agency for all purposes related to the SIP under State law. Local air districts and other agencies, such as the Department of Pesticide Regulation and the Bureau of Automotive Repair, prepare SIP elements and submit them to CARB for review and approval. CARB then forwards SIP revisions to the U.S. EPA for approval and publication in the Federal Register. The items included in the California SIP are listed in the Code of Federal Regulations at 40 Code of Federal Regulations 52.220.

As the regional air quality management district, the SCAQMD is responsible for preparing and implementing the portion of the SIP applicable to the portion of the SCAB within its jurisdiction. The air pollution control district for each county adopts rules, regulations, and programs to attain federal and State air quality standards and appropriates money (including permit fees) to achieve these objectives.

California Code of Regulations

The California Code of Regulations is the official compilation and publication of the regulations adopted, amended, or repealed by state agencies pursuant to the Administrative Procedure Act.

They are compiled into Titles and organized into Divisions containing the regulations of state agencies. The following California Code of Regulations would be applicable to the proposed Project:

- **Engine Idling.** In accordance with Section 2485 of Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.
- **Emission Standards.** In accordance with Section 93115 of Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

c. Regional Regulations

South Coast Air Quality Management District 2022 Air Quality Management Plan

To meet the NAAQS and CAAQS, the SCAQMD has adopted a series of air quality management plans (AQMPs), which serve as a regional blueprint to develop and implement an emission reduction strategy that will bring the area into attainment with the standards in a timely manner. The most significant air quality challenge in the SCAB is to reduce NO_X emissions sufficiently to meet the 2037 ozone standard deadline for the non-Coachella Valley portion of the SCAB, as NO_X plays a critical role in the creation of ozone. The 2022 AQMP includes strategies to ensure the SCAQMD does its part to further their ability to meet the 2015 federal ozone standards. The SCAQMD would need to reduce emissions of NO_X by 67 percent beyond what is required by the adopted rules and regulations in 2037 to meet the 2015 federal ozone standard (SCAQMD 2022). The 2022 AQMP builds on the measures already in place from the previous AQMPs and includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technology, best management practices, co-benefits from existing programs, incentives, and other CAA measures to meet the 8-hour O_3 standard. Since NO_X emissions also lead to the formation of $PM_{2.5}$, the NO_X reductions needed to meet the O_3 standards will likewise lead to improvement of $PM_{2.5}$ levels and attainment of annual $PM_{2.5}$ standards (SCAQMD 2017).[2]

The AQMP also incorporates the transportation strategy and transportation control measures from Southern California Association of Governments (SCAG)'s 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Plan (Connect SoCal) (SCAG 2020). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial counties, and addresses regional issues relating to transportation, the economy, community development, and the environment. SCAG coordinates with various air quality and transportation stakeholders in southern California to ensure compliance with the federal and State air quality requirements. Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is required by law to ensure that transportation activities "conform" to, and are supportive of, the goals of regional and State air quality plans to attain the NAAQS. Connect SoCal includes transportation programs, measures, and strategies generally designed to reduce vehicle miles travelled (VMT), which are contained in the AQMP. The SCAQMD combines its portion of the AQMP with those prepared by SCAG (SCAQMD 2022). Connect SoCal and Transportation Control Measures, included as Appendix IV-C of the 2022 AQMP, are based on SCAG's Connect SoCal.

[2] Estimates are based on the inventory and modeling results and are relative to the baseline emission levels for each attainment year (see Final 2016 AQMP for detailed discussion).

The 2022 AQMP forecasts the 2037 emissions inventories ''with growth'' based on SCAG's Connect SoCal. The region is projected to see a 12 percent growth in population, 17 percent growth in housing units, 11 percent growth in employment, and five percent growth in VMT between 2018 and 2037. Despite regional growth in the past, air quality has improved substantially over the years, primarily due to the effects of air quality control programs at the local, State, and federal levels (SCAQMD 2022).

South Coast Air Quality Management District Rules and Regulations

The SCAQMD implements rules and regulations for emissions that may be generated by various uses and activities. The rules and regulations detail pollution-reduction measures that must be implemented during construction and operation of projects. Rules and regulations relevant to the Project include the following:

- **Rule 401 (Visible Emissions):** This rule prohibits the discharge of visible air pollutant emissions from various sources as determined by shade and opacity criteria based on the Ringelmann Chart.
- **Rule 402 (Nuisance):** This rule prohibits the discharge of quantities of air contaminants or other material that causes injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property.
- **Rule 403 (Fugitive Dust Control):** This rule includes various requirements to prevent, reduce, and mitigate the amount of particulate matter entrained in the ambient air from man-made fugitive dust sources.
- **Rule 1113 (Architectural Coatings):** This rule establishes VOC content limits for a variety of architectural coatings, including 50 grams per liter for flat and non-flat coatings.

d. Local Regulations

City of Agoura Hills General Plan 2035

The City of Agoura Hills General Plan 2035 was adopted on March 24, 2010 (updated on August 10, 2022) by the City Council (City of Agoura Hills 2022). The City of Agoura Hills General Plan 2035 is a strategic document designed to guide the physical development of the city until the year 2035. Among other things, the City of Agoura Hills General Plan 2035 sets out the pattern of land uses, including residential, commercial, and industrial. It also establishes the system of streets, bikeways, and trails. The City of Agoura Hills General Plan 2035 addresses a wide variety of subject areas, including housing, traffic, natural resources, land uses, economic development, noise, and public safety.

The City of Agoura Hills General Plan 2035 contains the following goals and policies related to Air Quality, which would apply to the proposed Project.

Goal NR-7. Improvement of the City and the region's air quality.

> **Policy NR-7.1.** Cooperate with the South Coast Air Quality Management District (SCAQMD) and the Southern California Association of Governments (SCAG) in their efforts to implement provisions of the region's Air Quality Management Plan. (Imp NR-20)

Policy NR-7.3. Comply with and promote state and federal legislation that improves vehicle/transportation technology and cleaner fuels. (Imp U-46, NR-20, NR-21)

Policy NR-7.4. Adopt incentives, regulations, and/or procedures to minimize particulate emissions from paved and unpaved roads, parking lots, and building construction. (Imp NR-22, NR-23)

Policy NR-7.5. Minimize pollution exposure of residential uses near the freeway and along major arterials, such as Kanan Road, Agoura Road west of Kanan Road, and Thousand Oaks Boulevard.

Goal M-6 Alternative Transportation. Reduced reliance on single-occupancy vehicle travel and vehicle miles traveled through the provision of alternative travel modes and enhanced system design.

Policy M-6.1. Promote the most efficient use of the City's existing transportation network and encourage the integration of alternative modes into design standards and future improvements. (Imp M-10, M-19, M-34)

Policy M-6.2. Expand the choices of available travel modes to increase the freedom of movement for residents and reduce reliance on the automobile. Ensure that existing and future infrastructure will be adequate for future transportation modes. (Imp M-10, M-19, M-20, M-34)

Policy M-6.3. New roadways and future street improvement projects shall be bicycle- and pedestrian-friendly in design. (Imp M-19)

Policy M-6.4. Enhance bus stops with amenities such as street trees, benches, bus shelters and waste receptacles, public art or other measures. (Imp M-21)

Policy M-6.5. Promote non-motorized transportation through encouragement and education. (Imp M-22)

Policy M-6.6. Identify funding sources and allocate funds, including the potential formation of assessment districts, for pedestrian, bicycle, transit, and streetscape improvements in existing neighborhoods. (Imp M-17)

4.2.3 Impact Analysis

a. Methodology and Significance Thresholds

As discussed in Section 4.0, *Environmental Impact Analysis*, all Project components are analyzed at the programmatic level. Project components include the Bicycle Master Plan (BMP), the VMT Mitigation Exchange and Banking Program (Program), and the General Plan Amendments (Amendments). Projects included within the BMP are grouped into Class I facilities, Class II facilities, Class III facilities, Class IV facilities, and enhanced bicycle treatments, as identified in Section 2.5, *Project Characteristics,* and in Table 1 of Chapter 2, *Project Description.* The impact analysis contained herein provides a programmatic analysis of anticipated impacts for each of the five facility classes, as the individual project impacts associated with each class of facility are expected to be similar. Because the City seeks to prioritize implementation of the Medea Creek Path (Path) and the Agoura High School Connection (Connection), the Path and the Connection have their own subheadings within the Class I Facility impact analysis subsection to provide a more specific assessment of their environmental impacts. Impacts associated with the General Plan Amendments are analyzed within their own subsection.

As discussed in Chapter 2, *Project Description*, the only projects that are currently planned, unfunded, and could potentially be funded by the VMT Mitigation Exchange and Banking Program are those currently included within the Bicycle Master Plan. Therefore, the impact analysis contained herein does not include a subsection for impacts associated with the Program, as the individual project list for the BMP and the Program are identical and impacts associated with the BMP would encompass impacts associated with the Program.

Within the following environmental analysis, impacts associated with each Project component are explicitly identified under the respective heading.

According to Appendix G of the *California Environmental Quality Act* (CEQA) *Guidelines*, impacts related to air quality would be significant if the proposed Project would:

1. Conflict with or obstruct implementation of the applicable air quality plan;
2. Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment under an applicable federal or state ambient air quality standard;
3. Expose sensitive receptors to substantial pollutant concentrations; or,
4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

SCAQMD Significance Thresholds

Project-level significance thresholds established by local air quality management districts set the level at which a project would cause or have a cumulatively considerable contribution to an exceedance of the NAAQS and/or CAAQS. Therefore, if a project's air pollutant emissions exceed the NAAQS and/or CAAQS, the project could cause or contribute to human health impacts.

The SCAQMD recommends quantitative regional significance thresholds for temporary construction activities and long-term project operation in the SCAB. These thresholds, shown in Table 4.2-5, are used to evaluate a project's potential air quality impacts.

Table 4.2-5 SCAQMD Air Quality Significance Thresholds

Pollutant	Construction (pounds per day)	Operation (pounds per day)
NO_x	100	55
VOC	75	55
PM_{10}	150	150
$PM_{2.5}$	55	55
SO_x	150	150
CO	550	550

NO_x = Nitrogen Oxides; VOC = Volatile Organic Compounds; PM_{10} = Particulate Matter with a diameter no more than 10 microns; $PM_{2.5}$ = Particulate Matter with a diameter no more than 2.5 microns; SO_x = Sulfur Oxide; CO = Carbon Monoxide

Source: SCAQMD 2023

Localized Significance Thresholds

In addition to the above regional significance thresholds, the SCAQMD has developed Localized Significance Thresholds (LSTs) in response to the Governing Board's Environmental Justice Enhancement Initiative (1-4), which was prepared to update the *CEQA Air Quality Handbook* (1993). LSTs were devised in response to concern regarding exposure of individuals to criteria pollutants in

local communities and have been developed for NO_X, CO, PM_{10}, and $PM_{2.5}$. LSTs represent the maximum emissions from a project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or State ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in each source receptor area, distance to the sensitive receptor, and project size. LSTs have been developed for emissions within site areas that measure one, two, or five acres. If a site is greater than five acres, SCAQMD recommends a dispersion analysis be performed. Dispersion analyses were performed for the proposed Project as part of the health risk assessment (HRA). LSTs only apply to emissions in a fixed stationary location (such as fugitive dust, equipment exhaust, and operational energy and area sources) and are not applicable to mobile sources, such as cars on a roadway (SCAQMD 2008, 2009).

The Project area is within source receptor area 6 (West San Fernando Valley). SCAQMD provides LST lookup tables for project sites that measure one, two, or five acres. For the Path analysis, the individual project site is approximately 3.4 acres; therefore, the LST analysis uses two-acre LSTs. LSTs are provided for receptors at a distance of 82 feet (25 meters), 164 feet (50 meters), 328 feet (100 meters), 656 (200 meters), 1,640 feet (500 meters) from the Path disturbance boundary to the sensitive receptors. The border of construction activity for the Path would occur adjacent to single-family residences. Therefore, the analysis below uses the LST values for 82 feet (25 meters) to conservatively evaluate emissions. LSTs for construction in source receptor area 6 on a two-acre site with a receptor 82 feet away are shown in Table 4.2-6.

Table 4.2-6 SCAQMD LSTs for Construction and Operation

	Allowable Emissions for a Two-Acre Site in Source Receptor Area-6 for a Receptor 82 Feet Away (pounds per day)
Pollutant	**Construction**
Gradual conversion of NO_X to NO_2	147
CO	644
PM_{10}	6
$PM_{2.5}$	4

NO_x = Nitrogen Oxides; NO_2 = Nitrogen Dioxide; CO = Carbon Monoxide; PM_{10} = Particulate Matter with a diameter no more than 10 microns; $PM_{2.5}$ = Particulate Matter with a diameter no more than 2.5 microns

Source: SCAQMD 2009

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project conflict with or obstruct implementation of the applicable air quality plan?

Impact AQ-1 IMPLEMENTATION OF THE PROPOSED PROJECT WOULD NOT GENERATE POPULATION GROWTH. THEREFORE, THE PROJECT WOULD NOT EXCEED THE GROWTH FORECASTS ON WHICH THE 2022 AQMP IS BASED OR DELAY THE TIMELY ATTAINMENT OF AIR QUALITY STANDARDS. IMPACTS RELATED TO AQMP CONSISTENCY WOULD BE LESS THAN SIGNIFICANT.

Class I Facilities

A project may be inconsistent with the AQMP if it would generate population, housing, or employment growth exceeding forecasts used in the development of the AQMP. The 2022 AQMP, the most recent AQMP adopted by the SCAQMD, incorporates local city general plans and the SCAG's Connect SoCal socioeconomic forecast projections of regional population, housing, and employment growth (SCAQMD 2022, SCAG 2020). [3] Construction of the Class I facilities would not include the development of new residences such that population growth would occur, nor would it include the development of new businesses that could create employment opportunities. Therefore, implementation of the Class I facilities identified within the BMP would not generate population, housing, or employment growth exceeding the SCAG growth forecast for the City of Agoura Hills or other growth forecasts on which the 2022 AQMP is based.

The AQMP also provides strategies and measures to reach attainment with the thresholds for 8-hour and 1-hour ozone and $PM_{2.5}$. Construction of each individual project identified in the BMP would occur separately. The Medea Creek Path, a two-mile bicycle path, is the longest new facility proposed in the BMP, and construction of the Path would result in the largest area of disturbance with the most construction activities. All other facilities included within the BMP would be expected to result in less intensive construction, which would result in similar or lesser emissions than those of the Path. Therefore, to determine the maximum air quality impact associated with construction of any individual project within the Project area, an air quality assessment for construction of the Medea Creek Path was conducted below.

As shown in Table 4.2-7 under Impact AQ-2, construction of the Path would not generate criteria pollutant emissions that would exceed SCAQMD thresholds for ozone precursors (VOC and NO_X) and $PM_{2.5}$. Therefore, it can be conservatively assumed that construction of other Class I facilities would not generate criteria pollutant emissions that would exceed SCAQMD thresholds for ozone precursors (VOC and NO_X) and $PM_{2.5}$. Overall, implementation of Class I facilities would not conflict with or obstruct implementation of the applicable air quality plan. This impact would be less than significant.

MEDEA CREEK PATH

Implementation of the Path, a Class I facility, would not include the development of new residences such that population growth would occur, nor would it include the development of new businesses that could create employment opportunities. Therefore, implementation of the Path would not

[3] On April 4, 2024, SCAG's Regional Council formally adopted the 2024-2050 RTP/SCS (titled Connect SoCal 2024). The SIPs were adopted prior to this date and relies on the demographic and growth forecasts of the 2020-2045 RTP/SCS; therefore, these forecasts are utilized in the analysis of the project's consistency with the AQMP.

generate population, housing, or employment growth exceeding the SCAG growth forecast for the City of Agoura Hills or other growth forecasts on which the 2022 AQMP is based.

Furthermore, as shown in Table 4.2 7 under Impact AQ-2, construction of the Path would not generate criteria pollutant emissions that would exceed SCAQMD thresholds for ozone precursors (VOC and NO_X) and $PM_{2.5}$. Therefore, implementation of the Path would not conflict with or obstruct implementation of the applicable air quality plan. This impact would be less than significant.

AGOURA HIGH SCHOOL CONNECTION

Implementation of the Connection, a Class I facility, would not include the development of new residences such that population growth would occur, nor would it include the development of new businesses that could create employment opportunities. Therefore, implementation of the Connection would not generate population, housing, or employment growth exceeding the SCAG growth forecast for the City of Agoura Hills or other growth forecasts on which the 2022 AQMP is based. Furthermore, based on the air quality assessment for construction of the Medea Creek Path (shown in Table 4.2 7 under Impact AQ-2), it can be conservatively assumed that construction of the Connection would not generate criteria pollutant emissions that would exceed SCAQMD thresholds for ozone precursors (VOC and NOX) and $PM_{2.5}$. Therefore, implementation of the Connection would not conflict with or obstruct implementation of the applicable air quality plan. This impact would be less than significant.

Class II Facilities

Similar to Class I facilities, construction of the Class II facilities would not include the development of new residences such that population growth would occur, nor would it include the development of new businesses that could create employment opportunities. Therefore, implementation of the Class II facilities identified within the BMP would not generate population, housing, or employment growth exceeding the SCAG growth forecast for the City of Agoura Hills or other growth forecasts on which the 2022 AQMP is based. Furthermore, based on the air quality assessment for construction of the Medea Creek Path (shown in Table 4.2 7 under Impact AQ-2), it can be conservatively assumed that construction of Class II facilities would not generate criteria pollutant emissions that would exceed SCAQMD thresholds for ozone precursors (VOC and NO_X) and $PM_{2.5}$. Therefore, implementation of Class II facilities would not conflict with or obstruct implementation of the applicable air quality plan. This impact would be less than significant.

Class III Facilities

Similar to Class I and Class II facilities, construction of the Class III facilities would not include the development of new residences such that population growth would occur, nor would it include the development of new businesses that could create employment opportunities. Therefore, implementation of the Class III facilities identified within the BMP would not generate population, housing, or employment growth exceeding the SCAG growth forecast for the City of Agoura Hills or other growth forecasts on which the 2022 AQMP is based. Furthermore, as based on the air quality assessment for construction of the Medea Creek Path (shown in Table 4.2 7 under Impact AQ-2), it can be conservatively assumed that construction of Class III facilities would not generate criteria pollutant emissions that would exceed SCAQMD thresholds for ozone precursors (VOC and NO_X) and $PM_{2.5}$. Therefore, implementation of Class III facilities would not conflict with or obstruct implementation of the applicable air quality plan. This impact would be less than significant.

Class IV Facilities

Similar to Class I, Class II, and Class III facilities, construction of the Class IV facilities would not include the development of new residences such that population growth would occur, nor would it include the development of new businesses that could create employment opportunities. Therefore, implementation of the Class IV facilities identified within the BMP would not generate population, housing, or employment growth exceeding the SCAG growth forecast for the City of Agoura Hills or other growth forecasts on which the 2022 AQMP is based. Furthermore, based on the air quality assessment for construction of the Medea Creek Path (shown in Table 4.2 7 under Impact AQ-2), it can be conservatively assumed that construction of Class IV facilities would not generate criteria pollutant emissions that would exceed SCAQMD thresholds for ozone precursors (VOC and NO_X) and $PM_{2.5}$. Therefore, implementation of Class IV facilities would not conflict with or obstruct implementation of the applicable air quality plan. This impact would be less than significant.

Enhanced Bicycle Treatments

Similar to Class I-IV facilities, construction of enhanced bicycle treatments would not include the development of new residences such that population growth would occur, nor would it include the development of new businesses that could create employment opportunities. Therefore, implementation of the enhanced bicycle treatments identified within the BMP would not generate population, housing, or employment growth exceeding the SCAG growth forecast for the City of Agoura Hills or other growth forecasts on which the 2022 AQMP is based. Furthermore, based on the air quality assessment for construction of the Medea Creek Path (shown in Table 4.2 7 under Impact AQ-2), it can be conservatively assumed that construction of the enhanced bicycle treatments would not generate criteria pollutant emissions that would exceed SCAQMD thresholds for ozone precursors (VOC and NO_X) and $PM_{2.5}$. Therefore, implementation of the enhanced bicycle treatments would not conflict with or obstruct implementation of the applicable air quality plan. This impact would be less than significant.

General Plan Amendments

As part of the proposed Project, the City must amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. These General Plan Amendments shift the focus from prioritizing automobile mobility to reducing VMT through alternative transportation modes like walking and biking, guided by the BMP. The proposed General Plan Amendments would not encourage new development, result in unanticipated population growth, or update the growth forecasts on which the 2022 AQMP is based. Therefore, the Amendments would be consistent with existing growth forecasts for the City of Agoura Hills and would not conflict with or obstruct implementation of the applicable air quality plan. This impact would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 2:	Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Impact AQ-2 CONSTRUCTION OF THE PROPOSED PROJECT WOULD NOT EXCEED SCAQMD'S REGIONAL THRESHOLDS OF SIGNIFICANCE AND WOULD NOT RESULT IN OPERATIONAL EMISSIONS; THEREFORE, THE PROPOSED PROJECT WOULD NOT RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE REGION IS IN NONATTAINMENT UNDER APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARDS, AND IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Class I Facilities

Construction of each individual project identified in the BMP would occur separately. The Medea Creek Path, a two-mile bicycle path, is the longest new facility proposed in the BMP, and construction of the Path would result in the largest area of disturbance with the most construction activities. All other facilities included within the BMP would be expected to result in less intensive construction, which would result in similar or lesser emissions than those of the Path. Therefore, to determine the maximum air quality impact associated with construction of any individual project within the Project area, an air quality assessment for construction of the Medea Creek Path was conducted below.

As shown in Table 4.2-7 below, construction-related emissions associated with implementation of the Path would not exceed SCAQMD thresholds. Therefore, it can be conservatively assumed that construction of other Class I facilities would also not exceed SCAQMD thresholds, and as such, construction of other Class I facilities would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment under an applicable federal or State ambient air quality standard.

Operation of the Class I facilities would consist of bicycle and pedestrian travel along shared use paths, which would not result in a new source of mobile emissions. Therefore, operation of Class I facilities would not result in additional operational emissions beyond existing conditions. This impact would be less than significant.

MEDEA CREEK PATH

Construction of the Path would generate temporary air pollutant emissions associated with fugitive dust (PM_{10} and $PM_{2.5}$) and exhaust emissions from heavy construction equipment and construction vehicles, in addition to VOC emissions that would be released during the drying of architectural coating and paving phases. Table 4.2-7 summarizes the estimated maximum daily emissions of pollutants during construction of the Path. As shown therein, construction-related emissions would not exceed SCAQMD thresholds. Therefore, construction of the Path would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment under an applicable federal or State ambient air quality standard. This impact would be less than significant.

Table 4.2-7 Medea Creek Path Construction Emissions

	Maximum Daily Emissions (lbs./day)					
Year	**VOC**	**NO_X**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
2026	4	25	32	<1	3	1
SCAQMD Regional Thresholds	75	100	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

lbs/day = pounds per day; VOC = volatile organic compounds; NO_x = nitrogen oxide; CO = carbon monoxide; PM_{10} = particulate matter with a diameter no more than 10 microns; $PM_{2.5}$ = particulate matter with a diameter no more than 2.5 microns; SO_x = sulfur oxide

Notes: Some numbers may not add up precisely due to rounding considerations. Maximum on-site emissions are the highest emissions that would occur on the Project area from on-site sources, such as heavy construction equipment and architectural coatings, and excludes off-site emissions from sources such as construction worker vehicle trips and haul truck trips.

Source: Table 2.2 "Construction Emissions by Year, Unmitigated" emissions. Highest of Summer and Winter emissions results are shown for all emissions. See CalEEMod worksheets in **Appendix B.**

Operation of the Path would consist of bicycle and pedestrian travel along a shared use path, which would not result in a new source of mobile emissions. Therefore, operation of Class I facilities would not result in additional operational emissions beyond existing conditions. This impact would be less than significant.

AGOURA HIGH SCHOOL CONNECTION

Based on the air quality assessment for construction and operation of the Medea Creek Path, it can be conservatively assumed that implementation of the Connection would not exceed SCAQMD thresholds during construction or operation activities. Therefore, the Connection would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment under an applicable federal or State ambient air quality standard. This impact would be less than significant.

Class II Facilities

Based on the air quality assessment for construction and operation of the Medea Creek Path, it can be conservatively assumed that implementation of the Class II facilities would not exceed SCAQMD thresholds during construction or operation activities. Therefore, implementation of the Class II facilities would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment under an applicable federal or State ambient air quality standard. This impact would be less than significant.

Class III Facilities

Based on the air quality assessment for construction and operation of the Medea Creek Path, it can be conservatively assumed that implementation of the Class III facilities would not exceed SCAQMD thresholds during construction or operation activities. Therefore, implementation of the Class III facilities would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment under an applicable federal or State ambient air quality standard. This impact would be less than significant.

Class IV Facilities

Based on the air quality assessment for construction and operation of the Medea Creek Path, it can be conservatively assumed that implementation of the Class IV facilities would not exceed SCAQMD thresholds during construction or operation activities. Therefore, implementation of the Class IV

facilities would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment under an applicable federal or State ambient air quality standard. This impact would be less than significant.

Enhanced Bicycle Treatments

Based on the air quality assessment for construction and operation of the Medea Creek Path, it can be conservatively assumed that implementation of the enhanced bicycle treatments would not exceed SCAQMD thresholds during construction or operation activities. Therefore, implementation of the enhanced bicycle treatments would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment under an applicable federal or State ambient air quality standard. This impact would be less than significant.

General Plan Amendments

As part of the proposed Project, the City must amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. These General Plan Amendments shift the focus from prioritizing automobile mobility to reducing VMT through alternative transportation modes like walking and biking, guided by the BMP. The proposed General Plan Amendments would not result in construction or operation activities beyond existing conditions. Therefore, the Amendments would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment under an applicable federal or State ambient air quality standard. No impact would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 3:	Would the project expose sensitive receptors to substantial pollutant concentrations?

Impact AQ-3 PROJECT CONSTRUCTION WOULD NOT EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL TOXIC AIR CONTAINMENTS. THE PROJECT WOULD NOT INCREASE CARBON MONOXIDE CONCENTRATIONS SUCH THAT IT WOULD CREATE CARBON MONOXIDE HOTSPOTS, AND THE PROJECT IS NOT CONSIDERED A LAND USE THAT WOULD GENERATE SUBSTANTIAL TOXIC AIR CONTAMINANTS EMISSIONS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Class I Facilities

Class I facilities included in the BMP would be constructed in various locations across the City of Agoura Hills near a variety of sensitive receptors, including but not limited to residences and schools. The Medea Creek Path, a two-mile Class I facility, is the longest new facility proposed in the BMP, and construction of the Path would result in the largest area of disturbance with the most construction activities. Sensitive receptors nearest to the Path consist of single-family residences directly adjacent to Path's alignment. All other facilities included within the BMP would be expected to result in less intensive construction, which would result in similar or lesser pollutant concentrations near sensitive receptors than those of the Path. Therefore, to determine the

maximum air quality impact associated with pollutant concentrations of any individual project within the Project area, an air quality assessment for construction of the Medea Creek Path was conducted below.

As shown in Table 4.2-8, construction of the Path would not generate localized construction emissions that would exceed SCAQMD LST thresholds. Therefore, it can be conservatively assumed that construction of other Class I facilities would not generate localized construction emissions that would exceed SCAQMD LST thresholds.

Operation of the Class I facilities would consist of bicycle and pedestrian travel along shared use paths, which would not result in a new source of mobile emissions. Therefore, operation of Class I facilities would not result in additional operational emissions beyond existing conditions, and no impacts related to TACs during operation would occur.

MEDEA CREEK PATH

As discussed under Section 4.1.1, *Setting*, the closest sensitive receptors to the Path are single-family residences that share a property boundary line with the Project area. Localized air quality impacts to sensitive receptors typically result from TACs, which are analyzed through LSTs in the SCAQMD. The construction analysis for the Path assumes the main construction activities would occur on the north side of the Project boundary, which is shared with the nearest residential receptors. Table 4.2-8 summarizes the maximum localized daily construction emissions from Path construction. As shown therein, localized construction emissions would not exceed SCAQMD LST thresholds. Therefore, localized pollutant emissions impacts from Path construction would be less than significant.

Table 4.2-8 Path LST Construction Emissions

	Pollutant (lbs./day)			
Year	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**
Maximum Construction On-site Emissions	25	29	2	1
SCAQMD LST	147	644	6	4
Threshold Exceeded?	**No**	**No**	**No**	**No**

lbs/day = pounds per day; VOC = volatile organic compounds; NO_x = nitrogen oxide; CO = carbon monoxide; PM_{10} = particulate matter with a diameter no more than 10 microns; $PM_{2.5}$ = particulate matter with a diameter no more than 2.5 microns; SO_x = sulfur oxide

Notes: Some numbers may not add up precisely due to rounding considerations. Maximum on-site emissions are the highest emissions that would occur on the Project area from on-site sources, such as heavy construction equipment and architectural coatings, and excludes off-site emissions from sources such as construction worker vehicle trips and haul truck trips

Source: CalEEMod worksheets are provided in **Appendix B**, see Table 3.2 – 3.6 "Overall Construction-mitigated" emissions. Highest of Summer and Winter emissions results are shown for all emissions. The mitigated emissions account for Project sustainability features and/or compliance with specific regulatory standards.

Operation of the Path would consist of bicycle and pedestrian travel along a shared use path, which would not result in a new source of mobile emissions. Therefore, operation of the Path would not result in additional operational emissions beyond existing conditions, and no impacts related to TACs during operation would occur.

AGOURA HIGH SCHOOL CONNECTION

Based on the air quality assessment for construction and operation of the Medea Creek Path, it can be conservatively assumed that implementation of the Connection would not exceed SCAQMD LST thresholds during construction or operation activities. As such, construction and operation of the

Connection would not expose sensitive receptors to substantial TACs. This impact would be less than significant.

Class II Facilities

Based on the air quality assessment for construction and operation of the Medea Creek Path, it can be conservatively assumed that implementation of the Class II facilities would not exceed SCAQMD LST thresholds during construction or operation activities. As such, construction and operation of the Class II facilities would not expose sensitive receptors to substantial TACs. This impact would be less than significant.

Class III Facilities

Based on the air quality assessment for construction and operation of the Medea Creek Path, it can be conservatively assumed that implementation of the Class III facilities would not exceed SCAQMD LST thresholds during construction or operation activities. As such, construction and operation of the Class III facilities would not expose sensitive receptors to substantial TACs. This impact would be less than significant.

Class IV Facilities

Based on the air quality assessment for construction and operation of the Medea Creek Path, it can be conservatively assumed that implementation of the Class IV facilities would not exceed SCAQMD LST thresholds during construction or operation activities. As such, construction and operation of the Class IV facilities would not expose sensitive receptors to substantial TACs. This impact would be less than significant.

Enhanced Bicycle Treatments

Based on the air quality assessment for construction and operation of the Medea Creek Path, it can be conservatively assumed that implementation of the enhanced bicycle treatments would not exceed SCAQMD LST thresholds during construction or operation activities. As such, construction and operation of the enhanced bicycle treatments would not expose sensitive receptors to substantial TACs. This impact would be less than significant.

General Plan Amendments

As part of the proposed Project, the City must amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. These General Plan Amendments shift the focus from prioritizing automobile mobility to reducing VMT through alternative transportation modes like walking and biking, guided by the BMP. The proposed General Plan Amendments would not result in construction or operation activities beyond existing conditions. Therefore, the Amendments would not expose sensitive receptors to substantial TACs. This impact would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 4:	Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Impact AQ-4 THE PROJECT WOULD NOT GENERATE ODORS ADVERSELY AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE DURING CONSTRUCTION OR OPERATION. IMPACTS WOULD BE LESS THAN SIGNIFICANT

Class I Facilities

Construction of each individual project identified in the BMP would occur separately. The Medea Creek Path, a two-mile bicycle path, is the longest new facility proposed in the BMP, and construction of the Path would result in the largest area of disturbance with the most construction activities. All other facilities included within the BMP would be expected to result in less intensive construction, which would result in similar or lesser emissions, including those leading to odors, than those of the Path. Therefore, to determine the maximum air quality impact associated with construction of any individual project within the Project area, an air quality assessment for construction of the Medea Creek Path was conducted.

As identified below, odors emitted during construction activities associated with implementation of the Path would be intermittent and temporary in nature, and would cease upon completion. Furthermore, construction activities for the Path, as well as all other Class I facilities, would be required to comply with SCAQMD Rule 402, which specifies that a person shall not discharge such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public. Therefore, construction of the Path would not result in other emissions (such as those leading to odors) that would adversely affect a substantial number of people, and it can be conservatively assumed that construction of other Class I facilities would also not result in other emissions (such as those leading to odors) that would adversely affect a substantial number of people.

Operation of the Class I facilities would consist of bicycle and pedestrian travel along shared use paths. These activities would not result in a new source of odor emissions beyond existing conditions. Overall, the Class I facilities would not result in other emissions (such as those leading to odors) that would adversely affect a substantial number of people and impacts would be less than significant.

MEDEA CREEK PATH

During construction activities for the Medea Creek Path, use of heavy equipment and other construction vehicles would emit odors associated with engine exhaust, and during idling. These odors would be intermittent and temporary in nature, and would cease upon completion. In addition, construction of the Path would be required to comply with SCAQMD Rule 402, which specifies that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public.

Operation of the Path would consist of bicycle and pedestrian travel along a shared use path. These activities would not result in a new source of odor emissions beyond existing conditions. Overall, the Path would not result in other emissions (such as those leading to odors) that would adversely affect a substantial number of people and impacts would be less than significant.

AGOURA HIGH SCHOOL CONNECTION

Based on the air quality assessment for construction and operation of the Medea Creek Path, it can be conservatively assumed that implementation of the Connection would not result in other emissions (such as those leading to odors) during construction or operation that would adversely affect a substantial number of people. This impact would be less than significant.

Class II Facilities

Based on the air quality assessment for construction and operation of the Medea Creek Path, it can be conservatively assumed that implementation of the Class II facilities would not result in other emissions (such as those leading to odors) during construction or operation that would adversely affect a substantial number of people. This impact would be less than significant.

Class III Facilities

Based on the air quality assessment for construction and operation of the Medea Creek Path, it can be conservatively assumed that implementation of the Class III facilities would not result in other emissions (such as those leading to odors) during construction or operation that would adversely affect a substantial number of people. This impact would be less than significant.

Class IV Facilities

Based on the air quality assessment for construction and operation of the Medea Creek Path, it can be conservatively assumed that implementation of the Class IV facilities would not result in other emissions (such as those leading to odors) during construction or operation that would adversely affect a substantial number of people. This impact would be less than significant.

Enhanced Bicycle Treatments

Based on the air quality assessment for construction and operation of the Medea Creek Path, it can be conservatively assumed that implementation of the enhanced bicycle treatments would not result in other emissions (such as those leading to odors) during construction or operation that would adversely affect a substantial number of people. This impact would be less than significant.

General Plan Amendments

As part of the proposed Project, the City must amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. These General Plan Amendments shift the focus from prioritizing automobile mobility to reducing VMT through alternative transportation modes like walking and biking, guided by the BMP. The proposed General Plan Amendments would not result in construction or operation activities beyond existing conditions. Therefore, the Amendments would not result in other emissions (such as those leading to odors) during construction or operation that would adversely affect a substantial number of people.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.2.4 Cumulative Impacts

The geographic scope for cumulative air quality impacts is the SCAB. SCAB is currently designated as a nonattainment area for federal and State one-hour and eight-hour O_3 standards, State PM_{10} standards, federal 24-hour $PM_{2.5}$ standards, and federal and State annual $PM_{2.5}$ standards. As such, there is an existing adverse effect related to air quality within the SCAB relative to these pollutants.

This cumulative assessment of air quality impacts is based on the SCAQMD's recommendations included in their *CEQA Air Quality Handbook* and *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution* (SCAQMD 2003). Individual projects under the SCAQMD's jurisdiction would cause a cumulatively considerable increase in emissions for which the SCAB is in non-attainment if the individual project exceeds the SCAQMD's recommended thresholds. As identified in Table 3-1, *Cumulative Project List,* in Section 3.4, *Cumulative Development*, there are 11 currently planned and pending projects in the City of Agoura Hills, which would include recreation, residential, commercial, and office uses.

According to SCAQMD, if a project is inconsistent with the 2022 AQMP, it would be considered to result in a cumulatively adverse air quality impact. As identified under Impact AQ-1, the Project would be consistent with the 2022 AQMP. As such, cumulative impacts related to a conflict with an applicable air quality plan would be less than significant.

Cumulative development would generate temporary air quality emissions during construction activities. Each project would be required to comply with SCAQMD's regional criteria pollutant thresholds, which are developed to determine if an individual project would contribute to a cumulative impact within the SCAB (i.e., would an individual project contribute substantial emissions to a pollutant that the basin is in non-attainment for). When considered together, cumulative development could result in a potentially significant cumulative impact related to the net increase of criteria pollutants in the region. As shown in Table 4.2-7, construction of the Path would result in emissions that are well below the SCAQMD regional thresholds, and thus would not contribute to regional emissions during construction such that an air quality standard would be violated. As the Path is the longest new facility proposed in the BMP, and construction of the Path would result in the largest area of disturbance with the most construction activities, all other facilities included within the BMP would be expected to result in less intensive construction, which would result in similar or lesser emissions than those of the Path. Therefore, it can be conservatively assumed that implementation of all other facilities identified within the BMP would also result in emissions that are well below the SCAQMD regional thresholds, and thus would not contribute to regional emissions during construction such that an air quality standard would be violated. Furthermore, implementation of the BMP would not result in additional operational emissions beyond existing conditions because use of the identified bicycle facilities path would not increase vehicle trips, and thus the BMP would not result in a considerable increase of criteria pollutant emissions from mobile sources. Overall, the proposed Project would not considerably contribute to a cumulative impact related to a net increase in criteria pollutants in the SCAB.

Cumulative impacts related to nearby sensitive receptors are generally localized. With respect to localized impacts, the consideration of cumulative construction impacts is limited to particulate matter and cases when projects are constructed simultaneously and located within a few hundred yards of each other because of the short range (distance) of particulate dispersion, especially when compared to gaseous pollutants. Construction activities associated with implementation of the BMP could overlap with construction of some cumulative projects listed in Table 3-1. All cumulative development projects would be required to comply with the same SCAQMD thresholds analyzed

under Impact AQ-3. Nonetheless, cumulative development could result in a potentially significant impact related to exposure of sensitive receptors to substantial particulate matter concentrations. The minimal daily PM_{10} emissions identified under Impact AQ-3, the emissions well below SCAQMD thresholds shown in Table 4.2-7, compliance with SCAQMD thresholds and rules that manage fugitive dust (such as Rule 403), and implementation of standard construction measures, implementation of the BMP would not contribute a considerable amount of pollutants from construction emissions to the regional or local area, nor would implementation of the BMP considerably contribute to a cumulative impact related to exposure of sensitive receptors to substantial pollutant concentrations.

Cumulative impacts related to odors are also generally localized. With respect to localized impacts, the consideration of cumulative odor impacts is limited to cases when projects are constructed simultaneously and located within a few hundred yards of each other because of the short range (distance) of odor dispersion. While the cumulative projects listed in Table 3-1 may emit odors from construction at the same time as the project, these emissions would be short-term and would dissipate rapidly with distance. In addition, the proposed Project is not identified as an odor producing facility nor are there projects included in the cumulative development list that would produce significant odors. Therefore, cumulative impacts related to odors would be less than significant.

4.3 Biological Resources

The analysis in this section considers potential impacts to biological resources. Specifically, this section discusses the environmental and regulatory setting; the criteria used to determine the significance of environmental impacts related to biological resources; and potential impacts related to biological resources that would result from implementation of the proposed Project.

4.3.1 Setting

a. Topography, Soils, and Climate

The Project area encompasses all of the City of Agoura Hills. Topography of the Project area varies from gradual to rugged, steeply sloped terrain, with elevations ranging from approximately 800 feet above mean sea level in Lindero Canyon in the western portion of the Project area to 2,000 feet above mean sea level at Ladyface Mountain in the southern portion of the Project area. Other features include Strawberry Hill, Palo Comado Canyon, Liberty Canyon, and a number of smaller hills, ridgelines, canyons, and Lake Lindero. Soils in the Project area are generally loamy (Soil Survey Staff, Natural Resources Conservation Service, United States [US] Department of Agriculture 2025). The City of Agoura Hills has a Mediterranean climate characterized by warm, dry summers and mild winters. Summer temperatures typically range from the high 50s to mid-70s degrees Fahrenheit, while winter temperatures generally fall between the 40s to 60s degrees Fahrenheit. Average annual rainfall is about 18 inches and historically occurs between November and April.

b. Vegetation and Land Cover Types

Riparian Woodlands

Riparian habitats present within the Project area include southern coast live oak riparian forest, valley foothill riparian, riparian woodlands, riparian scrubs, and riparian seeps and springs. These habitats have high value for wildlife as they provide water, thermal cover, migration corridors, and diverse breeding and feeding opportunities. Riparian woodlands in and near the Project area are generally comprised of oak (*Quercus* spp.), California sycamore (*Platanus racemosa*), cottonwood (*Populus* spp.), and willow (*Salix* spp.) trees. Other species commonly found in the understory include mulefat (*Baccharis salicifolia*), blue elderberry (*Sambucus mexicana*), fragrant sumac (*Rhus aromatica*), poison oak (*Toxicodendron diversilobum*), mugwort (*Artemisia douglasiana*), California rose (*Rosa californica*), and California blackberry (*Rubus ursinus*). Herbs and grasses may include docks (*Rumex* spp.), sedges (*Carex* spp.), rushes (*Juncus* spp.), oats (*Avena* spp.), bromes (*Bromus* spp.), and mustards (e.g., *Brassica, Hirschfeldia, Rapa* spp.). Riparian woodlands within the Project area are found primarily around Medea Creek, Chesebro Creek, and scattered in other small areas throughout the city near drainages and other wetland or aquatic features.

Oak Woodland

Oak woodlands in the Project area include stands dominated by coast live oak (*Quercus agrifolia*) or valley oak (*Quercus lobata*) trees. Coast live oak woodland habitat is typically characterized by coast live oak trees in monotypic stands with an absent to dense understory. California walnut (*Juglans californica*) may be present as a co-dominant tree species in some areas. Typical understory species include shade tolerant shrubs such as blackberry, toyon (*Heteromeles arbutifolia*), and poison oak; and herbaceous plants such as fiesta flower (*Pholistoma auritum*), miner's lettuce (*Claytonia*

perfoliata), and various fern species. Valley oak woodlands typically include an open to continuous, or savannah-like tree canopy dominated by valley oaks. The shrub layer is sparse to open, and the herbaceous layer typically includes a wide range of grasses such as oats and bromes. On drier slopes, where savannas are more common, coast live oak woodland is often intermixed with coastal scrub, grassland, and chapparal communities. Oak woodlands and savannas support the greatest species richness of any vegetation type in the state and are considered important habitats (Barbour et al. 2007). Intact oak woodland habitat in the Project area is limited to Palo Comado Canyon Creek in the northeast and a few isolated stands in the central portion of the city south of Thousand Oaks Boluvard and west of Kanana Road.

Grasslands

Grasslands typically form on deep soils, usually on level terrain, but often dominate local hillsides. The soil moisture can range from moist to almost saturated. Grasslands in the Project area primarily consist of non-native/annual species. Non-native grasslands are typically an introduced plant community containing primarily annual "weedy" species such as wild oats, mustards, and brome. Native species include purple needlegrass (*Stipa pulchra*) and herbaceous wildflowers such as baby blue eyes (*Nemophila menziesii*), lupines (*Lupinus* spp.), owl's clover (*Castilleja exserta*), and blue dicks (*Dichelostemma capitatum*). Grasslands occur in the northeastern corner of the Project area, adjacent to Medea Creek north of Thousand Oaks Boulevard, and in scattered isolated patches in the northwestern, central, and southern portions of the Project area. Non-native grasslands are not classified as sensitive by California Department of Fish and Wildlife (CDFW; CDFW 2025e).

Chaparral

Chaparral is one of the most widespread plant communities in California and is often closely associated with southern coastal scrub occurrences. Chaparral soils are often shallow and rocky with low fertility. Vegetation is typically characterized by dense, needle-leafed or broad-leafed sclerophyllous shrubs and dwarf trees, with little to no understory. Chaparral communities are diverse and can include great variation in the assemblage of shrub species present, including chamise (*Adenostoma fasciculatum*), manzanita (*Arctostaphylos* spp.), ceanothus (*Ceanothus* spp.), laurel sumac (*Malosma laurina*), sticky monkey flower (*Diplacus aurantiacus*), California buckwheat (*Eriogonum fasciculatum*), lemonade berry (*Rhamnus ilicifolia*), oaks, toyon, sage (*Salvia* spp.), yerba santa (*Eriodictyon* spp.), chaparral yucca (*Hesperoyucca whipplei*), and poison oak in locally varying abundances. Chaparral communities are closely associated with fire. Wildfire in chaparral communities is a recurrent event and the plant species that grow in this community are adapted to this regime. This community occurs throughout the southern portion of the Project area south of Agoura Road.

Scrub

Stands of this vegetation community within the Project area are dominated by California sagebrush (*Artemisia californica*), California buckwheat, or coyote brush (*Baccharis pilularis*). Scrub habitat also includes smaller shrub species such as sticky monkey flower and deer weed (*Acmispon glaber*), with annual grasses such as wild oats (*Avena* spp.) and bromes (*Bromus* spp.) or herbs such as redstem filaree (*Erodium cicutatium*) in the opening between shrubs. Although it contains constituents of the chaparral communities, this vegetation type is typically more open and low-lying than the chaparral. Large, intact scrub habitat occurs in the northeastern, northwestern, and southeastern portions of the Project area, with some smaller isolated patches scattered in the Project area. This habitat

integrates with adjacent grassland, chaparral, and oak woodland habitat in some areas, and provides high value for plants and wildlife.

Developed/Disturbed

Developed/disturbed areas include commercial and retail developments, residential buildings, shopping centers, other infrastructure, golf courses, and paved areas with little to no vegetation, including roadways, unpaved gravel or hardpacked dirt. Ornamental landscaping typically associated with developed/disturbed areas includes a variety of non-native plant and tree species and provides limited value for wildlife. Developed/disturbed land occurs throughout the Project area and is not classified as sensitive by CDFW (CDFW 2025e).

c. Drainages, Wetlands, and Aquatic Habitat

The Project area is within the Malibu Creek Watershed (HUC 10-1807010401) and contains four main creeks, Medea, Lindero Canyon, Palo Comado, and Chesebro (US Geological Survey National Hydrography Dataset 2025). Medea Creek flows through the middle of the city, passing through both natural and man-made channels and an open space area. Lindero Canyon Creek flows through a canyon in the northwest part of the city, empties into Lake Lindero, and then reappears just south of Agoura Road, west of Kanan Road. Lake Lindero is an artificial lake in the western portion of the city, primarily surrounded by residences and a public golf course. Palo Comado Creek crosses the northeast section of the city, while Chesebro Creek flows along the north side of Agoura Road between Lewis Road and Medea Creek. In addition to these creeks, many smaller streams throughout the city occasionally carry water. Intermittent streams generally flow during the wetter months, with flow typically influenced by seasonal rainfall patterns. During the rainy season, the creeks can swell significantly, draining surface runoff from surrounding hills and the urban areas above. In drier months, the creeks may dry up or flow more slowly, leaving behind small pools of water in certain areas. This seasonal flow pattern is typical of the region's climate.

Wetlands and aquatic habitat are regarded as important biological resources both because of their rarity in California and because they serve a variety of functional values. The United States Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) illustrates several wetlands and non-wetland waters that occur within the Project area (USFWS 2025c). A general description of each of the classifications that occurs within the Project area is provided below. Of those habitats mapped by the NWI, freshwater emergent wetland and riverine are also mapped by the California Wildlife Habitat Relationships (CDFW 2025e).

Freshwater Emergent Wetlands

Freshwater emergent wetlands include all non-tidal waters dominated by emergent herbaceous plant species, mosses, and/or lichens. Wetlands of this type are also low in salinity. Wetlands which lack vegetation can be included in this class if they are less than 20 acres, do not have an active wave-formed or bedrock shoreline feature, have a low water depth less than 6.6 feet. Freshwater emergent wetlands are characterized by erect, rooted herbaceous hydrophytes.

Dominant vegetation is generally perennial monocots. All emergent wetlands are flooded frequently enough so that the roots of the vegetation prosper in an anaerobic environment. The vegetation may vary in size from small clumps to vast areas covering several kilometers. The acreage of freshwater emergent wetlands in California has decreased dramatically since the turn of the century due to drainage and conversion to other uses, primarily agriculture.

This wetland type can include vernal pools which are seasonal wetlands are small depressions that fill with water during the winter, gradually drying during the spring and becoming completely dry in the summer. These pools are found in only a few places in the world outside of California. Vernal pool vegetation is characterized by herbaceous plants that begin their growth as aquatic or semi-aquatic plants and transition to a dry land environment as the pool dries. Most vernal pool plants are annual herbs.

Freshwater Forested/Shrub Wetlands

These wetlands include non-tidal waters which are dominated by trees and shrubs, with emergent herbaceous plants, mosses, and/or lichens. Wetlands which lack vegetation can be included in this class if they also exhibit the same criteria as described for freshwater emergent wetlands. The vegetation found in freshwater forested/shrub wetlands are generally dominated by woody vegetation such as shrubs and trees. This wetland category also can include riparian habitats.

Freshwater Ponds

Freshwater ponds include non-tidal waters with vegetative cover along its edges such as trees, shrubs, emergent herbaceous plants, mosses, and/or lichens. Freshwater ponds can be man-made or natural and typically consist of an area of standing water with variable amounts of shoreline. These wetlands and deep-water habitats are dominated by plants that grow on or below the surface of the water.

Riverine

Riverine habitats are a riverine system which includes all wetlands and deep-water habitats contained in natural or artificial channels that contain periodically or continuously flowing water. This system may also form a connecting link between two bodies of standing water. Substrates generally consist of rock, cobble, gravel, or sand.

d. Special-Status Species

For the purpose of this Program Environmental Impact Report, special-status species are those plants and animals listed, proposed for listing, or candidates for listing as Threatened or Endangered by the USFW under the federal Endangered Species Act (FESA); those listed or candidates for listing as Rare, Threatened, or Endangered by the CDFW under the California Endangered Species Act (CESA); animals designated as "Fully Protected" by the California Fish and Game Code (CFGC); animals listed as "Species of Special Concern" by the CDFW[1]; species listed on the CDFW Special Animals List (CDFW 2025c) and CDFW Special Vascular Plants, Bryophytes, and Lichens List (CDFW 2025b) with a California Natural Diversity Database (CNDDB) state imperilment status of S1-S3 (CDFW 2025a); plant species with California Native Plant Society (CNPS) California Rare Plant Rank (CRPR) of 1A (presumed extirpated in California and either rare or extinct elsewhere), 1B (Rare or Endangered in California and elsewhere), 2A (Presumed extirpated in California, but more common elsewhere), 2B (Rare or Endangered in California, but more common elsewhere), and 4 (Plants of limited distribution – Watch list) in the Inventory of Rare and Endangered Vascular Plants of

[1] Species of Special Concern is a category used by the CDFW for those species which are considered indicators of regional habitat changes or are considered to be potential future protected species. Species of Special Concern do not have any special legal status except that which may be afforded by the Fish and Game Code. The category is intended by the CDFW for use as a management tool to include these species into special consideration when decisions are made concerning the development of natural lands, and these species are considered sensitive as described under the CEQA Appendix G questions.

California (CNPS 2025)[2]; and species designated as locally important or otherwise protected through ordinance, local policy, or plans.

Queries of the USFWS Information for Planning and Consultation (USFWS 2025a), the CDFW CNDDB (CDFW 2025a), and CNPS Inventory of Rare and Endangered Plants of California (CNPS 2025) were conducted to obtain comprehensive information regarding special-status species considered to have potential to occur within Project area. The evaluation for the potential occurrence of special-status species is based upon known ranges, distribution, habitat preferences for the species, species occurrence records from within the regional vicinity (within five miles) of the Project area, and previous reports for the Project area.

Special-Status Plants and Wildlife

The Project area and regional vicinity are home to several species protected by federal and state agencies, and important plant and animal species can be found in a variety of habitats. 19 special-status plant species and 36 wildlife species are known or have potential to occur within the Project area and its vicinity. The status and habitat requirements of those species are presented in Table 4.3-1 and Table 4.3-2, respectively.

Nesting Birds

Migratory birds protected under the Migratory Bird Treaty Act (MBTA) and the CFGC have potential to nest within and adjacent to a wide range of habitats adjacent to the Project area, including riparian habitat associated with creeks, ornamental vegetation, and adjacent structures (e.g., under bridges and on buildings). Riparian woodlands provide roosting and nesting sites for many birds, particularly raptors.

Table 4.3-1 Special-Status Plant Species Potentially Occurring in the Project Area

Scientific Name	Common Name	Status	Life Form, Habitat Requirements, Bloom Period
Astragalus brauntonii	Braunton's milk-vetch	FE/None 1B.1 G2/S2	Perennial herb. Chaparral, coastal scrub, valley and foothill grassland. Recent burns or disturbed areas; usually on sandstone with carbonate layers. Soil specialist; requires shallow soils to defeat pocket gophers and open areas, preferably on hilltops, saddles or bowls between hills. Elevations: 15-2,100 feet. Blooms Jan-Aug.
Baccharis malibuensis	Malibu baccharis	None/None 1B.1 G1/S1	Perennial deciduous shrub. Chaparral, cismontane woodland, coastal scrub, riparian woodland. In Conejo volcanic substrates, often on exposed roadcuts. Sometimes occupies oak woodland habitat. Elevations: 490-1,000 feet. Blooms Aug.
Calochortus clavatus var. gracilis	slender mariposa-lily	None/None 1B.2 G4T2T3/S2 S3	Perennial bulbiferous herb. Chaparral, coastal scrub, valley and foothill grassland. Shaded foothill canyons; often on grassy slopes within other habitat. Elevations: 1050-3,280 feet. Blooms Mar-Jun(Nov).
Calochortus plummerae	Plummer's mariposa-lily	None/None 4.2 G4/S4	Perennial bulbiferous herb. Chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest, valley and foothill grassland. Granitic, rocky. Elevations: 330-5,580 feet. Blooms May-Jul.

[2] CRPR List 3 species are "review list," and CRPR 4 species are considered "watch list" species. CRPR 3 and 4 species do not typically warrant analysis under CEQA except where they are part of a unique community, from the type locality, or designated as rare or significant by local governments, or where cumulative impacts could result in population–level effects.

Scientific Name	Common Name	Status	Life Form, Habitat Requirements, Bloom Period
Chorizanthe parryi var. fernandina	San Fernando Valley spineflower	None/SE 1B.1 G3T1/S1	Annual herb. Coastal scrub, valley and foothill grassland. Sandy soils. Elevations: 490-4,005 feet. Blooms Apr-Jul.
Deinandra minthornii	Santa Susana tarplant	None/SR 1B.2 G2/S2	Perennial deciduous shrub. Chaparral, coastal scrub. On sandstone outcrops and crevices, in shrubland. Elevations: 920-2,495 feet. Blooms Jul-Nov.
Dudleya cymosa ssp. agourensis	Agoura Hills dudleya	FT/None 1B.2 G5T1/S1	Perennial herb. Chaparral, cismontane woodland. Rocky, volcanic breccia. Elevations: 655-1,640 feet. Blooms May-Jun.
Dudleya cymosa ssp. marcescens	marcescent dudleya	FT/SR 1B.2 G5T2/S2	Perennial herb. Chaparral. On sheer rock surfaces and rocky volcanic cliffs. Elevations: 490-1,705 feet. Blooms Apr-Jul.
Dudleya cymosa ssp. ovatifolia	Santa Monica dudleya	FT/None 1B.1 G5T1/S1	Perennial herb. Chaparral, coastal scrub. In canyons on volcanic or sedimentary substrates; primarily on north-facing slopes. Elevations: 490-5,495 feet. Blooms Mar-Jun.
Dudleya multicaulis	many-stemmed dudleya	None/None 1B.2 G2/S2	Perennial herb. Chaparral, coastal scrub, valley and foothill grassland. In heavy, often clayey soils or grassy slopes. 49-2,592 feet. Blooms Apr-Jul.
Dudleya parva	Conejo dudleya	FT/None 1B.2 G1/S1	Perennial herb. Coastal scrub, valley and foothill grassland. In clay or volcanic soils on rocky slopes and grassy hillsides. 197-1,476 feet. Blooms May-Jun.
Eriogonum crocatum	Conejo buckwheat	None/SR 1B.2 G1/S1	Perennial herb. Chaparral, coastal scrub, valley and foothill grassland. Conejo volcanic outcrops; rocky sites. Elevations: 165-1,905 feet. Blooms Apr-Jul.
Horkelia cuneata var. puberula	mesa horkelia	None/None 1B.1 G4T1/S1	Perennial herb. Chaparral, cismontane woodland, coastal scrub. Sandy or gravelly sites. Elevations: 230-2,660 feet. Blooms Feb-Jul(Sep).
Monardella hypoleuca ssp. hypoleuca	white-veined monardella	None/None 1B.3 G4T3/S3	Perennial herb. Chaparral, cismontane woodland. Dry slopes. Elevations: 165-5,005 feet. Blooms (Apr)May-Aug(Sep-Dec).
Navarretia ojaiensis	Ojai navarretia	None/None 1B.1 G2/S2	Annual herb. Chaparral, coastal scrub, valley and foothill grassland. Openings in shrublands or grasslands. Elevations: 900-2,035 feet. Blooms May-Jul.
Nolina cismontana	chaparral nolina	None/None 1B.2 G3/S3	Perennial evergreen shrub. Chaparral, coastal scrub. Primarily on sandstone and shale substrates; also known from gabbro. Elevations: 460-4,185 feet. Blooms (Mar)May-Jul.
Orcuttia californica	California Orcutt grass	FE/SE 1B.1 G1/S1	Annual herb. Vernal pools. Elevations: 50-2,165 feet. Blooms Apr-Aug.
Pentachaeta lyonii	Lyon's pentachaeta	FE/SE 1B.1 G1/S1	Annual herb. Chaparral, coastal scrub, valley and foothill grassland. Edges of clearings in chaparral, usually at the ecotone between grassland and chaparral or edges of firebreaks. Elevations: 100-2,265 feet. Blooms (Feb)Mar-Aug.

Scientific Name	Common Name	Status	Life Form, Habitat Requirements, Bloom Period
Thysanocarpus conchuliferus	Santa Cruz Island fringepod	FE/None 1B.2 G2?/S2	Annual herb. Chaparral, cismontane woodland. Stony ridges and mossy pockets on the sides of rocks. Elevations: 150-2,150 feet. Blooms Mar-Apr(May).

Status (Federal/State)

FE = Federal Endangered
FT = Federal Threatened
SE = State Endangered
SR = State Rare

Other Statuses

G1 or S1	Critically Imperiled Globally or Subnationally (state)
G2 or S2	Imperiled Globally or Subnationally (state)
G3 or S3	Vulnerable to extirpation or extinction Globally or Subnationally (state)
G4/5 or S4/5	Apparently secure, common and abundant
T1, T2, or T3	Critically Imperiled, Imperiled, or vulnerable subspecies
Range	e.g., S2S3 indicates the rank is somewhere between S2 and S3
? to rank	e.g., S2?; this represents more certainty than S2S3, but less certainty than S2

CRPR (CNPS California Rare Plant Rank)

1B = Rare, Threatened, or Endangered in California and elsewhere
4 = Plants of Limited Distribution (a Watch List)

CRPR Threat Code Extension

.1 = Seriously endangered in California (>80% of occurrences threatened/high degree and immediacy of threat)
.2 = Moderately threatened in California (20-80% of occurrences threatened/moderate degree and immediacy of threat)
.3 = Not very endangered in California (<20% of occurrences threatened)

Sources: CNDDB (CDFW 2025a); USFWS IPaC (2025a); CDFW Special Vascular Plants, Bryophytes, and Lichens List (CDFW 2025b); and CNPS Rare Plant Inventory (2025)

Table 4.3-2 Special-Status Wildlife Species Potentially Occurring in the Project Area

Scientific Name	Common Name	Status	Habitat Requirements
Invertebrates			
Bombus crotchii	Crotch's bumble bee	None/SCE G2/S2	Coastal California east to the Sierra-Cascade crest and south into Mexico. Habitats include open grassland, shrublands, chaparral, desert margins, including Joshua tree and creosote scrub, and semi-urban settings. Food plant genera include *Antirrhinum*, *Amsinckia, Phacelia, Clarkia, Carduus, Dendromecon*, *Eschscholzia*, *Eriogonum,* and *Vicia*.
Bombus pensylvanicus	American bumble bee	None/None G3G4/S2	Long-tongued; forages on a wide variety of flowers including vetches (*Vicia*), clovers (*Trifolium*), thistles (*Cirsium*), sunflowers (*Helianthus*), etc. Nests above ground under long grass or underground. Queens overwinter in rotten wood or underground.
Branchinecta lynchi	vernal pool fairy shrimp	FT/None G3/S3	Endemic to the grasslands of the Central Valley, Central Coast mountains, and South Coast mountains, in astatic rain-filled pools. Inhabit small, clear-water sandstone-depression pools and grassed swale, earth slump, or basalt-flow depression pools.
Danaus plexippus	monarch butterfly	FPT/None G4T1T2Q/S2	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby. Migrating and breeding adults can occur in a wide range of natural and urban habitats if suitable nectar plants are available for feeding. Requires milkweed for breeding.

Scientific Name	Common Name	Status	Habitat Requirements
Euphydryas editha quino	quino checkerspot butterfly	FE/None G4G5T1T2/S1S2	Sunny openings within chaparral and coastal sage shrublands in parts of Riverside and San Diego counties. Hills and mesas near the coast. Need high densities of food plants *Plantago erecta*, *P. insularis*, and *Orthocarpus purpurescens*.
Socalchemmis gertschi	Gertsch's socalchemmis spider	None/None G1/S1	Closed canopy riparian woodland and coastal sage scrub. May occur within urban settings. Known from only two localities in Los Angeles County: Brentwood (type locality) and Topanga Canyon.
Streptocephalus woottoni	Riverside fairy shrimp	FE/None G1G2/S2	Endemic to Western Riverside, Orange, and San Diego counties in areas of tectonic swales/earth slump basins in grassland and coastal sage scrub. Inhabit seasonally astatic pools filled by winter/spring rains. Hatch in warm water later in the season.
Trimerotropis occidentiloides	Santa Monica grasshopper	None/None G2/S2	Found on bare hillsides and along dirt trails in chaparral. Known only from the Santa Monica Mountains.
Amphibians			
Anaxyrus californicus	arroyo toad	FE/None SSC G2G3/S2	Semi-arid regions near washes or intermittent streams, including valley-foothill and desert riparian, desert wash, etc. Rivers with sandy banks, willows, cottonwoods, and sycamores; loose, gravelly areas of streams in drier parts of range.
Rana draytonii	California red-legged frog	FT/None SSC G2G3/S2S3	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby or emergent riparian vegetation. Requires 11-20 weeks of permanent water for larval development. Must have access to estivation habitat.
Spea hammondii	western spadefoot	FPT/None SSC G2G3/S3S4	Occurs primarily in grassland habitats but can be found in valley-foothill hardwood woodlands. Vernal pools are essential for breeding and egg-laying.
Taricha torosa	coast range newt	None/None SSC G4/S4	Coastal drainages from Mendocino County to San Diego County. Lives in terrestrial habitats and will migrate over 1 kilometers to breed in ponds, reservoirs and slow moving streams.
Reptiles			
Actinemys pallida	southwestern pond turtle	FPT/None SSC G2G3/SNR	Permanent or nearly permanent fresh water habitats below 6,000 feet in elevation. Requires basking sites such as partially submerged logs, vegetation mats, or open mud banks. In lower elevations and latitudes, this species may be active at aquatic sites year-round. Uses protected upland terrestrial sites near aquatic sites with appropriate slope aspect and soils for an oviposition site.
Anniella pulchra pulchra	silvery legless lizard	None/None SSC G3G4T3T4Q/S3	Wide variety of upland habitats characterized by sparse vegetation supported by moist, sandy, or loose loamy soils. Soil moisture is essential.
Anniella stebbinsi	Southern California legless lizard	None/None SSC G3/S3	Generally south of the Transverse Range, extending to northwestern Baja California. Occurs in sandy or loose loamy soils under sparse vegetation. Disjunct populations in the Tehachapi and Piute Mountains in Kern County. Variety of habitats; generally in moist, loose soil. They prefer soils with a high moisture content.

Scientific Name	Common Name	Status	Habitat Requirements
Aspidoscelis tigris stejnegeri	coastal whiptail	None/None SSC G5T5/S3	Found in deserts and semi-arid areas with sparse vegetation and open areas. Also found in woodland and riparian areas. Ground may be firm soil, sandy, or rocky.
Diadophis punctatus modestus	San Bernardino ringneck snake	None/None G5T2T3/S2?	Most common in open, relatively rocky areas. Often in somewhat moist microhabitats near intermittent streams. Avoids moving through open or barren areas by restricting movements to areas of surface litter or herbaceous veg.
Phrynosoma blainvillii	coast horned lizard	None/None SSC G4/S4	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes. Open areas for sunning, bushes for cover, patches of loose soil for burial, and abundant supply of ants and other insects.
Thamnophis hammondii	two-striped gartersnake	None/None SSC G4/S3S4	Coastal California from vicinity of Salinas to northwest Baja California. From sea to about 7,000 feet elevation. Highly aquatic, found in or near permanent fresh water. Often along streams with rocky beds and riparian growth.
Thamnophis sirtalis pop. 1	south coast gartersnake	None/None SSC G5T1T2/S1S2	Southern California coastal plain from Ventura County to San Diego County, and from sea level to about 850 meters. Marsh and upland habitats near permanent water with good strips of riparian vegetation.
Birds			
Agelaius tricolor	tricolored blackbird	None/ST SSC G1G2/S2	Highly colonial species, most numerous in Central Valley and vicinity. Largely endemic to California. Requires open water, protected nesting substrate, and foraging area with insect prey within a few kilometers of the colony.
Aquila chrysaetos	golden eagle	None/FP G5/S3	Rolling foothills, mountain areas, sage-juniper flats, and desert. Cliff-walled canyons provide nesting habitat in most parts of range; also, large trees in open areas.
Athene cunicularia	burrowing owl	None/SCE SSC G4/S2	Open, dry annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.
Elanus leucurus	white-tailed kite	None/FP G5/S3S4	Rolling foothills and valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodland. Open grasslands, meadows, or marshes for foraging close to isolated, dense-topped trees for nesting and perching.
Falco peregrinus anatum	American peregrine falcon	FD/SD G4T4/S3S4	Near wetlands, lakes, rivers, or other water; on cliffs, banks, dunes, mounds; also, human-made structures. Nest consists of a scrape or a depression or ledge in an open site.
Polioptila californica californica	coastal California gnatcatcher	FT/None SSC G4G5T3Q/S2	Obligate, permanent resident of coastal sage scrub below 2,500 feet in Southern California. Low, coastal sage scrub in arid washes, on mesas and slopes. Not all areas classified as coastal sage scrub are occupied.
Riparia riparia	bank swallow	None/ST G5/S3	Colonial nester; nests primarily in riparian and other lowland habitats west of the desert. Requires vertical banks/cliffs with fine-textured/sandy soils near streams, rivers, lakes, ocean to dig nesting hole.
Vireo bellii pusillus	least Bell's vireo	FE/SE G5T2/S3	Summer resident of Southern California in low riparian in vicinity of water or in dry river bottoms; below 2000 feet. Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, *Baccharis*, mesquite.

Scientific Name	Common Name	Status	Habitat Requirements
Mammals			
Antrozous pallidus	pallid bat	None/None SSC G4/S3	Deserts, grasslands, shrublands, woodlands and forests. Most common in open, dry habitats with rocky areas for roosting. Roosts must protect bats from high temperatures. Very sensitive to disturbance of roosting sites.
Euderma maculatum	spotted bat	None/None SSC G4/S3	Occupies a wide variety of habitats from arid deserts and grasslands through mixed conifer forests. Feeds over water and along washes. Feeds almost entirely on moths. Needs rock crevices in cliffs or caves for roosting.
Eumops perotis californicus	western mastiff bat	None/None SSC G4G5T4/S3S4	Many open, semi-arid to arid habitats, including conifer and deciduous woodlands, coastal scrub, grasslands, chaparral, etc. Roosts in crevices in cliff faces, high buildings, trees and tunnels.
Lasiurus cinereus	hoary bat	None/None G3G4/S4	Prefers open habitats or habitat mosaics, with access to trees for cover and open areas or habitat edges for feeding. Roosts in dense foliage of medium to large trees. Feeds primarily on moths. Requires water.
Lasiurus frantzii	western red bat	None/None SSC G4/S3	Roosts primarily in trees, 2-40 feet above ground, from sea level up through mixed conifer forests. Prefers habitat edges and mosaics with trees that are protected from above and open below with open areas for foraging.
Macrotus californicus	California leaf-nosed bat	None/None SSC G3G4/S3	Desert riparian, desert wash, desert scrub, desert succulent scrub, alkali scrub and palm oasis habitats. Needs rocky, rugged terrain with mines or caves for roosting.
Myotis ciliolabrum	western small-footed myotis	None/None G5/S3	Wide range of habitats mostly arid wooded and brushy uplands near water. Seeks cover in caves, buildings, mines, and crevices. Prefers open stands in forests and woodlands. Requires drinking water. Feeds on a wide variety of small flying insects.
Taxidea taxus	American badger	None/None SSC G5/S3	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Needs sufficient food, friable soils and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.

Status (Federal/State)

FE = Federal Endangered
FT = Federal Threatened
FPT = Federal Proposed Threatened
FD = Federal Delisted
SE = State Endangered
ST = State Threatened
SCE = State Candidate Endangered
FP = State Fully Protected
SD = State Delisted
SSC = CDFW Species of Special Concern

Other Statuses

G1 or S1	Critically Imperiled Globally or Subnationally (state)
G2 or S2	Imperiled Globally or Subnationally (state)
G3 or S3	Vulnerable to extirpation or extinction Globally or Subnationally (state)
G4/5 or S4/5	Apparently secure, common and abundant
T1, T2, or T3	Critically Imperiled, Imperiled, or vulnerable subspecies
Q	Questionable taxonomy
Range	e.g., S2S3 indicates the rank is somewhere between S2 and S3
? to rank	e.g., S2?; this represents more certainty than S2S3, but less certainty than S2

Sources: CNDDB (CDFW 2025a); CDFW Special Animals List (CDFW 2025c); USFWS IPaC (2025a)

e. Sensitive Natural Communities

Sensitive natural communities are those listed by CDFW due to the rarity of the community in the state or throughout its entire range. Communities are considered sensitive if they have limited distributions, have high wildlife value, include sensitive species, or are particularly susceptible to disturbance. Sensitive plant communities in the CDFW List of Vegetation Alliances and Associations[3] (Natural Communities List) are assigned a conservation status rank (also known as "Rare Rank") based on their sensitivity (CDFW 2025d). Plant communities state status ranks of S1 (critically imperiled), S2 (imperiled), and S3 (vulnerable) are considered sensitive by CDFW. Plant communities are classified based on plant species composition and abundance, as well as the underlying abiotic conditions of the stand, such as slope, aspect, or soil type. Five sensitive natural communities are recorded in the regional vicinity of the Project area (CNDDB 2025a): California Walnut Woodland, Southern Coast Live Oak Riparian Forest, Southern Sycamore Alder Riparian Woodland, Valley Needlegrass Grassland, and Valley Oak Woodland. Southern Coast Live Oak Riparian Forest and Valley Oak Woodland are recorded in Project area and are described below.

Southern Coast Live Oak Riparian Woodland

Southern coast live oak riparian woodland (*Quercus agrifolia* Woodland Alliance) is a riparian woodland dominated by coast live oak. Riparian woodland is used as a general term for woody plant communities found along streams and drainage channels. Physical characteristics of these riparian corridors include moist to saturated soils and water table levels near or at the surface during part of the year. Typical species include woody plants such as alder (*Alnus* sp.), willows (*Salix* sp.), cottonwoods (*Populus* sp.), and California sycamore. Herbaceous plants may include cattails (*Typha* sp.) and currants (*Ribes* sp.). Southern coast live oak riparian woodland occurs in the northeastern portion of the Project area along Palo Comado Creek.

Valley Oak Woodland

Valley oak is typically dominant in this community, or co-dominant in the tree canopy with boxelder maple (*Acer negundo*), white alder (*Alnus rhombifolia*), northern California black walnut (*Juglans hindsii*), California sycamore, Fremont's cottonwood (*Populus fremontii*), coast live oak, Goodding's black willow (*Salix gooddingii*), and arroyo willow (*Salix lasiolepis*). This community is typically found in valley bottoms, lower slopes, and valleys where soils are alluvial or residual. Valley oak woodland occurs in the northeastern portion of the Project area west of Palo Comado Creek and in southeastern portion of the Project area in Liberty Canyon.

f. Designated Critical Habitat

When a species is proposed for listing as endangered or threatened under the Endangered Species Act, the USFWS must consider whether there are areas of habitat believed to be essential to the species' conservation. Those areas may be proposed for designation as critical habitat.

The USFWS Critical Habitat Portal (USFWS 2025b) provides online service for information regarding threatened and endangered species final critical habitat designation across the US. According to the CNDDB and the Critical Habitat Portal, no designated or proposed critical habitat is mapped within

[3] CDFW classifies vegetation at the two finest levels of alliance and association. The alliance is defined by plant species composition, habitat conditions, physiognomy, and diagnostic species; at least one of the diagnostic species is typically found in the uppermost or dominant stratum. The association is the most detailed classification level and reflects more specific characteristics of vegetation such as finer-level differences in species composition, topography, soils, substrate, climate, hydrology, and disturbance regime. Unlike alliances, associations often recognize two or more diagnostic species found in different vegetation layers (Sawyer et al. 2009).

or immediately adjacent to the Project area. Designated critical habitat for four species occurs within five miles of the Project area:

- Lyon's pentachaeta (*Pentachaeta lyonii*), located 0.75 mile to the southwest,
- Braunton's milk-vetch (*Astragalus brauntonii*), located 0.85 mile to the north,
- California red-legged frog (*Rana draytonii*), located 0.95 mile to the northeast, and
- Southern California steelhead Distinct Population Segment; *Oncorhynchus mykiss*) 4.5 miles to the southeast.

g. Significant Ecological Areas

Los Angeles County has designated several Significant Ecological Areas (SEA) throughout the unincorporated portions of the county. SEAs are officially designated areas within the county with irreplaceable biological resources. The SEA Program objective is to conserve genetic and physical diversity within the county by designating biological resource areas that are capable of sustaining themselves into the future.

The City of Agoura Hills has policies and regulations that guide development within the County-designated SEAs. Specifically, the City of Agoura Hills Zoning Ordinance includes provisions to safeguard the SEA from incompatible development, preserve natural landscapes, and uphold the city's environmental quality and aesthetic character, all while restricting development. The ordinance mandates that any new development within the SEA must secure a conditional use permit or architectural review approval before beginning.

Portions of the Santa Monica Mountains SEA are located in the northeastern and southern sections of the Project area (formerly identified as the Santa Monica Mountains SEA #26 and Palo Comado Canyon SEA #12) (Los Angeles County 2025). Small sections of the proposed Project overlap or are adjacent to the SEA.

h. Wildlife Corridors

Wildlife corridors typically connect one large habitat area with another, and while there is no pre-defined size limit or corridor width for such areas, they most often are on the scale of mountain ranges, valleys, or clearly defined ecological situations (i.e., vernal pools). Habitat linkages differ somewhat from wildlife corridors in that they may be identified by the presence of certain resources rather than by areas of linear movement. They may serve as corridors for species, which move from site to site as individuals, but for low-mobility organisms (such as plants, flightless arthropods, amphibians, reptiles, and chaparral birds) they may maintain genetic diversity between larger habitat areas by permitting long-term genetic exchange over a broad area. For these species, population-wide directional movement may be incremental and via a network of overlapping home ranges on a year-to-year basis. For species such as lizards, salamanders, and birds, habitat linkages physically connect separate units of similar habitat value by providing buffer zones or areas of marginal contact.

Linkage zones may extend for many miles between primary habitat areas, and their adequacy for supporting genetic flow often depends upon the combined presence of specific resources, sufficient width (to buffer against adjacent disturbances), and sufficient shelter or cover. Certain specific resources (such as rock outcroppings, vernal pools, or oak trees) may be needed at particular intervals to ensure that slower-moving species are able to traverse the linkage zone. For highly mobile or flying organisms, habitat linkages may consist of a series of discontinuous patches of

suitable resources, spaced sufficiently close together to permit movement along a route in a short period of time. The "landscape linkage" concept includes habitat linkages intended to serve this purpose.

Natural movement corridors and habitat linkages have been the focus of numerous studies intended to better understand relationships between animal populations, open space reserves, and natural movement patterns. The California Essential Habitat Connectivity Project (Spencer et al. 2010) was commissioned by the California Department of Transportation and CDFW to study the functional network of connected wildlands in California as these corridors are essential to the continued support of California's diverse natural communities in the face of human development and climate change. The report examines large, relatively natural habitat blocks that support native biodiversity (Natural Landscape Blocks) and areas essential for ecological connectivity between them (Essential Connectivity Areas).

Several small natural landscape blocks occur within the Project area along portions of creeks and where green spaces have been established. Portions of the eastern Project area overlap with a California Essential Connectivity Area that is generally associated with the area between Palo Comado and Cheseboro canyons (CDFW 2025f). Roads are a major barrier to wildlife movement, particularly small animals, with the effect of a road dependent on its design, width, traffic volume, and speed. Roads frequently force animals into specified small-scale "chokepoints" where passage may occur, such as via culvert systems under major freeways. The urban development of the Project area restricts wildlife movement, as does the U.S. Highway 101 (Ventura Freeway) itself. The primary "chokepoints" or movement pathways within the Project area include Medea Creek and Chesebro Creek, which run underneath the Ventura Freeway.

4.3.2 Regulatory Setting

a. Federal Regulations

Federal Endangered Species Act

The USFWS and National Marine Fisheries Service (NMFS) share responsibility for implementing the FESA. Generally, the USFWS implements the FESA for terrestrial and freshwater species, while the NMFS implements the FESA for marine and anadromous species. Projects that would result in "take" of any threatened or endangered animal species, or a threatened or endangered plant species if occurring on federal land, are required to obtain permits from the USFWS or NMFS through either Section 7 (interagency consultation with a federal nexus) or Section 10 (Habitat Conservation Plan) of the FESA, depending on the involvement by the federal government in funding, authorizing, or carrying out the project. The permitting process is used to determine if a project would jeopardize the continued existence of a listed species and what measures would be required to avoid jeopardizing the species. "Take" under federal definition means to harass, harm (which includes habitat modification), pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Proposed or candidate species do not have the full protection of the FESA; however, the USFWS and NMFS advise project applicants that they could be elevated to listed status at any time.

Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act prohibits anyone, without a permit issued by the USFWS, from "taking" bald or golden eagles, including their parts (such as feathers), nests, or eggs. The Act

provides criminal penalties for persons who "take, possess, sell, purchase, barter, offer to sell, purchase or barter, transport, export or import, at any time or any manner, any bald eagle ... [or any golden eagle], alive or dead, or any part, nest, or egg thereof." The Act defines "take" as "pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb."

"Disturb" means “to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, 2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or 3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior."

In addition to immediate impacts, this definition also covers impacts that result from human-induced alterations initiated around a previously used nest site during a time when eagles are not present, if, upon the eagle's return, such alterations agitate or bother an eagle to a degree that interferes with or interrupts normal breeding, feeding, or sheltering habits, and causes injury, death or nest abandonment.

Migratory Bird Treaty Act

The MBTA of 1918 implements four international conservation treaties that the US entered into with Canada in 1916, Mexico in 1936, Japan in 1972, and Russia in 1976. It is intended to ensure the sustainability of populations of all protected migratory bird species. The law has been amended with the signing of each treaty, as well as when any of the treaties were amended, such as with Mexico in 1976 and Canada in 1995. The MBTA prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the USFWS.

The list of migratory bird species protected by the law, in regulations at 50 Code of Federal Regulations (CFR) Part 10.13, is primarily based on bird families and species included in the four international treaties. A migratory bird species is included on the list if it meets one or more of the following criteria:

1. It occurs in the United States or US territories as the result of natural biological or ecological processes and is currently, or was previously listed as, a species or part of a family protected by one of the four international treaties or their amendments.
2. Revised taxonomy results in it being newly split from a species that was previously on the list, and the new species occurs in the United States or US territories as the result of natural biological or ecological processes.
3. New evidence exists for its natural occurrence in the United States or US territories resulting from natural distributional changes and the species occurs in a protected family.

In 2004, the Migratory Bird Treaty Reform Act limited the scope of the MBTA by stating the MBTA applies only to migratory bird species that are native to the US or US territories, and that a native migratory bird species is one that is present as a result of natural biological or ecological processes. The MBTA requires the USFWS to publish a list of all nonnative, human-introduced bird species to which the MBTA does not apply, and an updated list was published in 2020. The 2020 update identifies species belonging to biological families referred to in treaties the MBTA implements but are not protected because their presence in the US or US territories is solely the result of intentional or unintentional human-assisted introductions.

Clean Water Act Section 404

Congress enacted the Clean Water Act (CWA) "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." Section 404 of the CWA authorizes the Secretary of the Army, acting through the USACE, to issue permits regulating the discharge of dredged or fill materials into the "navigable waters at specified disposal sites."

Section 502 of the CWA further defines "navigable waters" as "waters of the United States, including the territorial seas." "Waters of the United States" are broadly defined at 33 CFR Part 328.3 to include navigable, tidal, and interstate waters and certain impoundments, tributaries, and wetlands. The agencies' most recent regulatory definition of the term was promulgated in January 2023, following failed attempts in prior years that had been frustrated by legal challenges. However, in May 2023 the U.S. Supreme Court issued its ruling in *Sackett v. Environmental Protection Agency*, which invalidated portions of the updated regulations. To address this ruling, in September 2023 the agencies issued a "conforming rule" (88 Federal Register [FR] 61964-61969) modifying their definition of "waters of the United States" to comport with the Court's ruling. This definition is described in detail below.

Waters of the U.S.

Current USACE and U.S. EPA regulations, reflecting of the January 2023 definition as modified by the September 2023 Conforming Rule, define "waters of the United States" as follows (33 CFR 328.3; see also 88 FR 61964-61969):

(1) Waters which are:
  (i) Currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;
  (ii) The territorial seas; or
  (iii) Interstate waters;

(2) Impoundments of waters otherwise defined as waters of the United States under this definition, other than impoundments of waters identified under paragraph (a)(5) of this section;

(3) Tributaries of waters identified in paragraph (a)(1) or (2) of this section that are relatively permanent, standing or continuously flowing bodies of water;

(4) Wetlands adjacent to the following waters:
  (i) Waters identified in paragraph (a)(1) of this section; or
  (ii) Relatively permanent, standing or continuously flowing bodies of water identified in paragraph (a)(2) or (a)(3) of this section and with a continuous surface connection to those waters;

(5) Intrastate lakes and ponds, not identified in paragraphs (a)(1) through (4) of this section that are relatively permanent, standing or continuously flowing bodies of water with a continuous surface connection to the waters identified in paragraph (a)(1) or (a)(3) of this section.

The definition specifies that the following features are not "waters of the United States" even where they otherwise meet the terms of provisions (2) through (5) above:

(1) Waste treatment systems, including treatment ponds or lagoons, designed to meet the requirements of the Clean Water Act;

(2) Prior converted cropland designated by the Secretary of Agriculture. The exclusion would cease upon a change of use, which means that the area is no longer available for the production of agricultural commodities. Notwithstanding the determination of an area's status as prior converted cropland by any other Federal agency, for the purposes of the Clean Water Act, the final authority regarding Clean Water Act jurisdiction remains with EPA;

(3) Ditches (including roadside ditches) excavated wholly in and draining only dry land and that do not carry a relatively permanent flow of water;

(4) Artificially irrigated areas that would revert to dry land if the irrigation ceased;

(5) Artificial lakes or ponds created by excavating or diking dry land to collect and retain water and which are used exclusively for such purposes as stock watering, irrigation, settling basins, or rice growing;

(6) Artificial reflecting or swimming pools or other small ornamental bodies of water created by excavating or diking dry land to retain water for primarily aesthetic reasons;

(7) Waterfilled depressions created in dry land incidental to construction activity and pits excavated in dry land for the purpose of obtaining fill, sand, or gravel unless and until the construction or excavation operation is abandoned and the resulting body of water meets the definition of waters of the United States; and

(8) Swales and erosional features (e.g., gullies, small washes) characterized by low volume, infrequent, or short duration flow.

The lateral limits of USACE jurisdiction in non-tidal waters is defined by the "ordinary high-water mark" (OHWM) unless adjacent wetlands are present. The OHWM is a line on the shore or edge of a channel established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed upon the bank, shelving, changes in the character of soil, destruction of vegetation, or the presence of debris (33 CFR 328.3(c)(1)). As such, waters are recognized in the field by the presence of a defined watercourse with appropriate physical and topographic features. If wetlands occur within, or adjacent to, waters of the United States, the lateral limits of USACE jurisdiction extend beyond the OHWM to the outer edge of the wetlands (33 CFR 328.4 (c)). The upstream limit of jurisdiction in the absence of adjacent wetlands is the point beyond which the OHWM is no longer perceptible (33 CFR 328.4; see also 51 FR 41217).

Wetlands

The USACE defines wetlands as “those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions” (33 CFR 328.3(c)(1)). The USACE’s delineation procedures identify wetlands in the field based on indicators of three wetland parameters: hydrophytic vegetation, hydric soils, and wetland hydrology. The following is a discussion of each of these parameters.

HYDROPHYTIC VEGETATION

Hydrophytic vegetation dominates areas where frequency and duration of inundation or soil saturation exerts a controlling influence on the plant species present. Plant species are assigned wetland indicator status according to the probability of their occurring in wetlands. More than fifty

percent of the dominant plant species must have a wetland indicator status to meet the hydrophytic vegetation criterion. The USACE published the National Wetland Plant List (USACE 2018), which separates vascular plants into the following four basic categories based on plant species frequency of occurrence in wetlands:

- **Obligate Wetland (OBL:** Almost always occur in wetlands.
- **Facultative Wetland (FACW):** Usually occur in wetlands, but occasionally found in non-wetlands.
- **Facultative (FAC):** Occur in wetlands or non-wetlands.
- **Facultative Upland (FACU):** Usually occur in non-wetlands, but may occur in wetlands.
- **Obligate Upland (UPL):** Almost never occur in wetlands.

The USACE considers OBL, FACW and FAC species to be indicators of wetlands. An area is considered to have hydrophytic vegetation when greater than 50 percent of the dominant species in each vegetative stratum (tree, shrub, and herb) fall within these categories. Any species not appearing on the United States Fish and Wildlife Service's list is assumed to be an upland species, almost never occurring in wetlands. In addition, an area needs to contain at least 5% vegetative cover to be considered as a vegetated wetland.

HYDRIC SOILS

Hydric soils are saturated or inundated for a sufficient duration during the growing season to develop anaerobic or reducing conditions that favor the growth and regeneration of hydrophytic vegetation. Field indicators of wetland soils include observations of ponding, inundation, saturation, dark (low chroma) soil colors, bright mottles (concentrations of oxidized minerals such as iron), gleying (indicates reducing conditions by a blue-grey color), or accumulation of organic material. Additional supporting information includes documentation of soil as hydric or reference to wet conditions in the local soils survey, both of which must be verified in the field.

WETLAND HYDROLOGY

Wetland hydrology is inundation or soil saturation with a frequency and duration long enough to cause the development of hydric soils and plant communities dominated by hydrophytic vegetation. If direct observation of wetland hydrology is not possible (as in seasonal wetlands), or records of wetland hydrology are not available (such as stream gauges), assessment of wetland hydrology is frequently supported by field indicators, such as water marks, drift lines, sediment deposits, or drainage patterns in wetlands.

Sackett v. U.S. EPA Supreme Court Decision

On May 25, 2023, the Supreme Court issued its decision on the petition from the Sacketts, a family in Idaho that was subject to a compliance order from the U.S. EPA for backfilling their lot near Priest Lake, which the U.S. EPA claimed contained federally regulated wetlands. The wetlands in question were adjacent to a ditch that fed a creek that ultimately drained into Priest Lake, a navigable water body. The U.S. EPA asserted that the Sacketts had violated the law by filling the wetlands on their property without a permit. The Court's decision addressed controversy over whether, and under what conditions, the CWA reaches navigable waters' tributaries or adjacent wetlands. The Supreme Court's decision in *Sackett* provides definitive guidance to the agencies in determining the limits of

their Clean Water Act authority. Major tenets of the decision have been incorporated into the agencies' current regulations through the September 2023 Conforming Rule.

The Court decided:

- "Adjacent wetlands" are WOTUS only if there is a continuous surface connection between the wetland and a navigable or relatively permanent water body, such that it is difficult to determine the boundary between the wetland and the water body. The opinion notes that "temporary interruptions to surface connection may sometimes occur because of phenomena like low tides or dry spells." The agencies addressed this element by defining the term "adjacent" to mean "having a continuous surface connection" in the Conforming Rule.
- The Significant Nexus Standard, introduced by the Court in prior decisions, is not mentioned in the Clean Water Act and should not be used. The Court determined that the standard applies ecological factors whose use in determining jurisdiction is not supported by the statute. The Conforming Rule removed significant nexus considerations from the definition.
- Although jurisdiction over tributaries was not addressed by the Court, the decision stated that "…the [Clean Water Act's] use of "waters" encompasses only those relatively permanent, standing or continuously flowing bodies of water forming geographical features that are described in ordinary parlance as streams, oceans, rivers, and lakes." The Conforming Rule makes clear that only relatively permanent tributaries qualify as "waters of the United States."

Rivers and Harbors Act Section 10

Section 10 of the Rivers and Harbors Act of 1899 requires authorization from the USACE for the construction of any structure in or over any navigable water of the United States. Structures or work outside the limits defined for navigable waters of the United States require a Section 10 permit if the structure or work affects the course, location, or condition of the water body. The law applies to any dredging or disposal of dredged materials, excavation, filling, re-channelization, or any other modification of a navigable water of the United States, and applies to all structures and work. It further includes, without limitation, any wharf, dolphin, weir, boom breakwater, jetty, groin, bank protection (e.g. riprap, revetment, bulkhead), mooring structures such as pilings, aerial or subaqueous power transmission lines, intake or outfall pipes, permanently moored floating vessel, tunnel, artificial canal, boat ramp, aids to navigation, and any other permanent, or semi-permanent obstacle or obstruction. It is important to note that Section 10 applies only to navigable waters, and thus does not apply to work in non-navigable wetlands or tributaries. In some cases, Section 10 authorization is issued by the USACE concurrently with CWA Section 404 authorization, such as when certain Nationwide Permits are used.

a. State Regulations

California Endangered Species Act

The CESA (CFGC Section 2050 et. seq.) prohibits take of state listed threatened or endangered. Take under CESA is defined as "Hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill" (CFGC sec. 86). This definition does not prohibit indirect harm by way of habitat modification, except where such harm is the proximate cause of death of a listed species. Where incidental take would occur during construction or other lawful activities, CESA allows the CDFW to issue an Incidental Take Permit upon finding, among other requirements, that impacts to the species have been minimized and fully mitigated. Unlike the FESA, CESA's protections extend to

candidate species during the period (typically one year) while the California Fish and Game Commission decides whether the species warrants CESA listing.

Special-status wildlife species are those species included on the CDFW "Special Animals" list (CDFW 2020). "Special Animal" is a general term that refers to all of the taxa the CNDDB is interested in tracking, regardless of their legal or protection status. The CDFW considers the taxa on this list to be those of greatest conservation need. The species on this list generally fall into one or more of the following categories:

- Officially listed or proposed for listing under the CESA and/or FESA;
- State or federal candidate for possible listing;
- Taxa that meet the criteria for listing, even if not currently included on any list, as described in *California Environmental Quality Act* (CEQA) *Guidelines* Section 1538;
- Taxa considered by the CDFW to be a Species of Special Concern;
- Taxa that are biologically rare, very restricted in distribution, declining throughout their range, or have a critical vulnerable stage in their life cycle that warrants monitoring; or,
- Populations in California that may be on the periphery of a taxon's range but are threatened with extirpation in California.

Native Plant Protection Act

The CDFW also has authority to administer the Native Plant Protection Act (NPPA) (CFGC Section 1900 et seq.). The NPPA requires the CDFW to establish criteria for determining if a species, subspecies, or variety of native plant is endangered or rare, and prohibits the take of listed plant species. Effective in 2015, CDFW promulgated regulations (14 California Code of Regulations [CCR] 786.9) under the authority of the NPPA, establishing that the CESA's permitting procedures would be applied to plants listed under the NPPA as "Rare." With this change, there is little practical difference for the regulated public between plants listed under CESA and those listed under the NPPA.

Fully Protected Species Laws

The CDFW enforces Sections 3511, 4700, 5050, and 5515 of the CFGC, which prohibit take of species designated as Fully Protected. The CDFW is not allowed to issue an Incidental Take Permit for Fully Protected species; therefore, impacts to these species must be avoided. The exception is situations where a Natural Community Conservation Plan is in place that authorizes take of the fully protected species.

Avian Protection Laws

The CFGC sections 3503, 3503.5, and 3513 describe unlawful take, possession, or destruction of native birds, nests, and eggs. Section 3503.5 of the CFGC protects all birds-of-prey and their eggs and nests against take, possession, or destruction of nests or eggs. Section 3513 makes it a state-level offense to take any bird in violation of the MBTA.

Protection of Lakes and Streambeds

The CFGC Section 1602 states that it is unlawful for any person to "substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake" without first notifying the CDFW of that activity. Thereafter, if CDFW

determines and informs the entity that the activity will not substantially adversely affect any existing fish or wildlife resources, the entity may commence the activity. If, however, CDFW determines that the activity may substantially adversely affect an existing fish or wildlife resource, the entity may be required to obtain from CDFW a Streambed Alteration Agreement (SAA), which will include reasonable measures necessary to protect the affected resource(s), before the entity may conduct the activity described in the notification. Upon receiving a complete Notification of Lake/Streambed Alteration, CDFW has 60 days to present the entity with a draft SAA. Upon review of the draft SAA by the applicant, any problematic terms are negotiated with CDFW, and a final SAA is executed.

The CDFW has not defined the term "stream" for the purposes of implementing its regulatory program under Section 1602, and the agency has not promulgated regulations directing how jurisdictional streambeds may be identified, or how their limits should be delineated. However, four relevant sources of information offer insight as to the appropriate limits of CDFW jurisdiction as discussed below.

- **The plain language of Section 1602 of CFGC** establishes the following general concepts:
  - References "river," "stream," and "lake"
  - References "natural flow"
  - References "bed," "bank," and "channel"
- **Applicable court decisions**, in particular *Rutherford v. State of California* (188 Cal App. 3d 1276 (1987), which interpreted Section 1602's use of "stream" to be as defined in common law. The Court indicated that a "stream" is commonly understood to:
  - Have a source and a terminus
  - Have banks and a channel
  - Convey flow at least periodically, but need not flow continuously and may at times appear outwardly dry
  - Represent the depression between the banks worn by the regular and usual flow of the water
  - Include the area between the opposing banks measured from the foot of the banks from the top of the water at its ordinary stage, including intervening sand bars
  - Include the land that is covered by the water in its ordinary low stage
  - Include lands below the OHWM
- **CDFW regulations** defining "stream" for other purposes, including sport fishing (14 CCR 1.72) and streambed alterations associated with cannabis production (14 CCR 722(c)(21)), which indicate that a stream:
  - Flows at least periodically or intermittently
  - Flows through a bed or channel having banks
  - Supports fish or aquatic life
  - Can be dry for a period of time
  - Includes watercourses where surface or subsurface flow supports or has supported riparian vegetation

- **Guidance documents**, *including A Field Guide to Lake and Streambed Alteration Agreements* (California Department of Fish and Game 1994) and *Methods to Describe and Delineate Episodic Stream Processes on Arid Landscapes for Permitting Utility-Scale Solar Power Plants* (Brady and Vyverberg 2013), which suggest the following:
  - A stream may flow perennially or episodically
  - A stream is defined by the course in which water currently flows, or has flowed during the historic hydrologic course regime (approximately the last 200 years)
  - Width of a stream course can reasonably be identified by physical or biological indicators
  - A stream may have one or more channels (single thread vs. compound form)
  - Features such as braided channels, low-flow channels, active channels, banks associated with secondary channels, floodplains, islands, and stream-associated vegetation, are interconnected parts of the watercourse
  - Canals, aqueducts, irrigation ditches, and other means of water conveyance can be considered streams if they support aquatic life, riparian vegetation, or stream-dependent terrestrial wildlife
  - Biologic components of a stream may include aquatic and riparian vegetation, all aquatic animals including fish, amphibians, reptiles, invertebrates, and terrestrial species which derive benefits from the stream system
  - The lateral extent of a stream can be measured in different ways depending on the particular situation and the type of fish or wildlife resource at risk

The tenets listed above, among others, are applied to establish the boundaries of streambeds in various environments. Importance of each factor may be weighted based on site-specific considerations and the applicability of the indicators to the streambed at hand.

Clean Water Act Section 401

Section 401 of the CWA requires an applicant requesting a federal license or permit for an activity that may result in any discharge into navigable waters (such as a Section 404 Permit) to provide state certification that the proposed activity will not violate state and federal water quality standards. In California, CWA Section 401 Water Quality Certification (Section 401 Certification) is issued by the RWQCBs and by the SWRCB for multi-region projects. The process begins when an applicant requests a pre-application meeting with the RWQCB, waits no less than 30 days, and then submits an application to the RWQCB and informs the USACE (or the applicable agency from which a license or permit was requested) that an application has been submitted. The USACE will then determine a "reasonable period of time" for the RWQCB to act on the application; this is typically 60 days for routine projects and longer for complex projects but may not exceed one year. Under current regulations, once initiated, the reasonable period of time cannot be stopped or paused. When the period has elapsed, if the RWQCB has not either issued or denied the application for Section 401 Certification, the USACE may determine that Certification has been waived and issue the requested permit. If a Section 401 Certification is issued it may include binding conditions, imposed either through the Certification itself or through the requested federal license or permit.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (Porter-Cologne Act) is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water

quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and ground water and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (California Water Code section 13000 et seq.), the policy of the State is as follows:

- The quality of all the waters of the State shall be protected
- All activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason
- The State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the State from degradation

The Porter-Cologne Act established nine RWQCBs (based on watershed boundaries) and the SWRCB, which are charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The SWRCB provides program guidance and oversight, allocates funds, and reviews RWQCB decisions. In addition, the SWRCB allocates rights to the use of surface water. The RWQCBs have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrologic regions. The SWRCB and RWQCBs have numerous nonpoint source related responsibilities, including monitoring and assessment, planning, financial assistance, and management.

Section 13260 of the Porter-Cologne Act requires any person discharging or proposing to discharge waste that could affect the quality of waters of the State to file a Report of Waste Discharge with the appropriate RWQCB. The RWQCB may then authorize the discharge, subject to conditions, by issuing Waste Discharge Requirements (WDRs). While this requirement was historically applied primarily to outfalls and similar point source discharges, the SWRCB's State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State, effective May 2020, make it clear that the agency will apply the Porter-Cologne Act's requirements to discharges of dredge and fill material as well. The Procedures state that they are to be used in issuing CWA Section 401 Certifications and WDRs, and largely mirror the existing review requirements for CWA Section 404 Permits and Section 401 Certifications, incorporating most elements of the U.S. EPA's Section 404(b)(1) Guidelines. Following issuance of the Procedures, the SWRCB produced a consolidated application form for dredge/fill discharges that can be used to obtain a CWA Section 401 Water Quality Certification, WDRs, or both.

Non-Wetland Waters of the State

The SWRCB and RWQCBs have not established regulations for field determinations of waters of the state except for wetlands currently. In many cases the RWQCBs interpret the limits of waters of the State to be bounded by the OHWM unless isolated conditions or ephemeral waters are present. However, in the absence of statewide guidance each RWQCB may interpret jurisdictional boundaries within their region and the SWRCB has encouraged applicants to confirm jurisdictional limits with their RWQCB before submitting applications. As determined by the RWQCB, waters of the State may include riparian areas or other locations outside the OHWM, leading to a larger jurisdictional area over a given water body compared to the USACE.

Wetland Waters of the State

Procedures for defining wetland waters of the State pursuant to the SWRCB's *State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State* went into effect May 28, 2020. The SWRCB defines an area as wetland if, under normal circumstances:

1) the area has continuous or recurrent saturation of the upper substrate caused by groundwater, or shallow surface water, or both;
2) the duration of such saturation is sufficient to cause anaerobic conditions in the upper substrate; and
3) the area's vegetation is dominated by hydrophytes or the area lacks vegetation.

The SWRCB's Implementation Guidance for the Wetland Definition and Procedures for Discharges of Dredge and Fill Material to Waters of the State (2020), states that waters of the U.S. and waters of the State should be delineated using the standard USACE delineation procedures, taking into consideration that the methods shall be modified only to allow for the fact that a lack of vegetation does not preclude an area from meeting the definition of a wetland.

b. Regional and Local Regulations

County of Los Angeles Significant Ecological Area Ordinance

The County SEA Ordinance (No. 2019-0072; County Code Title 22.102) implements the goals and policies of the County General Plan by establishing permitting requirements, design standards, and review processes for development within SEAs. The goal of the SEA Ordinance is to guide development to the least impactful areas on a property to avoid adverse impacts to biological resources. The level of SEA assessment is dependent on the area of disturbance, sensitivity of biological resources impacted, and consistency with development standards. Portions of the Santa Monica Mountains SEA are located within the Project area.

County of Los Angeles Locally Important Species

The County Locally Important Species guidance identifies plant and animal species that are not state or federally listed as threatened or endangered but are still considered significant due to their ecological, cultural, or local conservation value. The Locally Important Species list includes species that are rare, have limited distributions, are essential to local ecosystems, or face threats from habitat loss and urban development. Examples of authoritatively compiled databases include lists on the Audubon Society's "Los Angeles County Sensitive Bird List," and those in the inventory of the California Native Plant Society. This guidance helps inform environmental planning, impact assessments, and conservation efforts within the county to ensure these species receive consideration in land use decisions.

Santa Monica Mountains Conservancy Act

The Santa Monica Mountains Conservancy Act (Public Resources Code Sections 33000–33215) was enacted in 1979 by Assembly Bill 1312. The act established the Santa Monica Mountains Conservancy. The conservancy's mission is to strategically buy back, preserve, protect, restore, and enhance treasured pieces of Southern California to form an interlinking system of urban, rural and river parks, open space, trails, and wildlife habitats that are easily accessible to the general public. The conservancy aims to preserve, protect, and enhance the open spaces in the mountains within Los Angeles and Ventura counties with a guiding principle of maintaining a network of cross-freeway habitat linkages and wildlife corridors that keep the mountain ranges biologically inter-connected and provide enough habitat to support larger mammals.

City of Agoura Hills General Plan 2035

The City of Agoura Hills General Plan 2035 was adopted on March 24, 2010 (updated on August 10, 2022) by the City Council (City of Agoura Hills 2022). The City of Agoura Hills General Plan 2035 is a strategic document designed to guide the physical development of the city until the year 2035. Among other things, the City of Agoura Hills General Plan 2035 sets out the pattern of land uses, including residential, commercial, and industrial. It also establishes the system of streets, bikeways, and trails. The City of Agoura Hills General Plan 2035 addresses a wide variety of subject areas, including housing, traffic, natural resources, land uses, economic development, noise, and public safety.

The City of Agoura Hills General Plan 2035 contains the following goals and policies related to biological resources, which would apply to the proposed Project:

Goal LU-3. Open space lands that are preserved to maintain the visual quality of the City and provide recreational opportunities, protect the public from safety hazards, and conserve natural resources.

> **Policy LU-3.1.** Provide for the preservation of significant scenic areas and corridors, significant plant and animal habitat and riparian areas, and physiographic features within the City.
>
> **Policy LU-3.2.** Preserve ridgelines, natural slopes, and bluffs as open space, minimize hillside erosion, and complement natural landforms through sensitive grading techniques in hillside areas.
>
> **Policy LU-3.3.** Provide a network of open spaces and greenbelts with pedestrian access where appropriate.
>
> **Policy LU-3.4.** Continue to sustain oak trees, which are an integral part of the City‘s character, and consider the protection of other valuable tree species.
>
> **Policy LU-3.5.** Maintain the form and health of resources and habitat in the City‘s natural drainages. Explore restoration of those that have been degraded or channelized, such as Medea Creek and Chesebro Creek, as feasible to maintain storm water conveyance and property protection requirements.

Goal NR-4. Protection and enhancement of open space resources, other natural areas, and significant wildlife and vegetation in the City as an integral component of a sustainable environment.

> **Policy NR-4.1.** Preserve Agoura Hills’ two significant ecological areas (SEAs) from incompatible development through City policies and coordination with Los Angeles County and other relevant agencies to protect habitats of sensitive plants and animals.
>
> **Policy NR-4.2.** Continue to enforce the ordinances for new and existing development in the City’s hillside areas, such that development maintains an appropriate distance from ridgelines, creek and natural drainage beds and banks, oak trees, and other environmental resources, to prevent erosion, preserve viewsheds, and protect the natural contours and resources of the land.
>
> **Policy NR-4.3.** Ensure that the development and environmental review process is sensitive to the preservation and protection of sensitive wildlife and plant species, wildlife corridors, significant ecological areas (SEAs), and other sensitive habitat communities.

Policy NR-4.4. Place a high priority on acquiring and preserving open space lands for purposes of recreation, habitat preservation and enhancement, resource conservation, flood hazard management, public safety purposes, and overall community benefits.

Policy NR-4.6. Ensure that new development does not create barriers or impede the connection of the City's open space systems.

Policy NR-4.10. Continue to sustain the City's oak trees, which are an integral part of the character of the City, and continue to plant and maintain these trees in a manner that will allow them to mature and thrive.

Policy NR-4.11. Support the restoration of creeks and other natural resources. Activities include creek cleanup, erosion and urban runoff control, and weeding of non-native plants.

Policy NR-4.12. Protect and maintain wildlife corridors, particularly the Liberty Canyon wildlife corridor, and adjacent areas as appropriate, to help the continued survival of wildlife.

Goal N-1. Minimized land use conflicts between various noise sources and other human activities.

Goal N-3. Minimized non-transportation related noise impacts on sensitive noise receptors.

City of Agoura Hills Municipal Code

Article IX, Chapter 6, Part 2, Division 6 of the Agoura Hills Municipal Code (AHMC) establishes the City's noise regulations, declaring that unnecessary, excessive, and annoying sounds are detrimental to public health, welfare, and safety, and thus constitute a public nuisance. The purpose of these provisions is to prohibit noise that exceeds acceptable levels and to hold violators accountable through enforceable penalties. The regulations apply to all sources of sound within city boundaries and reflect the City's policy to maintain a peaceful community environment. Furthermore, Section 9663.5 of Division 6 sets forth regulations for connectivity and pedestrian accommodation, requiring that all pedestrian pathways be lit by low, ground-mounted, shielded and downward facing lighting fixtures at set intervals.

Division 7 outlines the city's oak tree preservation regulations, recognizing the historical, environmental, and aesthetic significance of oak trees in the City of Agoura Hills and the broader Conejo Valley. These provisions identified in Section 9657 of the AHMC aim to preserve all healthy oak trees unless compelling reasons justify their removal, pruning, or encroachment into their protected zones. The regulations require a valid oak tree permit issued by the Department of Planning and Community Development or the Planning Commission for any such activity, except in cases explicitly exempted—such as emergencies, routine maintenance, nursery operations, or removal by fire personnel during active firefighting. Overall, the oak tree policy requires preservation of trees unless their removal is necessary due to health, safety, or site development constraints. Conditions may be placed on permits, such as tree replacement requirements, on-site or off-site relocation, maintenance programs, and mitigation fees or donations. Removal is generally limited to no more than 10 percent of total tree canopy or root structure, though up to 20 percent may be allowed with an expert recommendation and assurance that the tree's viability will not be compromised. In all cases, a minimum of four native oaks must be provided for each tree removed or relocated. Section 9657 also requires an oak tree report prepared by a City-approved consultant and mandates compliance with the City's adopted Oak Tree Preservation Guidelines. Permit decisions are subject to notice and appeal procedures, with appeals allowed within 20 days of a decision. Enforcement mechanisms include permit suspensions and required mitigation for unauthorized removals. Violators are responsible for restitution, which may include replacing

damaged or removed trees with others of equivalent size and value, as determined by the City using a standardized tree evaluation formula.

4.3.3 Impact Analysis

a. Methodology and Significance Thresholds

As discussed in Section 4.0, *Environmental Impact Analysis*, all Project components are analyzed at the programmatic level. Project components include the Bicycle Master Plan (BMP), the VMT Mitigation Exchange and Banking Program (Program), and the General Plan Amendments (Amendments). Projects included within the BMP are grouped into Class I facilities, Class II facilities, Class III facilities, Class IV facilities, and enhanced bicycle treatments, as identified in Section 2.5, *Project Characteristics,* and in Table 1 of Chapter 2, *Project Description.* The impact analysis contained herein provides a programmatic analysis of anticipated impacts for each of the five facility classes, as the individual project impacts associated with each class of facility are expected to be similar. However, because the city seeks to prioritize implementation of the Medea Creek Path (Path) and the Agoura High School Connection (Connection), the Path and the Connection have their own subheadings within the Class I Facility impact analysis subsection to provide a more specific assessment of the environmental impacts of those two specific Projects included within the BMP. Impacts associated with the Amendments are analyzed within their own subsection.

As discussed in Chapter 2, *Project Description*, the only Projects that are currently planned, unfunded, and could potentially be funded by the Program are those currently included within the BMP. Therefore, the impact analysis contained herein does not include a subsection for impacts associated with the Program, as the individual Project list for the BMP and the Program are identical and impacts associated with the BMP would encompass impacts associated with the Program.

Within the following environmental analysis, impacts associated with each Project component are explicitly identified under the respective heading.

According to Appendix G of the *CEQA Guidelines*, impacts related to biological resources would be significant if the proposed Project would:

1. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;
2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;
3. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
4. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or,

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

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Impact BIO-1 THE PROJECT AREA IS LARGELY URBANIZED, AND INDIVIDUAL PROJECT COMPONENTS WOULD BE LOCATED ON PREVIOUSLY DEVELOPED AND/OR DISTURBED LANDS. IMPLEMENTATION OF THE MEDEA CREEK PATH COULD ADVERSELY IMPACT SPECIAL-STATUS SPECIES OR THEIR HABITAT. FURTHERMORE, LOCAL SPECIAL-STATUS SPECIES AND NESTING BIRDS ARE EXPECTED TO OCCUR WITHIN THE OVERALL PROJECT AREA AND COULD BE AFFECTED BY CONSTRUCTION ACTIVITIES. WITH IMPLEMENTATION OF MM BIO-1A THROUGH MM BIO-1C, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

This evaluation considers the potential for species occurrence within the Project area and vicinity. Most special-status plant species known to occur in the region are precluded from occurring within the Project area due to lack of suitable habitat (i.e., developed roadways). While it is likely that several of these special-status plant species are found in the city's open space areas and undeveloped hillsides at the wildland-urban interface, such as Agoura Hills dudleya (*Dudleya cymosa* ssp*. agourensis*), Lyon's pentachaeta, Crotch's bumble bee (*Bombus crotchii*), monarch butterfly (*Danaus plexippus*), and southwestern pond turtle (*Actinemys pallida*), most of the species evaluated in Table 4.3-1 and Table 4.3-2 would have low potential to occur within or immediately adjacent to individual project areas and are not expected to be present due to the lack of suitable habitat or other factors (e.g., urban development, nighttime noise and light, domestic animals).

Due to the programmatic nature of the Project, a precise, project-level analysis of the specific impacts of individual projects identified within the BMP on special-status species is not possible at this time. However, some special-status species are expected to be encountered at the locations where projects administered under the BMP would occur. It is anticipated that certain resources would not be avoided and that potentially significant impacts would occur.

Direct impacts to special-status species include injury or mortality occurring during implementation of projects under the BMP. Direct impacts also include habitat modification and loss such that it results in the mortality or otherwise alters the foraging and breeding behavior substantially enough to cause injury. Indirect impacts could occur due to the spread of invasive non-native species that out-compete native species and/or alter habitat towards a state that is unsuitable for special-status species. For example, the spread of certain weed species can reduce the biodiversity of native habitats, potentially eliminating special-status plant species and reduce the availability of suitable forage and breeding sites for special-status wildlife species. Indirect impacts could also result due to increased access by humans and domestic animals, particularly in areas where new facilities may be planned. Increased human and domestic animal (especially dogs) presence foster the spread of non-native invasive plant species and disrupt the normal behaviors of animal species.

Class I Facilities

Construction of Class I facilities would include clearing and grubbing, pavement demolition, grading, utility relocation, retaining wall or fencing installation, asphalt paving or repaving, street

improvements and/or construction of undercrossings and/or overcrossings, striping, and revegetation. These activities would require the development of temporary storage, staging, and active work areas that may result in direct impacts to biological resources. Furthermore, implementation of the Class I facilities would occur away from existing roadways rights-of-way (ROWs), which would result in the conversion of existing unpaved areas into developed pathways.

Special-status species have the potential to occur within and adjacent to various habitats near individual projects, including riparian habitats along creeks, ornamental vegetation, and man-made structures such as bridges and buildings. Disturbance to natural and undisturbed habitat associated with the implementation of the Class I facilities has the potential to directly impact special-status species and nesting birds, which would be a potentially significant impact, and mitigation would be required. Specifically, significant impacts to special-status wildlife species or their habitat associated with development of the Path may be a result of:

- Direct mortality resulting from the movement of equipment and vehicles, removal of trees with active bird nests, loss of suitable habitat resulting from the trimming or removal of host plants, and fill of jurisdictional riparian habitat or wetland features.
- Loss of breeding, foraging, and refuge habitat resulting from the filling of wetland or riparian vegetation.
- Abandoned eggs or young and subsequent nest failure for nesting birds, including raptors, and other migratory birds resulting from construction-related vibrations and noises.

Ground and vegetation disturbing activities, if conducted during the nesting bird season (generally February 1 to August 31), would also have the potential to result in removal or disturbance to trees and shrubs that could contain active bird nests. Construction activities that result in the loss of bird nests, eggs, and young, would be in violation of one or more of CFGC sections 3503 (any bird nest), 3503.5 (birds-of-prey), or 3511 (Fully Protected birds). In addition, the purposeful removal or destruction of one or more active nests of any other birds listed by the MBTA, whether nest damage was due to vegetation removal or to other construction activities, would be considered a violation of the MBTA and CFGC Section 3511. The loss of protected bird nests, eggs, or young due to implementation of the Class I facilities would result in a potentially significant impact to nesting birds, and mitigation would be required.

Operation of the Class I facilities would consist of bicycle and pedestrian travel along shared use paths. Temporary impacts to special-status species and nesting birds could occur due to noise and motion associated with the use of bicycles along the Class I facilities, which could startle animals and lead to nest or young abandonment. Bicycles passing close to vegetation also risk inadvertently disturbing special-status and nesting birds, particularly if off-trail riding were to occur, although unexpected. Human activity can also attract predators resulting in increased predation risks, and increased human presence may cause stress with some species reducing feeding or breeding efforts in high-traffic areas. Animals may flush in response to human activity, exposing themselves and their young to environmental stressors. These operational impacts are short-term, would only occur during active use of the Class I facilities, and would be minimized through educational signage encouraging facility users to stay on designated paths and reduce speed near sensitive areas. Therefore, operational impacts to special-status and nesting birds would be less than significant during operation of the Class I facilities.

MEDEA CREEK PATH

The proposed Path would result in construction of a Class I facility along Medea Creek from Agoura Road to the northern limit of the city. Construction of the Path would extend into undisturbed areas associated with Medea Creek, resulting in the potential to temporarily or permanently disturb or remove natural habitat. Specifically, implementation of the Path has the potential to directly impact riparian and aquatic habitat and could directly impact special-status species, such as southwestern pond turtle, in these areas. Disturbance to natural and undisturbed habitat associated with the implementation of the Path also has the potential to directly impact nesting birds. This impact would be potentially significant, and mitigation would be required.

Operation of the Path would consist of bicycle and pedestrian travel along a shared use path. Temporary impacts to special-status species and nesting birds could occur due to noise and motion associated with the use of bicycles along the Path, which could startle animals and lead to nest or young abandonment. Bicycles passing close to vegetation also risk inadvertently disturbing special-status and nesting birds, particularly if off-trail riding were to occur, although unexpected. Human activity can also attract predators resulting in increased predation risks, and increased human presence may cause stress with some species reducing feeding or breeding efforts in high-traffic areas. Animals may flush in response to human activity, exposing themselves and their young to environmental stressors. These operational impacts are short-term, would only occur during active use of the Path, and would be minimized through educational signage encouraging facility users to stay on designated paths and reduce speed near sensitive areas. Therefore, operational impacts to special-status and nesting birds would be less than significant during operation of the Path.

AGOURA HIGH SCHOOL CONNECTION

The proposed Connection would result in construction of a Class I facility connecting Thousand Oaks Boulevard to Fountain Place along the northern border of Agoura High School. Construction of the Connection would have the potential to temporarily disturb or remove overwintering and nesting habitat along the edges of the proposed facility for listed species such as Crotch's bumble bee, which is known to occupy similarly situated non-native grassland habitat similar to that within the identified project boundary for the Connection. This impact would be potentially significant, and mitigation would be required.

Operation of the Connection would consist of bicycle and pedestrian travel along a shared use path. Temporary impacts to special-status species and nesting birds could occur due to noise and motion associated with the use of bicycles along the Connection, which could startle animals and lead to nest or young abandonment. Bicycles passing close to vegetation also risk inadvertently disturbing special-status and nesting birds, particularly if off-trail riding were to occur, although unexpected. Human activity can also attract predators resulting in increased predation risks, and increased human presence may cause stress with some species reducing feeding or breeding efforts in high-traffic areas. Animals may flush in response to human activity, exposing themselves and their young to environmental stressors. These operational impacts are short-term, would only occur during active use of the Connection, and would be minimized through educational signage encouraging facility users to stay on designated paths and reduce speed near sensitive areas. Therefore, operational impacts to special-status and nesting birds would be less than significant during operation of the Connection.

Class II Facilities

The establishment of Class II facilities would generally require roadway restriping and reconfiguration of lane widths to accommodate new dedicated bike lanes. Restriping can be completed within a single work period and does not require the establishment of storage, staging, or work areas. Construction activities would occur within previously disturbed areas or areas lacking suitable habitat for sensitive species; thus, implementation of these facilities would be unlikely to modify or otherwise impact sensitive species habitat. This impact would be less than significant.

Pavement widening would be necessary on Driver Avenue and on Cornell Road to allow for the addition of bicycle lanes. Construction activities for pavement widening would require grading and/or excavation in natural and undisturbed habitat, which could result in direct impacts to special-status species, including nesting birds. This impact would be potentially significant, and mitigation would be required.

Operation of the Class II facilities would consist of bicycle travel along delineated bike lanes adjacent to existing travel lanes. Given the existing vehicular activity occurring on these roadways, operation of the Class II facilities would not result in impacts to special-status and nesting birds. Operational impacts would be less than significant.

Class III Facilities

Establishment of Class III facilities would be limited to the restriping of existing roads to identify bike routes. Restriping can be completed within a single work period and does not require the establishment of storage, staging, or work areas. Restriping would occur entirely within the existing roadway, which has been previously disturbed and lacks suitable habitat for sensitive species; thus, implementation of these facilities would be unlikely to modify or otherwise impact sensitive species habitat. This impact would be less than significant.

Operation of the Class III facilities would consist of bicycle travel along shared use travel lanes. Given the existing vehicular activity occurring on these travel lanes, operation of the Class III facilities would not result in impacts to special-status and nesting birds. Operational impacts would be less than significant.

Class IV Facilities

Construction of Class IV facilities would require pavement demolition, minor grading, bollard or fencing installation, asphalt paving or repaving, and striping. These activities would require the development of temporary storage, staging, and active work areas that may result in direct impacts to biological resources. Furthermore, implementation of the Class IV facilities would occur adjacent to but separate from existing roadways ROWs, which would result in the conversion of existing unpaved areas into developed pathways. These activities may directly impact special-status species, including nesting birds. This impact would be potentially significant, and mitigation would be required.

Operation of the Class IV facilities would consist of physically separated bikeways adjacent to travel lanes. Given the existing vehicular activity occurring on the adjacent roadways, operation of the Class IV facilities would not result in impacts to special-status and nesting birds. Operational impacts would be less than significant.

Enhanced Bicycle Treatments

Enhanced bicycle treatments could include street striping and restriping, signage and wayfinding, bicycle signals and detection at traffic signals, bicycle parking, and bicycle repair facilities. Construction and implementation of these facilities would be completed within a single work period and would not require the establishment of storage, staging, or work areas. These facilities would be implemented at various locations throughout the city within or adjacent to existing, new, or improved bikeways. Implementation would not result in development within previously undeveloped areas. Thus, implementation of these facilities would be unlikely to modify or otherwise impact sensitive species habitat. This impact would be less than significant.

Operation of the enhanced bicycle treatments would include continued use of existing bicycle facilities, storing of bicycles at new parking facilities, and use of bicycle repair facilities. Given that these facilities would be located within or adjacent to existing, new, or improved bikeways, operation of the enhance bicycle treatments would not result in impacts to special-status species or nesting birds. Operational impacts would be less than significant.

General Plan Amendments

As part of the proposed Project, the City must amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. These General Plan Amendments shift the focus from prioritizing automobile mobility to reducing VMT alternative transportation modes like walking and biking, guided by the BMP. The proposed General Plan Amendments would not result in construction or operation activities beyond existing conditions. Therefore, the Amendments would not modify or otherwise impact sensitive species or their habitats. No impact would occur.

Mitigation Measures

Class I facilities, Medea Creek Path, Agoura High School Connection, Class II facilities requiring pavement widening, and Class IV facilities would require the following mitigation measures.

BIO-1a Pre-Construction Biological Resources Assessment and Reporting

Prior to approval of final design for individual projects identified within the BMP that involve ground disturbance and/or vegetation trimming or removal, the City shall retain a qualified biologist to conduct a focused assessment of the environmental limits of the individual project boundary to identify sensitive biological resources that may be impacted by implementation of the project, including special-status plants, animals, and their habitats, as well as sensitive natural communities, regulated waters, and protected trees.

If the biologist identifies protected biological resources that may be affected by implementation o the project, the City shall first prepare alternative designs that seek to avoid and/or minimize impacts to the biological resources. If the project cannot be redesigned without complete avoidance, the City shall retain the qualified biologist to identify the specific impacts to the biological resource (i.e., special-status species, sensitive natural communities, regulated waters, and/or protected trees), identify any state or federal listed species that would necessitate coordination with the appropriate regulatory agency (i.e., USFWS, CDFW, USACE) to obtain regulatory permits, develop project-specific avoidance and mitigation procedures prior to initiating construction activities, and implement project-specific avoidance and mitigation measures prior to and during any construction activities.

Mitigation actions that may be required if impacts to sensitive biological resources be identified during implementation of individual projects include:

- Pre-construction surveys to identify the presence of special-status species, nesting birds, and roosting bats, within and adjacent to work areas;
- Worker Environmental Awareness Program training for all construction personnel;
- Complete avoidance of special-status species where and if possible. Avoidance measures may include:
  - Delimiting and flagging of special-status species avoidance buffer areas (Environmentally Sensitive Areas),
  - Monitoring of construction activity near Environmentally Sensitive Areas, and
  - Installation of special-status species exclusion fencing;
- Relocation of special-status species out of work areas (with applicable permits and authorizations as necessary);
- Restoration of temporarily disturbed special-status species' habitat; and,
- Compensatory mitigation for impacts to special-status species habitat at a minimum ratio appropriate for extent and quality of permanently disturbed habitat. Mitigation ratios may vary from 1:1 to 5:1.

BIO-1b Pre-Construction Nesting Bird Surveys, Avoidance, and Reporting

Future construction activities initiated during the raptor and passerine bird nesting season (January 1 – August 31) involving removal of vegetation or other nesting bird habitat, including abandoned structures and other manmade features, shall be preceded by a pre-construction nesting bird survey conducted no more than one week prior to initiation of ground disturbance and vegetation removal activities. The nesting bird preconstruction survey shall be conducted on foot and shall include up to a 200-foot buffer around the construction site depending on the specific area being surveyed, where publicly accessible. The survey shall be conducted by a qualified biologist familiar with the identification of avian species known to occur in southern California. If nests are found, an avoidance buffer shall be determined by a qualified biologist dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site, which shall be demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to demarcate the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to check with the qualified Biologist before entering the buffer zone during the nesting season. Encroachment into the buffer shall occur only at the discretion of the qualified biologist on the basis that the encroachment will not be detrimental to an active nest. No ground or vegetation disturbing activities shall occur within the buffer until the biologist has confirmed that breeding/ nesting is completed, and the young have fledged the nest. An email summarizing the preconstruction survey(s) shall be prepared by a qualified biologist and shall be submitted to the city prior to the commencement of construction activities.

Individual project plans shall include a statement acknowledging compliance with the MBTA and CFGC that includes avoidance of active bird nests and identification of BMPs to avoid impacts to active nests, including checking for nests prior to construction activities during the nesting bird season and what to do if an active nest is found so that the nest is not inadvertently impacted during grading or construction activities.

BIO-1c Construction Best Management Practices

The following construction BMPs shall be incorporated into all grading and construction plans for individual projects:

- A 20 mile-per-hour speed limit shall be designated in all construction areas where applicable.
- All vehicles and equipment shall be parked on pavement, existing roads, and previously disturbed areas, and clearing of vegetation for vehicle access shall be avoided to the greatest extent feasible.
- The number of access routes, number, and size of staging areas, and the total area of the activity shall be limited to the minimum necessary to achieve the goal of the Project.
- Equipment washout and fueling areas shall be located within the limits of grading at a minimum of 100 feet from waters, wetlands, or other sensitive resources as identified by a qualified biologist to the greatest extent feasible. Washout areas shall be designed to fully contain polluted water and materials for subsequent removal from the site.
- Daily construction work schedules shall be limited to daylight hours where adjacent to natural areas capable of supporting wildlife, and shall be consistent with local noise ordinances.
- Mufflers shall be used on all construction equipment where work will be conducted within or adjacent to natural areas capable of supporting wildlife, and vehicles shall be in good operating condition.
- Drip pans shall be placed under all stationary vehicles and mechanical equipment within 100 feet of a drainage, creek, or stream.
- All trash shall be placed in sealed containers and shall be removed from project sites a minimum of once per week.
- No pets are permitted on Project sites during construction.

Significance After Mitigation

Implementation of Mitigation Measure (MM) BIO-1a would require a pre-construction biological resources survey to identify protected biological resources within the limits of individual project boundaries, preparation of a report on the potential impacts due to construction activities, and as-needed mitigation. Implementation of Mitigation Measure BIO-1b would require pre-construction nesting bird surveys and avoidance. Mitigation Measure BIO-1c would require implementation of construction BMPs into all grading and construction plans to minimize impacts to sensitive biological resources. With implementation of Mitigation Measures BIO-1a, BIO-1b, and BIO-1c, impacts related to special-status species would be less than significant.

Threshold 2:	Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Impact BIO-2 FUTURE CONSTRUCTION ACTIVITIES COULD ADVERSELY IMPACT RIPARIAN HABITAT OR OTHER SENSITIVE NATURAL COMMUNITIES. WITH IMPLEMENTATION OF MM BIO-1A THROUGH MM BIO-2C, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Two sensitive natural communities are recorded by the CNDDB within the Project area: Valley Oak Woodland and Southern Coast Live Oak Riparian Woodland. Valley Oak Woodlands are found in

valley bottoms, lower slopes, and valleys where soils are alluvial or residual. A prime example of this vegetation community is within the Cheseboro/Palo Comado Canyon portion of the Santa Monica Mountains National Recreation Area (SMMNRA) east of Chesebro Road. This community is listed as vulnerable to extirpation or extinction globally or subnationally (G3/S3). Southern Coast Live Oak Riparian woodlands are found along streams and drainage channels, such as Medea Creek and Chesebro Creek. Typical species include woody plants such as alder, willows, cottonwoods, and California sycamore. Herbaceous plants may include cattails and currants. This community, however, is listed as apparently secure, common and abundant (G4/S4).

Two features mapped by NWI, Palo Comado Canyon Creek and Chesebro Canyon Creek, are classified as Riverine and overlap with Class III Facilities. Palo Comado Canyon Creek intersects both Balkins Drive and Fairview Place, with each street featuring an Arizona crossing. An Arizona crossing is a type of roadway crossing where a street or road goes directly through a creek or river without a bridge or culvert. Instead of being elevated, the road surface is designed to allow water to flow over it during wet conditions. These crossings are usually paved or reinforced to prevent erosion, but they can become impassable during heavy rains or flooding.

Due to the programmatic nature of the BMP, a precise, project-level analysis of the specific impacts of individual projects identified within the BMP on sensitive habitats is not possible at this time. However, several of the projects that may be implemented under the BMP have the potential to impact sensitive habitats, although the extent and severity of the impacts is not known at this time.

Class I Facilities

Construction of Class I facilities identified within the BMP, including the creation of storage, staging, and active work areas, would be located outside of existing roadways within the individual project boundaries. At the time of construction, should the construction contractor require additional staging areas, they would be responsible for identifying and securing long-term staging areas on previously disturbed storage yards, the locations of which are currently unknown. Implementation of Class I facilities would occur away from existing roadways ROWs, which would result in the conversion of existing unpaved areas into developed pathways. Construction activities that occur near riparian habitat or other sensitive natural communities could result in direct impacts to biological resources. This impact would be potentially significant, and mitigation would be required.

Operation of the Class I facilities would consist of bicycle and pedestrian travel along shared use paths, which would not result in direct or indirect impacts to riparian habitat or other sensitive natural communities. No operational impact would occur.

MEDEA CREEK PATH

Implementation of the Path would result in construction of a Class I facility along Medea Creek in previously undisturbed areas. The portion of Medea Creek within the Project area has the potential to support two natural communities of special concern: Valley Oak Woodland Forest and Southern Coast Live Oak Riparian Woodland. Construction activities associated with implementation of the Path within or adjacent these sensitive natural communities could result in direct impacts due to the removal of vegetation or compaction of soils, and/or indirect impacts due to dust, vegetation thinning, habitat degradation due to introduction of invasive plant species incidentally from construction equipment, or erosion of disturbed areas. Furthermore, construction activities could occur within riparian habitat associated with Medea Creek. Riparian areas provide wildlife habitat and movement corridors, enabling both terrestrial and aquatic organisms to move along river systems between areas of suitable habitat. Construction activities associated with implementation

of the Path could result in direct impacts due to disturbance of riparian flora and fauna and/or indirect impacts due to increased erosion and sedimentation, which would adversely affect downstream water quality.

Sensitive natural communities are regulated by the CDFW and riparian habitat is considered jurisdictional by CDFW. Because construction of the Path could directly impact CDFW-jurisdictional areas**,** a formal Jurisdictional Delineation would be required to determine the extent of impacts to jurisdictional features. Compliance with to the permit requirements of the CDFW, including permits under CFGC Sections 1600-1616, would reduce impacts riparian habitat or other sensitive natural communities. Nonetheless, direct and/or indirect impacts to riparian habitat or other sensitive natural communities associated with implementation of the BMP would still be potentially significant, and mitigation would be required.

Operation of the Path would consist of bicycle and pedestrian travel along a shared use path, which would not result in direct or indirect impacts to riparian habitat or other sensitive natural communities. No operational impact would occur.

AGOURA HIGH SCHOOL CONNECTION

The proposed Connection would result in construction of a Class I facility connecting Thousand Oaks Boulevard to Fountain Place along the northern border of Agoura High School. Implementation of the Connection would occur within non-native grasslands. There are no known riparian habitats or other sensitive natural communities located within or immediately adjacent to this project area. No impact would occur.

Class II Facilities

The establishment of Class II facilities would generally require roadway restriping and reconfiguration of lane widths to accommodate new dedicated bike lanes. Restriping can be completed within a single work period and does not require the establishment of storage, staging, or work areas. Construction activities would occur within previously disturbed areas lacking riparian habitats or other sensitive natural communities. Thus, implementation of these facilities would not modify or otherwise impact riparian habitat or other sensitive natural communities, and no impact would occur.

Pavement widening would be necessary on Driver Avenue and on Cornell Road to allow for the addition of bicycle lanes. Based on the known locations of these proposed Class II facilities, construction activities for pavement widening would require grading and/or excavation in areas with habitat that could support riparian habitat or other sensitive natural communities. For these projects, a formal Jurisdictional Delineation would be required to determine the extent of impacts to jurisdictional features. Compliance with permit requirements would reduce impacts to riparian habitats and other sensitive natural communities. Nonetheless, direct and/or indirect impacts to riparian habitat or other sensitive natural communities associated with implementation of Class II facilities requiring pavement widening would still be potentially significant, and mitigation would be required.

Operation of the Class II facilities would consist of bicycle travel along delineated bike lanes, which would not result in direct or indirect impacts to riparian habitat or other sensitive natural communities. No operational impact would occur.

Class III Facilities

Establishment of Class III facilities would be limited to the restriping of existing roads to identify bike routes. Restriping can be completed within a single work period and does not require the establishment of storage, staging, or work areas. Construction activities would occur within previously disturbed areas lacking suitable habitat for sensitive natural communities. Riparian features that overlap the locations of Class III facilities include Palo Comado Canyon Creek and Chesebro Canyon Creek. Because construction activities would occur within previously disturbed areas, implementation of Class III facilities would not impact the creeks or associated riparian vegetation. Overall, implementation of the Class III facilities would not modify or otherwise impact riparian habitat or other sensitive natural communities, and no impact would occur.

Operation of the Class III facilities would consist of bicycle travel along shared use travel lanes, which would not result in direct or indirect impacts to riparian habitat or other sensitive natural communities. No impact would occur.

Class IV Facilities

Construction of Class IV facilities would require pavement demolition, minor grading, bollard or fencing installation, asphalt paving or repaving, and striping. Implementation of the Class IV facilities would occur adjacent to but separate from existing roadways ROWs, which would result in the conversion of existing unpaved areas into developed pathways. Given the proposed locations of the proposed Class IV facilities, implementation is not anticipated to impact riparian habitat or other sensitive natural communities. This impact would be less than significant.

Operation of the Class IV facilities would consist of bicycle travel along physically separated bikeways adjacent to travel lanes, which would not result in direct or indirect impacts riparian habitat or other sensitive natural communities. No operational impact would occur.

Enhanced Bicycle Treatments

Enhanced bicycle treatments could include street striping and restriping, signage and wayfinding, bicycle signals and detection at traffic signals, bicycle parking, and bicycle repair facilities. Construction and implementation of these facilities would be completed within a single work period and would not require the establishment of storage, staging, or work areas. These facilities would be implemented at various locations throughout the city within or adjacent to existing, new, or improved bikeways. Implementation would not result in development within previously undeveloped areas. Thus, implementation of these facilities would be unlikely to modify or otherwise impact riparian habitat or other sensitive natural communities. This impact would be less than significant.

Operation of the enhanced bicycle treatments would include continued use of existing bicycle facilities, storing of bicycles at new parking facilities, and use of bicycle repair facilities. These activities would not result in direct or indirect impacts to riparian habitat or other sensitive natural communities. No operational impact would occur.

General Plan Amendments

As part of the proposed Project, the City must amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. The Amendments would not have a physical impact on the Project area. Thus, the

Amendments would not modify or otherwise impact riparian habitat or other sensitive natural communities. No impact would occur.

Mitigation Measures

Mitigation Measure BIO-1a and Mitigation Measure BIO-1c would be required; refer to Impact BIO-1 for full text of these measures. The following mitigation would also be required for Class I facilities, Medea Creek Path, and Class II facilities requiring pavement widening.

BIO-2a Riparian Habitat and Sensitive Natural Communities Protection

If sensitive natural communities, wetlands, or riparian habitats are identified within individual project limits, the City shall design or modify the project to avoid direct and indirect impacts on these habitats, if feasible. At a minimum, the City shall implement the following measures to minimize the loss of riparian vegetation, where feasible.

- **Protect sensitive habitat areas from harmful exposure to light.** If an individual project identified within the BMP is located within or adjacent to sensitive habitat areas or habitat for sensitive species, and lighting is proposed, then the facility will be designed to protect such areas from harmful exposure to light by shielding light sources, redirecting light sources, or using low intensity lighting.
- **Delineate sensitive habitat areas.** Sensitive habitat areas to be avoided, including appropriate buffers (determined by a qualified biologist), will be flagged by a qualified biologist prior to the onset of construction activities. Where indicated by the biologist, these areas will be fenced or otherwise protected from direct and indirect impacts. All such areas to be avoided with be clearly marked on construction plans and designated as “no construction” zones.
- **Slope stabilization.** Where construction will occur on bare soil or on slopes, the contractor shall stabilize exposed soil/slopes immediately upon completion of construction activities. On highly erodible soils/slopes, the contractor shall use a non-vegetative material that binds the soil initially and breaks down within a few years. If more intensive erosion control treatments are needed, geotextile mats, excelsior blankets, or other soil stabilization products shall be used.
- **Install signage and fencing, vegetation, or other natural barriers to prevent impacts on adjacent areas during operation.** Fencing, vegetation, or other natural barriers will be constructed to prevent impacts on sensitive habitat areas adjacent to the Facilities during operation. Signs will be erected in appropriate locations to inform users of the need to stay within designated bike paths, lanes, routes, or boulevards.

BIO-2b Jurisdictional Delineation Survey and Report

Before approving any individual project involving ground disturbance, the City shall retain a qualified biologist to conduct a site-specific assessment of the individual project area to identify sensitive natural communities, wetlands, or riparian habitats. The field delineation shall include a survey effort within the individual project area. During the field survey, sample points shall be established to document wetland and non-wetland aquatic resources, using the appropriate agency-approved methodology and data forms. The sample points shall focus on identifying indicators of an OHWM, wetland hydrology, hydric soils, and hydrophytic vegetation. Using this information, a “wetland edge” shall be discerned between the wetland and non-wetland points, and the boundary of the aquatic resources shall be mapped with a sub-meter global position system unit.

The survey shall be conducted in accordance with USACE Wetlands Delineation Manual (1987) and Arid West Regional Supplement to the manual, as well as the latest guidance from the CDFW and Los Angeles RWQCB. This methodology is the acceptable methodology for delineating the boundaries of federal and state jurisdictions.

A delineation report shall be prepared in accordance with the USACE Los Angeles District's 2017 Minimum Standards for Acceptance of Aquatic Resources Delineation Reports and shall be used to support necessary permit applications. The report shall include a discussion of methodologies and results that detail the background information; field observations and data collected; and a summary of findings. The report shall contain narrative descriptions of all aquatic features identified, including jurisdictional resources and their boundaries within the Project component's work area. The report shall quantify lengths and acreages of each aquatic feature, provide high-quality figures, site photographs, and completed data forms, and geographic information system (GIS) data.

The report shall be used to support permitting requirements and shall be submitted to the City for review and approval prior to the issuance of grading permits.

BIO-2c Compensatory Mitigation

If sensitive natural communities, state or federally protected wetlands, and/or riparian habitats are disturbed due to implementation of an individual project identified within the BMP, the City shall compensate for the disturbance to ensure no net loss of habitat functions and values. Compensation ratios shall be based on site-specific information and determined through coordination with state, federal, and/or local agencies as part of the permitting process for the individual project prior to the issuance of a grading permit and/or initiation of construction activities. Unless determined otherwise by the regulatory/permitting agency, the compensation shall be at a minimum ratio of two acres restored, created, and/or preserved for every one acre disturbed (2:1). Compensation may comprise on-site restoration/creation off-site restoration, preservation, or purchase of mitigation credits (or a combination of these elements). If compensatory mitigation involves restoration, the City shall develop and implement a Restoration and Monitoring Plan that describes how the habitat shall be created and monitored over a minimum period of time.

In broad terms, the Restoration and Monitoring Plan shall at a minimum include:

- Description of the Project/impact and mitigation sites
- Information related to riparian habitat impacts
- Specific objectives
- Success criteria
- Plant palettes for each vegetation community
- Implementation plan
- Maintenance activities
- Monitoring plan
- Contingency measures

The plant palette shall include a diversity of appropriate native species that occur in the communities in the surrounding area. The performance standards for the Restoration and Monitoring Plan shall be, at a minimum, the following:

- Within five years after introducing the native plants to the mitigation site, the acreage of restored native grassland habitat shall be no less than two times the acreage lost to Project construction.
- Within five years after introducing the native plants to the mitigation site, the absolute cover of the target species and other native species shall be no less than 50 percent within the restoration area.
- Restoration will be considered successful after the success criteria have been met for a period of at least 2 years without any maintenance or remediation activities other than invasive species control.

The restoration project shall be initiated prior to development of the individual project and shall be implemented at most over a five-year period, unless success criteria is met sooner. The restoration project shall incorporate an iterative process of annual monitoring and evaluation of progress, and allow for adjustments to the restoration plan, as necessary, to achieve desired outcomes and meet success criteria. Annual reports discussing the implementation, monitoring, and management of the restoration Project shall be submitted to the City. Five years after start of the restoration project, a final report shall be submitted to the City, which shall at a minimum discuss the implementation, monitoring, and management of the restoration project over the five-year period and indicate whether the restoration project has been successful based on established success criteria. The annual reports and the final report shall include as-built plans submitted as an appendix to the report.

If the loss of the sensitive habitat types is to be mitigated by a contribution of an in-lieu fee, the City shall provide evidence of payment of the in-lieu fee prior to issuance of the grading permit. The fee shall be based on the cost per acre to restore or create in-kind habitat and the acreage of sensitive communities impacted. In-lieu fees shall be used for the restoration of in-kind habitat.

Significance After Mitigation

Implementation of Mitigation Measure BIO-1a would require a pre-construction biological resources survey to identify protected biological resources within the limits of individual project boundaries, preparation of a report on the potential impacts due to construction activities, and as-needed mitigation. Mitigation Measure BIO-1c would require implementation of construction BMPs into all grading and construction plans to minimize impacts to sensitive biological resources, including sensitive natural communities, wetland, and/or riparian habitats. Implementation of Mitigation Measure BIO-2a would protect and minimize the loss of riparian vegetation and natural communities. Implementation of Mitigation Measure BIO-2b would require identification, and if present, the delineation of riparian and other sensitive natural communities. Implementation of Mitigation Measure BIO-2c would require compensatory mitigation for the disturbance to riparian habitat, sensitive natural communities, and protected wetlands. With implementation of Mitigation Measures BIO-1a, BIO-1c, BIO-2a, BIO-2b, and BIO-2c, impacts related to riparian habitat or other sensitive natural communities would be less than significant.

Threshold 3:	Would the project have a substantial adverse effect on state or federally protected wetlands (including but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Impact BIO-3 FUTURE CONSTRUCTION ACTIVITIES COULD ADVERSELY IMPACT STATE OR FEDERALLY PROTECTED WETLANDS DEFINED BY SECTION 404 OF THE CLEAN WATER ACT. WITH IMPLEMENTATION OF MM BIO-2A THROUGH MM BIO-2C, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Medea Creek is mapped by NWI as a Relatively Permanent Water which has a direct hydrologic surface connection to the Pacific Ocean and is therefore considered a traditional navigable water. Medea Creek is classified as mostly Freshwater Emergent Wetland in the Project area, with portions classified as Freshwater Forested/Shrub Wetland. The creek overlaps portions of the proposed Path.

Due to the programmatic nature of the BMP, a precise, project-level analysis of the specific impacts of individual projects identified within the BMP on wetlands is not possible at this time. However, several of the projects that may be implemented under the BMP have the potential to impact wetland habitats, although the extent and severity of the impacts is not known at this time.

Class I Facilities

Construction of Class I facilities identified within the BMP, including the creation of storage, staging, and active work areas, would be located outside of existing roadways within the individual project boundaries. At the time of construction, should the construction contractor require additional staging areas, they would be responsible for identifying and securing long-term staging areas on previously disturbed storage yards, the locations of which are currently unknown. Implementation of Class I facilities would occur away from existing roadways ROWs, which would result in the conversion of existing unpaved areas into developed pathways. Construction activities that occur near federally protected wetlands or waters could result in direct impacts to biological resources. This impact would be potentially significant, and mitigation would be required.

Operation of the Class I facilities would consist of bicycle and pedestrian travel along shared use paths, which would not result in direct or indirect impacts to wetlands. No operational impact would occur.

MEDEA CREEK PATH

Implementation of the Path would result in construction of a Class I facility along Medea Creek in previously undisturbed areas. Construction activities associated with implementation of the Path within or adjacent to this wetland could result in direct impacts to biological resources.

Wetlands are subject to regulatory oversight and are considered jurisdictional by both RWQCB and the USACE. Because construction of the Path could directly affect areas under RWQCB and USACE jurisdiction, a formal Jurisdictional Delineation would be necessary to determine the extent of potential impacts to these features. Compliance with applicable permitting requirements, including those under Sections 401 and 404 of the CWA and the Porter-Cologne Water Quality Control Act, would help minimize impacts to wetlands. However, direct and indirect impacts to wetlands resulting from implementation of the BMP could still be potentially significant, and mitigation measures would be required.

Operation of the Path would consist of bicycle and pedestrian travel along a shared use path, which would not result in direct or indirect impacts to wetlands. No operational impact would occur.

AGOURA HIGH SCHOOL CONNECTION

The proposed Connection would result in construction of a Class I facility connecting Thousand Oaks Boulevard to Fountain Place along the northern border of Agoura High School. Implementation of the Connection would occur within non-native grasslands. There are no known wetlands located within or immediately adjacent to this project area. No impact would occur.

Class II Facilities

The establishment of Class II facilities would generally require roadway restriping and reconfiguration of lane widths to accommodate new dedicated bike lanes. Restriping can be completed within a single work period and does not require the establishment of storage, staging, or work areas. Construction activities would occur within previously disturbed areas lacking wetlands. Thus, implementation of these facilities would not modify or otherwise impact wetlands, and no impact would occur.

Pavement widening would be necessary on Driver Avenue and on Cornell Road to allow for the addition of bicycle lanes. Construction activities for pavement widening would require grading and/or excavation in areas with habitat that could support wetlands. For these projects, a formal Jurisdictional Delineation would be required to determine the extent of impacts to jurisdictional features. Compliance with permit requirements would reduce impacts to wetlands. Nonetheless, direct and/or indirect impacts to wetlands associated with implementation of Class II facilities requiring pavement widening would still be potentially significant, and mitigation would be required.

Operation of the Class II facilities would consist of bicycle travel along delineated bike lanes, which would not result in direct or indirect impacts to wetlands. No operational impact would occur.

Class III Facilities

Establishment of Class III facilities would be limited to the restriping of existing roads to identify bike routes. Restriping can be completed within a single work period and does not require the establishment of storage, staging, or work areas. Construction activities would occur within previously disturbed areas lacking suitable habitat for sensitive natural communities. Because construction activities would occur within previously disturbed areas, implementation of the Class III facilities would not modify or otherwise impact wetlands, and no impact would occur.

Operation of the Class III facilities would consist of bicycle travel along shared use travel lanes, which would not result in direct or indirect impacts to wetlands. No impact would occur.

Class IV Facilities

Construction of Class IV facilities would require pavement demolition, minor grading, bollard or fencing installation, asphalt paving or repaving, and striping. Implementation of the Class IV facilities would occur adjacent to but separate from existing roadways ROWs, which would result in the conversion of existing unpaved areas into developed pathways. Given the proposed locations of the proposed Class IV facilities, implementation is not anticipated to impact wetlands. This impact would be less than significant.

Operation of the Class IV facilities would consist of bicycle travel along physically separated bikeways adjacent to travel lanes, which would not result in direct or indirect impacts to wetlands. No operational impact would occur.

Enhanced Bicycle Treatments

Enhanced bicycle treatments could include street striping and restriping, signage and wayfinding, bicycle signals and detection at traffic signals, bicycle parking, and bicycle repair facilities. Construction and implementation of these facilities would be completed within a single work period and would not require the establishment of storage, staging, or work areas. These facilities would be implemented at various locations throughout the city within or adjacent to existing, new, or improved bikeways. Implementation would not result in development within previously undeveloped areas. Thus, implementation of these facilities would be unlikely to modify or otherwise impact wetlands. This impact would be less than significant.

Operation of the enhanced bicycle treatments would include continued use of existing bicycle facilities, storing of bicycles at new parking facilities, and use of bicycle repair facilities. These activities would not result in direct or indirect impacts to wetlands. No operational impact would occur.

General Plan Amendments

As part of the proposed Project, the City must amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. The Amendments would not have a physical impact on the Project area. Thus, the Amendments would not modify or otherwise impact wetlands. No impact would occur.

Mitigation Measures

Mitigation Measures BIO-1a, BIO-1c, BIO-2a, BIO-2b, and BIO-2c would be required for Medea Creek Path and Class I facilities; refer to Impact BIO-1 and Impact BIO-2 for full text of these measures.

Significance After Mitigation

Implementation of Mitigation Measure BIO-1a would require a pre-construction biological resources survey to identify protected biological resources within the limits of individual project boundaries, preparation of a report on the potential impacts due to construction activities, and as-needed mitigation. Mitigation Measure BIO-1c would require implementation of construction BMPs into all grading and construction plans to minimize impacts to sensitive biological resources, including sensitive natural communities, wetland, and/or riparian habitats. Implementation of Mitigation Measure BIO-2a would protect and minimize the loss of riparian vegetation and natural communities. Implementation of Mitigation Measure BIO-2b would require identification, and if present, the delineation of riparian and other sensitive natural communities. Implementation of Mitigation Measure BIO-2c would require compensatory mitigation for the disturbance to riparian habitat, sensitive natural communities, and protected wetlands. With implementation of Mitigation Measures BIO-1a, BIO-1c, BIO-2a, BIO-2b, and BIO-2c, impacts related to wetlands would be less than significant.

Threshold 4:	Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Impact BIO-4 CONSTRUCTION AND OPERATIONAL ACTIVITIES COULD RESULT IN TEMPORARY IMPACTS TO WILDLIFE MOVEMENT OR NURSERY SITES; IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Due to the programmatic nature of the BMP, a precise, project-level analysis of the specific impacts of individual projects identified within the BMP on wildlife movement and nursery sites is not possible at this time. However, several of the projects that may be implemented under the BMP may increase human activity in areas where sensitive biological resources could occur, which could disturb wildlife movement and nursery sites.

Direct impacts to wildlife movement include increased noise and increased human presence during construction, as well as increased trash which may attract predators to individual project sites and discourage wildlife use of surrounding natural habitat. Indirect impacts include invasion of natural habitats by non-native species and a long-term increase in the presence of humans and domestic animals. Furthermore, some individual projects identified within the BMP would include new segments of fencing or walls that that could hinder wildlife movement.

The City of Agoura Hills General Plan 2035 provides land use and zoning designations for wildlife corridors and open space within the city (City of Agoura Hills 2022). The only wildlife corridor mapped by the city is a portion of the SMMNRA outside of the eastern city boundary, which crosses the Ventura Freeway and reconnects with another portion of the SMMNRA in the southeastern corner of the city. None of the individual projects identified within the BMP overlap with this area.

Class I Facilities

Construction of Class I, including the creation of storage, staging, and active work areas, would be located outside of existing roadways within individual project boundaries. Because implementation of Class I facilities would occur away from existing roadways ROWs, construction would result in the conversion of existing unpaved areas into developed pathways. However, other than the Path and the Connection, which are discussed below, Class I facilities would be located adjacent to existing paved and previously constructed or disturbed ROWs. Therefore, the storage, staging, and active work areas for Class I facilities are expected to lack suitable coverage for wildlife foraging, cover, nesting, and breeding. Impacts to wildlife movement and nursery sites associated with the construction of Class I facilities would be less than significant.

Operation of the Class I facilities would consist of bicycle and pedestrian travel along shared use paths, which would not prevent wildlife movement. Furthermore, active use of these facilities would be short-term and temporary; thus, there would be no indirect impacts associated with noise, lighting, and harassment. Operational impacts would be less than significant.

MEDEA CREEK PATH

Medea Creek can serve as a wildlife corridor for aquatic and terrestrial species traversing through the city. Impacts to movement of these species during construction would be temporary and limited to the installation of temporary fencing, construction noise, and the presence of construction personnel during working hours. Native habitats located adjacent to the Path could also be temporarily degraded if subject to light trespass or glare from artificial night lighting, which could affect the normal behavior of wildlife and cause some species to avoid the area.

Construction of the Path would require the creation of storage, staging, and active work areas, which would be temporarily fenced for security. Temporary nighttime lighting may be used for additional security within the temporary fenced areas. Nighttime security lighting would be shielded and directed downward and inward toward the work, storage, or staging areas to prevent light spill onto adjacent properties or habitats. Given the temporary and intermittent nature of construction, the temporary and intermittent use of fencing, and the use of directional shielding on nighttime lighting, these impacts to wildlife movement and nursery sites would be less than significant.

Increased noise levels during construction of the Path could impact wildlife species within the individual project site and surrounding areas. This impact would be minimal for construction occurring near urban and previously developed locations where ambient noise presently exists, and where wildlife would be expected to be urban tolerant. However, noise impacts could adversely affect wildlife if located adjacent to undeveloped open space. Compliance with Section 9656 of the AHMC would limit construction-related noise to no greater than a 55 A-weighted decibel (dBA) Community Noise Equivalent Level (CNEL) within known wildlife nesting or migration areas. Therefore, noise impacts to wildlife movement and nursery sites would be less than significant.

Operation of the Path would consist of bicycle and pedestrian travel along a shared use path, which would not prevent wildlife from moving through the area. Operational lighting requirements are not currently identified for the Path. Nonetheless, Section 9663.5 of the AHMC requires ground-mounted, shielded, and downward facing lighting fixtures at regular intervals along pedestrian paths. Therefore, implementation of the Path would include the installation of ground-mounted lighting fixtures. With compliance with the AHMC requirements, this new source of lighting would not result in impacts wildlife movement and nursery sites. Furthermore, active use of the Path would be short-term and temporary; thus, there would be no indirect impacts associated with noise, lighting, and harassment. Operational impacts would be less than significant.

AGOURA HIGH SCHOOL CONNECTION

The Connection occurs within an area that connects to the larger open space of the SMMNRA and other greenways that eventually connect to Medea Creek. Impacts to wildlife movement during construction would be temporary and limited to the installation of temporary fencing, construction noise, and the presence of construction personnel during working hours. Native habitats located adjacent to the Connection could also be temporarily degraded if subject to light trespass or glare from artificial night lighting, which could affect the normal behavior of wildlife and cause some species to avoid the area.

Construction of the Connection would require the creation of storage, staging, and active work areas, which would be temporarily fenced for security. Temporary nighttime lighting may be used for additional security within the temporary fenced areas. Nighttime security lighting would be shielded and directed downward and inward toward the work, storage, or staging areas to prevent light spill onto adjacent properties or habitats. Given the temporary and intermittent nature of construction, the temporary and intermittent use of fencing, and the use of directional shielding on nighttime lighting, these impacts to wildlife movement and nursery sites would be less than significant.

Increased noise levels during construction of the Connection would occur near urban and previously developed locations where ambient noise presently exists, and where wildlife would be expected to be urban tolerant. Therefore, noise impacts to wildlife movement and nursery sites would be less than significant.

Operation of the Connection would consist of bicycle and pedestrian travel along a shared use path, which would not prevent wildlife from moving through the area. Operational lighting requirements are not currently identified for the Connection. Nonetheless, Section 9663.5 of the AHMC requires ground-mounted, shielded, and downward facing lighting fixtures at regular intervals along pedestrian paths. Existing sources of light near the Connection include building lighting and windows from Agoura High School, overhead lighting for the athletic fields at Agoura High School, and building lighting and windows from nearby residential development. Therefore, this new source of lighting associated with the Connection would not result in impacts wildlife movement and nursery sites. Furthermore, active use of the Connection would be short-term and temporary; thus, there would be no indirect impacts associated with noise, lighting, and harassment. Operational impacts would be less than significant.

Class II Facilities

The establishment of Class II facilities would generally require roadway restriping and reconfiguration of lane widths to accommodate new dedicated bike lanes. Restriping can be completed within a single work period and does not require the establishment of fenced storage, staging, or work areas. Construction activities would occur within previously disturbed areas lacking suitable habitat for wildlife seeking refuge or coverage. Thus, implementation of these facilities would not impact wildlife movement or nursery sites, and no impact would occur

Pavement widening would be necessary on Driver Avenue and on Cornell Road to allow for the addition of bicycle lanes. Construction activities for pavement widening would require grading and/or excavation in previously undisturbed areas. These activities may result in temporary direct and indirect impacts to wildlife that utilize those areas for refuge, movement, and cover. Impacts would be temporary and limited to the installation of temporary fencing, construction noise, and the presence of construction personnel during working hours. Noise impacts would be minimal for construction occurring near urban and previously developed locations where ambient noise presently exists, and where wildlife would be expected to be urban tolerant. Noise impacts could adversely affect wildlife if located adjacent to undeveloped open space. Compliance with Section 9656 of the AHMC would limit construction-related noise to no greater than a 55 dBA CNEL within known wildlife nesting or migration areas. Therefore, impacts to wildlife movement and nursery sites during construction would be less than significant.

Operation of the Class II facilities would consist of bicycle travel along delineated bike lanes, which would not prevent wildlife movement. Furthermore, active use of these facilities would be short-term and temporary; thus, there would be no indirect impacts associated with noise, lighting, and harassment. Operational impacts would be less than significant.

Class III Facilities

Establishment of Class III facilities would be limited to the restriping of existing roads to identify bike routes. Restriping can be completed within a single work period and does not require the establishment of storage, staging, or work areas. Restriping would occur entirely within the existing roadway, which has been previously disturbed. Thus, there would be no impact to wildlife movement and nursery sites during construction.

Operation of the Class III facilities would consist of bicycle travel along shared use travel lanes. Given the existing vehicular activity occurring on these travel lanes, operation of the Class III facilities would result in no impact to wildlife movement and nursery sites.

Class IV Facilities

Construction of Class IV, including the creation of storage, staging, and active work areas, would be located outside of existing roadways within individual project boundaries. Implementation of the Class IV facilities would occur adjacent to but separate from existing roadways ROWs, which would result in the conversion of existing unpaved areas into developed pathways. Class IV facilities would be located adjacent to existing paved and previously constructed or disturbed ROWs. Therefore, the storage, staging, and active work areas for Class IV facilities are expected to lack suitable coverage for wildlife foraging, cover, nesting, and breeding.

Operation of the Class IV facilities would consist of bicycle travel along physically separated bikeways adjacent to travel lanes. Physical buffers would consist of vertical barriers such as mountable curbs or flexible barriers, which would maintain separation between vehicles and bicyclists without impacting wildlife movement and nursery sites. Operational impacts would be less than significant.

Enhanced Bicycle Treatments

Enhanced bicycle treatments could include street striping and restriping, signage and wayfinding, bicycle signals and detection at traffic signals, bicycle parking, and bicycle repair facilities. Construction and implementation of these facilities would be completed within a single work period and would not require the establishment of storage, staging, or work areas. These facilities would be implemented at various locations throughout the city within or adjacent to existing, new, or improved bikeways. Implementation would not result in development within previously undeveloped areas. Furthermore, these facilities would be implemented where ambient noise presently exists, and wildlife is expected to be urban tolerant. Therefore, the construction of these facilities does not have the potential to impact wildlife movement or nursery sites.

Operation of the enhanced bicycle treatments would include continued use of existing bicycle facilities, storing of bicycles at new parking facilities, and use of bicycle repair facilities. These activities would not result in direct or indirect impacts to wildlife movement or nursery sites. No impact would occur.

General Plan Amendments

As part of the proposed Project, the City must amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. The Amendments would not have a physical impact on the Project area. Thus, the Amendments would not result in direct or indirect impacts to wildlife movement or nursery sites. No impact would occur.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 5:	Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impact BIO-5 FUTURE CONSTRUCTION ACTIVITIES COULD CONFLICT WITH LOCAL POLICIES PROTECTING BIOLOGICAL RESOURCES. WITH IMPLEMENTATION OF MM BIO-1A, MM BIO-1C, MM BIO-2A THROUGH MM BIO-2C, AND MM BIO-5A, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT

Due to the programmatic nature of the BMP, a precise, project-level analysis of the specific impacts of individual projects identified within the BMP on biological resources protected by local policies or ordinances is not feasible at this time. However, several of the projects that may be implemented under the BMP would occur in areas where protected trees and other biological resources which are protected by city and/or county ordinances and/or policies could be encountered. Therefore, the Project may conflict with local ordinances and/or policies protecting biological resources, including oak trees. To address this, oak trees within individual project areas would need to be surveyed in the field and documented in an Arborist Report prepared in accordance with the City's requirements. This is particularly important because some trees that are currently below ordinance size thresholds may reach protected status by the time of project construction. Therefore, field verification and updated assessments would be necessary during the project-level planning phase to ensure compliance with the City's tree protection ordinances and to avoid or minimize impacts to protected trees.

Class I Facilities

Construction of Class I, including the creation of storage, staging, and active work areas, would be located outside of existing roadways within individual project boundaries. Because implementation of Class I facilities would occur away from existing roadways ROWs, construction would result in the conversion of existing unpaved areas into developed pathways that have the potential to support oak trees. Direct or indirect impacts to oak trees would conflict with local policies and ordinances that protect biological resources, including Policy LU-3.4, Policy NR-4.2, and Policy NR 4-10 of the City of Agoura Hills General Plan 2035, all of which focus on sustaining the city's protected oak trees, as well as Section 9657 of the AHMC, which aims to preserve all healthy oak trees. Conflicting with the City of Agoura Hills General Plan 2035 and the AHMC would be potentially significant, and mitigation would be required.

Operation of the Class I facilities would consist of bicycle and pedestrian travel along shared use paths, which would not have the potential to impact oak trees or other protected biological resources. No operational impact would occur.

MEDEA CREEK PATH

Implementation of the Path would occur within riparian habitat and would have the greatest potential to impact protected oak trees. Direct or indirect impacts to oak trees would conflict with local policies and ordinances that protect biological resources, including Policy LU-3.4, Policy NR-4.2, and Policy NR 4-10 of the City of Agoura Hills General Plan 2035, all of which focus on sustaining the city's protected oak trees, as well as Section 9657 of the AHMC, which aims to preserve all healthy oak trees. Conflicting with the City of Agoura Hills General Plan 2035 and the AHMC would be potentially significant, and mitigation would be required.

Operation of the Path would consist of bicycle and pedestrian travel along a shared use path, which would not have the potential to impact oak trees or other protected biological resources. No operational impact would occur.

AGOURA HIGH SCHOOL CONNECTION

The proposed Connection would result in construction of a Class I facility connecting Thousand Oaks Boulevard to Fountain Place along the northern border of Agoura High School. Implementation of the Connection would occur within non-native grasslands that are not suitable for oak trees or other protected biological resources. Therefore, no impact would occur during construction or operation.

Class II Facilities

The establishment of Class II facilities would generally require roadway restriping and reconfiguration of lane widths to accommodate new dedicated bike lanes. These activities would occur within previously disturbed areas that are not suitable for oak trees or other protected biological resources. Therefore, no impact would occur during restriping activities.

Pavement widening would be necessary on Driver Avenue and on Cornell Road to allow for the addition of bicycle lanes. Construction activities for pavement widening would require grading and/or excavation in previously undisturbed areas that have the potential to support oak trees. Direct or indirect impacts to oak trees would conflict with local policies and ordinances that protect biological resources, including Policy LU-3.4, Policy NR-4.2, and Policy NR 4-10 of the City of Agoura Hills General Plan 2035, all of which focus on sustaining the city's protected oak trees, as well as Section 9657 of the AHMC, which aims to preserve all healthy oak trees. Conflicting with the City of Agoura Hills General Plan 2035 and the AHMC would be potentially significant, and mitigation would be required.

Operation of the Class II facilities would consist of bicycle travel along delineated bike lanes, which would not have the potential to impact oak trees or other protected biological resources. No operational impact would occur.

Class III Facilities

Establishment of Class III facilities would be limited to the restriping of existing roads to identify bike routes. These activities would occur within previously disturbed areas that are not suitable for oak trees or other protected biological resources. Therefore, no impact would occur during restriping activities.

Class IV Facilities

Construction of Class IV, including the creation of storage, staging, and active work areas, would be located outside of existing roadways within individual project boundaries. Implementation of the Class IV facilities would occur adjacent to but separate from existing roadways ROWs, which would result in the conversion of existing unpaved areas into developed pathway where there is the potential for oak trees to occur. Direct or indirect impacts to oak trees would conflict with local policies and ordinances that protect biological resources, including Policy LU-3.4, Policy NR-4.2, and Policy NR 4-10 of the City of Agoura Hills General Plan 2035, all of which focus on sustaining the city's protected oak trees, as well as Section 9657 of the AHMC, which aims to preserve all healthy oak trees. Conflicting with the City of Agoura Hills General Plan 2035 and the AHMC would be potentially significant, and mitigation would be required.

Operation of the Class IV facilities would consist of bicycle travel along physically separated bikeways adjacent to travel lanes, which would not have the potential to impact oak trees or other protected biological resources. No operational impact would occur.

Enhanced Bicycle Treatments

Enhanced bicycle treatments could include street striping and restriping, signage and wayfinding, bicycle signals and detection at traffic signals, bicycle parking, and bicycle repair facilities. These facilities would be implemented at various locations throughout the city within or adjacent to existing, new, or improved bikeways. Implementation would not result in development within previously undeveloped areas suitable for oak trees or other protected biological resources. Operation of the enhanced bicycle treatments would include continued use of existing bicycle facilities, storing of bicycles at new parking facilities, and use of bicycle repair facilities. These activities would not result in direct or indirect impacts to oak trees or other protected biological resources. No impact would occur.

General Plan Amendments

As part of the proposed Project, the City must amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. The Amendments would not have a physical impact on the Project area. Thus, the Amendments would not result in direct or indirect impacts to oak trees or other protected biological resources. No impact would occur.

Mitigation Measures

Class I facilities, Medea Creek Path, and Class IV facilities would require the following mitigation measures. Mitigation Measure BIO-1a, Mitigation Measure BIO-1c, Mitigation Measure BIO-2a, Mitigation Measure BIO-2b, and Mitigation Measure BIO-2c would be required; refer to Impact BIO-1 and Impact BIO-2 for full text of these measures. The following mitigation would also be required.

BIO-5a Tree Protection

The City shall procure all necessary tree removal permits prior to impacting a protected oak tree. A tree protection and replacement plan shall be developed by a certified arborist for any protected oak tree(s) or other naturally occurring native tree that has a trunk diameter (at 4.5 feet above grade; diameter at breast height [DBH]) that will be affected by implementation of an individual project identified within the BMP. The tree protection and replacement plan shall include, but would not be limited to, an inventory of protected oak trees and naturally occurring native trees with a DBH of four inches or more within the individual construction site, setbacks from trees and protective fencing, restrictions regarding grading and paving near trees, direction regarding pruning and digging within the root zone of trees, and requirements for replacement and maintenance of trees. If protected oak trees or other naturally occurring native trees with a DBH of four inches or more will be removed, replacement tree plantings of like species in accordance with the city standards, but at a minimum ratio of 4:1 (trees planted to trees impacted) for protected oak trees in accordance with the City of Agoura Hills Oak Tree Preservation Guidelines and Oak Tree Ordinance (Municipal Code Article IX, Chapter 6, Part 2., Division 7) and a minimum ratio of 1:1 replacement for other naturally occurring native trees with a DBH of four inches or more, and shall be installed on-site or at an approved off-site location and a restoration and monitoring program shall be developed and implemented for a minimum of seven years.

If the protective zone (as defined per the Agoura Hills Oak Tree Preservation Guidelines) of a protected oak tree is disturbed by more than 30 percent, the tree shall be retained and mitigated at a ratio of 4:1 as described above, because long-term impacts that may lead to decline or mortality may not be visible for several years. Any protected oak tree that will be encroached within its

protective zone during construction shall have a certified arborist present to oversee the work activities. Any trimming of roots and branches shall be performed or directly supervised by a certified arborist and shall be done in accordance with the American National Standards Institute A300 Tree Care standards.

Significance After Mitigation

Implementation of Mitigation Measure BIO-1a would require a pre-construction biological resources survey to identify protected biological resources within the limits of the Project area, preparation of a report on the potential impacts due to Project activities and mitigate as needed. Mitigation Measure BIO-1c would require implementation of construction BMPs into all grading and construction plans to minimize impacts to sensitive biological resources. Implementation of Mitigation Measure BIO-2a would protect and minimize the loss of riparian vegetation and natural communities. Implementation of Mitigation Measure BIO-2b would require identification, and if present, the delineation of riparian and other sensitive natural communities. Implementation of Mitigation Measure BIO-2c would require compensatory mitigation for the disturbance to riparian habitat, sensitive natural communities, and protected wetlands. Implementation of Mitigation Measure BIO-5a would require tree protection and removal permits prior to disturbance. With implementation of Mitigation Measure BIO-1a, MM BIO-1c, MM Bio-2a through MM Bio-2c, and MM-Bio 5a, impacts related to local policies or ordinances would be less than significant.

Threshold 6:	Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Impact BIO-6 THE PROPOSED PROJECT WOULD NOT CONFLICT WITH AN ADOPTED HABITAT CONSERVATION PLAN. NO IMPACT WOULD OCCUR.

There are no existing landscape-level Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans within the boundaries of the City of Agoura Hills. Thus, the proposed Project would not conflict with any such plans. No impact would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

No impact would occur.

4.3.4 Cumulative Impacts

The geographic scope for cumulative impacts related to biological resources is the Project area, which encompasses all of the City of Agoura Hills. Past, present, and reasonably foreseeable future projects, including the projects listed in Table 3-1, would have the potential to result in cumulative impacts to biological resources within the city, including special-status plant and wildlife species, sensitive natural communities, wetlands, riparian habitats, wildlife movement corridors, nursery sites, oak trees, or other protected biological resources. The magnitude of impacts would depend upon the location, type, and size of development and the specific resources associated with individual project sites. Biological resource evaluations would be completed on a case-by-case basis

for all future development. Compliance with applicable regulations and implementation of appropriate mitigation measures, including those contained within this PEIR, would address impacts to biological resources associated with future development. Therefore, cumulative development would have a less-than-significant cumulative impact on biological resources. Furthermore, as there are no existing landscape-level Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans within the boundaries of the City of Agoura Hills, the project cannot contribute to a cumulative impact related to a conflict with such plans.

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4.4 Cultural Resources

The analysis in this section considers potential impacts to historical and archaeological resources and human remains. Specifically, this section discusses the environmental and regulatory setting; the criteria used to determine the significance of environmental impacts related to historical and archaeological resources and human remains; and potential impacts related to historical and archaeological resources and human remains that would result from implementation of the proposed Project. Potential impacts to tribal resources are addressed in Section 4.12, *Tribal Cultural Resources*; potential impacts to paleontological resources are addressed in Section 4.5, *Geology and Soils*.

4.4.1 Setting

a. Prehistoric Setting

The Project area, which compasses all of the City of Agoura Hills, is located in what is generally described as the Northern Bight archaeological region, one of eight geographical divisions of California designated by Jones and Klar (2007). This region encompasses the northern half of the California Bight, is bounded by the Southern California coastline, and encompasses the previously designated Southern Coast archaeological region described by Moratto (1984). The Northern Bight archaeological region primarily includes the counties of Santa Barbara, Ventura, and portions of Los Angeles, extending from the coastline at Vandenberg Air Force Base inland to the Cuyama River Valley and south to the Santa Monica Mountains and the Los Angeles Basin. Following Glassow et al. (2007), the pre-contact cultural chronology for the Northern Bight is generally divided into six periods: Paleo-Indian (ca. 10,000–7000 before common era [BCE]), Millingstone (7000–5000 BCE), Early (5000 BCE–2000 BCE), Middle (2000 BCE–1 common era [CE]), Middle-Late Transition (1–1000 CE), and Late (1000 CE–Historic Contact). These periods are discussed in further detail below.

Paleo-Indian Period (ca. 10,000–7,000 BCE)

The Paleo-Indian Period describes the earliest evidence of human occupation of the Northern Bight and includes the cultural trends and subsistence strategies of contemporary populations from approximately 10,000–7,000 BCE (Glassow et al. 2007). Archaeologists largely define the Paleo-Indian Period in North America by projectile points associated with extinct large mammal remains, such as mammoth, bison, and dire wolves in the Southwest and Plains regions (Erlandson et al. 2007; Huckell 1996). These projectile points have been classified as the Clovis style, which exhibit a lanceolate shape with a flute initiated from the base that extends as far as the midline (Justice 2002).

The earliest accepted dates for human occupation in California were recovered from archaeological sites on two of the Northern Channel Islands, located off the southern coast of Santa Barbara County. Over 90 paleo-coastal sites dating between approximately 11,000 to 6,200 years BCE have been documented in the Northern Channel Islands (McLaren et al. 2019). Archaeological deposits from the Daisy Cave site on San Miguel Island establishes the presence of people in this area approximately 8000 BCE (Erlandson 1991; Erlandson et al. 2007), and the Arlington Springs Woman (CA-SRI-173) has a calibrated date approximately 9000 BCE derived from the human remains and rodent bones recovered from within the same deposits on Santa Rosa Island (Erlandson et al. 2007; Glassow et al. 2007; Johnson et al. 2002). Shell middens identified on the mainland of California have yielded dates from 8000 to 7000 BCE (Erlandson et al. 2007).

Recent data from Paleo-Indian shell middens, bone middens, lithic scatters, and quarry workshops on the Channel Islands indicate that the area supported substantial human populations during later paleo-coastal times (McLaren et al. 2019). Data from the last 20 years also suggests that the economy was a diverse mixture of hunting, fishing, and gathering, with a major emphasis on aquatic resources in many coastal areas (e.g., Jones and Ferneau 2002; Erlandson et al. 2007). Shellfish are particularly prevalent, suggesting a heavy reliance on this resource, with varying intensities of reliance on fish, marine mammals, seabirds, and waterfowl (McLaren et al. 2019).

Assemblages on the Channel Islands include chipped-stone bifaces, cores and flake tools, ground-stone artifacts, bone gorges, Olivella shell beads, woven sea grass cordage, and red ochre. While no fluted points have been found on the Channel Islands, a few have been found along California's mainland coast (McLaren et al. 2019). One fluted projectile point fragment was recovered from site CA-SBA-1951 on the Santa Barbara Channel coastal plain (Erlandson 1994: 44; Erlandson et al. 1987). Archaeological deposits at the Daisy Cave site further yielded an assemblage of "the oldest known fishhooks in the Americas" (Erlandson et al. 2007: 57).

Millingstone Horizon (7,000–5,000 BCE)

Originally identified in 1929, the Millingstone Horizon, as described by Wallace (1955, 1978) and Warren (1968), is characterized by an ecological adaptation to collecting plant resources, such as seeds and nuts. This identification was suggested by the appearance and abundance of well-made milling implements (e.g., metates, milling slabs, and hand stones like manos and mullers) in the archaeological record, particularly in areas along the coast of California. Archaeologists generally accept that human occupation of California during the Paleo-Indian period originated from small, dispersed occupations. With milling implements occurring in high frequencies for the first time, archaeologists infer the Millingstone Horizon experienced a significant population increase in the Central Coast region (Glassow et al. 2007). Excavations at the Tank Site (CA-LAN-1) in Topanga Canyon from 1947 to 1948 (Treganza and Bierman 1958), for example, confirmed the presence of over 2,000 milling implements that correspond with the Millingstone Horizon.

Flaked stone assemblages, which include crude core and cobble-core tools, flake tools, large side-notched projectile points, and pitted stones (Glassow et al. 2007; Jones et al. 2007), and shell middens in coastal sites suggest that contemporary people in the Northern Bight practiced a mixed food procurement strategy. Faunal remains identified at Millingstone Horizon sites point to a broad-spectrum of hunting and gathering of shellfish, fish, birds, and mammals, though large faunal assemblages are uncommon. This mixed food procurement strategy demonstrates adaptation to regional and local environments.

Along the Northern Bight, Millingstone Horizon sites are most common on terraces and knolls, typically set back from the current coastline (Erlandson 1994: 46). 40 sites dating to this period have been identified in various settings, including rocky coasts, estuaries, and nearshore interior valleys (Glassow et al. 2007). The larger sites usually contain extensive midden deposits, possible subterranean house pits, and cemeteries. Most of these sites probably reflect intermittent use over many years of local cultural habitation and resource exploitation.

Early Period (5,000 BCE–2,000 BCE)

The Early Period of the Northern Bight is marked by a lower frequency of radiocarbon dated archaeological sites as well as changes in artifact forms. Differences in artifact forms, and particularly in ground stone implements, likely represent changes in subsistence (Glassow et al. 2007). The material culture recovered from Early Period sites within the Northern Bight provides

evidence for continued exploitation of inland plant and coastal marine resources, as well as the incorporation of "newly important food resources" found in specific habitats (Glassow et al. 2007: 197). In addition to the use of metates and manos, indigenous populations began to use mortars and pestles, such as those recovered from the Sweetwater Mesa (CA-LAN-267) and Aerophysics (CA-SBA-53) sites (Glassow et al. 2007).

Artifact assemblages recovered from Early Period sites also include bipointed bone gorge hooks used for fishing, Olivella beads, bone tools, and pendants made from talc schist. The frequency of projectile points in Early Period assemblages also increased, while the style began to change from lanceolate forms to side-notched forms (Glassow et al. 2007). The projectile point trend has become apparent at numerous sites along the Northern Bight coastal regions, as well as a few inland sites (e.g. CA-SBA-210 and CA-SBA-530). In many cases, manifestations of this trend are associated with the establishment of new and larger settlements, such as at the Aerophysics site (Glassow et al. 2007, Jones et al. 2007).

Middle Period (2000 BCE–1 CE)

The remains of fish, land mammals, and sea mammals are increasingly abundant and diverse in archaeological deposits along the coastal Northern Bight during the Middle Period, suggesting a pronounced trend toward greater adaptation to regional or local resources, as well as the development of socioeconomic and political complexity in indigenous populations (Glassow et al. 2007). Shell fishhooks were introduced, as opposed to the bone fishhooks found in earlier assemblages, and projectile points changed from side-notched dart points to contracting stem styles.

Flaked stone tools used for hunting and processing—such as large side-notched, stemmed, lanceolate or leaf-shaped projectile points, large knives, edge modified flakes, and drill-like implements—occurred in archaeological deposits in higher frequencies and are more morphologically diversified during the Middle Period. Bone tools, including awls, are more numerous than in the preceding period, and the use of asphaltum adhesive became common. Circular fish hooks that date from between 1000 and 500 BCE, compound bone fish hooks that date between CE 300 and 900, notched stone sinkers, and the tule reed or balsa raft, indicative of major developments in maritime technology, became common during this period (Arnold 1995; Glassow et al. 2007; Jones and Klar 2005: 466; King 1990: 87–88).

Populations continued to follow a seasonal settlement pattern until the end of the Middle Period; large, permanently occupied settlements with formal architecture, particularly in coastal areas, appear to have been the norm by the end of the Middle Period (Glassow et al. 2007). Indigenous populations began to bury the deceased in formal cemeteries with artifacts that may represent changes in ideology and the development of ritual practices (Glassow et al. 2007).

Middle-Late Transition Period (1 CE–1,000 CE)

The Middle-Late Transition period is marked in the archaeological record by major changes in settlement patterns, diet, and interregional exchange. Contemporary populations of the Northern Bight continued to occupy more permanent settlements with the continued use of formal cemeteries and burial of goods. The manufacture of the plank canoe, or tomol, allowed contemporary populations to catch larger fish that occupied deeper sea waters (Glassow et al. 2007). Following the introduction of the plank canoe, harpoons make a more pronounced appearance as their use increases. The plank canoe also appears to have influenced commerce between the mainland Northern Bight coastal regions and the Channel Islands (Glassow et al. 2007:

204). Evidence at Middle-Late Transition Period sites in the Northern Bight indicate that populations replaced atlatl (dart) technologies with the bow and arrow, which required smaller projectile points.

Late Period (1,000 CE–Historic Contact)

Archaeologists distinguish Late Period sites in the Northern Bight with small, finely worked projectile points and temporally diagnostic shell beads. Although shell beads were typical of coastal sites, trade brought many of these maritime artifacts to inland locations, especially during the latter part of the Late Period. Projectile points diagnostic of both the Middle and Late periods found within the Northern Bight region and down the central and southern coasts of California include large, contracting-stemmed types typical of the Middle Period, as well as small, leaf-shaped Late Period projectile points (Jones and Ferneau 2002: 217). The small, finely worked projectile points typically associated with bow and arrow technology are believed to have been introduced to the area by the Takic migration from the deserts into Southern California.

Other common artifacts identified at Late Period sites in the Northern Bight include bifacial bead drills, bedrock mortars, hopper mortars, lipped and cupped Olivella shell beads, and steatite disk beads. The presence of beads and bead drills suggest that low-level bead production was widespread throughout the region (Glassow et al. 2007). Unlike the large Middle Period shell middens, Late Period sites are more frequently single-component deposits with evidence for only one period of occupation or use. There are also more inland sites, with fewer and less visible sites along the Pacific shore during the Late Period.

b. Historic-Period Setting

Post-Contact history for the state of California is generally divided into three periods: the Spanish Period (1769–1822), Mexican Period (1822–1848), and American Period (1848–present). Although Spanish, Russian, and British explorers visited the area for brief periods between 1529 and 1769, the Spanish Period in California began with the establishment of a settlement at San Diego in 1769 and the subsequent founding of Mission San Diego de Alcalá, the first of 21 missions constructed between 1769 and 1823. Independence from Spain in 1821 marked the beginning of the Mexican Period, and the signing of the Treaty of Guadalupe Hidalgo in 1848 ended the Mexican-American War, which signaled the beginning of the American Period when California became a territory of the United States.

Spanish Period (1769 – 1822)

Spanish explorers made sailing expeditions along the coast of California between the mid-1500s and mid-1700s. In 1542, Juan Rodriguez Cabrillo led the first European expedition to observe what was known by the Spanish as Alta (upper) California. For more than 200 years, Cabrillo and other Spanish, Portuguese, British, and Russian explorers sailed the Alta California coast and made limited inland expeditions, but they did not establish permanent settlements (Bean 1968; Rolle 2003). The Spanish crown laid claim to Alta California based on the surveys conducted by Cabrillo and Vizcaíno (Bancroft 1885; Gumprecht 1999).

By the 18th century, Spain developed a three-pronged approach to secure its hold on the territory and counter against other foreign explorers. The Spanish established military forts known as presidios, as well as missions and pueblos (towns) throughout Alta California. The 1769 overland expedition by Captain Gaspár de Portolá marked the beginning of California's historic period, occurring just after the King of Spain installed the Franciscan Order to direct religious and colonization matters in assigned territories of the Americas. Portolá established the Presidio of San

Diego as the first Spanish settlement in Alta California in 1769. Franciscan Father Junípero Serra also founded Mission San Diego de Alcalá that same year, the first of the 21 missions that would be established in Alta California by the Spanish and the Franciscan Order between 1769 and 1823 (Graffy 2010). The nearest missions to what is now Agoura Hills were San Fernando Rey de Espana and San Gabriel Arcangel, founded in 1797 and 1791, respectively.

The mission and presidio relied on Tongva and Tataviam labor; eventually, the majority of the native populations were forced to live within the mission complex. During the Spanish Period, construction of missions and associated presidios was a major emphasis with the goal of integrating the Native American population into Christianity and communal enterprise. Incentives were also provided to draw settlers to pueblos or towns. Three pueblos were established during the Spanish Period, only two of which, San José and Los Angeles, were successful and remain as California cities (Library of Congress 2024a, 2024b, Galvin Preservation Associates [GPA] 2009)).

Spain began making land grants in 1784, typically to retiring soldiers, although the grantees were only permitted to inhabit and work the land. The land titles technically remained property of the Spanish king (Livingston 1914). In 1800, Miguel Ortega was granted a Spanish grazing concession called Rancho Las Virgenes or El Rancho de Nuestra Senora La Reina de Las Virgenes. It was abandoned after his death in 1809.

Mexican Period (1822 – 1848)

Up to this period, several factors kept growth within Alta California to a minimum, including the threat of foreign invasion, political dissatisfaction, and unrest among the indigenous population. After more than a decade of intermittent rebellion and warfare, New Spain won independence from Spain in 1821. In 1822, the Mexican legislative body in California ended isolationist policies designed to protect the Spanish monopoly on trade, and decreed California ports open to foreign merchants (Orsi and Gutierrez 1998).

Extensive land grants were established in the interior during the Mexican Period, in part to increase the population inland from the more settled coastal areas where the Spanish had first concentrated their colonization efforts. The secularization of the missions following Mexico's independence from Spain resulted in the subdivision of former mission lands and establishment of many additional ranchos. Commonly, former soldiers and well-connected Mexican families were the recipients of these land grants, which now included the title to the land (Graffy 2010). Rancho Las Virgenes was eventually given to Nemecio Dominquez and Domingo Carrillo in a land grant in 1834. A portion of the rancho was transferred to Nemecio's father, Jose Maria Dominguez, in 1837.

During the supremacy of the ranchos (1834–1848), landowners largely focused on the cattle industry and devoted large tracts to grazing. Cattle hides became a primary Southern California export, providing a commodity to trade for goods from the east and other areas in the United States and Mexico. The number of nonnative inhabitants increased during this period because of the influx of explorers, trappers, and ranchers associated with the land grants. The rising California population contributed to the introduction and rise of diseases foreign to the Native American population, who had no associated immunities (Graffy 2010).

American Period (1849 – Present)

The United States went to war with Mexico in 1846. The war ended in 1848 with the Treaty of Guadalupe Hidalgo, ushering California into its American Period. California officially became a state with the Compromise of 1850, which also created Utah and New Mexico (with present-day Arizona)

as United States territories (Waugh 2003). Horticulture and livestock, based primarily on cattle as the currency and staple of the rancho system, continued to dominate the Southern California economy through 1850s. The discovery of gold in the northern part of the state led to the Gold Rush beginning in 1848, and with the influx of people seeking gold, cattle were no longer desired mainly for their hides but also as a source of meat and other goods. During the 1850s cattle boom, rancho vaqueros, or cowboys, drove large herds from southern to northern California to feed that region's burgeoning mining and commercial boom.

A severe drought in the 1860s decimated cattle herds and drastically affected rancheros' source of income. In addition, property boundaries that were loosely established during the Mexican era led to disputes with new incoming settlers, problems with squatters, and lawsuits. Rancheros often were encumbered by debt and the cost of legal fees to defend their property. As a result, much of the rancho lands were sold or otherwise acquired by Americans. Most of these ranchos were subdivided into agricultural parcels or towns (Dumke 1944).

c. Local History

In 1845, Maria Antonia Machado de Reyes purchased land from her uncle, Jose Maria Dominguez. Maria, along with her son José Paulino, constructed an adobe home on the land in 1850. This home, known as Reyes Adobe, was determined eligible for listing in the National Register of Historic Places (NRHP) and is automatically eligible for listing in the California Register of Historical Resources (CRHR), and therefore qualifies as a historical resource under CEQA. This home was formally listed on the CRHR (California Historical Resources Status Code 2S2) in 1994, still remains and is one of the oldest houses in Agoura Hills; it was retained by the Reyes family until 1916 (City of Agoura Hills 2022; California Office of Historic Preservation 2025).

The area that would become Agoura Hills remained largely agricultural and sparsely populated through the entry into the American period in 1848 and the end of the nineteenth century. By 1900, the area was a popular stagecoach stop along El Camino Real due in part to a natural spring at the foothills of Ladyface Mountain. Modern development began in earnest in 1924 when Ira and Leon Colodny purchased 500 acres in the area and sold subdivided lots, calling the development "Independent Acres." In 1927, Paramount Pictures purchased a large portion of the former Rancho Las Virgenes south of the city to be used as a ranch for films (County of Los Angeles 2023). This area, then referred to as "Picture City", was one of the early developments in Agoura Hills and was situated in its southeast corner along the Cheeseboro Canyon mountains (USGS 1932). The Picture City Chamber of Commerce petitioned for a permanent local name and post office, and in 1928 the name of "Agoura" was chosen, after Pierre Agoure, a Basque rancher who moved to the area in the 1870s for sheepherding (County of Los Angeles 2023).

In the 1930s and 1940s, growth in the area remained limited largely due to a lack of proper water supply (City of Agoura Hills 2022). With the establishment of the La Virgenes Municipal Water District in the 1950s, a reliable water source made Agoura Hills more attractive to both families and businesses. Thus, development and the local population substantially increased. With its proximity to Los Angeles, families were drawn to the relatively quiet and suburban character of Agoura Hills despite its commuting distance to the larger metropolitan region. During this period, the local Highway 101 through Agoura Hills was expanded into the Ventura Freeway, further contributing to the expansion and population growth of the city and surrounding area. Agoura Hills continued to expand with large suburban developments as well as school and shopping areas from east to west, primarily on the east side of Kanan Road at first, eventually continuing west past Kanan Road beginning in the 1970s (NETRONline 2023). The first substantial housing tracts were also developed

during this period in the Hillrise, Liberty Canyon, and Lake Lindero communities (City of Agoura 2022).

On December 8, 1982, Agoura Hills became the 83rd city in Los Angeles County though local vote; in 1985 and 1987 the City adopted its first General Plan and Municipal Code, respectively (City of Agoura Hills 2022). Today, Agoura Hills is a prosperous community, popular for its schools and family-oriented environment (Pascal 2013).

d. Identification of Cultural Resources

Built Environment Resources

A review of the NRHP, CRHR, and California State Office of Historic Preservation Built Environment Directory (BERD), completed in March 2025, identified one designated resource in Agoura Hills. The Reyes Adobe Historical Site, located just north of the Ventura Freeway on Reyes Adobe Road, is listed in the CRHR and was previously determined eligible for listing in the NRHP by the California State Historic Preservation Officer; as such, it meets the definition of a historical resource pursuant to State CEQA Guidelines Section 15064.5(a). The property includes the 1850 adobe and a later barn which possesses significant associations with both the rancho period of California and adobe architecture.

The Project area is a developed urban area comprised of commercial and residential development punctuated by open space. Much of the development within the Project area has occurred during the past 40 to 50 years; therefore, there are buildings and structures throughout the city that meet the 45-year age threshold for consideration as historical resources pursuant to CEQA. Agoura Hills has not been previously subject to a formal, citywide historical resources survey. The review of available information did not identify additional properties which are designated or have previously been found eligible for listing in the NRHP or CRHR.

The City does not currently have a historic preservation ordinance or adopted criteria by which to designate historical resources locally. The City does recognize the unique character of the commercial portion of the area known as “Old Agoura” and adopted the Old Agoura Design Overlay District. The overlay district as currently adopted in the municipal code does not meet the definition of a “historic district” pursuant to federal and state guidelines and regulations.

Archaeological Resources

A California Historical Resources Information System (CHRIS) records search was completed for the Project area by staff at the South Central Coastal information Center (SCCIC), housed at California State University, Fullerton in February 2025. The records search included a review of all previously recorded cultural resources and previous studies within the Project area and a 0.5-mile radius. The records search results indicated 159 cultural resource studies have been conducted within 0.5 miles of the Project area. Of the 159 studies, 115 overlap proposed bicycle facilities identified in the BMP.

The records search results also indicated 62 cultural resources have been previously recorded within the 0.5-mile radius of the Project area including 44 prehistoric archaeological sites, one multicomponent archaeological site, two historic-period archaeological sites, three historic-period built environment resources, and 12 prehistoric isolates. Of the 62 previously recorded cultural resources, 11 overlap or are located immediately adjacent to (within 150 feet of) proposed bicycle facilities identified in the Project, all of which are prehistoric archaeological sites (Table 1). Of the 11 prehistoric archaeological resources located within or immediately adjacent to the proposed bicycle

facilities identified in the Project, two (P-19-000725 and -000726) are lithic scatters, three (P-19-000032, -000671, and -004819) are artifact scatters containing both lithic and groundstone artifacts, four (P-19-000041, -000238, -001352, and -004711) are habitation sites containing midden soils, and two (P-19-000243 and -000314) are habitation sites containing midden soils and human remains. Of these 11 resources, two (P-19-000032 and -000243) overlap Class I Bikeways, two (P-19-000671 and -001352) overlap Class II Bikeways, four (P-19-000238, -000314, -004711, and -004819) overlap Class III Bikeways, two (P-19-000725 and -000726) overlap Class IV Bikeways, and one (P-19-000041) overlaps Class I, II, and III Bikeways. These 11 resources are summarized in Table 4.4-1.

Table 4.4-1 Summary of Previously Recorded Cultural Resources Within or Immediately Adjacent to the Proposed Bikeways

Primary No. (P-19-)	Permanent Trinomial (CA-LAN-)	Descriptions	Dates Recorded	CRHR Eligibility	Bikeway
000032	32	Prehistoric archaeological site: artifact scatter	1967	Not evaluated	Class I Bikeway
000041	41	Prehistoric archaeological site: habitation site with midden soils	1951; 1961; 1965; 2000; 2010; 2011	Recommended eligible	Class I, II, and III Bikeways
000238	238	Prehistoric archaeological site: habitation site with midden soils	1963	Not evaluated	Class III Bikeway
000243	243	Prehistoric archaeological site: habitation site with midden soils and human remains	1963	Not evaluated	Class I Bikeway
000314	314	Prehistoric archaeological site: habitation site with midden soils and possible human remains	1963; 2011	Not evaluated	Class III Bikeway
000671	671	Prehistoric archaeological site: artifact scatter	1976	Not evaluated	Class II Bikeway
000725	725	Prehistoric archaeological site: lithic scatter	1977	Not evaluated	Class IV Bikeway
000726	726	Prehistoric archaeological site: lithic scatter	1977	Not evaluated	Class IV Bikeway
001352	1352	Prehistoric archaeological site: habitation site with midden soils	1987; 2011	Recommended eligible	Class II Bikeway
004711	4711	Prehistoric archaeological site: habitation site with midden soils	2015	Recommended eligible	Class III Bikeway
004819	4819	Prehistoric archaeological site: artifact scatter	2017	Recommended not eligible	Class III Bikeway

Source: SCCIC 2025

4.4.2 Regulatory Setting

a. Federal Regulations

National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA) deals with historic preservation at the federal level. One of the most important provisions of the NHPA is the establishment of the NRHP, the official federal designation of historical resources. Although the Project does not have a federal nexus, properties which are listed in or have been formally determined eligible for listing in the NRHP are automatically listed in the CRHR. The following is therefore presented to provide applicable regulatory context.

The NRHP was authorized by Section 101 of the NHPA and is the nation's official list of cultural resources worthy of preservation. The NRHP, administered by the National Park Service, recognizes the quality of significance in American, state, and local history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects. To be eligible for the NRHP, a property must be significant under the criteria enumerated in 36 Code of Federal Regulations (CFR), Part 60.4. Specifically, a property is eligible for listing in the NRHP if it meets one or more of the following criteria:

Criterion A: Is associated with events that have made a significant contribution to the broad patterns of our history

Criterion B: Is associated with the lives of persons significant in our past

Criterion C: Embodies the distinctive characteristics of a type, period, or method of installation, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction

Criterion D: Has yielded, or may be likely to yield, information important in prehistory or history

In addition to meeting at least one of the above designation criteria, resources must also retain integrity. The NPS recognizes seven aspects or qualities that, considered together, define historic integrity. To retain integrity, a property must possess several of these seven qualities—if not all—defined in the following manner:

Location: The place where the historic property was constructed or the place where the historic event occurred

Design: The combination of elements that create the form, plan, space, structure, and style of a property

Setting: The physical environment of a historic property

Materials: The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property

Workmanship: The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory

Feeling: A property's expression of the aesthetic or historic sense of a particular period of time

Association: The direct link between an important historic event or person and a historic property

Listing in the NRHP does not entail specific protection or assistance for a property, but it does guarantee recognition in planning for federal or federally-assisted projects (46 United States Code [U.S.C.] § 470f [Section 106 of the NHPA]), eligibility for federal tax benefits and qualification for federal historic preservation assistance. The NRHP is influential beyond its statutory role because it achieves uniform standards of documentation and evaluation.

Certain properties are generally considered ineligible for listing in the NRHP, including cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions, relocated structures, or commemorative properties. Additionally, a property must be at least 50 years of age to be eligible for listing in the NRHP. The National Park Service states that 50 years is the general estimate of the time needed to develop the necessary historical perspective to evaluate significance (National Park Service 1997: 41). Properties which are less than 50 years must be determined to have "exceptional importance" to be considered eligible for NRHP listing.

b. State Regulations

California Register of Historical Resources

The CRHR was established in 1992 and codified by PRC Sections 5024.1 and Title 14 Section 4852. The CRHR is an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change (PRC Section 5024.1(a)). The criteria for eligibility for the CRHR are consistent with the NRHP criteria but have been modified for state use in order to include a range of historical resources that better reflect the history of California (PRC Section 5024.1(b)). Unlike the NRHP, the CRHR does not have a defined age threshold for eligibility; rather, a resource may be eligible for the CRHR if it can be demonstrated sufficient time has passed to understand its historical or architectural significance (California Office of Historic Preservation 2011). Furthermore, resources may still be eligible for listing in the CRHR even if they do not retain sufficient integrity for NRHP eligibility (California Office of Historic Preservation 2011). Generally, the California Office of Historic Preservation recommends that resources over 45 years of age be recorded and evaluated for historical resources eligibility (California Office of Historic Preservation 1995: 2).

A property is eligible for listing in the CRHR if it meets one or more of the following criteria:

Criterion 1: Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage

Criterion 2: Is associated with the lives of persons important to our past

Criterion 3: Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values

Criterion 4: Has yielded, or may be likely to yield, information important in prehistory or history

The CRHR includes properties that are listed or have been formally determined to be eligible for listing in the NRHP, State Historical Landmarks and eligible Points of Historical Interest. Other resources require nomination for inclusion in the Register. These may include resources contributing to the significance of a local historic district, individual historical resources, historical resources identified in historic resource surveys conducted in accordance with State Historic Preservation Office (SHPO) procedures, historic resources or districts designated under a local ordinance

consistent with State Historic Resources Commission procedures, and local landmarks or historic properties designated under local ordinance.

Two other programs are administered by the state: California Historical Landmarks and California "Points of Historical Interest." California Historical Landmarks are buildings, sites, features, or events that are of statewide significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other historical value. California Points of Historical Interest are buildings, sites, features, or events that are of local (city or county) significance and have anthropological, cultural, military, political, architectural, economic, scientific or technical, religious, experimental, or other historical value.

Codes Governing Human Remains

The disposition of human remains is governed by Health and Safety Code Section 7050.5 and PRC Sections 5097.5, 5097.94 and 5097.98. If human remains are discovered, the County Coroner must be notified within 48 hours and there should be no further disturbance to the site where the remains were found. If the remains are determined by the coroner to be Native American, the coroner is responsible for contacting the Native American Heritage Commission (NAHC) within 24 hours. The NAHC, pursuant to PRC Section 5097.98, will immediately notify those persons it believes to be most likely descended from the deceased Native Americans so they can inspect the burial site and make recommendations for treatment or disposal. Section 5097.5 of the Code states the following:

> A person shall not knowingly and willfully excavate upon, or remove, destroy, injure or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands...(c) A violation of this section is a misdemeanor…

As used in this section, "public lands" means lands owned by, or under the jurisdiction of, the State or any city, county, district, authority or public corporation, or any agency thereof. Consequently, the City of Agoura Hills is required to comply with Public Resource Code Section 5097.5 for its activities on publicly-owned land.

Section 5097.993 sets requirements for the unlawful and malicious excavation, removes, destruction, injury, or defacing of a Native American historic, cultural, or sacred site, that is listed or may be eligible for listing in the CRHR.

c. Local Regulations

City of Agoura Hills General Plan 2035

The City of Agoura Hills General Plan 2035 was adopted on March 24, 2010 (updated on August 10, 2022) by the City Council (City of Agoura Hills 2022). The City of Agoura Hills General Plan 2035 is a strategic document designed to guide the physical development of the city until the year 2035. Among other things, the City of Agoura Hills General Plan 2035 sets out the pattern of land uses, including residential, commercial, and industrial. It also establishes the system of streets, bikeways, and trails. The City of Agoura Hills General Plan 2035 addresses a wide variety of subject areas, including housing, traffic, natural resources, land uses, economic development, noise, and public safety.

The City of Agoura Hills General Plan 2035 contains the following goals and policies related to related to archaeological and historic resources, which would apply to the proposed Project.

Goal HR-1. The protection and maintenance of historic resources to foster stewardship and civic pride, which contributes to the unique identity and character of Agoura Hills.

> **Policy HR-1.1.** Enhance community appreciation of the importance of the City's historic sites and buildings, and protect and preserve significant historical resources, to the extent feasible
>
> **Policy HR-3.1.** Require that the potential for the presence of significant archaeological and paleontological resources be considered prior to the development of a property.

Goal HR-3. The protection of significant archaeological and paleontological resources in Agoura Hills.

> **Policy HR-3.2** Require that significant archaeological and paleontological resources be preserved in-situ, as feasible. When avoidance of impacts is not possible, require data recovery mitigation for all significant resources. Require that excavation of deposits of Native American origin be coordinated with and monitored by recognized Chumash representatives.
>
> **Policy HR-3.3**. Require that if human remains or funerary objects are discovered and unearthed during any soil disturbing activity, the discoveries shall be treated in compliance with applicable state and federal laws, including notifying the County Coroner and the California Native American Heritage Commission, as appropriate, and following relevant procedures.

City of Agoura Hills Municipal Code

The City does not currently have a historic preservation ordinance or adopted criteria by which to designate historical resources locally; the City does recognize the unique character of the commercial portion of the area known as "Old Agoura" through the adoption of the Old Agoura Design Overlay District in Article IX, Chapter 5, Part 6 of the Agoura Hills Municipal Code (AHMC). The intent of this overlay designation is to "preserve the unique character of Old Agoura through the establishment of special public improvement standards and design guidelines." It establishes permitted, conditional, and prohibited uses, in addition to providing design standards relating to building coverage, height, and signs among other considerations. Section 9552.2 of the AHMC specifically identifies four properties within the district which would require conditional use permits prior to any modification, alteration or change, specifically "Amazing Kate's," "Old Post Office," "Stage Door Theatre," and "Agoura Sign."

4.4.3 Impact Analysis

a. Methodology and Significance Thresholds

As discussed in Section 4.0, *Environmental Impact Analysis*, all Project components are analyzed at the programmatic level. Project components include the Bicycle Master Plan (BMP), the VMT Mitigation Exchange and Banking Program (Program), and the General Plan Amendments (Amendments). Projects included within the BMP are grouped into Class I facilities, Class II facilities, Class III facilities, Class IV facilities, and enhanced bicycle treatments, as identified in Section 2.5, Project Characteristics, and in Table 1 of Chapter 2, Project Description. The impact analysis contained herein provides a programmatic analysis of anticipated impacts for each of the five facility classes, as the individual project impacts associated with each class of facility are expected to be similar. Because the City seeks to prioritize implementation of the Medea Creek Path (Path) and the

Agoura High School Connection (Connection), the Path and the Connection have their own subheadings within the Class I Facility impact analysis subsection to provide a more specific assessment of their environmental impacts. Impacts associated with the General Plan Amendments are analyzed within their own subsection.

As discussed in Chapter 2, Project Description, the only projects that are currently planned, unfunded, and could potentially be funded by the VMT Mitigation Exchange and Banking Program are those currently included within the Bicycle Master Plan. Therefore, the impact analysis contained herein does not include a subsection for impacts associated with the Program, as the individual project list for the BMP and the Program are identical and impacts associated with the BMP would encompass impacts associated with the Program.

Within the following environmental analysis, impacts associated with each Project component are explicitly identified under the respective heading.

According to State CEQA Guidelines Appendix G, impacts related to cultural resources would be significant if the proposed Project would:

1. Cause a substantial adverse change in the significance of an historical resource pursuant to Section 15064.5;
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; or,
3. Disturb any human remains, including those interred outside of dedicated cemeteries.

The first threshold broadly refers to historical resources. To more clearly differentiate between archaeological and built environment resources, the analysis under Impact CUL-1 is limited to built environment resources. Archaeological resources, including those that may be considered historical resources pursuant to Section 15064.5 and those that may be considered unique archaeological resources pursuant to Section 21083.2, are considered under Impact CUL-2.

The significance of a cultural resource and subsequently the significance of any impact is determined by consideration of whether or not that resource can increase our knowledge of the past. The determining factors are site content and degree of preservation. A finding of archaeological significance follows the criteria established in the *CEQA Guidelines*. Specifically, State CEQA Guidelines Section 15064.5 (Determining the Significance of Impacts to Archaeological Resources) states:

> (a)(3) […] Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the CRHR (Pub. Res. Code, § 5024.1, Title 14 CCR, Section 4852)...
>
> (a)(4) The fact that a resource is not listed in, or determined to be eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.
>
> (b) A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

A substantial adverse change in the significance of a historical resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired. Generally, impacts to historical resources can be mitigated to below a level of significance by following the Secretary of the Interior's Guidelines for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings [Guidelines § 15064.6(b)]. In some circumstances, documentation of a historical resource by way of historic narrative photographs or architectural drawings will not mitigate the impact of demolition below the level of significance [Guidelines § 15126.4(b)(2)].

Preservation in place is the preferred manner of mitigation for archaeological resources as it retains the relationship between artifacts and context [Guidelines § 15126.4 (b)(3)(A)].

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Impact CUL-1 THE PROPOSED PROJECT HAS THE POTENTIAL TO RESULT IN SIGNIFICANT IMPACTS IF DEVELOPMENT CARRIED OUT UNDER THE PROJECT WOULD CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A HISTORICAL RESOURCE. THIS IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE.

CEQA requires a lead agency to analyze whether historic and archaeological resources may be adversely impacted by a proposed project. Under CEQA, a "project that may cause a substantial adverse change in the significance of a historic resource is a project that may have a significant effect on the environment" (California Public Resources Code [PRC] Section 21084.1). Answering this question is a two-part process: first, the determination must be made as to whether or not the proposed Project involves cultural resources; second, if cultural resources classified as historical or archaeological resources are present, the proposed Project must be analyzed for a potential "substantial adverse change in the significance" of the resource. Any future discretionary projects within the City's borders would be required to analyze site specific historic and archaeological resource impacts under CEQA and mitigate any impacts if feasible.

The records search and archival research, conducted in February and March 2025, respectively, identified one previously recorded built environment resource within the city. In 1994, the Reyes Adobe was determined eligible for listing in the NRHP and is automatically eligible for listing in the CRHR, and therefore qualifies as a historical resource under CEQA. There are also numerous structures (e.g., bridges, channels, streets), objects (e.g., street furniture), and buildings in the city that have not been subject to previous historical resources evaluation but which may meet the 45-year threshold triggering the need for consideration consistent with California Office of Historic Preservation (OHP) guidance. Implementation of the BMP may result in direct impacts to structures and objects, as well as indirect impacts to adjacent buildings that may qualify as historical resources but have yet to be evaluated. Direct impacts to structures and objects may result from construction activities such as pavement demolition, grading, retaining wall/fencing installation, street/undercrossing improvements, and pavement widening. Furthermore, although the BMP does not directly propose demolition or alteration to buildings, the introduction of new visual elements such as retaining walls/fences, bollards, signage, and traffic signals could result in indirect impacts to the setting of adjacent buildings.

Class I Facilities

Construction of the proposed Class I facilities would require clearing and grubbing, pavement demolition, grading, utility relocation, retaining wall or fencing installation, asphalt paving or repaving, street and undercrossing improvements, striping, and revegetation. These activities could directly impact structures and/or objects. These facilities may also indirectly impact adjacent buildings through the introduction of elements such as signage and new signal heads. Demolition or alteration of structures/objects and/or the introduction of new elements to the setting of adjacent buildings qualifying as historical resources could result in significant impacts. Therefore, the proposed Project has the potential to result in a substantial adverse change in the significance of a built environment resource qualifying as a historical resource under CEQA. Impacts would be potentially significant, and mitigation would be required.

MEDEA CREEK PATH

Implementation of the Medea Creek Path would include construction of an asphalt bike path, which could directly impact structures and/or objects, as well as indirectly impact buildings. These direct and indirect impacts can result in significant impacts to historical resources. Specific construction activities associated with the Path that could result in direct and/or indirect impacts to historical resources include demolition of existing curb ramps and modifications to medians and crosswalks as well as construction of access ramps, retaining walls/fences, and undercrossings. Impacts would be potentially significant, and mitigation would be required.

AGOURA HIGH SCHOOL CONNECTION

Construction activities for the Agoura High School Connection could also directly impact structures and objects, as well as indirectly impact buildings, which can result in significant impacts to historical resources. Specific construction activities that could result in direct and/or indirect impacts to historical resources would include modifications to medians, relocation of signal heads, reconfiguration of Thousand Oaks Boulevard, construction of concrete sidewalks, and construction of access ramps. Impacts would be potentially significant, and mitigation would be required.

Class II Facilities

Class II facilities would primarily involve restriping and reconfiguration of lane widths to accommodate new dedicated bike lanes. Limited pavement widening would be required on Driver Avenue, between Easterly Road and Colodny Drive, and on Cornell Road, between Agoura Road and Cornell Way. Construction activities associated with pavement widening would involve clearing and grubbing, subgrade stabilization, base course installation, and asphalt paving. These activities could directly impact structures and/or objects. No above ground elements are planned as part of the Class II facilities; therefore, no indirect visual impacts to adjacent buildings are anticipated. Nonetheless, demolition or alteration of structures/objects could result in significant impacts to historical resources. Therefore, the proposed Project has the potential to result in a substantial adverse change in the significance of a built environment resource qualifying as a historical resource under CEQA. Impacts would be potentially significant, and mitigation would be required.

Class III Facilities

Implementation of Class III facilities involves re-marking existing roadways and, thus, does not require new construction, nor would it include above ground visual elements. Therefore, no direct

impacts to structures/objects or indirect impacts to adjacent buildings qualifying as historical resources are anticipated. No impact would occur.

Class IV Facilities

Class IV facilities would involve pavement demolition, grading, bollard or fencing installation, and asphalt paving or repaving. These activities could directly impact structures and/or objects and indirectly impact adjacent buildings through the introduction of elements such as signage and new signal heads. Demolition or alteration of structures/objects and/or the introduction of new elements to the setting of adjacent buildings qualifying as historical resources could result in significant impacts. Therefore, the proposed Project has the potential to result in a substantial adverse change in the significance of a built environment resource qualifying as a historical resource under CEQA. Impacts would be potentially significant, and mitigation would be required.

Enhanced Bicycle Treatments

Several enhanced bicycle treatments are also identified in the BMP. The construction of enhanced bicycle treatments could directly impact structures and/or objects and indirectly impact adjacent buildings through the introduction of elements such as signage, new signal heads, bicycle parking, and repair facilities. Demolition or alteration of structures/objects and/or the introduction of new elements to the setting of adjacent buildings qualifying as historical resources could result in significant impacts. Therefore, the proposed Project has the potential to result in a substantial adverse change in the significance of a built environment resource qualifying as a historical resource under CEQA. Impacts would be potentially significant, and mitigation would be required.

General Plan Amendments

As part of the proposed Project, the City must amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. These General Plan Amendments shift the focus from prioritizing automobile mobility to reducing vehicle miles traveled (VMT) through alternative transportation modes like walking and biking, guided by the BMP. The proposed General Plan Amendments would not facilitate development that would result in a direct or indirect impact to historical resources. No impact would occur.

Mitigation Measures

CUL-1 Prepare Historical Resources Evaluation Prior to Approval of Project Involving Structures 45 Years or Older and Implement Mitigation Prior to and During Construction

Prior to approval of individual Class I facilities, Class II facilities, Class IV facilities, and enhanced bicycle treatments that include construction activities which could result in direct/indirect impacts to historical resources, including those that could result in direct impacts to structures/objects and/or indirect impact to buildings 45 years or older, the City shall retain a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards (SOI PQS) in architectural history and/or history as defined in CFR Title 36, Part 61 to oversee the following steps:

- Prior to proceeding with the historical resources evaluation (HRE) described below, a qualified architectural historian or historian (who meets the Secretary of the Interior's Professional

Qualifications Standards (SOI PQS) in architectural history and/or history as defined in CFR Title 36, Part 61) shall conduct a review of the applicable registers of previously documented built environment resources qualifying as historical resources to determine the presence of such resources within or immediately adjacent to a Class I, II, or IV project footprint or enhanced bicycle facility, and to confirm its condition is consistent with that presented in associated designation documentation. This effort, which may include a field survey, shall be documented in a report (that may be combined with the report described in the third bullet below as necessary and appropriate) that shall be submitted to the City for review and approval prior to initiation of a project component.

- Based on guidance provided by the California Office of Historic Preservation (OHP), not all built environment resources merit recordation. Therefore, the professional judgement of an architectural historian (that meets the SOI PQS in architectural history or history as defined in Code of Federal Regulations, Title 36, Part 61) shall be relied upon to determine if built environment resources with potential significance requiring recordation are present within a given project component site or its immediate surroundings. If a project component site or property in its immediate surroundings includes a building, structure, or other built environment feature that is 45 years of age or older that merits recordation and has the potential to be significantly impacted by the project, the City shall prepare a HRE for the property containing said building, structure, or other built environment feature. The evaluation shall consider the eligibility of the resource for listing in the National Register of Historic Places and California Register of Historical Resources, in addition to any applicable local register of historical resources.
- The HRE shall be prepared by a SOI PQS architectural historian or historian. The HRE shall include an intensive-level evaluation prepared in accordance with the guidelines and best practices promulgated by the California OHP. The building, structure or other built environment feature shall be evaluated within an appropriate historic context and documented in a report that meets the California OHP guidelines. All evaluated resources shall be documented on California Department of Parks and Recreation Series 523 Forms (DPR forms) in accordance with the guidance included in the OHP's *Instruction for Recording Historical Resources*. The report with attached DPR forms shall be submitted to the City for review and approval prior to proceeding with construction of the project component.
- If built environment resources qualifying as historical resources having the potential to be significantly impacted by a proposed project component are identified within a proposed project component site or its immediate surroundings, efforts shall be made to ensure that impacts are mitigated. In such instances, the above-noted HRE report shall be amended or supplemented with a report that identifies the resource's character-defining features and recommends treatment methods for character-defining features. The report shall demonstrate how the proposed project component complies with the Secretary of the Interior's Standards for the Treatment of Historic Properties (SOI Standards) and avoids impacts to historical resources pursuant to CEQA. The report shall be submitted to the City for review and approval prior to proceeding with construction the project.
- If built environment historical resources are identified and compliance with the SOI Standards is not possible, appropriate site-specific mitigation measures that reduce impacts to historical resources to the greatest extent feasible shall be established and undertaken. Mitigation measures may include, but would not be limited to, documentation of the historical resource in the form of a Historic American Building Survey (HABS) or Historic American Engineering Record (HAER) report that complies with the Secretary of the Interior's Standards for Architectural and

Engineering Documentation, or development of an interpretative display or educational opportunity that relates the history and significance of the resource to the public.

Significance After Mitigation

Implementation of Mitigation Measures CUL-1 would reduce impacts to historical resources to the extent feasible by identifying and evaluating significant historical resources and managing avoidance, or preservation, rehabilitation, restoration, or reconstruction in compliance with the Standards as applicable. Nonetheless, even with implementation of Mitigation Measures CUL-1, eligible historical resources could still be materially impaired by future development that would be carried out under the Project. It is possible that a future project could result in the demolition or substantial alteration of a historical resource. Therefore, this impact would remain significant and unavoidable.

Threshold 2:	Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Impact CUL-2 THE PROPOSED PROJECT HAS THE POTENTIAL TO RESULT IN SIGNIFICANT IMPACTS IF DEVELOPMENT CARRIED OUT UNDER THE PROJECT WOULD CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF AN ARCHAEOLOGICAL RESOURCE. THIS IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE.

The CHRIS records search identified 62 cultural resources within the study area, 47 of which are archaeological sites. Of these 47 previously recorded archaeological sites, four are described as habitation sites containing midden soils, and two are described as habitation sites containing midden soils and human remains. As such, the CHRIS records search indicates the Project area is sensitive for the presence of subsurface archaeological resources that may be eligible for inclusion in the CRHR and qualify as significant.

Class I Facilities

Class I facilities involve the construction of new bike paths, which require grading and excavations. Depending on the depth of these ground-disturbing activities, the construction of Class I facilities could encounter surficial and subsurface archaeological resources. Therefore, the proposed Project has the potential to result in a substantial adverse change in the significance of an archeological resource. Impacts would be potentially significant, and mitigation would be required.

MEDEA CREEK PATH

Construction of the Medea Creek Path, which would include construction of an asphalt bike path that could intrude into previously undisturbed soils or sediments, could result in significant impacts to archaeological resources. Construction activities that could result in direct and/or indirect impacts archaeological resources include demolition of existing curb ramps and modifications to medians and crosswalks as well as construction of access ramps, retaining walls/fences, and undercrossings. Impacts would be potentially significant, and mitigation would be required.

AGOURA HIGH SCHOOL CONNECTION

Construction of the Agoura High School Connection, which would include construction of an asphalt bike path that could intrude into previously undisturbed soils or sediments, could result in significant impacts to archaeological resources. Construction activities that could result in impacts to

archaeological resources would include modifications to medians, relocation of signal heads, reconfiguration of Thousand Oaks Boulevard, construction of concrete sidewalks, and construction of access ramps. Impacts would be potentially significant, and mitigation would be required.

Class II Facilities

Class II facilities would primarily involve restriping and reconfiguration of lane widths to accommodate new dedicated bike lanes. Limited pavement widening would be required on Driver Avenue, between Easterly Road and Colodny Drive, and on Cornell Road, between Agoura Road and Cornell Way. Construction activities associated with pavement widening would involve clearing and grubbing, subgrade stabilization, base course installation, and asphalt paving. If construction activities affect previously undisturbed soils or sediments, then construction of this type of Class II facility could significantly impact archaeological resources. Impacts would be potentially significant, and mitigation would be required.

Class III Facilities

Implementation of Class III facilities involves re-marking existing roadways, which does not require ground disturbance. Therefore, the construction of Class III facilities does not have the potential to impact archaeological resources. No impact would occur.

Class IV Facilities

The construction of Class IV facilities would involve re-marking existing roadways and installing vertical buffers, such as bollards, posts, or raised islands. Installing these barriers would result in minimal ground disturbance into sediments that are all or nearly all disturbed and/or fill sediments, which have low to no archaeological sensitivity. Therefore, the construction of this type of Class IV facility does not have the potential to impact archaeological resources. No impact would occur.

Alternatively, some Class IV facilities may require widening of existing roadways, which would require clearing and grubbing, subgrade stabilization, base course installation, and asphalt paving. If these activities affect previously undisturbed soils or sediments, then construction of this type of Class IV facility could significantly impact archaeological resources. Impacts would be potentially significant, and mitigation would be required.

Enhanced Bicycle Treatments

The construction of enhanced bicycle treatments could result in ground disturbing activities. Ground disturbance associated with the construction of enhanced bicycle treatments in previously undisturbed soils and sediments would result in direct impacts to archaeological resources. Therefore, the proposed Project has the potential to result in a substantial adverse change in the significance of an archaeological resource under CEQA. Impacts would be potentially significant, and mitigation would be required.

General Plan Amendments

The proposed General Plan Amendments would not facilitate development that would result in a direct or indirect impact to archaeological resources. No impact would occur.

Mitigation Measures

CUL-2 Prepare Archaeological Resources Assessment Prior to Project Approval and Implement Mitigation Prior to and During Construction

Prior to approval of individual Class I facilities, Class II facilities, Class IV facilities, and enhanced bicycle treatments that involve ground disturbing activities, the City shall retain an archaeologist that meets the SOI PQS in either prehistoric or historic archaeology (qualified archaeologist as defined in CFR, Title 36, Part 61) to oversee the preparation of an archaeological resources assessment).

- Archaeological Resources Assessments shall include a CHRIS records search at the SCCIC with a minimum 0.5-mile radius and a Sacred Lands File search through the California Native American Heritage Commission. The records searches will characterize the results of previous cultural resource surveys and disclose any cultural resources that have been recorded and/or evaluated in and around Class I facilities, Class II facilities involving road widening, Class IV facilities involving road widening, or enhanced bicycle treatments located in previously undisturbed areas. A Phase I pedestrian survey shall be undertaken at Class I facilities, Class II facilities involving road widening, Class IV facilities involving road widening, or enhanced bicycle treatments located in previously undisturbed areas and shall include the participation of a retained Tribal representative approved by local Tribes listed on the NAHC contact list culturally affiliated with the project area to locate any surface evidence of cultural materials. A geoarchaeological review (examination of CHRIS and ethnographic data, historical, geological, and soil maps, aerial imagery, geotechnical reports) shall be conducted to assess the potential for the project to encounter unknown archaeological resources during construction. A qualified archaeologist shall identify known archaeological resources and classify the Class I facilities, Class II facilities involving road widening, Class IV facilities involving road widening, or enhanced bicycle treatments located in previously undisturbed areas as having high, medium, or low sensitivity for unknown archaeological resources. The assessment shall also include recommendations for additional studies and/or mitigation, as necessary, such as archaeological and Tribal monitoring during construction-related ground disturbance. Construction monitoring shall be recommended when archaeological resources are present and/or the assessment identifies a moderate or high likelihood of archaeological resources being present.
- If the CHRIS search or Phase I archaeological survey identifies resources that may be impacted by Class I facilities, Class II facilities involving road widening, Class IV facilities involving road widening, or enhanced bicycle treatments located in previously undisturbed areas, the archaeological resources assessment shall also include Phase II testing and evaluation. Local Tribes listed on the NAHC contact list culturally affiliated with the area shall be notified of any prehistoric resources identified and retained, as requested, to advise on appropriate next steps. Local Tribes culturally affiliated with the project area shall be provided the opportunity to review and approve the Phase II Testing and Evaluation Plan prior to implementation. A Tribal representative shall be present to monitor all Phase II testing and evaluation activities. If resources are determined significant (i.e., eligible for the CRHR and/or NRHP or unique to the City) shall first consider whether avoidance and preservation in place is feasible. If resource avoidance and preservation in place is not feasible, appropriate site-specific mitigation measures shall be identified in the Phase II evaluation.

- For archaeological resources found eligible under CRHR Criterion 4/NRHP Criterion D (data potential) that cannot be avoided and will be impacted by Class I facilities, Class II facilities involving road widening, Class IV facilities involving road widening, or enhanced bicycle treatments located in previously undisturbed areas, mitigation shall include, but would not be limited to, a Phase III data recovery program. The data recovery program shall make provisions for adequately recovering the scientifically consequential information from and about the resource. The qualified archaeologist and City shall consult with appropriate Native American representatives regarding the data recovery program in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource, beyond those that are scientifically important, are considered. For archaeological resources that are found eligible under CRHR Criteria 1/NRHP Criteria A (events), 2/B (persons), and/or 3/C (design/craftsmanship) that cannot be avoided and will be impacted by Class I facilities, Class II facilities involving road widening, Class IV facilities involving road widening, or enhanced bicycle treatments located in previously undisturbed areas, other appropriate mitigation shall be determined by a qualified archaeologist in consultation with the City and, if the resource is of indigenous origin, local interested Tribes. Mitigation may include, but would not be limited to, development of interpretive or educational materials or preservation of all or portions of the archaeological site.
- Final disposition of any recovered artifacts or samples, which could include but would not be limited to curation or onsite reburial, shall occur as specified by the qualified archaeologist in consultation with the City and, if the resource is of indigenous origin, local interested Tribes. Artifacts and samples include material recovered from all phases of work, including the Phase I survey, Phase II testing, Phase III data recovery, and construction monitoring.

Significance After Mitigation

Implementation of Mitigation Measures CUL-2 would reduce impacts to archaeological resources to the extent feasible by identifying and evaluating significant archaeological resources and managing avoidance, or treatment as applicable. Nonetheless, even with implementation of Mitigation Measures CUL-2, archaeological resources eligible for listing in the NRHP and/or CRHR could still be significantly impacted by future development that would be carried out under the Project. Therefore, this impact would remain significant and unavoidable.

Threshold 3:	Would the project disturb any human remains, including those interred outside of formal cemeteries?

Impact CUL-3 FUTURE DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT WOULD COMPLY WITH CALIFORNIA HEALTH AND SAFETY CODE SECTION 7050.5, WHICH WOULD ENSURE IMPACTS TO HUMAN REMAINS ARE LESS THAN SIGNIFICANT.

The CHRIS records search identified multiple archaeological resources containing human remains within the Project area. Plan elements involving ground disturbing activities that may encounter human remains include Class I facilities, the Path, the Connection, Class II facilities involving road widening, Class IV facilities, and enhanced bicycle treatments. Therefore, the proposed Project has the potential to disturb human remains, including those interred outside of formal cemeteries. As noted in the Section 4.4.2b of the Regulatory Setting, human burials have specific provisions for treatment Health and Safety Code Section 7050.5 and PRC Sections 5097.5, 5097.94 and 5097.98.

If human remains are found during ground disturbing activities, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. In the event of an unanticipated discovery of human remains, the County coroner shall be notified immediately. If the human remains are determined to be prehistoric, the coroner will notify the NAHC, which will determine and notify a most likely descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of being granted access to the site and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Due to required compliance with PRC Section 5097.98 and California Health and Safety Code Section 7050.5, impacts to human remains would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.4.4 Cumulative Impacts

The geographic scope for cumulative impacts related to cultural resources is the Project area, which encompasses all of the City of Agoura Hills. This geographic scope is appropriate because, generally, cultural resources impacts associated with individual developments are site-specific in nature and must be addressed on a case-by-case basis.

The past, present, and reasonably foreseeable future projects, including the projects listed in Table 3-1 in Chapter 3, *Environmental Setting*, would have the potential to adversely impact historical resources. The magnitude of impacts for individual projects to significantly impact historical resources would depend upon the location, size of development, and proximity to historical built environment resources. Historic resource evaluations would be completed on a case-by-case basis for all future development. Compliance with applicable regulations and implementation of appropriate mitigation measures, including resource avoidance measures and noise and vibration reduction measures, would address impacts related to historical resources associated with cumulative development. Therefore, cumulative development would have a less-than-significant cumulative impact involving substantial adverse changes in the significance of historical resources.

Past, present, and reasonably foreseeable future projects would also have the potential to adversely impact buried archaeological resources through ground-disturbing construction activities. The magnitude of impacts for individual projects to archaeological resources would depend upon the location, size of development, depth of the ground disturbance, and the resources within the individual development sites. Archeological resource evaluations would be completed on a case-by-case basis for all future development. Compliance with applicable regulations and implementation of appropriate mitigation measures, including resource avoidance measures and monitoring during ground disturbance within culturally sensitive areas, would address impacts related to archaeological resources associated with cumulative development. Therefore, cumulative development would have a less-than-significant cumulative impact involving substantial adverse changes in the significance of archeological resources.

Similarly, cumulative development projects would have the potential to adversely impact buried human remains through ground-disturbing construction activities. The magnitude of impacts for

individual projects would depend upon the location, size of development, depth of the ground disturbance. State of California Health and Safety Code Section 7050.5 would apply to all future development, and compliance with such regulations would address impacts related to buried human remains associated with cumulative development. Therefore, cumulative development would have a less-than-significant cumulative impact involving the disturbance of human remains.

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4.5 Geology and Soils

The analysis in this section considers potential impacts to geology and soils. Specifically, this section discusses the environmental and regulatory setting; the criteria used to determine the significance of environmental impacts related to geology and soils; and potential impacts related to geology and soils that would result from implementation of the proposed Project.

4.5.1 Setting

The Project area, which encompasses all of the City of Agoura Hills, is situated in the Transverse Ranges geomorphic province, one of the eleven geomorphic provinces in California (California Geological Survey [CGS] 2002). The Transverse Ranges extend approximately 275 miles west-east from Point Arguello in Santa Barbara County, east to the San Bernardino Mountains, and south to the Anacapa-Santa Monica-Hollywood-Raymond-Cucamonga fault zone (Yerkes and Campbell 2005). The Transverse Ranges are composed of Proterozoic to Mesozoic intrusive crystalline igneous and metamorphic rocks overlain by Cenozoic marine and terrestrial sedimentary deposits and volcanic rock (Norris and Webb 1976).

a. Earthquake Faults and Surface Rupture

A fault is a fracture or area of fractures between two units of rock that allow the units to move relative to each other, which can occur slowly over time as creep or rapidly during an earthquake. Earthquake faults are categorized as active, potentially active, and inactive. A fault is classified as active if it has moved during the Holocene epoch, which consists of approximately the last 11,700 years. A fault is classified as potentially active if it has experienced movement within the Quaternary epoch, which is during the last 1.8 million years, but not within the Holocene epoch. Faults that have not moved in the last 1.8 million years are generally considered inactive (California Department of Conservation 2018). The term seismicity describes the effects of seismic waves that are radiated from an earthquake fault in motion. While most of the energy released during an earthquake results in the permanent displacement of the ground, as much as 10 percent of the energy may dissipate immediately in the form of seismic waves. Faults are geologic hazards due to the potential for both surface fault rupture and seismic ground shaking (discussed in the following subsection), which are distinct but related properties. Surface fault rupture is the breakage of ground along the surface trace of a fault, which is caused by the intersection of the fault surface area ruptured in an earthquake with the earth's surface. Surface fault displacement occurs when material on one side of a fault moves relative to the material on the other side of the fault as a result of surface fault rupture. Surface fault rupture and displacement can be very destructive to structures and infrastructure constructed across active faults and within the rupture zone. However, the zone of damage is limited to a relatively narrow area along either side of the fault, as opposed to seismic ground shaking damage, which can be quite widespread. The amount of surface displacement during a rupture event can range from a few inches to tens of feet.

Like most of California, the Project area is subject to risks associated with earthquakes. Earthquakes are most common along geologic faults that are planes of weakness or fractures along which rocks have been displaced. There are no major faults within or immediately adjacent to the Project area. The nearest major faults to the Project area include the Simi-Santa Rosa Fault (approximately seven miles north of the Project area), the Oak Ridge Fault (approximately 17 miles north of the Project

area), and the San Cayetano Fault (approximately 18 miles north of the Project area) (City of Agoura Hills 2022).

Alquist-Priolo Earthquake Fault Zones are regulatory zones established throughout California by the CGS. These zones identify areas where potential surface rupture along an active fault could prove hazardous and identify where special studies are required to characterize the fault rupture hazard potential to habitable structures. There are no Alquist-Priolo Special Studies Zones identified within the City of Agoura Hills (City of Agoura Hills 2022).

b. Seismic Ground Shaking

In addition to surface rupture, the major cause of structural damage from earthquakes is seismic ground shaking. The intensity of ground motion expected at a particular site depends on the magnitude of the earthquake, the distance to the epicenter, and the geology of the area between the epicenter and the property. The composition of underlying soils, even those relatively distant from faults, can intensify ground shaking. Greater movement can be expected at sites located on poorly consolidated material, such as alluvium, within close proximity to the ruptured fault, or in response to a seismic event of great magnitude. Strong ground shaking from an earthquake can result in damage with buildings shifted off their foundations and underground pipes being broken.

The Project area may be subject to seismic ground shaking in the event of fault rupture of the Simi-Santa Rosa Fault, the Oak Ridge Fault, and the San Cayetano Fault (City of Agoura Hills 2022).

c. Liquefaction

Liquefaction is a seismic phenomenon in which loose, saturated granular and non-plastic fine-grained soils lose their structure/strength when subjected to high-intensity ground shaking and act like a liquid. Liquefaction occurs when three general conditions exist: 1) shallow groundwater within the top 50 feet of the ground surface; 2) low-density non-plastic soils; and 3) high-intensity ground motion. When liquefaction occurs, it can result in ground failure that can result in damage to roads, pipelines, and buildings. In areas subject to elevated liquefaction hazards with high groundwater tables, certain types of activities have the potential to exacerbate liquefaction risk, such as groundwater injection and stormwater infiltration.

Several areas within the Project area are located within liquefaction zones, primarily located along the foothills and slopes of the Santa Monica Mountains in the eastern and southeastern portions of the city (CGS 2025).

d. Landslides and Slope Instability

Landslides occur when slopes become unstable, and masses of earth material move downslope. Landslides are usually rapid events, often triggered during periods of rainfall or by earthquakes. Mudslides and slumps are a more shallow type of slope failure. They typically affect the upper surficial soil horizons rather than bedrock features. Usually, mudslides and slumps occur during or soon after periods of rainfall, but they can also be triggered by seismic shaking. Landslides can occur where faults have fractured rock and along the base of slopes or cliffs where supporting material has been removed by stream or wave erosion or by human activities. Heavy rainfall, human actions, or earthquakes can trigger landslides. They may take the form of slow continuous movement, such as a slump, or may move very rapidly as a semi-liquid mass, such as a debris flow or avalanche.

Slope disturbance and soil creep from a long-term geologic cycle of uplift, mass wasting, intense precipitation or wind, and gravity can result in slope failure in the form of mudslides and rock fall.

Mass wasting refers to a variety of erosional processes from gradual downhill soil creep to mudslides, debris flows, landslides, and rock fall - processes that are commonly triggered by intense precipitation or wind, which varies according to climactic shifts. Often, various forms of mass wasting are grouped together as landslides, which are generally used to describe the downhill movement of rock and soil. Soil creep is a long-term, gradual downhill migration of soil under the influence of gravity and is generally on the order of a fraction of an inch per year. These soils can gradually creep downslope from the sides of foundations, reducing lateral support.

Several areas within the Project area are considered landslide hazard zones, primarily located along foothills and mountain slopes in the northern, eastern, and southern portions of the city (CGS 2025). Although landslides can occur due to improper grading practices, no major structural damage has occurred in the City of Agoura Hills as a result of deep-seated bedrock instability triggered by grading practices. Superficial landslides have occurred locally on graded cut-and-fill slopes in tract developments. The majority of these shallow-slope failures occur on the moderate-to-steep soil-covered natural slopes throughout the city (City of Agoura Hills 2022).

e. Subsidence

Subsidence or settlement can occur from immediate settlement, consolidation, shrinkage of expansive soil, and liquefaction. Immediate settlement occurs when a load from a structure or placement of new fill material is applied, causing distortion in the underlying materials. This settlement occurs quickly and is typically complete after placement of the final load. Consolidation settlement occurs in saturated clay from the volume change caused by squeezing out water from the pore spaces. Consolidation occurs over a period of time and is followed by secondary compression, which is a continued change in void ratio[1] under the continued application of the load. Soils tend to settle at different rates and by varying amounts depending on the load weight or changes in properties over an area, which is referred to as differential settlement. Areas underlain by soft sediments or undocumented fills are most prone to settlement.

Natural subsidence occurs from shifting tectonic plates and dissolution of limestone and can produce sinkholes. Human-induced subsidence can occur from pumping water, oil, or gas from underground reservoirs; collapse of underground mines; drainage of wetlands; and soil compaction. Subsidence can be problematic because it threatens the stability of roads, bridges, canals, and other infrastructure. Soils particularly subject to subsidence include those with high silt or clay content. Soils with high shrink-swell potential can be particularly susceptible to subsidence during a loss of soil moisture.

No recognized subsidence has been identified in the Project area. Due to the limited groundwater resources contained in the relatively shallow alluvial basin, and because of the low probability of significant future oil production, the likelihood of substantial subsidence occurring in the Project area is minimal (City of Agoura Hills 2022).

f. Corrosive and Expansive Soils

Corrosive soils are considered a geologic hazard because they react with concrete and ferrous metals, which can cause damage to foundations and buried pipelines. Soils with relatively high clay content are expansive due to the capacity of clay minerals to take in water and swell (expand) to greater volumes. Expansive soils are also considered a geologic hazard because an increase in soil volume can exert forces on structures and, thus, damage building foundations, walls, and floors.

[1] The void ratio of a soil is the ratio of the volume of the empty spaces between solid particles to the volume of solid particles in the soil.

Differential settlement is a phenomenon that occurs when one portion of a building's foundation settles unevenly relative to other potions. In general, areas are susceptible to differential settlement if underlain by compressible sediments, such as poorly engineered artificial fill or loose unconsolidated alluvial sediments. When these soils dry out and shrink, structural damage can occur.

Within the Project area, ungraded native soils in the lowland portions of the City exhibit the highest potential for shrinkage and swelling (City of Agoura Hills 2022). Lowland portions of the city include East Agoura Hills, South End, Forest Cove, Reyes Adobe, , and Lake Lindero.

g. Paleontological Resources

Paleontological resources, or fossils, are the remains and traces of prehistoric life (Society of Vertebrate Paleontology [SVP] 2010). Fossils are typically preserved in layered sedimentary rocks, and the distribution of fossils is a result of the sedimentary history of the geologic units within which they occur. Fossils occur in a non-continuous and often unpredictable distribution within some sedimentary units, and the potential for fossils to occur within sedimentary units depends on several factors. Although it is not possible to determine whether a fossil will occur in any specific location, it is possible to evaluate the potential for geologic units to contain scientifically significant paleontological resources and therefore evaluate the potential for impacts to those resources and provide mitigation for paleontological resources if they occur during construction.

Absent specific agency guidelines, most paleontologists in California adhere to guidelines set forth by the SVP in its "Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources" (SVP 2010). These guidelines establish detailed protocols for the assessment of the paleontological resource potential, or "sensitivity" of a project area and outline measures to follow in order to mitigate adverse impacts to known or unknown fossil resources during project development. Using baseline information gathered during a paleontological resource assessment, the paleontological resource potential of the geologic unit(s) or members thereof underlying a project area can be assigned to a high, undetermined, low, or no paleontological sensitivity category. This criterion is based on rock units within which vertebrate or significant invertebrate fossils have been determined by previous studies to be present or likely to be present. While these standards were specifically written to protect vertebrate paleontological resources, all fields of paleontology have adopted these guidelines.

The geology of the region surrounding the City of Agoura Hills has been mapped by Dibblee and Ehrenspeck (1992, 1993) and Bedrossian and Roffers (2012). These authors identified many distinct geologic units underlying the Project area, including Quaternary alluvial sediments, Cenozoic sedimentary rocks, and Cenozoic volcanic rocks.

Quaternary alluvial sediments include sediments deposited by creeks, washes, and alluvial fans, and they are mapped primarily in the topographically lower parts of the BMP area (Dibblee and Ehrenspeck 1992, 1993; Bedrossian and Roffers 2012). The age of these sediments ranges from late Holocene, which are too young to preserve paleontological resources (i.e., less than 5,000 years old; SVP 2010), to Pleistocene, which are known to preserve paleontological resources in Los Angeles County (Jefferson 2010; Paleobiology Database 2025). Therefore, the paleontological sensitivity of these sediments varies with age, with younger sediments being low sensitivity and older sediments being high sensitivity. Furthermore, alluvial sediments increase in age with depth, so sediments that are low-sensitivity at the surface will become old enough to preserve paleontological resources, and therefore high sensitivity, at some depth in the subsurface.

Cenozoic sedimentary rocks of the Project area are primarily Oligocene to Miocene in age and assigned to geologic units such as the Monterey Formation and Topanga Formation (Dibblee and Ehrenspeck 1992, 1993; Bedrossian and Roffers 2012). Cenozoic sedimentary rocks are known to preserve paleontological resources throughout southern California (Paleobiology Database 2025), but their paleontological sensitivity varies by geologic unit being low, high, or undetermined.

Cenozoic volcanic rocks within the Project area are considered part of the Miocene-aged Conejo Volcanics (Dibblee and Ehrenspeck 1992, 1993). Volcanic rocks are generally not conducive to fossil preservation due to them forming via the cooling of molten rock at or below Earth's surface (SVP 2010). However, certain types of volcanic rocks (e.g., ashfall deposits, volcanic mudflows) can preserve paleontological resources. Therefore, volcanic rocks can have no, low, high, or undetermined paleontological sensitivity.

4.5.2 Regulatory Setting

a. Federal Regulations

National Earthquake Hazards Reduction Program

The National Earthquake Hazards Reduction Program was established by the United States Congress when it passed the Earthquake Hazards Reduction Act of 1977, Public Law 95-124. In establishing the National Earthquake Hazards Reduction Program, Congress recognized earthquake-related losses could be reduced through improved design and construction methods and practices, land use controls and redevelopment, prediction techniques and early warning systems, coordinated emergency preparedness plans, and public education and involvement programs. The four basic goals are as follows:

- Develop effective practices and policies for earthquake loss reduction and accelerate their implementation.
- Improve techniques for reducing earthquake vulnerabilities of facilities and systems.
- Improve earthquake hazards identification and risk assessment methods, and their use.
- Improve the understanding of earthquakes and their effects.

Several key federal agencies contribute to earthquake mitigation efforts. There are four primary National Earthquake Hazards Reduction Program agencies:

- National Institute of Standards and Technology of the Department of Commerce
- National Science Foundation
- USGS
- Federal Emergency Management Agency (FEMA)

Implementation of National Earthquake Hazards Reduction Program priorities is accomplished primarily through original research, publications, and recommendations to assist and guide state, regional, and local agencies in the development of plans and policies to promote safety and emergency planning.

Landslide Hazard Program

The USGS created the Landslide Hazard Program in the mid-1970s; the primary objective of the program is to reduce long-term losses from landslide hazards by improving our understanding of the

causes of ground failure and suggesting mitigation strategies. The federal government takes the lead role in funding and conducting this research, whereas the reduction of losses due to geologic hazards is primarily a State and local responsibility.

Clean Water Act

Congress enacted the Clean Water Act (CWA), formerly the Federal Water Pollution Control Act of 1972, with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the United States. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and non-point source discharges to surface water. Those discharges are regulated by the National Pollutant Discharge Elimination System (NPDES) permit process (CWA Section 402). NPDES permitting authority is administered by the California State Water Resources Control Board (SWRCB) and its nine Regional Water Quality Control Boards (RWQCB) on behalf of the United States Environmental Protection Agency. The City of Agoura Hills is within the jurisdiction of the Los Angeles RWQCB.

While the CWA is primarily associated with protecting and enhancing surface water quality, some regulatory provisions of the CWA help to control erosion and soil loss and compliance with these provisions can help mitigate potential impacts to geology and soils. In particular, the SWRCB administers the NPDES Construction General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit) (Order 2009-0009-DWQ, as amended by Orders 2010-0014- DWQ and 2012-006-DWQ). The order applies to construction sites or other projects that include one or more acre of soil disturbance, as required by the CWA. Activities subject to the Construction General Permit include clearing, grading, and disturbances to the ground, such as grubbing or excavation. The Construction General Permit requires the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) prepared by a Qualified SWPPP Developer and submitted to the SWRCB. The SWPPP contains a site map that shows the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the project site. The purposes of the SWPPP are: (1) to help identify the sources of sediment and other pollutants that could affect the quality of stormwater discharges and (2) to describe and ensure the implementation of best management practices (BMPs) to reduce or eliminate sediment and other pollutants in stormwater as well as non-stormwater discharges resulting from construction activity. BMPs that can be implemented include, but are not limited to, silt fences, runoff control devices, wind erosion control, prevention of fluid leaks, and use of tracking controls at the site entrance.

Disaster Mitigation Act of 2000

Congress passed the Disaster Mitigation Act of 2000 to amend the Robert T. Stafford Disaster Relief and Emergency Assistance Act by invoking new and revitalized approaches to mitigation planning. Section 322 of the act emphasizes the need for state and local government entities to closely coordinate mitigation planning activities and makes the development of a hazard mitigation plan a specific eligibility requirement for any local government applying for federal mitigation grant funds. Communities with an adopted and federally approved hazard mitigation plan thereby become pre-positioned and more apt to receive available mitigation funds before and after the next declared disaster. To implement the new Stafford Act provisions, FEMA published requirements and procedures for local hazard mitigation plans in the Code of Federal Regulations (CFR) at Title 44, Chapter 1, Part 201.6. These regulations specify minimum standards for developing, updating, and

submitting local hazard mitigation plans for FEMA review and approval at least once every five years.

b. State Regulations

California Building Code

Part 2 of Title 24 of the California Code of Regulations (CCR), known as the California Building Code (CBC), establishes minimum standards intended to safeguard public health, safety, and general welfare through the regulation of design, construction, and site development activities. While the CBC primarily applies to buildings and structures, certain provisions are applicable to general construction activities, particularly when grading, drainage, retaining walls, or other structural elements are involved. The CBC includes requirements for seismic safety, excavation, foundations, retaining walls, and site demolition, all of which may be relevant to the development of bicycle paths depending on site conditions. It also regulates grading activities, including drainage and erosion control.

Chapter 16 of the CBC defines seismic sources and outlines procedures for calculating seismic forces. These requirements apply to structural components that may be associated with bicycle paths, such as bridges, undercrossings, or retaining walls. The CBC uses factors such as occupancy category, site class, soil classification, and seismic coefficients to determine a Seismic Design Category (SDC), which ranges from SDC A (very low seismic vulnerability) to SDC E/F (very high seismic vulnerability near major faults). Design specifications for applicable components are determined based on the assigned SDC.

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act, California's Alquist-Priolo Act (PRC 2621 et seq.), is intended to reduce the risk to life and property from surface fault rupture during earthquakes. The Alquist-Priolo Act prohibits the location of most types of structures intended for human occupancy across the traces of active faults and strictly regulates construction in the corridors along active faults (Earthquake Fault Zones). It also defines criteria for identifying active faults, giving legal weight to terms such as "active," and establishes a process for reviewing building proposals in and adjacent to Earthquake Fault Zones. Under the Alquist-Priolo Act, faults are zoned, and construction along or across them is strictly regulated if they are "sufficiently active" and "well-defined." A fault is considered sufficiently active if one or more of its segments or strands shows evidence of surface displacement during Holocene time (defined as within the last 11,000 years). A fault is considered well-defined if its trace can be clearly identified by a trained geologist at the ground surface or in the shallow subsurface, using standard professional techniques, criteria and judgment.

Seismic Safety Act

The Seismic Safety Act established the California Seismic Safety Commission in 1975 with the intent of providing oversight, review, and recommendations to the Governor and State Legislature regarding seismic issues. The commission's name was changed to the Alfred E. Alquist Seismic Safety Commission in 2006. Since then, the Commission has adopted several documents based on recorded earthquakes, such as the 1994 Northridge earthquake, 1933 Long Beach earthquake, the 1971 Sylmar earthquake, etc.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act of 1990 was passed into law following the destructive October 17, 1989, Mw 6.9 Loma Prieta earthquake. The act directs CGS to delineate Seismic Hazard Zones. In accordance with the mapping criteria, the CGS seismic hazard zone maps identify areas with the potential for a ground shaking event that corresponds to a 10-percent probability of exceedance in 50 years. The purpose of the act is to reduce the negative implications of seismic hazards to public health and safety and to minimize the loss of life and property by identifying and mitigating seismic hazards. Cities, counties, and State agencies are directed to use seismic hazard zone maps developed by CGS in their land-use planning and permitting processes. The act requires site-specific the preparation of geotechnical investigations, including mitigation measures based on site-specific conditions, prior to permitting most urban development projects in seismic hazard zones.

California Public Resources Code Section 5097.5

California Public Resource Code (PRC) Section 5097.5 states "no person shall knowingly and willfully excavate upon, or remove, destroy, injure or deface" any "vertebrate paleontological site" on public lands without the "permission of the public agency having jurisdiction over such lands." Violation of this section is a misdemeanor. As used in PRC Section 5097.5, "public lands" means lands owned by or under the jurisdiction of the State or any city, county, district, authority, or public corporation, or any agency thereof. Consequently, public agencies are required to comply with PRC Section 5097.5 for their own activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others.

c. Regional and Local Regulations

City of Agoura Hills General Plan 2035

The City of Agoura Hills General Plan 2035 was adopted on March 24, 2010 (updated on August 10, 2022) by the City Council (City of Agoura Hills 2022). The City of Agoura Hills General Plan 2035 is a strategic document designed to guide the physical development of the city until the year 2035. Among other things, the City of Agoura Hills General Plan 2035 sets out the pattern of land uses, including residential, commercial, and industrial. It also establishes the system of streets, bikeways, and trails. The City of Agoura Hills General Plan 2035 addresses a wide variety of subject areas, including housing, traffic, natural resources, land uses, economic development, noise, and public safety.

The City of Agoura Hills General Plan 2035 contains the following goals and policies related to geology and soils, which would apply to the proposed Project.

Goal S-2. Minimize adverse effects to residents, public and private property, and essential services caused by seismic and geologic hazards.

> **Policy S-2.2**. Require geotechnical investigations to determine the potential for ground rupture, groundshaking, landslides, and liquefaction due to seismic events, as well as expansive soils and subsidence problems on sites, including steep slopes, except where the Building Official determines such hazards are not present.

City of Agoura Hills Municipal Code

Portions of the Path would be constructed on land zoned as Open Space-Restricted (OS-R) and Open Space- Deed Restricted (OS-DR). Section 9489 of the City's Municipal Code sets forth special

standards that apply to development within any OS-R district. In accordance with Section 9489.2, the proposed project must be located and designed so as to protect the safety of current and future community residents, and the proposed project must not create significant threats to life and/or property due to the presence of geologic, seismic, slope instability, fire, flood, mud flow, or erosion hazards. Section 9490 of the City's Municipal Code sets forth special standards that apply to development within any OS-DR district. In accordance with Section 9490.5, the proposed project must be located and designed so as to protect the safety of current and future community residents, and the proposed project must not create significant threats to life and/or property due to the presence of geologic, seismic, slope instability, fire, flood, mud flow, or erosion hazards. The City's Hillside and Scenic Corridor Preservation Ordinance (Section 9652) establishes specific standards for development within these districts. In accordance with this ordinance, the proposed project must minimize grading, preserve natural landforms and vegetation, and be designed to minimize visual impacts, ensure stable slopes, and prevent hazards related to erosion, flooding, and landslides.

4.5.3 Impact Analysis

a. Methodology and Significance Thresholds

As discussed in Section 4.0, *Environmental Impact Analysis*, all Project components are analyzed at the programmatic level. Project components include the Bicycle Master Plan (BMP), the VMT Mitigation Exchange and Banking Program (Program), and the General Plan Amendments (Amendments). Projects included within the BMP are grouped into Class I facilities, Class II facilities, Class III facilities, Class IV facilities, and enhanced bicycle treatments, as identified in Section 2.5, *Project Characteristics,* and in Table 1 of Chapter 2, *Project Description.* The impact analysis contained herein provides a programmatic analysis of anticipated impacts for each of the five facility classes, as the individual project impacts associated with each class of facility are expected to be similar. However, because the City seeks to prioritize implementation of the Medea Creek Path (Path) and the Agoura High School Connection (Connection), the Path and the Connection have their own subheadings within the Class I Facility impact analysis subsection to provide a more specific assessment of their environmental impacts. Impacts associated with the General Plan Amendments are analyzed within their own subsection.

As discussed in Chapter 2, *Project Description*, the only projects that are currently planned, unfunded, and could potentially be funded by the VMT Mitigation Exchange and Banking Program are those currently included within the Bicycle Master Plan. Therefore, the impact analysis contained herein does not include a subsection for impacts associated with the Program, as the individual project list for the BMP and the Program are identical and impacts associated with the BMP would encompass impacts associated with the Program.

Within the following environmental analysis, impacts associated with each Project component are explicitly identified under the respective heading.

According to State CEQA Guidelines Appendix G, impacts related to geology and soils would be significant if the proposed project would:

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

a. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault,
b. Strong seismic ground shaking,
c. Seismic-related ground failure, including liquefaction, or
d. Landslides;

2. Result in substantial soil erosion or the loss of topsoil;
3. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse;
4. Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property;
5. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater; or
6. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

b. Project Impacts and Mitigation Measures

Threshold 1a:	Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

Impact GEO-1 THERE ARE NO FAULTS OR ALQUIST-PRIOLO SPECIAL STUDIES ZONES WITHIN OR IMMEDIATELY ADJACENT TO THE PROJECT AREA. THEREFORE, IMPLEMENTATION OF THE PROPOSED PROJECT WOULD NOT DIRECTLY OR INDIRECTLY CAUSE POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY, OR DEATH INVOLVING RUPTURE OF A KNOWN EARTHQUAKE FAULT. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Fault rupture can occur along or immediately adjacent to faults during an earthquake. Fault rupture is characterized by ground cracks and displacement which could endanger life and property. Damage is typically limited to areas close to the moving fault. As discussed in Section 4.5.1, *Setting*, there are no faults or Alquist-Priolo Special Studies Zones within the Project area. There are three faults in the vicinity of the city: the Simi-Santa Rosa Fault (approximately seven miles north of the Project area), the Oak Ridge Fault (approximately 17 miles north of the Project area), and the San Cayetano Fault (approximately 18 miles north of the Project area). Therefore, implementation of the proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. This impact would be less than significant.

Threshold 1b: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Impact GEO-2 THE PROJECT AREA IS NOT LOCATED WITHIN OR ADJACENT TO AN ACTIVE FAULT AND THE PROJECT DOES NOT INCLUDE THE CONSTRUCTION OF BUILDINGS OR HABITABLE STRUCTURES. THE PROJECT WOULD NOT EXACERBATE THE RISK OF LOSS, INJURY, OR DEATH INVOLVING STRONG SEISMIC GROUND SHAKING. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Seismic ground shaking is the result of an earthquake, and the impacts can be widespread. Although a function of earthquake intensity, ground shaking effects can be magnified by the underlying soils and geology, which may amplify shaking at great distances. It is difficult to predict the magnitude of ground shaking following an earthquake, as shaking can vary widely within a relatively small area. As discussed in Section 4.5.1, *Setting*, the closest faults to the Project area include the Simi-Santa Rosa Fault (approximately seven miles north of the Project area), the Oak Ridge Fault (approximately 17 miles north of the Project area), and the San Cayetano Fault (approximately 18 miles north of the Project area). Although the Project area is not located within an active fault, the Project area is located in a seismically active area, as is the majority of southern California. As such, the nearby earthquake faults could produce strong seismic ground shaking within the Project area in the event of an earthquake.

Implementation of individual projects identified within the BMP would involve construction activities such as clearing and grubbing, pavement demolition, grading, subgrade stabilization, utility relocation, construction of undercrossings and/or overcrossings, installation of retaining walls, construction of bollards and fencing, asphalt paving or repaving, striping, restriping, reconfiguration and/or revegetation. Construction activities would be required to comply with CBC standards related to, but not limited to, excavation, grading and earthwork construction, and fills. Compliance with these standards would ensure that construction activities would not exacerbate seismic ground shaking.

Implementation of the BMP would result in the construction of pedestrian undercrossings beneath existing roadways but would not result in the construction of buildings or habitable structures. Undercrossing improvements would be required to comply with CBC standards related to, but not limited to, design specifications and procedures for calculating seismic forces. Pursuant to Policy S-2.2 in the City of Agoura Hills General Plan 2035, a geotechnical investigation would be prepared prior to construction of undercrossing improvements to determine the potential for risks related to ground rupture and ground shaking due to seismic events. Although the Project area would be subject to ground shaking, particularly in the event of an earthquake originating along the Simi-Santa Rosa Fault, this hazard is common in the region and the Project would not increase exposure of people to the risk of loss, injury or death from structural failure due to seismic ground shaking.

As part of the proposed Project, the City must also amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. The proposed General Plan Amendments would not result in construction activities or physical development that could increase the risk of loss, injury or death from structural failure due to seismic ground shaking.

Overall, implementation of the proposed Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. This impact would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 1c:	Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Impact GEO-3 PORTIONS OF THE PROJECT WOULD BE LOCATED WITHIN LIQUEFACTION ZONES. WITH COMPLIANCE WITH APPLICABLE REGULATORY REQUIREMENTS UNDER THE CALIFORNIA BUILDING CODE, THE PROJECT WOULD NOT EXACERBATE THE RISK OF LOSS, INJURY, OR DEATH INVOLVING LIQUEFACTION. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

As discussed in Section 4.5.1, *Setting*, several areas within the City of Agoura Hills are located within liquefaction zones, primarily located along the foothills and slopes of the Santa Monica Mountains in the eastern and southeastern portions of the city (CGS 2025).

Class I Facilities

Class I facilities would be located within identified liquefaction zones. Construction activities for Class I facilities would include clearing and grubbing, pavement demolition, grading, utility relocation, retaining wall or fencing installation, asphalt paving or repaving, street and undercrossing improvements, striping, and revegetation. Given the programmatic nature of the BMP, construction details for all individual projects included within the BMP are not yet known. As discussed in Chapter 2, *Project Description*, specific construction details have been identified for the Medea Creek Path, a two-mile bicycle path and the longest new facility proposed in the BMP. Construction of the Path would result in the largest area of disturbance with the most construction activities. The maximum depth of excavation required during construction of the Path would be 12 feet. All other facilities included within the BMP would be expected to result in less intensive construction. Therefore, it can be assumed that the maximum depth of excavation required during construction of the remaining Class I facilities would also be 12 feet.

Construction activities would be required to comply with CBC standards related to, but not limited to, excavation, grading and earthwork construction, and fills. Compliance with these standards would ensure that temporary construction activities, including grading and ground disturbance at depths of up to 12 feet, would not exacerbate seismic-related ground failure, including an increased risk of liquefaction. Furthermore, implementation of the Class I facilities would not result in the construction of buildings or habitable structures, and undercrossing improvements would be required to comply with CBC standards related to, but not limited to, design specifications and procedures for calculating seismic forces. Pursuant to Policy S-2.2 in the City of Agoura Hills General Plan 2035, a geotechnical investigation would be prepared prior to construction of undercrossing improvements to determine the potential for risks related to liquefaction due to seismic events. Therefore, Class I facilities would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. This impact would be less than significant.

MEDEA CREEK PATH

The Path is not located within an identified liquefaction zone. Therefore, there would be no impact related to the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.

AGOURA HIGH SCHOOL CONNECTION

The Connection is not located within an identified liquefaction zone. Therefore, there would be no impact related to the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.

Class II Facilities

The proposed Class II facilities are not located within an identified liquefaction zone. Therefore, there would be no impact related to the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.

Class III Facilities

Class III facilities would be located within identified liquefaction zones. Construction activities associated with implementation of the proposed Class III facilities would be limited to the restriping of existing roads to identify bike routes, and no ground disturbance would occur. Implementation of the Class III facilities would not result in the construction of buildings or habitable structures. Therefore, implementation of the Class III facilities would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. This impact would be less than significant.

Class IV Facilities

The proposed Class IV facilities are not located within an identified liquefaction zone. Therefore, there would be no impact related to the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.

Enhanced Bicycle Treatments

Enhanced bicycle treatments could include street striping and restriping, signage and wayfinding, bicycle signals and detection at traffic signals, bicycle parking, and bicycle repair facilities. These facilities would be implemented at various locations throughout the city within or adjacent to existing, new, or improved bikeways, which could be located within identified liquefaction zones. Construction activities associated with implementation of the enhanced bicycle treatments could include minor ground disturbing activities, which would be required to comply with CBC standards related to, but not limited to, excavation, grading and earthwork construction, and fills. Compliance with these standards would ensure that temporary construction activities during implementation of the enhanced bicycle treatments would not exacerbate seismic-related ground failure, including an increased risk of liquefaction. Furthermore, enhanced bicycle treatments would not include buildings or habitable structures, and any aboveground features would be required to comply with CBC standards related to, but not limited to, design specifications and procedures for calculating seismic forces. Therefore, implementation of these facilities would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. This impact would be less than significant.

General Plan Amendments

As part of the proposed Project, the City must also amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. The proposed General Plan Amendments would not result in construction activities or physical development that could increase the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. No impact would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 1d: Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Impact GEO-4 PORTIONS OF THE PROJECT WOULD BE LOCATED WITHIN AREAS IDENTIFIED AS AT RISK OF LANDSLIDES. WITH COMPLIANCE WITH APPLICABLE REGULATORY REQUIREMENTS UNDER THE CALIFORNIA BUILDING CODE, THE PROJECT WOULD NOT EXACERBATE THE RISK OF LOSS, INJURY, OR DEATH INVOLVING LANDSLIDES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

As discussed in Section 4.5.1, *Setting*, several areas within the City of Agoura Hills are considered landslide hazard zones, primarily located along foothills and mountain slopes to the in the northern, eastern, and southern portions of the city (CGS 2025).

Class I Facilities

Class I facilities would be located within areas identified as at risk of landslides. Construction activities for Class I facilities would include clearing and grubbing, pavement demolition, grading, utility relocation, retaining wall or fencing installation, asphalt paving or repaving, street and undercrossing improvements, striping, and revegetation. These construction activities would be required to comply with CBC standards related to, but not limited to, excavation, grading and earthwork construction, and fills. Compliance with these standards would ensure that temporary construction activities, including grading and ground disturbance at depths of up to 12 feet, would not exacerbate the risk of landslides near Class I facilities. Furthermore, implementation of the Class I facilities would not result in the construction of buildings or habitable structures, and undercrossing improvements would be required to comply with CBC standards related to, but not limited to, design specifications and procedures for calculating seismic forces. Pursuant to Policy S-2.2 in the City of Agoura Hills General Plan 2035, a geotechnical investigation would be prepared prior to construction of undercrossing improvements to determine the potential for risks related to landslides due to seismic events. Therefore, Class I facilities would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. This impact would be less than significant.

MEDEA CREEK PATH

The Path is located adjacent to areas identified as at risk of landslides. Construction activities would be required to comply with CBC standards related to, but not limited to, excavation, grading and

earthwork construction, and fills. Compliance with these standards would ensure that temporary construction activities, including grading and ground disturbance at depths of up to 12 feet, would not exacerbate the risk of landslides within or near the Path's alignment. Furthermore, implementation of the Path would not result in the construction of buildings or habitable structures, and undercrossing improvements would be required to comply with CBC standards related to, but not limited to, design specifications and procedures for calculating seismic forces. Pursuant to Policy S-2.2 in the City of Agoura Hills General Plan 2035, a geotechnical investigation would be prepared prior to construction of undercrossing improvements to determine the potential for risks related to landslides due to seismic events. Therefore, the Path would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. This impact would be less than significant.

AGOURA HIGH SCHOOL CONNECTION

The Connection is located adjacent to areas identified as at risk of landslides. Construction activities would be required to comply with CBC standards related to, but not limited to, excavation, grading and earthwork construction, and fills. Compliance with these standards would ensure that temporary construction activities, including grading and ground disturbance at depths of up to 12 feet, would not exacerbate the risk of landslides near the Connection. Furthermore, implementation of the Connection would not result in the construction of buildings, habitable structures, or undercrossings. Nonetheless, any aboveground features would be required to comply with CBC standards related to, but not limited to, design specifications and procedures for calculating seismic forces. Therefore, the Connection would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. This impact would be less than significant.

Class II Facilities

The proposed Class II facilities are not located within an identified as at risk of landslides. Therefore, there would be no impact related to the risk of loss, injury, or death involving landslides.

Class III Facilities

Class III facilities would be located within areas identified as at risk of landslides. Construction activities associated with implementation of the proposed Class III facilities would be limited to the restriping of existing roads to identify bike routes, and no ground disturbance would occur. Implementation of the Class III facilities would not result in the construction of buildings or habitable structures. Therefore, implementation of the Class III facilities would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. This impact would be less than significant.

Class IV Facilities

The proposed Class IV facilities are not located within an identified as at risk of landslides. Therefore, there would be no impact related to the risk of loss, injury, or death involving landslides.

Enhanced Bicycle Treatments Facilities

Enhanced bicycle treatments could include street striping and restriping, signage and wayfinding, bicycle signals and detection at traffic signals, bicycle parking, and bicycle repair facilities. These facilities would be implemented at various locations throughout the city within or adjacent to

existing, new, or improved bikeways, which could be located within areas identified as at risk of landslides. Construction activities associated with implementation of the enhanced bicycle treatments could include minor ground disturbing activities, which would be required to comply with CBC standards related to, but not limited to, excavation, grading and earthwork construction, and fills. Compliance with these standards would ensure that temporary construction activities during implementation of the enhanced bicycle treatments would not exacerbate the risk of landslides. Furthermore, enhanced bicycle treatments would not include buildings or habitable structures, and any aboveground features would be required to comply with CBC standards related to, but not limited to, design specifications and procedures for calculating seismic forces. Therefore, implementation of these facilities would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. This impact would be less than significant.

General Plan Amendments

As part of the proposed Project, the City must also amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. The proposed General Plan Amendments would not result in construction activities or physical development that could increase the risk of loss, injury, or death involving landslides. No impact would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 2:	Would the project result in substantial soil erosion or the loss of topsoil?

Impact GEO-5 THE PROJECT WOULD NOT RESULT IN SUBSTANTIAL SOIL EROSION OR THE LOSS OF TOPSOIL. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Implementation of Class I facilities including the Path and the Connection, Class II facilities, Class IV facilities, and enhanced bicycle treatments would involve earth-disturbing construction activities. Loose and disturbed soils are more prone to erosion and loss of topsoil by wind and water. As identified in Section 4.7, *Hydrology and Water Quality,* soil erosion is effectively controlled through a combination of State Water Resources Control Board (SWRCB) permits and AHMC requirements. Specifically, individual projects that disturb more than one acre of soil would be subject to the SWRCB Construction General Permit, which mandates preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP identifies and prescribes sediment controls—such as silt fences, sediment basins, and stabilized construction entrances—to maintain pre-development flow paths, prevent on- or off-site siltation, and minimize the potential for erosion. Individual projects that disturb between one and five acres of soil may opt for a Small Construction Rainfall Erosivity Waiver, but regardless of waiver applicability would be required to comply with Article V, Chapter 5 of the AHMC, which would ensure Best Management Practices (BMPs) for erosion control are implemented. Individual projects disturbing less than one acre of soil, though exempt from the Construction General Permit, would be bound by the AHMC's BMP requirements, ensuring consistent erosion and sediment controls for construction of all individual

projects identified within the BMP. Therefore, construction activities associated with implementation of Class I facilities including the Path and the Connection, Class II facilities, Class IV facilities, and enhanced bicycle treatments would not result in substantial soil erosion or the loss of topsoil. This impact would be less than significant.

Implementation of Class III facilities would be limited to the restriping of existing roads to identify bike routes, and no ground disturbance would occur. Therefore, Class III facilities would not result in substantial soil erosion or the loss of topsoil. No impact would occur.

After completion of construction activities, all ground surfaces would be either hardscape or maintained landscaping, and no large areas of exposed soils would be left to erode off individual project sites. Therefore, operation of individual projects implemented under the BMP would not result in substantial soil erosion or the loss of topsoil, and no impact would occur.

As part of the proposed Project, the City must also amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. The proposed General Plan Amendments would not result in construction activities or physical development that could result in substantial soil erosion or the loss of topsoil. No impact would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 3:	Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Impact GEO-6 PORTIONS OF THE PROJECT WOULD BE LOCATED ON GEOLOGIC UNITS OR SOILS THAT ARE UNSTABLE. HOWEVER, THE PROJECT WOULD NOT EXACERBATE SOIL INSTABILITY, NOR WOULD THE PROJECT RESULT IN ON- OR OFF-SITE LANDSLIDE, LATERAL SPREADING, SUBSIDENCE, LIQUEFACTION, OR COLLAPSE. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

As discussed under Impact GEO-3 and Impact GEO-4, Class II and Class IV facilities would not be located in areas identified as at risk of landslide or liquefaction; Class I facilities, Class III facilities, and enhanced bicycle treatments would be located in areas identified as at risk of both landslide and liquefaction; and the Path and the Connection would be located adjacent to areas identified as at risk of landslides but not within an identified liquefaction zone. Compliance with CBC standards and adherence to City of Agoura Hills General Plan 2035 Policy S-2.2, implementation of individual projects identified within the BMP would not exacerbate soil instability such that the risk of landslides or liquefaction would be increased. Impacts related to landslides and liquification would be less than significant.

Lateral spreading is a type of liquefaction-induced ground failure that occurs on gentle slopes or flat areas when poorly drained soils lose pressure during ground shaking and fall apart. Although soils within the Project area could experience lateral spreading during ground shaking events, compliance with CBC standards and adherence to City of Agoura Hills General Plan 2035 Policy S-2.2 would reduce the potential risk such that construction activities would not increase the risk of

lateral spreading. Furthermore, implementation of the proposed Project would not result in the construction of buildings or habitable structures on soils subject to lateral spreading. Impacts related to lateral spreading would be less than significant.

Subsidence and collapse are the downward vertical movement or shrinking of the ground surface, which can be caused by natural activity (e.g., ground shaking or sinkholes) or human activity (e.g., drilling or groundwater dewatering). Construction activities for individual projects would require ground disturbance but would not require groundwater dewatering. Furthermore, as discussed in Section 4.5.1, *Setting*, no recognized subsidence has been identified in the City of Agoura Hills and the likelihood of substantial subsidence occurring in the Project area is low. Pursuant to Policy S-2.2 in the City of Agoura Hills General Plan 2035, a geotechnical investigation would be prepared prior to construction of aboveground features to determine the potential for risks of subsidence problems. Therefore, implementation of individual projects identified within the BMP would not have the potential to result in on- or off-site subsidence or collapse. Impacts related to subsidence and collapse would be less than significant.

As part of the proposed Project, the City must also amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. The proposed General Plan Amendments would not result in construction activities or physical development that could result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. No impact would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 4:	Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Impact GEO-7 THE PROJECT MAY BE LOCATED UPON EXPANSIVE SOILS. COMPLIANCE WITH APPLICABLE CITY REQUIREMENTS WOULD MINIMIZE POTENTIAL RISKS ASSOCIATED WITH EXPANSIVE SOILS. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

As discussed in Section 4.5.1, *Setting*, ungraded native soils in or near East Agoura Hills, South End, Forest Cove, Reyes Adobe, and Lake Lindero exhibit the highest potential for shrinkage and swelling (City of Agoura Hills 2022). Implementation of individual projects identified within the BMP could occur on expansive soils, and bicycle facilities could be subject to damage or instability when underlying soils shrink or swell. Pursuant to Policy S-2.2 in the City of Agoura Hills General Plan 2035, a geotechnical investigation would be prepared prior to individual project approvals to determine the potential for risks related to expansive soils. The adverse effects of expansive soils would be avoided through proper subsoil preparation, drainage, and foundation design during construction activities if such risks are identified.

As part of the proposed Project, the City must also amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. The proposed General Plan Amendments would not result in construction activities or physical development that could occur on expansive soils.

Overall, the proposed Project would not result in substantial direct or indirect risks to life or property due to expansive soils. This impact would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 5:	Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Impact GEO-8 THE PROJECT WOULD NOT REQUIRE THE USE OF SEPTIC TANKS OR ALTERNATIVE WASTEWATER DISPOSAL SYSTEMS. NO IMPACT WOULD OCCUR.

The proposed Project would not result in the construction of buildings or habitable structures requiring a sanitary sewer system. Therefore, the Project would not require the use of septic tanks or alternative wastewater disposal systems. No impact would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

No impact would occur.

Threshold 6:	Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Impact GEO-9 GROUND DISTURBANCE DURING CONSTRUCTION ACTIVITIES COULD ENCOUNTER GEOLOGIC UNITS WITH HIGH OR UNDETERMINED PALEONTOLOGICAL SENSITIVITY. WITH IMPLEMENTATION OF MITIGATION MEASURE GEO-9, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Due to the programmatic nature of the Project, a precise, project-level analysis of the specific impacts of individual projects identified within the BMP on paleontological resources is not possible at this time. The potential for impacts to paleontological resources can only be determined at the individual project level because the effects depend on individual project site conditions such as the underlying geology and the history of development at that project site. Nonetheless, individual projects that would be facilitated by implementation of the BMP fall into several categories, and the nature of some facility types could preclude them from having a potential impact on paleontological resources regardless of location. Specifically, ground-disturbing activities associated with construction of individual projects identified within the BMP would have the potential to damage or

destroy paleontological resources that may be present on or below the ground surface in areas of high or undetermined paleontological sensitivity.

Class I Facilities

Construction of the Class I facilities would require ground disturbing activities. These activities could result in the discovery of paleontological resources if undisturbed geologic units with high or undetermined paleontological sensitivity are encountered. Consequently, damage to or destruction of paleontological resources could occur during implementation of the Class I facilities. This impact would be potentially significant, and mitigation would be required.

MEDEA CREEK PATH

Construction of the Path would require ground disturbing activities. These activities could result in the discovery of paleontological resources if undisturbed geologic units with high or undetermined paleontological sensitivity are encountered. Consequently, damage to or destruction of paleontological resources could occur during implementation of the Path. This impact would be potentially significant, and mitigation would be required.

AGOURA HIGH SCHOOL CONNECTION

Construction of the Connection would require ground disturbing activities. These activities could result in the discovery of paleontological resources if undisturbed geologic units with high or undetermined paleontological sensitivity are encountered. Consequently, damage to or destruction of paleontological resources could occur during implementation of the Connection. This impact would be potentially significant, and mitigation would be required.

Class II Facilities

The establishment of Class II facilities would generally require roadway restriping and reconfiguration of lane widths to accommodate new dedicated bike lanes. Restriping activities would not require ground disturbance and therefore would not result in the discovery of paleontological resources.

Pavement widening would be necessary on Driver Avenue and Cornell Road to allow for the addition of bicycle lanes. Pavement widening would require ground disturbance, and these activities could result in the discovery of paleontological resources if undisturbed geologic units with high or undetermined paleontological sensitivity are encountered. Consequently, damage to or destruction of paleontological resources could occur during implementation of the Class II facilities. This impact would be potentially significant, and mitigation would be required.

Class III Facilities

Establishment of Class III facilities would be limited to the restriping of existing roads to identify bike routes. Restriping activities would not require ground disturbance and therefore would not result in the discovery of paleontological resources.

Class IV Facilities

Construction of Class IV facilities would require ground disturbing activities. These activities could result in the discovery of paleontological resources if undisturbed geologic units with high or undetermined paleontological sensitivity are encountered. Consequently, damage to or destruction

of paleontological resources could occur during implementation of the Class IV facilities. This impact would be potentially significant, and mitigation would be required.

Enhanced Bicycle Treatments

Enhanced bicycle treatments could include street striping and restriping, signage and wayfinding, bicycle signals and detection at traffic signals, bicycle parking, and bicycle repair facilities. These facilities would be implemented at various locations throughout the city within or adjacent to existing, new, or improved bikeways. Although minimal, implementation of these facilities would require ground disturbance. Ground disturbance could result in the discovery of paleontological resources if undisturbed geologic units with high or undetermined paleontological sensitivity are encountered. Consequently, damage to or destruction of paleontological resources could occur during implementation of the enhanced bicycle treatments. This impact would be potentially significant, and mitigation would be required.

General Plan Amendments

As part of the proposed Project, the City must also amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. The proposed General Plan Amendments would not result in ground disturbing activities and therefore would not result in the discovery of paleontological resources. No impact would occur.

Mitigation Measures

GEO-9 Paleontological Resources Assessment

Prior to approval of final design for individual projects identified within the BMP that involve ground disturbance, the City shall require preparation of a Paleontological Resources Assessment. This assessment may be prepared as a standalone report or incorporated into a larger environmental review document. The Paleontological Resources Assessment shall be prepared by an individual meeting the standards of a Qualified Professional Paleontologist as defined by the SVP. The assessment shall summarize the results of a records search of the Natural History Museum of Los Angeles County, summarize the results of a desktop review of available literature and geologic maps of the individual project site, characterize the paleontological sensitivity of the geologic unit(s) present within the project site using the SVP paleontological sensitivity scale, assess the potential for significant impacts to paleontological resources, and provide mitigation recommendations for avoiding or reducing impacts to paleontological resources from project construction, if necessary.

Significance After Mitigation

Implementation of Mitigation Measure GEO-9 would identify the potential to encounter paleontological resources at individual project sites and prescribe specific mitigation for construction activities based on the site's sensitivity. With implementation of Mitigation Measure GEO-9, impacts related to paleontological resources would be less than significant.

4.5.4 Cumulative Impacts

The geographic scope of cumulative impacts for geology and soils is the Project area, which encompasses all of the City of Agoura Hills. This geographic scope is appropriate because the Project would occur in various locations throughout the city, and geologic hazards are present but varied throughout the city. For this analysis, a cumulative impact would occur if cumulative development

would have the potential to directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, seismic ground shaking, liquefaction, or landslides; result in substantial soil erosion or the loss of topsoil; be located on an unstable geologic unit and potentially result in landslide, lateral spreading, subsidence, liquefaction, or collapse; be located on expansive soil; have soils incapable of supporting the use of septic tanks or alternative wastewater disposal systems; or destroy a unique paleontological resource, site, or geologic feature.

Past, present, and reasonably foreseeable future projects, including the projects listed in Table 3-1, would expose additional people and property to seismic and geologic hazards that are present in the region. The magnitude of geologic hazards for individual projects would depend upon the location, type, and size of development as well as specific hazards associated with individual sites. Any specific geologic hazards associated with each individual site would be limited to that site without affecting other areas. Furthermore, compliance with both the CBC requirements and Policy S-2.2 in the City of Agoura Hills General Plan 2035 would reduce the risk of seismic and geologic hazards for all future projects. Therefore, cumulative development would have a less-than-significant cumulative impact involving the risk of loss, injury, or death due to rupture of a known earthquake fault, seismic ground shaking, liquefaction, or landslides; substantial soil erosion; unstable geologic units; expansive soils, or soils incapable of supporting the use of septic tanks.

During construction, cumulative development would result in ground disturbance; during operation, cumulative development could increase access to areas known to contain scientifically significant paleontological resources. Therefore, construction and operation of cumulative development could increase the chances of damage, destruction, or unlawful collection of those resources. This cumulative impact to paleontological resources would be potentially significant. Ground-disturbing activities associated with construction facilitated by the proposed Project have the potential to damage or destroy paleontological resources that may be present on or below the ground surface in areas of high or undetermined paleontological sensitivity. With implementation of Mitigation Measure GEO-8, Project impacts related to paleontological resources would be less than significant due to the preparation of a site-specific paleontological resources assessment. Therefore, the Project would not contribute considerably to a cumulative impact related to paleontological resources.

4.6 Hazards and Hazardous Materials

The analysis in this section considers potential impacts to hazards and hazardous materials. Specifically, this section discusses the environmental and regulatory setting; the criteria used to determine the significance of environmental impacts related to hazards and hazardous materials; and potential impacts related to hazards and hazardous materials that would result from implementation of the proposed Project.

4.6.1 Setting

a. Overview of Hazardous Materials

The term "hazardous materials" refers to both hazardous materials and hazardous waste. The term "hazardous material" is defined in the State of California's Health and Safety Code (HSC), Division 20, Chapter 6.95, Section 25501(n) as:

> Any material that …, "because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment" […]. "Hazardous materials" include, but are not limited to, hazardous substances, hazardous waste and any material that a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

Hazardous waste is hazardous material generated, intentionally or unintentionally, as a byproduct of some process or condition. Hazardous wastes are defined in California HSC Section 25141(b) as wastes that:

> …because of their quantity, concentration, or physical, chemical, or infectious characteristics, [may either] cause, or significantly contribute to an increase in mortality or an increase in serious illness [or] pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

A material is hazardous if it exhibits one or more of the following characteristics: toxicity, ignitability, corrosivity, and reactivity. These types of hazardous materials are further defined below:

- **Toxic Substances.** Toxic substances are materials that are poisonous to living organisms and can cause health effects. Carcinogens, substances that can cause cancer, are a special class of toxic substances. Examples of toxic substances include benzene (a component of gasoline and suspected carcinogen) and methylene chloride (a common laboratory solvent and a suspected carcinogen).
- **Ignitable Substances.** Ignitable substances are hazardous because of their ability to burn. Gasoline, hexane, and natural gas are examples of ignitable substances.
- **Corrosive Materials.** Corrosive materials can cause severe burns. Corrosives include strong acids and bases such as sodium hydroxide (lye) or sulfuric acid (battery acid).
- **Reactive Materials.** Reactive materials may cause explosions or generate toxic gases. Explosives, pure sodium or potassium metals (which react violently with water), and cyanides are examples of reactive materials.

b. Hazardous Substances

Volatile Organic Compounds

Volatile Organic Compounds (VOCs) are a group of chemicals that easily evaporate at room temperature and are found in many products, including paints, solvents, and cleaning supplies. The United States Environmental Protection Agency (U.S. EPA) states that VOCs can have both short- and long-term health effects, ranging from eye, nose, and throat irritation to more severe impacts such as liver and kidney damage (U.S. EPA 2024a). VOCs also contribute to the formation of ground-level ozone and smog, impacting air quality.

Gasoline

Gasoline is a highly flammable liquid composed of hydrocarbons, including alkanes, benzene, toluene, and xylenes. According to the U.S. EPA, exposure to gasoline can occur through inhalation, ingestion, or skin contact, leading to health effects such as dizziness, headaches, respiratory issues, and central nervous system depression. Prolonged exposure to gasoline vapors can result in organ damage or cancer due to the presence of benzene and other toxic substances. Additionally, burning gasoline releases harmful pollutants like carbon monoxide, which can be fatal in high concentrations (U.S. EPA 2024b). The Occupational Safety and Health Administration (OSHA) regulations require proper storage of flammable liquids like gasoline in approved containers with clear labeling to prevent accidental misuse or fire hazards (29 Code of Federal Regulations (CFR) Section 1910.106)

Deisel

Diesel fuel, a complex mixture of hydrocarbons, is commonly used in engines and heating systems. OSHA identifies diesel as a flammable liquid that poses several health hazards, including skin irritation, respiratory issues, and potential carcinogenic effects. Inhalation of diesel fumes can cause dizziness, headaches, and long-term exposure may lead to more severe health problems such as lung damage and cancer. Diesel spills can also contaminate soil and water, posing environmental risks(OSHA 2025).

Asbestos-Containing Materials

Asbestos is a naturally occurring fibrous material that was widely used in asphalt and in structures built between 1945 and 1978 for its fireproofing and insulating properties. Asbestos-containing materials (ACM) were banned by the U.S. EPA between the early 1970s and 1991 under the authority of the federal Clean Air Act and the Toxic Substances Control Act due to their harmful health effects. Exposure to asbestos increases the risk of developing lung disease, such as lung cancer, mesothelioma, or asbestosis (U.S. EPA 2024c). Common ACMs include vinyl flooring and associated mastic, wallboard and associate joint compound, plaster, stucco, acoustic ceiling spray, ceiling tiles, heating system components, and roofing materials. Pre-1973 commercial and industrial structures are required to implement asbestos regulations if damage occurs, or if remodeling, renovation, or demolition activities disturb ACMs.

Lead and Lead-Based Paint

Lead is a naturally occurring element that can be toxic to humans and animals, and lead exposure can result in health effects, especially in children. Lead and lead compounds have been used in a variety of consumer products, including lead-based paint (LBP), ceramics, pipes and plumbing materials, solders, gasoline, batteries, ammunition, and cosmetics (U.S. EPA 2024d). In 1978,

consumer uses of lead-based paint were banned. Old paint and pavement may contain lead, which could be disturbed by demolition.

c. Generation and Disposal of Hazardous Materials and Waste

Many chemicals used in household cleaning, construction, light and heavy industry, dry cleaning, film processing, landscaping and automotive maintenance and repair are considered to generate hazardous materials and waste. Additionally, in some cases, past industrial or commercial uses on a site may have resulted in spills or leaks of hazardous materials and petroleum that have caused contamination of the underlying soil and groundwater. Federal and state laws require that soils and groundwater having concentrations of contaminants that are higher than certain acceptable levels are handled and disposed as hazardous waste during excavation, transportation, and disposal. The California Code of Regulations (CCR), Title 22, Sections 66261.20-24 contains technical descriptions of characteristics that would cause a soil to be classified as a hazardous waste. Hazardous materials require special methods of disposal, storage and treatment, and the release of hazardous materials requires an immediate response to protect human health and safety and the environment. Improper disposal can harm the environment and people who work in the waste management industry.

d. Use, Transport, and Abatement of Hazardous Materials

If improperly handled, hazardous materials can result in public health hazards through human contact with contaminated soils or groundwater, or through airborne releases in vapors, fumes, or dust. There is also the potential for accidental or unauthorized releases of hazardous materials that would pose a public health concern. The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, State, and local regulations. In accordance with such regulations, the transport of hazardous materials and waste can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous waste transporters are required to complete and carry a hazardous waste manifest, which includes forms, reports, and procedures designed to seamlessly track hazardous waste.

Hazardous materials used and generated within the city and their waste would be transported via major regional routes, such as United States Highway 101 (Ventura Freeway). The City does not have direct authority over the transport of hazardous materials on this roadway. Instead, the United States Department of Transportation and California Highway Patrol regulate transportation of hazardous materials by truck.

e. Existing Hazardous Materials Contamination

Chapter 5, *Community Safety,* of the City of Agoura Hills General Plan 2035 identifies various sources of hazardous materials within the city. Specifically, land uses near the Ventura Freeway corridor are at risk of exposure if an accident occurs during the transport of hazardous material; leaking underground storage tanks (LUST) containing motor vehicle fuels and other toxic substances can contaminate soil and groundwater; and, a network of natural gas pipelines presents a risk of accidental rupture during construction activities. Light industrial facilities, dry cleaners, and auto repair shops use solvents and other toxic substances, which can generate hazardous wastes. Residences and office buildings can also store potentially hazardous materials, though typically in smaller quantities than commercial or industrial uses (City of Agoura Hills 2022).

f. Wildland Fire

Wildlands are tracts of land in a natural state. Wildland fires are uncontrolled fires in wildland areas with extensive combustible fuel, including vegetation. The Wildland Urban Interface (WUI) is the area where human development meets wildland vegetation, and it is typically characterized by a mix of residential, commercial, and natural land uses. The WUI is particularly vulnerable to wildfire because it combines the presence of human-built structures with the presence of combustible vegetation and other wildfire fuels. The city contains both WUI and Wildfire Influence zones, which are zones with wildfire susceptible vegetation up to 1.5 miles from WUI zones (The California Department of Forestry and Fire Protection [CAL FIRE] 2025).

In California, state and local agencies share responsibility for wildfire prevention and suppression, and federal agencies take part as well. Federal agencies are responsible for oversight of federal lands in Federal Responsibility Areas (FRA). The State of California has determined that some non-federal lands in unincorporated areas with watershed value are of statewide interest and have classified those lands as State Responsibility Areas (SRA), which are managed by CAL FIRE. All incorporated areas and unincorporated lands not in FRAs or SRAs are classified as Local Responsibility Areas (LRA). The City of Agoura Hills is a Very High Fire Hazard Severity Zone (VHFHSZ) in a LRA and is bordered on the north and south by VHFHSZs in a SRA (CAL FIRE 2024).

4.6.2 Regulatory Setting

a. Federal Regulations

Occupational Safety and Health Act

Created by the Occupational Safety and Health Act of 1970 (CFR Title 29), the OSHA is the federal agency responsible for ensuring worker safety. OSHA regulations provide standards for safe workplaces and work practices, including those relating to hazardous materials handling. Occupational Safety and Health Act Standard 1917.156 designates fueling locations, regulates liquid fuel, and specifies standards for fueling operation and storage. Occupational Safety and Health Act Standard 1910.39 mandates that each job site have a fire prevention plan.

Hazardous Materials Transportation Act

The United States Department of Transportation, in conjunction with U.S. EPA, is responsible for enforcement and implementation of federal laws and regulations pertaining to transportation of hazardous materials. The Hazardous Materials Transportation Act of 1974 (49 United States Code 5101) directs the United States Department of Transportation to establish criteria and regulations regarding the safe storage and transportation of hazardous materials. 49 CFR Parts 171 to 180 define the types of material classified as hazardous, regulate the transportation of hazardous materials, and specify the marking of vehicles transporting hazardous materials.

Comprehensive Environmental Response, Compensation, and Liability Act and Superfund Amendments and Reauthorization Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) was enacted in 1980 and amended by the Superfund Amendments and Reauthorization Act in 1986. This law provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. Among other things, CERCLA established requirements concerning closed and abandoned hazardous waste sites,

provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enabled revision of the National Contingency Plan, which provides the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants.

In 1986, the Superfund Amendments and Reauthorization Act (SARA) amended CERCLA, reflecting the U.S. EPA's experience in administering the Superfund program over six years. SARA provided new enforcement authorities and tools, increased the amount of funds available for hazardous waste site cleanups, and increased the awareness of human health problems affiliated with hazardous waste sites. SARA also revised the U.S. EPA's Hazard Ranking System to accurately assess the risk posed to human health and the environment by uncontrolled hazardous waste sites.

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) was passed by the United States Congress in 1976 and is administered by U.S. EPA to regulate the introduction of new or already existing chemicals. Under the TSCA, U.S. EPA evaluates potential risks from new and existing chemicals and acts to address any unreasonable risks chemicals may have on human health and the environment. The TSCA provides U.S. EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures.

Emergency Planning and Community Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act was created under SARA Title III to help communities protect public health and safety from chemical hazards. The national legislation requires each state to appoint a State Emergency Response Commission, which then divides each state into Emergency Planning Districts and nominates a Local Emergency Planning Committee for each district. The Emergency Planning and Community Right-to-Know Act provides compliance and reporting standards as well as waste, chemical, and cleanup enforcement, allowing each district to plan and prepare thoroughly should a hazardous waste accident or release arise.

b. State Regulations

Hazardous Waste Control Law

DTSC, a department of CalEPA, is the primary agency in California that regulates hazardous waste, cleans up existing contamination, and looks for ways to reduce the hazardous waste produced in California. DTSC regulates hazardous waste in California primarily under the authority of the Resource Conservation and Authority Act and the California Health and Safety Code. DTSC also administers the California Hazardous Waste Control Law (California Health and Safety Code Section 25100, et seq.) to regulate hazardous wastes. The Hazardous Waste Control Law lists chemicals and common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills.

Environmental Health Standards for the Management of Hazardous Waste Law

Title 22 CCR Division 4.5, Chapter 11, Sections 66261.20 through 66261.24 contain technical descriptions of characteristics that would classify waste material, including soil, as hazardous waste. Specifically, waste is considered hazardous if it is toxic, ignitable, corrosive, or reactive pursuant to the criteria established in Title 22 CCR Division 4.5, Chapter 11, Article 3. When excavated, soils with concentrations of contaminants higher than certain acceptable levels must be handled and disposed of as hazardous waste. When demolished, structural features containing LBP can also be considered hazardous waste, depending on concentrations, and must be handled and disposed of as hazardous waste.

AB 747

AB 747 requires cities and counties in California to address the capacity of evacuation routes in the safety element of their general plans. It mandates that local governments plan for the capacity of these routes under various emergency scenarios to ensure effective evacuations.

California Government Code Section 65962.5

California Government Code Section 65962.5 requires DTSC, the California Department of Health Services, SWRCB, and the California Department of Resources, Recycling, and Recovery (CalRecycle) to compile and annually update lists of hazardous materials sites and land designated as hazardous waste sites throughout the state. The Secretary for Environmental Protection consolidates the information submitted by these agencies and distributes it to each city and county where sites on the lists are located. Before a lead agency accepts an application for any development project as complete, the applicant must consult these lists to determine if the site at issue is included. If any soil is excavated from a site containing hazardous materials, it is considered a hazardous waste if it exceeds specific criteria in CCR Title 22. Remediation of hazardous wastes found at a site may be required if excavation of these materials is performed, or if certain other soil-disturbing activities would occur. Even if soil or groundwater at a contaminated site does not have the characteristics required to be defined as hazardous waste, remediation of the site may be required by regulatory agencies subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking jurisdiction.

California Code of Regulations

Soil excavated from a site would be considered a hazardous waste it contained hazardous materials exceeding specific criteria identified by the DTSC in Title 22, Division 4.5 Section 66261.10 of the CCR. Remediation of hazardous waste found at a site may be required if excavation of these materials is performed, or if other soil disturbing activities would occur. Even if soil or groundwater at a contaminated site does not have the characteristics required to be defined as hazardous waste, remediation of the site may be required by regulatory agencies subject to jurisdictional authority. Cleanup requirements are determined on a case-by-case basis by the agency taking jurisdiction.

Additionally, because of its toxic properties, lead is regulated by the CCR as a hazardous material as well as a toxic air contaminant. State-certified contractors must perform inspection, testing, and abatement of lead-containing building materials in compliance with applicable health and safety and hazardous materials regulations. These regulations cover the demolition, removal, cleanup, transportation, storage, and disposal of lead-containing material. The regulations outline the permissible exposure limit, protective measures, monitoring, and compliance to ensure the safety of construction workers exposed to lead-based materials. The California Division of Occupational

Safety and Health's (Cal/OSHA) Lead in Construction Standard requires project proponents to develop and implement a lead compliance plan when LBP would be disturbed during construction. The plan must describe activities that could emit lead, methods for complying with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction activities.

California Public Resources Code

The California Public Resources Code (PRC) requires projects that would be located within 0.25 mile of a school and might reasonably be expected to emit or handle hazardous materials to consult with the school district regarding potential hazards. California PRC also directs CAL FIRE to map fire hazards within State Responsibility Areas (SRAs) based on fuel loading, slope, fire weather, and other relevant factors present, including areas where winds have been identified by the department as a major cause of wildfire spread. These zones, referred to as Fire Hazard Severity Zones and classify a wildland zone as Moderate, High, or Very High fire hazard based on the average hazard across the area included in the zone.

California Fire Code

The California Fire Code is contained within Chapter 9 of CCR Title 24 and is based on the International Fire Code. Updated every three years, the California Fire Code includes provisions and standards for emergency planning and preparedness, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution.

California Vehicle Code

Section 31303 of the California Vehicle Code requires that hazardous materials be transported via routes with the least overall travel time and prohibits the transportation of hazardous materials through residential neighborhoods.

California Manual on Uniform Traffic Control Devices

Chapter 6C of the California Manual on Uniform Traffic Control Devices (CA MUTCD) outlines the essential components and principles for establishing safe and effective Temporary Traffic Control zones during road work or incidents. The goal is to ensure the safety of road users and workers while maintaining efficient traffic flow. Key guidance elements include proper signage, buffer zones, barriers and channelizing devices, reduced speed limits, and lane closure (California Department of Transportation [Caltrans] 2014).

c. Regional

Las Virgenes-Malibu Council of Governments Multi-Jurisdictional Hazards Mitigation Plan 2024

The Las Virgenes-Malibu Council of Governments (LVMCOG) Multi-Jurisdictional Hazard Mitigation Plan (2024) is a regional plan spanning five jurisdictions in Los Angeles County: Agoura Hills, Calabasas, Hidden Hills, Malibu, and Westlake Village. The LVMCOG Multi-Jurisdictional Hazard Mitigation Plan addresses several critical areas to enhance community safety within the City of Agoura Hills. The Hazard Mitigation Plan states that there are sites in the region known to harbor hazardous materials, but there has been no historical record of a major hazardous material spill or incident in the cities within the region. Therefore, the Hazard Mitigation Plan evaluates hazards as a

risk of natural disasters and climate change including flooding, earthquake, and fire. For emergency access and evacuation, the Multi-Jurisdictional Hazard Mitigation Plan focuses on maintaining critical evacuation routes, improving infrastructure resilience, and coordinating local agencies for effective traffic management and communication during emergencies. These strategies collectively aim to protect residents and the environment from various hazards (LVMCOG 2024).

Los Angeles County Emergency Evacuation Zones

The Los Angeles County Emergency Evacuation Zones are designed to provide clear and organized evacuation procedures during emergencies. These zones are determined based on tactical and geographic considerations, major roads, and ingress/egress routes. The zones are part of a coordinated effort by the Los Angeles County Office of Emergency Management, Los Angeles County Fire Department, and Lost Angeles County Sheriff's Department to ensure efficient and safe evacuations. The system includes real-time updates on evacuation status through online platforms, which help residents stay informed about their specific zone's evacuation orders and warning (City of Agoura Hills 2025).

d. Local

City of Agoura Hills General Plan 2035

The City of Agoura Hills General Plan 2035 was adopted on March 24, 2010 (updated on August 10, 2022) by the City Council (City of Agoura Hills 2022). The City of Agoura Hills General Plan 2035 is a strategic document designed to guide the physical development of the city until the year 2035. Among other things, the City of Agoura Hills General Plan 2035 sets out the pattern of land uses, including residential, commercial, and industrial. It also establishes the system of streets, bikeways, and trails. The City of Agoura Hills General Plan 2035 addresses a wide variety of subject areas, including housing, traffic, natural resources, land uses, economic development, noise, and public safety.

The City of Agoura Hills General Plan 2035 contains the following goals and policies related to hazards and hazardous materials, which would apply to the proposed Project

Goal S-3. Minimize risks to persons and property in Agoura Hills from urban and wildland fires.

> **Policy S-3.10**. Plan for emergency evacuation, including identifying standards for evacuation, and maintaining adequate departure paths especially in areas that do not have at least two emergency evacuation routes (i.e., points of ingress and egress).
>
> **Policy S-3.15.** Implement measures of the Las Virgenes-Malibu Council of Governments Multi-Jurisdictional Hazard Mitigation Plan relevant to the City, and work to ensure the Hazard Mitigation Plan is periodically updated.

Goal S-5. Residents, visitors, property, and the natural environment in Agoura Hills are protected to the maximum extent feasible by the use, storage, or transport of hazardous materials.

> **Policy S-5.5.** Require proponents of projects in known areas of contamination from oil operations or other uses to perform comprehensive soil and groundwater contamination assessments, and undertake remedial procedures, as appropriate, prior to grading and development.

Goal S-6. Effective emergency response to natural or human-induced disasters that minimize the loss of life and damage to property, and also reduce disruptions in the delivery of vital public and private services during and following a disaster.

> **Policy S-6.1.** Maintain and implement the Standardized Emergency Management System (SEMS) Plan to address disasters, such as earthquakes, flooding, hazardous material spills, epidemics, fires, extreme weather, accidents, and terrorism.

Agoura Hills Evacuation Plan 2020

The 2018 Woolsey Fire required a full evacuation of the City of Agoura Hills, demonstrating the need for a comprehensive and coordinated evacuation plan. In response, the City adopted the Agoura Hills Evacuation Plan in 2020. The evacuation plan was developed through a collaborative multi-agency development process including representatives from the City, the Los Angeles County Fire Department, the Los Angeles County Sheriff's Department, and the Los Angeles County Office of Emergency Services. The evacuation plan divides the city into nine evacuation zones and establishes seven evacuation routes including (City of Agoura Hills 2020):

- Kanan Road (southbound to Ventura Freeway)
- Kanan Road (northbound for Section 3)
- Reyes Adobe Road (southbound to Ventura Freeway),
- Reyes Adobe Road (northbound to Ventura Freeway),
- Agoura Road,
- Chesebro Road, and
- Liberty Canyon Road.

The evacuation plan also identifies feeder routes including Colodny Dive, Driver Avenue, and Fairview Place.

City of Agoura Hills Municipal Code

The Agoura Hills Municipal Code (AHMC) includes provisions for development standards in regard to emergency vehicle access, hazards, and fire code. Specifically, Article III, Chapter 1, Section 3100 of the AHMC formally adopts the 2023 Los Angeles County Fire Code, which includes portions of the 2022 California Fire Code and the 2021 Edition of the International Fire Code. Together, these codes set standards for permitted road designs and road widths that shall be maintained at all times.

4.6.3 Impact Analysis

a. Methodology and Significance Thresholds

As discussed in Section 4.0, *Environmental Impact Analysis*, all Project components are analyzed at the programmatic level. Project components include the Bicycle Master Plan (BMP), the Vehicle Miles Traveled (VMT) Mitigation Exchange and Banking Program (Program), and the General Plan Amendments (Amendments). Projects included within the BMP are grouped into Class I facilities, Class II facilities, Class III facilities, Class IV facilities, enhanced bicycle treatments, as identified in Section 2.5, *Project Characteristics,* and in Table 1 of Chapter 2, *Project Description.* The impact analysis contained herein provides a programmatic analysis of anticipated impacts for each of the five facility classes, as the individual project impacts associated with each class of facility are

expected to be similar. Because the City seeks to prioritize implementation of the Medea Creek Path (Path) and the Agoura High School Connection (Connection), the Path and the Connection have their own subheadings within the Class I Facility impact analysis subsection to provide a more specific assessment of their environmental impacts. Impacts associated with the General Plan Amendments are analyzed within their own subsection.

As discussed in Chapter 2, *Project Description*, the only projects that are currently planned, unfunded, and could potentially be funded by the VMT Mitigation Exchange and Banking Program are those currently included within the Bicycle Master Plan. Therefore, the impact analysis contained herein does not include a subsection for impacts associated with the Program, as the individual project list for the BMP and the Program are identical and impacts associated with the BMP would encompass impacts associated with the Program.

Within the following environmental analysis, impacts associated with each Project component are explicitly identified under the respective heading.

According to Appendix G of the *California Environmental Quality Act* (CEQA) *Guidelines*, impacts related to hazards and hazardous materials would be significant if the proposed project would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment;
5. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or,
7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
Threshold 2:	Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Impact HAZ-1 BY FOLLOWING APPLICABLE LEGISLATION AND THROUGH IMPLEMENTATION OF A SOIL MANAGEMENT PLAN WHEN REQUIRED, THE PROPOSED PROJECT WOULD NOT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH EITHER THE ROUTINE TRANSPORT, USE, OR DISPOSAL OF HAZARDOUS MATERIALS, OR THROUGH REASONABLY FORESEEABLE UPSET AND ACCIDENT CONDITIONS INVOLVING THE RELEASE OF HAZARDOUS MATERIALS. WITH IMPLEMENTATION OF MITIGATION MEASURE HAZ-1, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Class I Facilities

Construction of Class I facilities would include clearing and grubbing, pavement demolition, grading, utility relocation, retaining wall or fencing installation, asphalt paving or repaving, street improvements and/or construction of undercrossings and/or overcrossings, striping, and revegetation. These activities would temporarily increase the regional transport, use, disposal, and possibility of release of hazardous materials.

Construction-related hazardous materials would include diesel fuel, lubricants, paints and solvents, and cement products containing strong basic or acidic chemicals. Pavement demolition and ground disturbing activities would also require the excavation and transport of paving materials (e.g., asphalt, concrete, roadbed fill materials) and soils, which could possibly be contaminated by vehicle-related pollution (e.g., oil, gasoline, diesel, and other automotive chemicals). Additionally, roadways constructed before the 1970s were known to use asbestos-containing materials in asphalt and LBP for roadway markings. Therefore, the existing pavement may contain asbestos and/or LBP due to its age. Yellow paint striping may also contain metals, such as lead and chromium, that require special handling and disposal.

The increased transport, use, and disposal of hazardous materials has the potential to result in adverse effects in the event construction workers, the public, or the surrounding environment become exposed to them, resulting in associated health risks. Potential reasonably foreseeable upset and accident conditions that could occur from the transport, use, and disposal of hazardous materials include direct contact of these materials on skin, incidental ingestion of hazardous materials, or inhalation of airborne dust released from dried hazardous materials. The transport, use, and disposal of hazardous materials could also result in accidental spills, leaks, toxic releases, fire, or explosion. Ground-disturbing activities could generate fugitive dust, which can also have adverse effects on construction workers, the public, and the surrounding environment if concentrated.

Demolition of asphalt pavement during construction would not create airborne hazards, as construction would occur in an open-air environment and potentially hazardous dust associated with asphalt demolition would dissipate quickly. Furthermore, any transport, use, disposal, or handling of potentially hazardous materials during construction of the Class I facilities would be required to comply with applicable federal, state, and local regulations established by U.S. EPA, the

State of California, and the City of Agoura Hills. These regulations, as identified in Section 4.6.2, *Regulatory Setting,* include OSHA, the Hazardous Material Transportation Act, Hazardous Waste Control Law, Environmental Health Standards for the Management of Hazardous Waste Law, and the CCR, all of which establish procedures for the proper transport, use, storage, and disposal of excess hazardous materials and hazardous construction waste. Therefore, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

The only known hazardous materials sites within 1,000 feet of proposed Class I facilities are located adjacent to the Path, which is discussed below. There are no other known hazardous materials sites located adjacent to other Class I facilities proposed within the BMP. Therefore, construction of Class I facilities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Operation of the Class I facilities would consist of bicycle and pedestrian travel along shared use paths. The addition of bicycle infrastructure within the city would not increase the use, transportation, storage, or generation of significant quantities of hazardous materials during operation activities. Rather, use of the Class I bicycle facilities identified in the BMP may result in a decreased likelihood of the release of hazardous materials like diesel fuel and gasoline because these facilities would provide an alternative to vehicular travel. Therefore, operation of the Class I facilities would not create a significant hazard to the public or the environment. Overall, with compliance with existing regulations, this impact would be less than significant

MEDEA CREEK PATH

Hazardous materials associated with the construction of the Path would include diesel fuel, lubricants, paints and solvents, and cement products containing strong basic or acidic chemicals. Compliance with applicable federal, state, and local laws and regulations, including those identified under Section 4.6.2, *Regulatory Setting,* would minimize potential impacts to the public and environment associated with the routine transport, use, or disposal or accidental release of hazardous materials during construction.

There are three closed LUST sites (V-Fire Station #36, Shell #204-0048-0107, and Agoura Building Materials) and one closed Cleanup Program site (Galaxy Cleaners) located within 1,000 feet of the Path alignment (SWRCB 2025). While ground disturbance associated with construction of the Path would not occur directly on these sites, there is a possibility that contamination from these former sites has migrated through soil and could be present in soils where ground disturbance would occur. Therefore, ground disturbance associated with construction of the Path would have the potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. This impact would be potentially significant, and mitigation would be required.

Operation of the Path would consist of bicycle and pedestrian travel along a shared use path. Use of this bicycle infrastructure would not increase the use, transportation, storage, or generation of significant quantities of hazardous materials during operation activities. As such, the Medea Creek Path would not create a significant hazard to the public or the environment during operation. Impacts associated with operation would be less than significant.

AGOURA HIGH SCHOOL CONNECTION

Hazardous materials associated with the construction of the Connection would include diesel fuel, lubricants, paints and solvents, and cement products containing strong basic or acidic chemicals. Compliance with applicable federal, state, and local laws and regulations, including those identified under Section 4.6.2, *Regulatory Setting,* would minimize potential impacts to the public and environment associated with the routine transport, use, or disposal or accidental release of hazardous materials during construction. There are no known hazardous materials sites located within 1,000 feet of the proposed Connection. Therefore, construction of the Connection would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Operation of the Connection would consist of bicycle and pedestrian travel along a shared use path. Use of bicycle infrastructure would not increase the use, transportation, storage, or generation of significant quantities of hazardous materials during operation activities. As such, the Connection would not create a significant hazard to the public or the environment during operation. This impact would be less than significant.

Class II Facilities

Implementation of the Class II facilities would generally not require ground disturbance; rather, construction activities would include roadway restriping and reconfiguration of lane widths to accommodate new dedicated bike lanes. Construction-related hazardous materials associated with roadway restriping would include diesel fuel, lubricants, and paints and solvents. Pavement widening would be required on Driver Avenue, between Easterly Road and Colodny Drive, and on Cornell Road, between Agoura Road and Cornell Way to allow for the addition of bicycle lanes. Pavement widening would require clearing and grubbing, subgrade stabilization, base course installation, and asphalt paving. Construction-related hazardous materials would include diesel fuel, lubricants, paints and solvents, and cement products containing strong basic or acidic chemicals.

Construction activities associated with implementation of the Class II facilities would temporarily increase the regional transport, use, and disposal of hazardous materials. Compliance with applicable federal, state, and local laws and regulations, including those identified under Section 4.6.2, *Regulatory Setting,* would minimize potential impacts to the public and environment associated with the routine transport, use, or disposal or accidental release of hazardous materials during construction. Furthermore, there are no hazardous materials sites located within 1,000 feet of any proposed Class II facilities. Therefore, construction of the Class II facilities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Operation of the Class II facilities would consist of bicycle travel along delineated bike lanes. Use of bicycle infrastructure would not increase the use, transportation, storage, or generation of significant quantities of hazardous materials during operation activities. This impact would be less than significant.

Class III Facilities

Construction of Class III facilities would require roadway restriping to identify bike routes. Hazardous materials associated with roadway restriping would include diesel fuel, lubricants, and paints and solvents. Compliance with applicable federal, state, and local laws and regulations, including those identified under Section 4.6.2, *Regulatory Setting,* would minimize potential impacts

to the public and environment associated with the routine transport, use, or disposal or accidental release of hazardous materials during construction.

There are 19 known hazardous materials sites located within 1,000 feet of proposed Class III facilities identified within the BMP. Due to the lack of ground disturbance required for implementation, proposed Class III facilities would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Operation of the Class III facilities would consist of bicycle travel along shared use travel lanes. Use of bicycle infrastructure would not increase the use, transportation, storage, or generation of significant quantities of hazardous materials during operation activities. This impact would be less than significant.

Class IV Facilities

Construction of Class IV facilities would include pavement demolition, minor grading, bollard or fencing installation, asphalt paving or repaving, and striping. These activities would temporarily increase the regional transport, use, disposal, and possibility for the release of hazardous materials into the environment. Hazardous materials associated with the construction of Class IV facilities would include diesel fuel, lubricants, paints and solvents, and cement products containing strong basic or acidic chemicals. Compliance with applicable federal, state, and local laws and regulations, including those identified under Section 4.6.2, *Regulatory Setting,* would minimize potential impacts to the public and environment associated with the routine transport, use, or disposal or accidental release of hazardous materials during construction.

There are two closed LUST sites (V-Fire Station #36 and Lake Lindero Country Club) and one closed Cleanup Program site (Joe Martin Commercial Property) located within 1,000 feet of proposed Class IV facilities (SWRCB 2025). The Lake Lindero Country Club sites and Joe Martin Commercial Property site are located directly adjacent to the proposed Class IV facility on Thousand Oaks Boulevard. The V-Fire Station #36 site is located approximately 850 feet south of the proposed Class IV facility on along Thousand Oaks Boulevard. Contamination from these sites could be present in soils where ground disturbance would occur. Therefore, ground disturbance associated with construction of the Class IV facilities would have the potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. This impact would be potentially significant, and mitigation would be required.

Operation of the Class IV facilities would consist of bicycle travel along physically separated bikeways adjacent to travel lanes. Use of bicycle infrastructure would not increase the use, transportation, storage, or generation of significant quantities of hazardous materials during operation activities. As such, Class IV facilities would not create a significant hazard to the public or the environment during operation. Impacts associated with operation of the Class IV facilities would be less than significant.

Enhanced Bicycle Treatments

Enhanced bicycle treatments would be implemented at various locations throughout the city. These facilities could include street striping and restriping, signage and wayfinding, bicycle signals and detection at traffic signals, bicycle parking, and bicycle repair facilities. Compliance with applicable federal, state, and local laws and regulations, including those identified under Section 4.6.2,

Regulatory Setting, would minimize potential impacts to the public and environment associated with the routine transport, use, or disposal or accidental release of hazardous materials during construction. Although minor, construction activities associated with these facilities may still require limited ground disturbance. If ground disturbance were to occur near a known hazardous release site, contamination from the site(s) could be present in soils where ground disturbance would occur. Therefore, ground disturbance associated with construction of the enhanced bicycle treatments would have the potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. This impact would be potentially significant, and mitigation would be required.

Operation of the enhanced bicycle treatments would include continued use of existing bicycle facilities, storing of bicycles at new parking facilities, and use of bicycle repair facilities. Use of these facilities would not increase the use, transportation, storage, or generation of significant quantities of hazardous materials during operation activities. As such, the enhanced bicycle treatments would not create a significant hazard to the public or the environment during operation. Impacts associated with operation of the enhanced bicycle treatments would be less than significant.

General Plan Amendments

As part of the proposed Project, the City must amend Chapter 3, Infrastructure and Community Services, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. These General Plan Amendments shift the focus from prioritizing automobile mobility to reducing VMT through alternative transportation modes like walking and biking, guided by the BMP. The proposed General Plan Amendments would not result in construction or operation activities beyond existing conditions. Therefore, the Amendments would not result in impacts to the public and environment associated with the routine transport, use, or disposal or accidental release of hazardous materials. No impact would occur.

Mitigation Measures

HAZ-1 Soil Management Plan

Prior to commencement of ground-disturbing activities for proposed facilities within 1,000 feet of a known hazardous release site, the City shall retain a qualified consultant (i.e., professional geologist or professional engineer) to prepare a Soil Management Plan (SMP) for the project. The SMP shall address:

1. On-site handling and management of unanticipated contaminated soils or other contaminated wastes (e.g., stained soil, soil with solvent or chemical odors) if encountered during ground disturbance, and
2. Specific actions to reduce hazards to construction workers and off-site receptors during construction (e.g., personal protective equipment, dust control, and/or air monitoring).

The SMP must establish remedial measures and soil management practices to ensure construction worker safety and prevent the off-site migration of contaminants from the project site to the satisfaction of the Director of Public Works. These measures and practices may include, but are not limited to:

- Proper transportation and disposal procedures for contaminated materials in accordance with applicable regulations, including CCR Title 22.

- A requirement to halt work in the immediate area and contact a qualified consultant (i.e., professional geologist or professional engineer) immediately to evaluate the project site conditions if odorous or visually stained soils, other indications of piping or equipment (including hydrocarbon piping or equipment), or debris are encountered during ground-disturbing activities.
- A health and safety plan for contractors working at the project site that addresses the safety and health hazards of each phase of project construction activities with the requirements and procedures for employee protection and outlines proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.
- Reporting on monitoring activities.

The Director of Public Works shall review and approve the SMP prior to construction (grading/excavation) activities at and prior to issuing grading permits for proposed facilities within 1,000 feet of a known hazardous release site. The City shall implement the SMP during grading and construction activities.

Significance After Mitigation

Implementation of Mitigation Measure HAZ-1 would ensure that potential hazardous materials encountered during future construction (including Pathway construction) activities would be properly transported and disposed of, reducing impacts to a less-than-significant level.

Threshold 3:	Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Impact HAZ-2 COMPLIANCE WITH APPLICABLE REGULATIONS AND IMPLEMENTATION OF A SOIL MANAGEMENT PLAN WHEN REQUIRED WOULD MINIMIZE THE POTENTIAL FOR CONSTRUCTION TO CREATE A SIGNIFICANT HAZARD INVOLVING HAZARDOUS EMISSIONS OR THE HANDLING OF HAZARDOUS MATERIALS WITHIN ONE-QUARTER MILE OF A SCHOOL. WITH IMPLEMENTATION OF MITIGATION MEASURE HAZ-1, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Class I Facilities

Yerba Buena Elementary School is located approximately 0.2 mile (1,056 feet) from the proposed Class I facility on Reyes Adobe Road. Construction of Class I facilities could emit hazardous emissions or require the handling of hazardous materials, substances, or waste. Any transport, use, disposal, or handling of potentially hazardous materials during construction of the Class I facilities would be required to comply with applicable federal, state, and local regulations established by U.S. EPA, the State of California, and the City. These regulations, as identified in Section 4.6.2, *Regulatory Setting,* include OSHA, the Hazardous Material Transportation Act, Hazardous Waste Control Law, Environmental Health Standards for the Management of Hazardous Waste Law, and CCR, all of which establish procedures for the proper transport, use, storage, and disposal of excess hazardous materials and hazardous construction waste. Furthermore, the only hazardous materials sites within 1,000 feet of proposed Class I facilities are located adjacent to the Path, which is discussed below. Use of bicycle infrastructure would not increase the use, transportation, storage, or generation of significant quantities of hazardous materials during operation activities such that hazardous materials, substances, or wastes would be emitted. With compliance with existing regulations,

construction and operation of the Class I facilities would not pose a significant hazard to existing or proposed schools within one-quarter mile of individual project sites. This impact would be less than significant.

MEDEA CREEK PATH

Willow Elementary School is located approximately 400 feet east of the proposed Path alignment. Construction of the Path could emit hazardous emissions or require the handling of hazardous materials, substances, or waste. Compliance with applicable federal, state, and local laws and regulations, including those identified under Section 4.6.2, *Regulatory Setting,* would minimize the potential for potentially hazardous materials to be emitted during construction activities. While there are known hazardous materials sites located within 1,000 of the Path, the closest known release site is located approximately 0.42 mile from Willow Elementary School. Therefore, ground disturbance within one-quarter mile of Willow Elementary School would not be likely to encounter contamination from this former site. Use of bicycle infrastructure would not increase the use, transportation, storage, or generation of significant quantities of hazardous materials during operation activities such that hazardous materials, substances, or wastes would be emitted. With compliance with existing regulations, construction and operation of the Path would not pose a significant hazard to existing or proposed schools within one-quarter mile of individual project sites. This impact would be less than significant.

AGOURA HIGH SCHOOL CONNECTION

Agoura High School is located directly adjacent to the proposed Connection. Construction of the Connection could emit hazardous emissions or require the handling of hazardous materials, substances, or waste. Compliance with applicable federal, state, and local laws and regulations, including those identified under Section 4.6.2, *Regulatory Setting,* would minimize the potential for potentially hazardous materials to be emitted during construction activities. Furthermore, there are no hazardous materials sites within 1,000 feet of the Connection. Use of bicycle infrastructure would not increase the use, transportation, storage, or generation of significant quantities of hazardous materials during operation activities such that hazardous materials, substances, or wastes would be emitted. With compliance with existing regulations, construction and operation of the Connection would not pose a significant hazard to existing or proposed schools within one-quarter mile of individual project sites. This impact would be less than significant.

Class II Facilities

Agoura High School is located directly between two proposed Class II facilities on Driver Avenue and Thousand Oaks Boulevard. Conejo Hebrew High School is located approximately 700 feet west of a proposed Class II facility on Reyes Adobe Road. Construction of Class II facilities could emit hazardous emissions or require the handling of hazardous materials, substances, or waste. Compliance with applicable federal, state, and local laws and regulations, including those identified under Section 4.6.2, *Regulatory Setting,* would minimize the potential for potentially hazardous materials to be emitted during construction activities. Furthermore, fuels, lubricants, paints, and solvents used during roadway restriping would be contained within vessels specifically engineered for safe storage to prevent the accidental release of hazardous materials. These materials would not be transported, stored, or used in quantities that would pose a significant hazard to students attending schools located within one-quarter mile of construction activities.

There are no known hazardous materials sites within 1,000 feet of Driver Avenue or Cornell Road where ground disturbance would occur. Use of bicycle infrastructure would not increase the use, transportation, storage, or generation of significant quantities of hazardous materials during operation activities such that hazardous materials, substances, or wastes would be emitted. With compliance with existing regulations, construction and operation of the Class II facilities would not pose a significant hazard to existing or proposed schools within one-quarter mile of individual project sites. This impact would be less than significant.

Class III Facilities

There are five schools located within one-quarter mile of proposed Class III facilities:

- Lindero Canyon Middle School,
- Conejo Hebrew High School,
- Agoura High School,
- Willow Elementary, and
- Sumac Elementary School.

Implementation of the Class III facilities would be limited to roadway restriping to identify bike routes. Fuels, lubricants, paints, and solvents used during roadway restriping would be contained within vessels specifically engineered for safe storage to prevent the accidental release of hazardous materials. These materials would not be transported, stored, or used in quantities that would pose a significant hazard to students attending schools located within one-quarter mile of construction activities. Furthermore, due to the lack of ground disturbance, implementation of proposed Class III facilities located within one-quarter mile of an existing or proposed school would not encounter contaminated soils from hazardous materials release sites.

Use of bicycle infrastructure would not increase the use, transportation, storage, or generation of significant quantities of hazardous materials during operation activities such that hazardous materials, substances, or wastes would be emitted. With compliance with existing regulations, construction and operation of the Class III facilities would not pose a significant hazard to existing or proposed schools within one-quarter mile of individual project sites. This impact would be less than significant.

Class IV Facilities

Lindero Canyon Middle School is located 890 feet north of the proposed Class IV facility on Thousand Oaks Boulevard. Willow Elementary School is located 450 feet west of the proposed Class IV facility on Kanan Road, and Sumac Elementary School is located 325 feet east of the proposed Class IV facility on Kanan Road. Construction of Class IV facilities could emit hazardous emissions or require the handling of hazardous materials, substances, or waste. Compliance with applicable federal, state, and local laws and regulations, including those identified under Section 4.6.2, *Regulatory Setting,* would minimize the potential for potentially hazardous materials to be emitted during construction activities

There are two closed LUST sites and one closed Cleanup Program site located within 1,000 feet of proposed Class IV facilities. The closed Cleanup Program Site (Joe Martin Commercial Property) is located approximately 0.21 mile south of Lindero Canyon Middle School. Contamination from this site could be present in soils where ground disturbance would occur. Therefore, ground disturbance associated with construction of the Class IV facility on Thousand Oaks Boulevard would have the

potential to emit hazardous emissions within one-quarter mile of the Lindero Canyon Middle School. This impact would be potentially significant, and mitigation would be required.

Operation of the Class IV facilities would consist of bicycle travel along physically separated bikeways adjacent to travel lanes. Use of bicycle infrastructure would not increase the use, transportation, storage, or generation of significant quantities of hazardous materials during operation activities such that hazardous materials, substances, or wastes would be emitted. As such, Class IV facilities would not create a significant hazard to the public or the environment during operation. However, construction would result in a potentially significant impact, and mitigation would be required.

Enhanced Bicycle Treatments

Enhanced bicycle treatments would be implemented at various locations throughout the city and could be constructed within one-quarter mile of a school. These facilities would be located within or adjacent to existing, new, or improved bikeways. Construction activities could emit hazardous emissions or require the handling of hazardous materials, substances, or waste. Furthermore, although minor, construction activities associated with these facilities may require limited ground disturbance. If ground disturbance were to occur near a known hazardous release site, contamination from the site(s) could be present in soils where ground disturbance would occur. Nonetheless, compliance with applicable federal, state, and local laws and regulations, including those identified under Section 4.6.2, *Regulatory Setting,* would minimize the potential for potentially hazardous materials to be emitted during construction activities. Use of the enhanced bicycle treatments would not increase the use, transportation, storage, or generation of significant quantities of hazardous materials during operation activities such that hazardous materials, substances, or wastes would be emitted. With adherence to existing regulations, construction and operation of the enhanced bicycle treatments would not pose a significant hazard to existing or proposed schools within one-quarter mile of individual project sites. This impact would be less than significant.

General Plan Amendments

As part of the proposed Project, the City must amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. These General Plan Amendments shift the focus from prioritizing automobile mobility to reducing VMT through alternative transportation modes like walking and biking, guided by the BMP. The proposed General Plan Amendments would not result in construction or operation activities beyond existing conditions. Therefore, the Amendments would not result in impacts to the public and environment associated with the routine transport, use, or disposal or accidental release of hazardous materials within one-quarter mile of a school. No impact would occur.

Mitigation Measures

Mitigation Measure HAZ-1 would be required; refer to Impact HAZ-1 for full text of this measure.

Significance After Mitigation

Implementation of Mitigation Measure HAZ-1 would require preparation of an SMP to ensure that potential hazardous materials associated with former hazardous materials sites would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste

within one-quarter mile of an existing or proposed school. Impacts would be less than significant with mitigation incorporated.

Threshold 4:	Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Impact HAZ-3 INDIVIDUAL FACILITIES IDENTIFIED IN THE BICYCLE MASTER PLAN WOULD NOT BE LOCATED ON AN ACTIVE SITE INCLUDED ON A LIST OF HAZARDOUS MATERIALS SITES COMPILED PURSUANT TO GOVERNMENT CODE SECTION 65962.5. THROUGH COMPLIANCE WITH APPLICABLE REGULATIONS, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

California Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to maintain an updated Hazardous Waste and Substances Sites List, also known as the Cortese List. The list includes specific types of hazardous materials sites, such as hazardous waste facilities subject to corrective action, hazardous substance release sites selected for and subject to a response action, all underground storage tank sites for which an unauthorized release report is filed, all solid waste disposal facilities from which there is a migration of hazardous waste, and sites subject to cease and desist and cleanup and removal (abatement) orders that concern the discharge of wastes that are hazardous materials. The following databases were searched in February 2025 for records related to any known hazardous materials contamination near proposed facilities included in the BMP:

- State Water Resources Control Board (SWRCB) GeoTracker database, which includes data from the California Department of Toxic Substances Control (DTSC) (SWRCB 2025).
- SWRCB's list of solid waste disposal sites with waste constituents above hazardous waste levels outside the waste management unit (CalEPA 2025).
- CalEPA Active Cease and Desist Orders (CDOs) and Cleanup Abatement Orders (CAOs) (CalEPA 2025).
- List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code (CalEPA 2025).

According to databases of hazardous materials sites identified above, there are four registered SWRCB LUST cleanup sites and two registered Cleanup Program site located within 1,000 feet of proposed facilities included in the Plan that would require ground disturbance during construction; all six identified hazardous materials sites have a status of "Completed—Case Closed," indicating no further evaluation and remediation are required (SWRCB 2025).

Class I Facilities

The only known hazardous materials sites located on or near a Class I facility are located adjacent to the Path, which is discussed below. There are no other known hazardous materials sites located near proposed Class I facilities. Therefore, implementation of the Class I facilities would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. No impact would occur.

MEDEA CREEK PATH

The Path would be located near several hazardous materials sites compiled pursuant to Government Code Section 65962.5, including three closed LUST sites (V-Fire Station #36, Shell #204-0048-0107, and Agoura Building Materials) and one closed Cleanup Program site (Galaxy Cleaners) (SWRCB 2025). V-Fire Station #36 is located 480 feet west of the Path; Shell #204-0048-0107 is located 950 feet west of the Path; Agoura Building Materials is located 780 feet west of the Path; and Galaxy Cleaners is located 880 feet west of the Path. While ground disturbance would not occur directly on these sites, there is a possibility that contamination from these former sites has migrated through soil and could be present in soils where ground disturbance is anticipated to occur. Therefore, ground disturbance associated with construction of the Path would have the potential to create a significant hazard to the public or environment. However, compliance with regulations discussed in Section 4.6.2, *Regulatory Setting*, would minimize the potential for ground disturbance creating a significant hazard to the public or environment. This impact would be less than significant.

AGOURA HIGH SCHOOL CONNECTION

The Connection is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. No impact would occur.

Class II Facilities

Proposed Class II facilities would be located on or near several known hazardous materials sites compiled pursuant to Government Code Section 65962.5, including five closed LUST sites (Tosco – 76 Station #7426, Hydro West, Exxon #7-3364, Shell #204-0054-0124, and Circle K #2211248) (SWRCB 2025). Construction activities for the proposed Class II facilities near the known hazardous materials sites would be limited to roadway restriping and would not require ground disturbance. Pavement widening would be required on Driver Avenue and on Cornell Road. There are no known hazardous materials sites located on or near these two road segments. Therefore, construction of the Class II facilities would not expose the public or environment to previously contaminated soils associated with sites included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. This impact would be less than significant.

Class III Facilities

Proposed Class III facilities would be located on or near 15 known hazardous materials sites compiled pursuant to Government Code Section 65962.5, including 16 closed LUST sites (SWRCB 2025). Construction of Class III facilities would be limited to roadway restriping and would not require ground disturbance. Therefore, construction of Class III facilities would not expose the public or environment to previously contaminated soils associated with sites included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. This impact would be less than significant.

Class IV Facilities

Proposed Class IV facilities would be located on or near several hazardous materials sites compiled pursuant to Government Code Section 65962.5, including two closed LUST sites (Lake Lindero Country Club and V-Fire Station #36) and one closed Cleanup Program site (Joe Martin Commercial Property) (SWRCB 2025). The Lake Lindero Country Club and Joe Martin Commercial Property sites are located directly adjacent to the proposed Class IV facility on Thousand Oaks Boulevard. The V-

Fire Station #36 site is located approximately 850 feet south of the proposed Class IV facility on along Thousand Oaks Boulevard, and there is a possibility that contamination from this former site has migrated through soil and could be present where ground disturbance is anticipated to occur. However, compliance with regulations discussed in Section 4.6.2, *Regulatory Setting*, would minimize the potential for ground disturbance creating a significant hazard to the public or environment. This impact would be less than significant..

Enhanced Bicycle Treatments

Enhanced bicycle treatments would be implemented at various locations throughout the city. Construction of these facilities could occur on or near sites included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Although limited, ground disturbance associated with construction of the enhanced bicycle treatments could have the potential to create a significant hazard to the public or environment. This impact would be potentially significant, and mitigation would be required.

General Plan Amendments

As part of the proposed Project, the City must amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. These General Plan Amendments shift the focus from prioritizing automobile mobility to reducing VMT through alternative transportation modes like walking and biking, guided by the BMP. The proposed General Plan Amendments would not result in construction or operation activities beyond existing conditions. Therefore, the Amendments would not result in impacts to the public and environment associated with being located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. No impact would occur.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 5:	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Impact HAZ-4 THE CITY IS NOT LOCATED WITHIN AN AIRPORT LAND USE PLAN OR WITHIN TWO MILES OF A PUBLIC AIRPORT OR PUBLIC USE AIRPORT. NO IMPACT WOULD OCCUR.

The Van Nuys Airport is located approximately 14.2 miles east of the Project. According to the Los Angeles County Airport Land Use Commission's Airport Influence Area Figure, the City of Agoura Hills is not located within the noise contours of the Van Nuys Airport or any other nearby airport (Los Angeles County Airport Land Use Commission 2003). Therefore, the proposed Project would not result in a safety hazard or excessive noise for people residing or working in the City related to airport operation. No impact would occur.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

No impact would occur.

Threshold 6:	Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

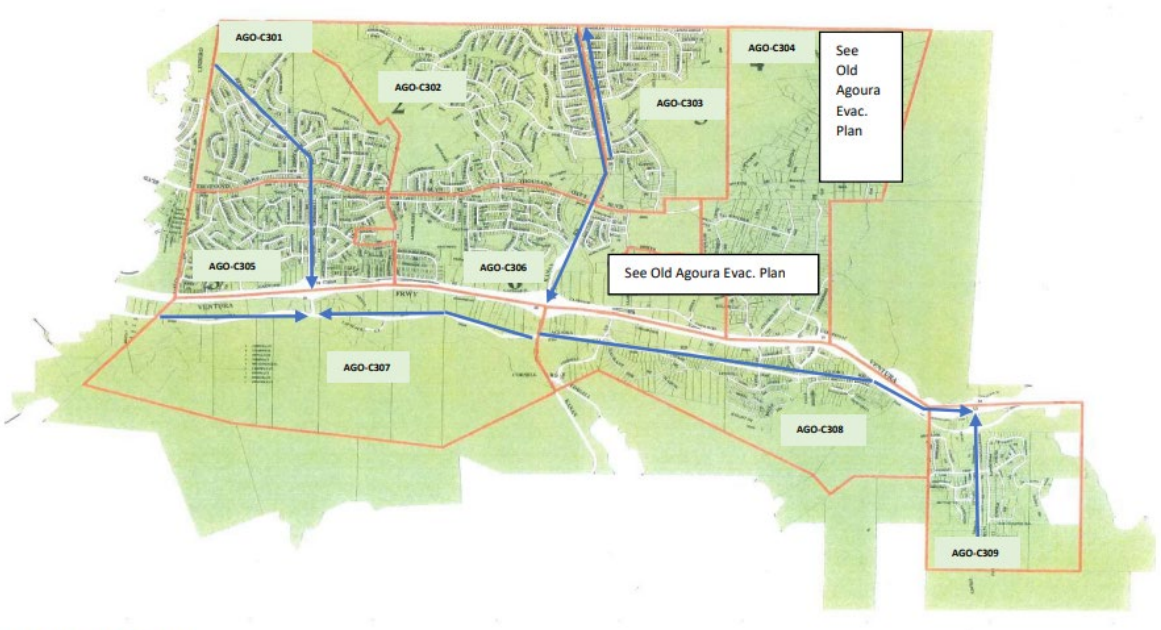
Impact HAZ-5 WITH COMPLIANCE WITH THE CALIFORNIA MANUAL OF UNIFORM TRAFFIC CONTROL DEVICES DURING CONSTRUCTION ACTIVITIES, IMPLEMENTATION OF THE PROPOSED PROJECT WOULD NOT IMPAIR IMPLEMENTATION OF OR PHYSICALLY INTERFERE WITH AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The City adopted the Agoura Hills Evacuation Plan in 2020. The evacuation plan divides the City into nine different evacuation zones and establishes seven primary evacuation routes including (City of Agoura Hills 2020):

- Kanan Road (southbound to Ventura Freeway),
- Kanan Road (northbound for Section 3)
- Reyes Adobe Road (southbound to Ventura Freeway),
- Reyes Adobe Road (northbound to Ventura Freeway),
- Agoura Road,
- Chesebro Road, and
- Liberty Canyon Road.

The evacuation plan identifies feeder routes including Colodny Drive, Driver Avenue, and Fairview Place. The Agoura Hills Evacuation Plan also includes an Emergency Traffic Control Plan for the Old Agoura Area, which is located in evacuation zones AGO-C304 and AGO-C306 East in the eastern portion of the City. The Old Agoura Area evacuation zones have a singular point of ingress and egress (City of Agoura Hills 2020). The evacuation zones and evacuation routes for the Agoura Hills Evacuation Plan and the Emergency Traffic Control Plan for the Old Agoura Area are shown in Figure 4.6-1 and Figure 4.6-2 respectively.

Figure 4.6-1 Evacuation Zones and Major Evacuation Routes



AGO-C301 & AGO-C305
Use Reyes Adobe Rd to egress either eastbound or westbound on US 101

AGO-C302 & AGO-C306
Use Kanan Rd. southbound to US 101

AGO-C303
Use Kanan Rd. northbound to Lindero Canyon Rd.

AGO-C304 & AGO-C306 East (See Old Agoura Evacuation Plan; Page 5)

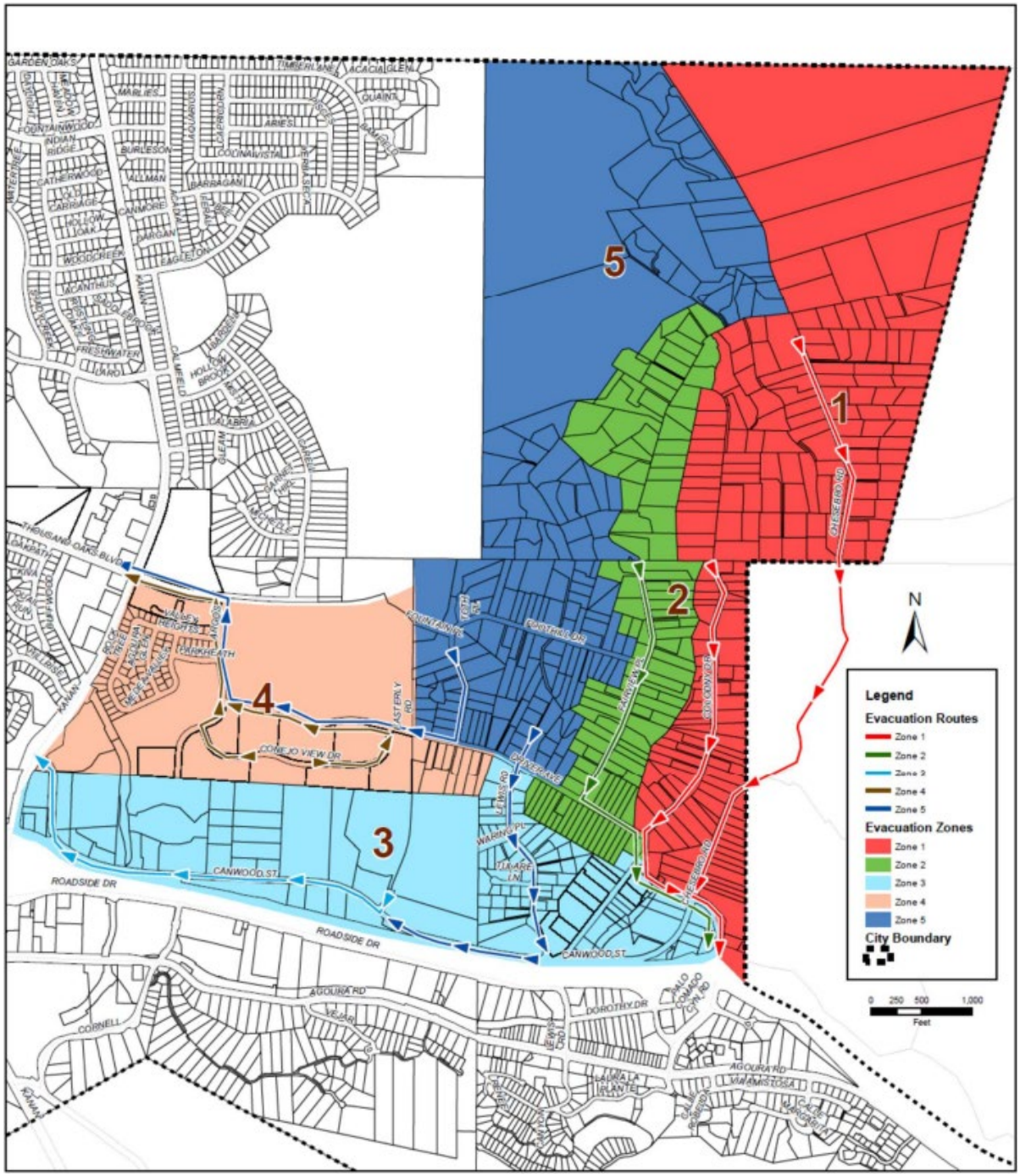
AGO-C307
Use Reyes Adobe Rd to egress either eastbound or westbound on US 101
Alternate: Agoura Rd (eastbound bound or westbound)

AGO-C308
Use Agoura Road, eastbound to Liberty Canyon, to US 101 south

AGO-C309
Use Liberty Canyon northbound to US 101.

Source: City of Agoura Hills 2020

Figure 4.6-2 Emergency Traffic Control Plan for the Old Agoura Area



Source: City of Agoura Hills 2020

Class I Facilities

Of the proposed Class I facilities identified within the BMP, two facilities would be constructed adjacent to primary evacuation routes on Reyes Adobe Road and Agoura Road. Construction of the proposed Class I facilities would require clearing and grubbing, pavement demolition, grading, utility relocation, retaining wall or fencing installation, asphalt paving or repaving, street and undercrossing improvements, striping, and revegetation. Storage, staging, and active work areas would be established during the construction period for Class I facilities. Storage and staging areas would be contained within the identified project boundary and outside of the roadway right of way (ROW). At the time of construction, should the construction contractor require additional staging areas, they would be responsible for identifying and securing long-term staging areas on previously disturbed storage yards, the locations of which are currently unknown. Although not currently anticipated, if future construction activities require work within the roadway, a construction traffic control plan would be prepared and implemented in accordance with the CA MUTCD. The construction traffic control plan would include the use of flaggers during any temporary lane closures, consistent with Chapter 6 (Flagger Control) of the CA MUTCD, and no detours would be required (Caltrans 2014). Therefore, construction of the Class I facilities would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. This impact would be less than significant.

Operation of the Class I facilities would consist of bicycle and pedestrian travel along shared use paths located away from existing roadways. As discussed in Section 4.13.6, *Population and Housing,* the proposed Project would not induce substantial unplanned population growth such that evacuation routes would be overburdened. Therefore, operation of the Class I facilities would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan during operation. This impact would be less than significant.

MEDEA CREEK PATH

The proposed Path would result in construction of a Class I bikeway along Medea Creek from Agoura Road to the northern limit of the city. Construction activities would require established storage, staging, and active work areas. Storage and staging areas would be contained within the identified project boundary and outside of existing roadway ROWs. At the time of construction, should the construction contractor require additional staging areas, they would be responsible for identifying and securing long-term staging areas on previously disturbed storage yards, the locations of which are currently unknown.

Pedestrian and bicycle access ramps would be constructed on Agoura Road and Kanan Road to provide access to the path; both roadways are identified as primary evacuation routes in the Agoura Hills Evacuation Plan. Given the existing shoulder widths at these locations, temporary lane closures are not anticipated. Although not currently anticipated, if future construction activities require work within the roadway, a construction traffic control plan would be prepared and implemented in accordance with the CA MUTCD. The construction traffic control plan would include the use of flaggers during any temporary lane closures, consistent with Chapter 6 (Flagger Control) of the CA MUTCD, and no detours would be required (Caltrans 2014). Therefore, construction of the Path would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. This impact would be less than significant.

Operation of the Path would consist of bicycle and pedestrian travel along a shared use path away from existing roadways. As discussed in Section 4.13.6, *Population and Housing,* the proposed Project would not induce substantial unplanned population growth such that evacuation routes

would be overburdened. Therefore, operation of the Path would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan during operation. This impact would be less than significant.

AGOURA HIGH SCHOOL CONNECTION

The proposed Connection would result in construction of a Class I bikeway connecting Thousand Oaks Boulevard to Fountain Place along the northern border of Agoura High School. Construction activities would require established storage, staging, and active work areas. Storage and staging areas would be contained within the identified project boundary and outside of existing roadway ROWs. At the time of construction, should the construction contractor require additional staging areas, they would be responsible for identifying and securing long-term staging areas on previously disturbed storage yards, the locations of which are currently unknown.

Implementation of the Connection would involve roadway and intersection improvements on Thousand Oaks Boulevard near Argos Street, both of which are identified as evacuation routes in Old Agoura Area Emergency Traffic Control Plan. Specifically, improvements would include relocation of the existing signal head and modifications to the existing median on Thousand Oaks Boulevard. Relocation of the existing signal head would occur within the sidewalk adjacent to the westbound travel lane on Thousand Oaks Boulevard, which would not require lane closure or any work within the lane itself. Modifications to the existing median would occur on the side of the eastbound travel lane of Thousand Oaks Boulevard, which would not impede the westbound travel identified in the Old Agoura Area Emergency Traffic Control Plan. Therefore, construction of the Connection would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. This impact would be less than significant.

Operation of the Connection would consist of bicycle and pedestrian travel along a shared use path. As discussed in Section 4.13.6, *Population and Housing,* the proposed Project would not induce substantial unplanned population growth such that evacuation routes would be overburdened. Therefore, operation of the Connection would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan during operation. This impact would be less than significant.

Class II Facilities

Of the proposed Class II facilities identified within the BMP, three facilities would be constructed along identified evacuation routes. Specifically, bicycle lanes would be established on Reyes Adobe Road and Driver Avenue; Reyes Adobe Road is identified as a primary evacuation route in the Agoura Hills Evacuation Plan and Driver Avenue is identified as a feeder route in the Agoura Hills Evacuation Plan. Bicycle lanes would also be established on Thousand Oaks Boulevard; Thousand Oaks Boulevard and Driver Avenue are both partially identified as evacuation routes in Old Agoura Area Emergency Traffic Control Plan.

Implementation of the Class II facilities on Reyes Adobe Road and Thousand Oaks Boulevard would require roadway restriping and reconfiguration of lane widths to accommodate new dedicated bike lanes. Restriping can generally be completed within a single work period and does not require the establishment of storage, staging, or work areas. Therefore, restriping activities would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Implementation of the Class II facility proposed on Driver Avenue would require pavement widening to allow for the addition of bicycle lanes. Construction activities would require the creation of storage, staging, and active work areas. Storage and staging areas would be contained within the identified project boundary and outside of existing roadway ROWs. At the time of construction, should the construction contractor require additional staging areas, they would be responsible for identifying and securing long-term staging areas on previously disturbed storage yards, the locations of which are currently unknown. To facilitate pavement widening, active work areas could be established within travel lanes, requiring temporary lane closures. During construction activities that require work within the roadway or temporary lane closures, a construction traffic control plan would be prepared and implemented in accordance with the CA MUTCD. The construction traffic control plan would include the use of flaggers during any temporary lane closures, consistent with Chapter 6 (Flagger Control) of the CA MUTCD, and no detours would be required (Caltrans 2014). Therefore, construction of the Class II facilities would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. This impact would be less than significant.

Operation of the Class II facilities would consist of bicycle travel along delineated bike lanes. The restriping and reconfiguration of lane widths to accommodate new dedicated bike lanes would not require a reduction in vehicle travel lanes along any roadway. As discussed in Section 4.13.6, *Population and Housing,* the proposed Project would not induce substantial unplanned population growth such that evacuation routes would be overburdened. Therefore, operation of the Class II facilities would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan during operation. This impact would be less than significant.

Class III Facilities

Class III facilities are proposed along primary evacuation routes and feeder routes in the Agoura Hills Evacuation Plan and the Old Agoura Area Emergency Traffic Control Plan. Implentation of Class III facilities involve roadway restriping to identify bike routes. Restriping can generally be completed within a single work period and does not require the establishment of storage, staging, or work areas. Therefore, restriping activities would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. This impact would be less than significant.

Operation of the Class III facilities would consist of bicycle travel along shared use travel lanes. The restriping establish shared use travel lanes would not require a reduction in vehicle travel lanes along any roadway. As discussed in Section 4.13.6, *Population and Housing,* the proposed Project would not induce substantial unplanned population growth such that evacuation routes would be overburdened. Therefore, operation of the Class III facilities would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan during operation. This impact would be less than significant.

Class IV Facilities

Of the Class IV facilities identified within the BMP, one proposed Class IV facility would be constructed along Kanan Road north of Thousand Oaks Boulevard. Kanan Road is identified as a primary evacuation route in the Agoura Hills Evacuation Plan. Although Class II bicycle lanes are currently established along this portion of Kanan Road, physical vertical barriers, such as bollards, would be installed to convert the Class II bicycle lanes into a Class IV separated bikeway.

Construction activities would require the creation of storage, staging, and active work areas. Storage and staging areas would be contained within the identified project boundary and outside of existing roadway ROWs. At the time of construction, should the construction contractor require additional staging areas, they would be responsible for identifying and securing long-term staging areas on previously disturbed storage yards, the locations of which are currently unknown. A construction traffic control plan would be prepared and implemented for any construction activities occurring within the roadway, in accordance with the CA MUTCD. The construction traffic control plan would include the use of flaggers during temporary lane closures, consistent with Chapter 6 (Flagger Control) of the CA MUTCD, and no detours would be required (Caltrans 2014). Therefore, construction of the Class IV facility on Kanan Road would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. This impact would be less than significant.

Operation of the Class IV facilities would consist of bicycle travel along physically separated bikeways adjacent to existing travel lanes. As discussed in Section 4.13.6, *Population and Housing,* the proposed Project would not induce substantial unplanned population growth such that evacuation routes would be overburdened. Therefore, operation of the Class IV facilities would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan during operation. This impact would be less than significant.

Enhanced Bicycle Treatments

Enhanced bicycle treatments would include street striping and restriping, signage and wayfinding, bicycle signals and detection at traffic signals, bicycle parking, and bicycle repair facilities. Construction and implementation of these facilities would be completed within a single work period and would not require the establishment of storage, staging, or work areas. Operation of the enhanced bicycle treatments would include continued use of existing bicycle facilities, storing of bicycles at new parking facilities, and use of bicycle repair facilities. Therefore, the enhanced bicycle treatments would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

General Plan Amendments

As part of the proposed Project, the City must amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. These General Plan Amendments shift the focus from prioritizing automobile mobility to reducing VMT through alternative transportation modes like walking and biking, guided by the BMP. The proposed General Plan Amendments would not result in construction or operation activities beyond existing conditions. Therefore, the Amendments would not result in impacts to the public and environment associated with an adopted emergency response plan or emergency evacuation plan. No impact would occur.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

No impact would occur.

Threshold 7:	Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Impact HAZ-6 THE PROPOSED PROJECT WOULD NOT EXPOSE PEOPLE OR STRUCTURES, EITHER DIRECTLY OR INDIRECTLY, TO A SIGNIFICANT RISK OF LOSS, INJURY OR DEATH INVOLVING WILDLAND FIRES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The City of Agoura Hills is located in a Very High Fire Hazard Severity Zone (VHFHSZ) in a Local Responsibility Area and is bordered to the north and south by a VHFHSZ in State Responsibility Area (California Department of Forestry and Fire Protection 2024). During construction activities, there would be a temporary increase in human activity and potential ignition sources, including equipment that could create sparks, be a source of heat, or leak flammable materials on individual project sites. Heat or sparks from construction equipment, vehicles, and the use of flammable hazardous materials have the potential to ignite adjacent vegetation and start a fire, especially during weather events that include low-humidity and high wind speeds. OSHA mandates that each job site have a fire prevention plan (CFR Standard 1910.39) that includes "a list of all major fire hazards, proper handling and storage procedures for hazardous materials, potential ignition sources and their control, and the type of fire protection equipment necessary to control each major hazard; procedures to control accumulations of flammable and combustible waste materials; as well as procedures for regular maintenance of safeguards installed on heat-producing equipment to prevent the accidental ignition of combustible materials." Therefore, with OSHA compliance, construction of individual projects identified within the BMP would not potentially expose people or structures to a significant risk of loss, injury or death involving wildland fires.

Operation of individual projects identified within the BMP would consist of bicycle and pedestrian travel. Use of these bicycle facilities would not result in the operation of equipment that could create sparks, be a source of heat, or leak flammable materials on individual project sites. As discussed in Section 4.13.6, *Population and Housing,* the proposed Project would not induce substantial unplanned population growth. Furthermore, the Project would not include structural components or physical development that would expose people or structures, to a significant risk of loss, injury or death involving wildland fires. This impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.6.4 Cumulative Impacts

The cumulative study area for hazardous materials is the Project area, which encompasses all of the City of Agoura Hills. Past, present, and reasonably foreseeable future projects, including the projects listed in Table 3-1, would have the potential to expose residents, employees, and visitors to hazards and hazardous materials. The magnitude of hazards for individual projects would depend upon the location, type, and size of development and the specific hazards associated with individual sites. Hazard evaluations would be completed on a case-by-case basis for all future development. Compliance with applicable regulations and implementation of appropriate mitigation measures, including remedial action on contaminated sites, would address impacts related to these hazards

and hazardous materials associated with future development. Therefore, cumulative development would have a less-than-significant cumulative impact, involving the transport, use, and disposal of hazardous materials; accidental release of hazardous materials; release of hazardous materials within 0.25 mile of a school; and creation of a hazard to the public or environment from listed hazardous materials sites.

The Project site is not located within an airport land use plan or within two miles of a public airport. Therefore, the project cannot contribute to a cumulative impact related to a safety hazard related to aircraft operations.

All cumulative projects would be required to comply with the LVMCOG Multi-Jurisdictional Hazard Mitigation Plan, which includes actions to reduce risks from hazards, including emergency response. Therefore, cumulative development would not impair implementation of or physically interfere with an evacuation plan, and cumulative impacts related to hazards, hazardous materials, and emergency response would be less than significant.

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4.7 Hydrology and Water Quality

4.7.1 Setting

The analysis in this section considers potential impacts to hydrology and water quality. Specifically, this section discusses the environmental and regulatory setting; the criteria used to determine the significance of environmental impacts related to hydrology and water quality; and potential impacts related to hydrology and water quality that would result from implementation of the proposed Project.

a. Surface Water

The Project area, which encompasses all of the City of Agoura Hills, is located in the Malibu Creek Watershed (HUC-10 1807010401), Medea Creek Subwatershed (HUC-8 18070104) (California Department of Transportation n.d.). The Malibu Creek Watershed covers 109 square miles in Los Angeles and Ventura counties. Much of the Malibu Creek Watershed remains relatively undeveloped; the dominant human-altered land uses within the watershed include residential use, agriculture, and commercial/industrial use. This development has been concentrated primarily in and around the cities of Agoura Hills, Westlake, Malibu, and Calabasas (Las Virgenes Malibu Conejo Council of Governments 2001).

The main hydrologic feature of the Malibu Creek Watershed is Malibu Creek, whose headwaters are located in the Simi Hills. Tributaries of Malibu Creek include Las Virgenes Creek and Medea Creek, the latter of which runs through the City of Agoura Hills (California Department of Transportation n.d.). Near the coast, Malibu Creek flows to the Santa Monica Bay through Malibu Lagoon. Pollutants of concern in Malibu Creek, many of which are discharged from non-point-sources, include excess nutrients, sediment, and bacteria (California Department of Water Resources [DWR] 2013).

For regulatory purposes, the Los Angeles Regional Water Quality Control Board (LARWQCB) uses the watershed classification system developed by DWR, which divides watersheds into Hydrologic Units (HUs) that are divided into Hydrological Areas (HA), which are further divided into Hydrological Sub-Areas (HSAs). As designated by the LARWQCB, the Project area is located within Santa Monica Bay HU, Malibu Creek HA, and Lindero Canyon HSA.

b. Surface Water Quality

Downstream receiving waters in the City of Agoura Hills include Palo Comado Creek, Lake Lindero, Lindero Creek, and Medea Creek. Lake Lindero, Lindero Creek, Palo Comado Creek and Medea Creek are listed on the 2024 303(d) list as impaired water bodies, as discussed below.

Lake Lindero

Lake Lindero is an artificial lake in the western portion of the City of Agoura Hills, primarily surrounded by residences as well as a public golf course. Lake Lindero is listed on the 2024 303(d) list as impaired for commercial and sport fishing, non-contact water recreation, and warm freshwater habitat. Plans to restore water quality of Lake Lindero include total maximum daily loads (TMDLs) for Malibu Creek and the Malibu Creek Watershed, which are designed to address trash and nutrients within the respective plan areas (United States Environmental Protection Agency [U.S. EPA] 2024).

Lindero Creek

Lindero Creek is a seasonal stream in the City of Agoura Hills, flowing through the foothills of the Santa Monica Mountains and eventually feeding into Lake Lindero. Lindero Creek is listed on the 2024 303(d) list as impaired for water contact recreation and warm freshwater habitat. Plans to restore water quality of Lindero Creek include TMDLs for Malibu Creek, Malibu Lagoon, and the Malibu Creek Watershed, which are designed to address bacteria, trash, and nutrients within the respective plan areas (U.S. EPA 2024).

Palo Comado Creek

Palo Comado Creek is a seasonal stream located in the city of Agoura Hills, flowing through the foothills of the Santa Monica Mountains. Palo Comado Creek is listed on the 2024 303(d) list as impaired for indicator bacteria. Plans to restore water quality of Palo Comado Creek include TMDLs for the Malibu Creek Watershed, which are designed to address bacteria within the respective plan area (U.S. EPA 2024).

Medea Creek

Medea Creek is a perennial stream in the City of Agoura Hills, located west of Kanan Road, that flows through residential and open space areas and eventually merges with Lindero Creek. Medea Creek is listed on the 2024 303(d) list as impaired for water contact recreation, cold freshwater habitat, and warm freshwater habitat. Plans to restore water quality of Medea Creek include TMDLs for Malibu Creek, Malibu Lagoon, and the Malibu Creek Watershed, which are designed to address bacteria, sedimentation, trash, and nutrients within the respective plan areas (U.S. EPA 2024).

c. Drainage and Drainage Patterns

Drainage patterns within Agoura Hills are characterized by a network of creeks and stormwater management systems. Seasonal precipitation during the winter months is generally directed from the higher elevations (such as in the foothills of the Santa Monica Mountains) towards the lower-lying areas, where stormwater feeds into local creeks, such as Lindero Creek and Medea Creek. These creeks channel stormwater south through the city before converging and eventually draining into Malibu Creek, which flows southerly into North Santa Monica Bay.

To manage stormwater runoff and prevent flooding, the City has implemented various infrastructure projects, including storm drain systems, retention basins, and low-impact development (LID) practices. These measures help control the flow of water, reduce erosion, and improve overall water quality by filtering pollutants before they reach natural waterways.

d. Flooding and Inundation

Most of the City of Agoura Hills is not subject to flooding. According to the Federal Emergency Management Agency (FEMA) National Flood Hazard Layer, most of the city is located within Zone X, defined as an area of minimal flood hazard. Areas of the city that are subject to flooding include Lake Lindero, Lindero Creek, and Medea Creek. Lake Lindero is located within Zone A, which is a Special Flood Hazard Area (SFHA) with a one percent annual risk of a major flood, also known as the base flood or 100-year flood. Lindero Creek and Medea Creek each contain Zone A, as well as Zone AE (which refers to low-lying areas with a high risk of flooding; these areas have a one percent chance of flooding each year, and are also referred to as the 100-year floodplain), and Zone B

(defined as a low-risk flood zone with a 0.2 percent (one in 500) chance of experiencing a flood in a given year) (FEMA 2008, 2018).

Tsunamis and seiches are two types of water waves that are generated by earthquake events. Tsunamis are broad-wavelength ocean waves, and seiches are standing waves within confined bodies of water, typically reservoirs. According to the California Tsunami Maps, the City of Agoura Hills is not within an area subject to inundation from tsunami (California Department of Conservation 2025). Due to the absence of a large body of water upslope of the city, the Project area is not subject to inundation from seiche.

The City of Agoura Hills is potentially affected by several upstream dams within the Malibu Creek watershed. Notable dams include the Malibu Creek Dam, Rindge Dam, and Century Dam. However, these dams are regularly inspected and maintained to ensure their structural integrity and operational safety. The City collaborates with dam operators and emergency services to develop and maintain an Emergency Action Plan to mitigate the risk of inundation and ensure the safety of residents.

The Los Angeles County Department of Public Works presently owns and maintains three major flood control facilities in Agoura Hills: the Lindero Canyon Channel, the Chesebro Canyon Channel, and parts of Medea Creek. The Lindero Canyon Channel provides flood protection for the west drainage flow from Lindero Canyon, which extends into Ventura County, well beyond the City of Agoura Hills' northern boundary. The Chesebro Canyon Channel provides controlled drainage for the east drainage area of the city and intercepts the flows from Chesebro Canyon and Palo Comado Canyon. Medea Creek is partially improved between Agoura Road and north to the Ventura County line and provides flood control protection for the central drainage area of the city. Two major drainage channels not maintained by the Los Angeles County Department of Public Works are the Palo Comado Canyon and Liberty Canyon (City of Agoura Hills 2022). Palo Comado Canyon lies within the Santa Monica Mountains National Recreation Area and is managed by the National Park Service as a semi-natural channel; Liberty Canyon Channel is maintained by the Los Angeles County Flood Control District's Flood Maintenance Division.

e. Groundwater

The South Coast Hydrologic Region has 56 delineated groundwater basins (DWR 2003). The City of Agoura Hills overlies the Russell Valley Groundwater Basin, which covers approximately 3,100 acres in Los Angeles and Ventura Counties and is managed by the Calleguas Municipal Water District. The basin is a relatively small alluvial basin bounded by semi-permeable rocks of the Santa Monica Mountains, with the principal water-bearing formation being Holocene-age alluvium. This alluvium consists of unconsolidated, poorly sorted sand, gravel, silt, and clay, with groundwater being unconfined (DWR 2004).

The water balance of the basin indicates that recharge primarily occurs from the percolation of rainfall, with additional contributions from underflow and irrigation return. The basin is designated as Very Low Priority and is not in a state of overdraft. Groundwater quality within the basin is generally good, with no documented irrigation concerns, subsidence, or saline intrusion (DWR 2004, 2025). According to the United States Geological Survey, the minimum depth to groundwater (as recorded by wells within the area) is approximately 127 feet (United States Geological Survey 2025).

The Russell Valley Groundwater Basin is not adjudicated, meaning there is no court decree defining groundwater rights and usage. The regulatory boundaries for groundwater management align with the basin boundaries, ensuring consistent oversight and management practices.

f. Water Agencies and Management Regions

The City of Agoura Hills lies within the Los Angeles Regional Water Quality Control Board's (LARWQCB) boundaries. The LARWQCB protects ground and surface water quality in the Los Angeles Region, including the coastal watersheds of Los Angeles and Ventura Counties, along with very small portions of Kern and Santa Barbara Counties. The LARWQCB is the primary agency responsible for overseeing water quality issues in the region.

The city is located within the Greater Los Angeles County Integrated Regional Water Management (IRWM) Region.[1] The Greater Los Angeles County IRWM Region is comprised of five subregions (North Santa Monica Bay, Upper Los Angeles River, South Bay, Upper San Gabriel River and Rio Hondo River, and Lower San Gabriel and Lower Los Angeles Rivers) that span from Ventura County to Orange County, including portions of both counties, and from the Pacific Ocean coastline to the San Gabriel Mountains.

4.7.2 Regulatory Setting

a. Federal Regulations

Clean Water Act

The Federal Water Pollution Prevention and Control Act of 1948 was the first major law to address water pollution in the United States. In 1972, the Federal Water Pollution Control Act was amended and became known as the Clean Water Act. The Clean Water Act established the basic structure for regulating discharges of pollutants into the waters of the United States. The Clean Water Act gave the U.S. EPA the authority to implement federal pollution control programs, such as setting water quality standards for contaminants in surface water, establishing wastewater and effluent discharge limits for various industry contaminants in surface water, establishing wastewater and effluent discharge limits for various industry categories, and imposing requirements for controlling nonpoint-source pollution. At the federal level, the Clean Water Act is administered by the U.S. EPA and United States Army Corps of Engineers (USACE).

The federal Clean Water Act places the primary responsibility for the control of water pollution and for the planning of development and use of water resources with the states, although it does establish certain guidelines for the states to follow in developing their programs. At the state and regional levels in California, the Clean Water Act is enforced by the State Water Resources Control Board (SWRCB) and the nine RWQCBs.

SECTION 401: WATER QUALITY CERTIFICATION

Section 401 of the Clean Water Act regulates discharges of fill and dredged material to waters of the United States. Under Section 401, the SWRCB and RWQCBs have regulatory authority over actions in waters of the United States through the issuance of water quality certifications, which are issued in conjunction with any federal permit (e.g., permits issued by the USACE under Section 404 of the Clean Water Act, described below). Section 401 provides the SWRCB and the RWQCBs with the regulatory authority to waive, certify, or deny any proposed activity that could result in a discharge to surface waters of the State. To waive or certify an activity, these agencies must find the proposed discharge would comply with State water quality standards, including those protecting beneficial

[1] IRWM regions serve to coordinate regional water project funding applications and planning and serve as a primary source of budgetary planning for multi-jurisdictional water infrastructure projects.

uses and water quality. If these agencies deny the proposed activity, the federal permit cannot be issued.

SECTION 402: NATIONAL POLLUTANT ELIMINATION SYSTEM (NPDES)

Section 402 of the Clean Water Act establishes the NPDES regulations for stormwater and other pollutant discharges. Section 402 prohibits discharge of pollutants to waters of the United States unless they are regulated by an NPDES permit. Stormwater discharges are regulated under a variety of NPDES permits, including municipal, agricultural, industrial, construction, and low-threat discharge permits.

In 1987, Congress amended the Clean Water Act to require the implementation of a two-phased program to address stormwater discharges. Phase I of the NPDES program, promulgated by the U.S. EPA in November 1990, requires NPDES permits for stormwater discharges from municipal separate storm sewer systems (MS4s)[2] serving populations of 100,000 or greater, construction sites disturbing greater than five acres of land, and 10 categories of industrial activities.

The U.S. EPA recognized that smaller construction projects (disturbing less than five acres) and small MS4s (serving populations smaller than 100,000) were also contributing substantially to pollutant discharges nationwide. Therefore, in order to further improve stormwater quality, the U.S. EPA promulgated the NPDES Phase II program in January 2000, which requires NPDES permits for stormwater discharges from regulated small MS4s and for construction sites disturbing between one and five acres of land.

In California, the NPDES program is administered by SWRCB through the nine RWQCBs. Further discussion of the NPDES program and permits in California relevant to the Project are provided in discussion of state regulations, below.

SECTION 303(D): IMPAIRED WATERS AND TOTAL MAXIMUM DAILY LOADS (TMDL)

Section 303(d) of the Clean Water Act requires states to identify water bodies that do not meet water quality objectives and are not supporting beneficial uses. Each state must submit an updated biennial list, called the 303(d) list, to U.S. EPA. In addition to identifying the water bodies that are not supporting beneficial uses, the list also identifies the pollutant or stressor causing the impairment. Once a water body has been deemed impaired, a TMDL must be developed for each pollutant causing an impairment. A TMDL is an estimate of the total load of pollutants from point, nonpoint, and natural sources that a water body may receive without exceeding applicable water quality standards (often with a "factor of safety" included, which limits the total load of pollutants to a level well below that which could cause the standard to be exceeded). Once established, the TMDL is allocated among current and future dischargers into the water body.

National Flood Insurance Program

The National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973 were enacted by Congress to reduce the costs of disaster relief. The intent of these acts was to reduce the need for large, publicly funded flood control structures and disaster relief efforts by restricting development in floodplains. FEMA administers the National Flood Insurance Program (NFIP) to provide subsidized flood insurance to communities that comply with FEMA regulations limiting development in a floodplain. FEMA issues Flood Insurance Rate Maps (FIRMs) of communities

[2] An MS4 is a conveyance or system of conveyances designed or used to collect or convey stormwater (e.g., storm drains, pipes, ditches) that are owned by a state, city, town, or other public entity.

participating in the NFIP. These maps delineate flood hazard zones in the community. Local agencies are responsible for administering their community's floodplain management regulations. The City of Agoura Hills manages local storm drain facilities and is responsible for flood control planning within the city.

b. State Regulations

Porter-Cologne Water Quality Control Act

California's primary statute governing water quality and water pollution is the Porter-Cologne Water Quality Control Act of 1970 (Porter-Cologne Act). The Porter-Cologne Act grants the SWRCB and nine RWQCBs broad powers to protect water quality and is the primary vehicle for the implementation of the Clean Water Act in California. The Porter-Cologne Act grants the SWRCB and RWQCBs the authority and responsibility to adopt plans and policies, regulate discharges to surface water and groundwater, regulate waste disposal sites, and require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, oil, or petroleum product. Each RWQCB must adopt and implement a Water Quality Control Plan (Basin Plan) for its region in conformance with the policies set forth in the Porter-Cologne Act. The City of Agoura Hills is within the jurisdictional boundaries of the LARWQCB (Region 4).

California Toxics Rule

In May 2000, the U.S. EPA promulgated the California Toxics Rule, which established numeric water quality criteria for toxic pollutants for waters in California. The California Toxics Rule provides water quality criteria for certain potentially toxic compounds for inland surface waters, enclosed bays, estuaries, and waters designated for human health or aquatic life uses. The California Toxics Rule is often used by the RWQCBs when establishing water quality objectives and TMDLs. Although the California Toxics Rule criteria do not apply directly to discharges of stormwater runoff, they are utilized as benchmarks for toxics in urban runoff and to evaluate the potential ecological impacts of stormwater runoff to receiving waters.

Antidegradation Policy

The State Antidegradation Policy (Resolution No. 68-16) was adopted by SWRCB in 1968 to protect surface water and groundwater from degradation. The Antidegradation Policy applies to the disposal of waste to high-quality surface water and groundwater. The Antidegradation Policy requires the water quality of these water bodies to be maintained unless SWRCB finds the change will be consistent with maximum benefit to the people of the state, will not unreasonably affect present and anticipated beneficial uses of the waters, and will not result in water quality less than that prescribed in policies regulating water quality. The Antidegradation Policy also requires the best practicable treatment or control of discharges to high-quality waters to assure pollution or nuisance will not occur, and the highest possible water quality will be maintained.

Construction General Permit

The *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities*, Order No. 2022-0057-DWQ, NPDES No. CAS000002 (Construction General Permit), adopted by SWRCB, regulates construction activities that include clearing, grading, and excavation resulting in soil disturbance of at least one acre of total land area. The Construction General Permit

authorizes the discharge of stormwater to surface waters from construction activities and requires all developers of land where construction activities will occur over more than one acre to do the following:

- Complete a Risk Assessment to determine pollution prevention requirements pursuant to the three risk levels established in the Construction General Permit;
- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the United States;
- Develop and implement a Stormwater Pollution Prevention Plan (SWPPP) that specifies construction best management practices (BMP) that will reduce pollution in stormwater discharges to the Best Available Technology/Economically Achievable/Best Conventional Pollutant Control Technology standards;
- Perform inspections and maintenance of all BMPs; and
- Conduct stormwater sampling, if required based on risk level.

To obtain coverage under the Construction General Permit, a project applicant must electronically file all permit registration documents with SWRCB prior to the start of construction. Permit registration documents must include a Notice of Intent, Risk Assessment, site map, SWPPP, annual fee, and signed certification statement.

Typical BMPs contained in SWPPPs are designed to minimize erosion during construction, stabilize construction areas, control sediment, control discharges from groundwater dewatering, and control pollutants from construction materials. The SWPPP must also include a discussion of the program to inspect and maintain all BMPs.

The Construction General Permit also contains post-construction requirements for projects not covered under a Phase I or Phase II MS4 Permit. The Construction General Permit requires implementation of operational BMPs and low impact development features to reduce runoff and pollutants in stormwater discharge.

The Construction General Permit also includes groundwater dewatering requirements for projects not covered under a *De Minimis* or Low Threat Discharge Permit. The dewatering requirements mandate dischargers to implement BMPs to control the volume and velocity of dewatering discharges. The Construction General Permit also requires testing and treatment, if necessary, of groundwater discharge to verify the discharge meets or exceeds the effluent limitations specified in the permit.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) of 2014 is a comprehensive three-bill package that Governor Jerry Brown signed into California state law in September 2014. The SGMA provides a framework for sustainable management of groundwater supplies by local authorities, with a limited role for State intervention if necessary to protect the resource. The plan is intended to achieve a reliable groundwater supply for California for years to come. The SGMA requires governments and water agencies of high- and medium-priority basins to halt overdrafts of groundwater basins. The SGMA requires the formation of local GSAs that are required to adopt GSPs to manage the sustainability of the groundwater basins.

c. Local Regulations

City of Agoura Hills General Plan 2035

The City of Agoura Hills General Plan 2035 was adopted on March 24, 2010 (updated on August 10, 2022) by the City Council (City of Agoura Hills 2022). The City of Agoura Hills General Plan 2035 is a strategic document designed to guide the physical development of the city until the year 2035. Among other things, the City of Agoura Hills General Plan 2035 sets out the pattern of land uses, including residential, commercial, and industrial. It also establishes the system of streets, bikeways, and trails. The City of Agoura Hills General Plan 2035 addresses a wide variety of subject areas, including housing, traffic, natural resources, land uses, economic development, noise, and public safety.

The City of Agoura Hills General Plan 2035 contains the following goals and policies related to Hydrology and Water Quality, which would apply to the proposed Project.

Goal S-1. Minimize risk to residents, workers, and visitors from flood hazards.

> **Policy S-1.6.** Regulate development within floodplains in accordance with the County, state and federal requirements, and maintain the City's eligibility under the National Flood Insurance Program.
>
> **Policy S-1.9.** Limit new development in Flood Zones A and AE, in accordance with the Federal Emergency Management Agency (FEMA) and City Building Code requirements, and assess properties for flooding vulnerabilities in these zones.

City of Agoura Hills Municipal Code

Article III, Chapter 7 of the Agoura Hills Municipal Code (AHMC) regulates floodplain management and addresses the management of flood-prone areas within the city. It includes regulations for development in floodplains to minimize flood risks and ensure compliance with federal and state floodplain management standards. This chapter specifies requirements for building permits, elevation certificates, and floodproofing measures. It also outlines the responsibilities of the floodplain administrator and procedures for variances and appeals.

Article V, Chapter 5 of the AHMC regulates stormwater management and discharge, focusing on the preventing of pollution from stormwater and urban runoff. It establishes regulations for the discharge of pollutants into the storm drain system and natural watercourses. Key provisions include requirements for BMPs to control runoff from construction sites, industrial facilities, and commercial properties. The chapter also outlines enforcement mechanisms and penalties for non-compliance.

4.7.3 Impact Analysis

a. Methodology and Significance Thresholds

As discussed in Section 4.0, *Environmental Impact Analysis*, all Project components are analyzed at the programmatic level. Project components include the Bicycle Master Plan (BMP), the VMT Mitigation Exchange and Banking Program (Program), and the General Plan Amendments (Amendments). Projects included within the BMPare grouped into Class I facilities, Class II facilities, Class III facilities, Class IV facilities, and enhanced bicycle treatments, as identified in Section 2.5, *Project Characteristics,* and in Table 1 of Chapter 2, *Project Description.* The impact analysis

contained herein provides a programmatic analysis of anticipated impacts for each of the five facilities, as impacts associated with each facility type are expected to be similar. However, because the City seeks to prioritize implementation of the Medea Creek Path (Path) and the Agoura High School Connection (Connection), the Path and the Connection have their own subheadings within the Class I Facility impact analysis subsection to provide a more specific assessment of their environmental impacts. Impacts associated with the General Plan Amendments are analyzed within their own subsection.

As discussed in Chapter 2, *Project Description*, the only projects that are currently planned, unfunded, and could potentially be funded by the VMT Mitigation Exchange and Banking Program are those currently included within the Bicycle Master Plan. Therefore, the impact analysis contained herein does not include a subsection for impacts associated with the Program, as the individual project list for the BMP and the Program are identical and impacts associated with the BMP would encompass impacts associated with the Program.

Within the following environmental analysis, impacts associated with each Project component are explicitly identified under the respective heading.

According to Appendix G of the *California Environmental Quality Act* (CEQA) *Guidelines*, impacts related to hydrology and water quality would be significant if the proposed Project would:

1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality;
2. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;
3. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
    a. Result in substantial erosion or siltation on- or off-site,
    b. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site,
    c. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, or
    d. Impede or redirect flood flows;
4. Risk release of pollutants due to project inundation if located in flood hazard, tsunami, or seiche zones; or,
5. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Impact HYD-1 THROUGH COMPLIANCE WITH EXISTING REGULATORY REQUIREMENTS, THE PROJECT WOULD NOT VIOLATE ANY WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS OR OTHERWISE SUBSTANTIALLY DEGRADE SURFACE OR GROUND WATER QUALITY. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Construction of Class I through Class IV Facilities

Construction of the proposed Class I facilities, including construction of the Medea Creek Path and Agoura High School Connection, would require clearing and grubbing, pavement demolition, grading, utility relocation, retaining wall or fencing installation, asphalt paving or repaving, street and undercrossing improvements, striping, and revegetation. Construction of Class II facilities would generally require roadway restriping and reconfiguration of lane widths to accommodate new dedicated bike lanes. Pavement widening would be necessary on Driver Avenue, between Easterly Road and Colodny Drive, and on Cornell Road, between Agoura Road and Cornell Way to allow for the addition of bicycle lanes. Pavement widening associated with Class II facilities would require clearing and grubbing, subgrade stabilization, base course installation, and asphalt paving. Construction of the Class III facilities would be limited to the restriping of existing roads to identify bike routes, which would not involve ground disturbance. Construction of Class IV facilities would require pavement demolition, minor grading, bollard or fencing installation, asphalt paving or repaving, and striping.

Construction activities resulting in soil disturbance would increase the potential for erosion and sedimentation to occur. If construction activities occur during the rainy season, or in the event of heavy storms, soils from individual project sites could be entrained, eroded, and transported off-site or to downstream receiving waters. In addition, chemicals, liquid products, petroleum products (e.g., paints, solvents, fuels), and concrete-related waste may be spilled or leaked during construction and have the potential to be transported off-site via stormwater runoff.

Individual projects proposed within the BMP that disturb less than one acre of soil are expressly exempt from the SWRCB's Construction General Permit as long as they are not part of a larger project that results in an overall disturbance of one acre or more. Regardless of disturbance acreage, all projects proposed within the BMP would comply with the BMP requirements identified in AHMC Article V, Chapter 5, which mandate sediment control (e.g., fiber rolls, stabilized entry pads) and runoff management (e.g., temporary diversion swales). As a result, during construction of individual projects that disturb less than one acre of soil, water quality would be maintained at pre-construction levels through erosion controls; no waste discharge to surface waters would occur beyond natural stormwater flows; surface water degradation via siltation or flooding would be prevented by stabilizing exposed soils; and groundwater would remain unaffected because there are no uncontained discharges or anticipated dewatering activities.

Individual projects proposed within the BMP that disturb between one and five acres of soil may qualify for a Small Construction Rainfall Erosivity Waiver if the project's Revised Universal Soil Loss Equation [R value[3]] is below five for the proposed timeframe. Waived sites would not be required to

[3] The rainfall-runoff erosivity factor (R-Factor) reflects the erosion potential on a site. It quantifies the effects of raindrop impacts and reflects the amount and rate of runoff associated with the rain. A lower R-Factor indicates a lower erosion potential.

comply with the Construction General Permit but would still be required to implement a site-specific SWPPP-equivalent in compliance with AHMC Article V, Chapter 5. Compliance with AHMC Article V, Chapter 5 would result in the implementation of BMPs for erosion and sediment capture (silt fences, sediment traps), pollution prevention (secured material storage, concrete washout containment), and routine inspections. Therefore, during construction of projects that qualify for a Small Construction Rainfall Erosivity Waiver, water quality would remain protected by the same suite of controls as required under the Construction General Permit; potential waste discharge would be managed on-site; surface water paths would be preserved and stabilized to prevent new erosion or flooding; and groundwater would be safeguarded because sediment and chemicals would be held on-site, with no dewatering or unpermitted discharges.

If the rainfall erosivity factor exceeds the waiver threshold (R value of five or more)—or if a waiver is not obtained—individual projects disturbing one to five acres would be required to comply with the Construction General Permit, and a full SWPPP would be implemented. The SWPPP prescribes BMPs for sediment control, dewatering, material handling, and spill response. It also requires visual monitoring, corrective-action reporting, and, for higher-risk segments, stormwater sampling. Implementation of the SWPPP would ensure water quality standards are met or exceeded; no unauthorized waste discharges occur; surface water degradation from increased runoff, erosion, or silt loading is prevented; and groundwater protection is maintained through engineered controls on dewatering and chemical storage.

Individual projects proposed within the BMP that disturb over five acres of soil would automatically trigger Construction General Permit coverage, SWPPP development, and implementation of all permit-level BMPs (including sediment basins and dewatering plans). The SWPPP would document pre- and post-development hydrology to confirm no net increase in peak flows, and all stormwater would be treated through sediment traps or active treatment systems. Consequently, water quality would remain at or above baseline levels; waste discharges would be routed through containment and treatment; surface water courses would remain unaltered in course or flow, avoiding erosion, flooding, and siltation; and groundwater would be protected by strict dewatering controls and secondary containment for chemicals.

Across all disturbance thresholds (less than one acre, between one and five acres, and greater than five acres), compliance with the SWRCB Construction General Permit (or waiver), implementation of site-specific SWPPPs, and compliance with AHMC Article V BMPs would collectively minimize the potential to violate water quality standards, result in unpermitted waste discharges, and degrade surface or groundwater quality. Construction impacts would be less than significant.

Operation of Class I through Class IV Facilities

Operation of the Class I facilities, including the Path and Connection, would consist of bicycle and pedestrian travel along shared use paths; operation of the Class II facilities would consist of bicycle travel along delineated bike lanes; operation of the Class III facilities would consist of bicycle travel along shared use travel lanes; operation of the Class IV facilities would consist of bicycle travel along physically separated bikeways adjacent to travel lanes. These operational activities would not introduce new land uses that discharge additional pollutants to downstream receiving waters relative to existing conditions. Compliance with existing regulatory requirements, such as the SWRCB's Construction General Permit and Article V, Chapter 5 of the AHMC, would ensure that the Class I through Class IV facilities do not violate water quality standards or waste discharge requirements and would not create substantial runoff water or otherwise degrade water quality. Operational impacts would be less than significant.

Enhanced Bicycle Treatments

Enhanced bicycle treatments would include street striping and restriping, signage and wayfinding, bicycle signals and detection at traffic signals, bicycle parking, and bicycle repair facilities. Construction activities associated with these facilities would disturb less than one acre of soil and would be exempt from the requirements of the Construction General Permit. Construction of the enhanced bicycle treatments would comply with Article V, Chapter 5 of the AHMC, which requires implementation of BMPs to control runoff from construction sites. Therefore, construction of the enhanced bicycle treatments would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality, and the impact would be less than significant.

Operation of the enhanced bicycle treatments would include continued use of existing bicycle facilities, storing of bicycles at new parking facilities, and use of bicycle repair facilities. Operation of enhanced bicycle treatments would not introduce new land uses that discharge additional pollutants to downstream receiving waters relative to existing conditions. Compliance with existing regulatory requirements would ensure that the enhanced bicycle treatments do not violate water quality standards or waste discharge requirements and would not create substantial runoff water or otherwise degrade water quality. Operational impacts would be less than significant.

General Plan Amendments

As part of the proposed Project, the City must amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. These General Plan Amendments shift the focus from prioritizing automobile mobility to reducing vehicle miles traveled (VMT) through alternative transportation modes like walking and biking, guided by the BMP. The proposed General Plan Amendments would not result in construction or operation activities beyond existing conditions. Therefore, the Amendments would not violate water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. No impact would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 2:	Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Impact HYD-2 THE PROJECT WOULD NOT SUBSTANTIALLY DECREASE GROUNDWATER SUPPLIES OR INTERFERE SUBSTANTIALLY WITH GROUNDWATER RECHARGE SUCH THAT THE PROJECT MAY IMPEDE SUSTAINABLE GROUNDWATER MANAGEMENT OF THE RUSSELL VALLEY GROUNDWATER BASIN. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Class I Facilities

Construction of the proposed Class I facilities would require clearing and grubbing, pavement demolition, grading, utility relocation, retaining wall or fencing installation, asphalt paving or repaving, street and undercrossing improvements, striping, and revegetation. Given the programmatic nature of the BMP, construction details for all individual projects included within the BMP are not yet known. As discussed in Chapter 2, *Project Description*, specific construction details have been identified for the Medea Creek Path, a two-mile bicycle path and the longest new facility proposed in the BMP. Construction of the Path would result in the largest area of disturbance with the most construction activities. The maximum depth of excavation required during construction of the Path would be 12 feet. All other facilities included within the BMP would be expected to result in less intensive construction. Therefore, it can be assumed that the maximum depth of excavation required during construction of the remaining Class I facilities would also be 12 feet. As discussed in Section 4.7.1(e), groundwater is anticipated at a depth of approximately 127 feet. Therefore, groundwater would not be encountered during grading and excavation activities for Class I facilities. Thus, construction activities would not require groundwater dewatering and would not decrease groundwater supplies or interfere with recharge. No impacts to groundwater supplies or recharge would occur during construction.

Operation of the Class I facilities would consist of bicycle and pedestrian travel along shared use paths. Operation of the Class I facilities would not substantially increase impervious surface area, as the facilities would be constructed from semi-permeable materials such as asphalt concrete. During precipitation events, stormwater would flow into adjacent permeable (grass or landscaped) areas, or onto existing streets, where it would be collected by the city's existing stormwater system. Therefore, the Class I facilities would not substantially interfere with groundwater recharge such that the Class I facilities would impede sustainable groundwater management of the basin. No impacts on groundwater supplies or recharge would occur during operation.

MEDEA CREEK PATH

Groundwater is anticipated at a depth of approximately 127 feet. The estimated depth of ground disturbance during construction of the Path is 12 feet. Therefore, groundwater would not be encountered during grading and excavation activities associated with construction of the Path. Construction activities would not otherwise require groundwater dewatering and therefore would not decrease groundwater supplies or interfere with recharge. No impacts to groundwater supplies or recharge would occur during construction.

Due to the addition of pavement within previously undisturbed areas, the Path would result in an increase in impervious surfaces. During precipitation events, stormwater would flow into adjacent permeable (grass or landscaped) areas or onto existing streets where it would be collected by the city's existing stormwater system. Therefore, the Path would facilitate the off-site movement of

stormwater, allowing for infiltration and recharge of the underlying Russell Valley Groundwater Basin. Impacts during operation would be less than significant.

AGOURA HIGH SCHOOL CONNECTION

Groundwater is anticipated at a depth of approximately 127 feet. As discussed in Chapter 2, *Project Description*, specific construction details have been identified for the Connection, and the estimated depth of ground disturbance during construction of the Connection is 12 feet. Therefore, groundwater would not be encountered during grading and excavation activities associated with construction of the Connection. Construction activities would not otherwise require groundwater dewatering and therefore would not decrease groundwater supplies or interfere with recharge. No impacts to groundwater supplies or recharge would occur during construction.

Due to the addition of pavement within previously undisturbed areas, the Connection would result in an increase in impervious surfaces. During precipitation events, stormwater would flow into adjacent permeable (grass or landscaped) areas or onto existing streets where it would be collected by the city's existing stormwater system. Therefore, the Connection would facilitate the off-site movement of stormwater, allowing for infiltration and recharge of the underlying Russell Valley Groundwater Basin. Impacts during operation would be less than significant.

Class II Facilities

Construction of Class II facilities would generally require roadway restriping and reconfiguration of lane widths to accommodate new dedicated bike lanes. Pavement widening would be necessary on Driver Avenue and Cornell Road to allow for the addition of bicycle lanes. Pavement widening would require clearing and grubbing, subgrade stabilization, base course installation, and asphalt paving. These activities would not involve excavation and would not require groundwater dewatering, and therefore would not decrease groundwater supplies or interfere with recharge. No impacts to groundwater supplies or recharge would occur during construction.

Operation of the Class II facilities would consist of bicycle travel along delineated bike lanes, with the exception of roadway widening on Driver Avenue and Cornell Road. The proposed roadway widenings would not substantially increase impervious surface area, as the roadways would consist of semi-permeable materials such as asphalt, and would be similar to existing conditions in that stormwater would be directed to current drainage systems. Therefore, the Class II facilities would not increase impervious surface area and would not substantially interfere with groundwater recharge such that the Class II facilities would impede sustainable groundwater management of the basin. No impacts on groundwater supplies or recharge would occur during operation.

Class III Facilities

Construction of the Class III facilities would be limited to the restriping of existing roads to identify bike routes, which would not involve grading or excavation. Therefore, groundwater dewatering would not be required during construction activities. Construction activities would not otherwise require groundwater dewatering and therefore would not decrease groundwater supplies or interfere with recharge. Therefore, no impacts to groundwater supplies or recharge would occur during construction.

Operation of the Class III facilities would consist of bicycle travel along existing travel lanes. Therefore, the Class III facilities would not increase impervious surface area and would not substantially interfere with groundwater recharge such that the Class III facilities would impede

sustainable groundwater management of the basin. No impacts on groundwater supplies or recharge would occur during operation.

Class IV Facilities

Construction of the proposed Class IV facilities would require pavement demolition, grading, bollard or fencing installation, asphalt paving or repaving, and striping. Given the programmatic nature of the BMP, construction details for all individual projects included within the BMP are not yet known. As discussed in Chapter 2, *Project Description*, specific construction details have been identified for the Medea Creek Path, a two-mile Class I facility and the longest new facility proposed in the BMP. Construction of the Path would result in the largest area of disturbance with the most construction activities. The maximum depth of excavation required during construction of the Path would be 12 feet. All other facilities included within the BMP would be expected to result in less intensive construction. Therefore, it can be assumed that the maximum depth of excavation required during construction of the Class IV facilities would also be 12 feet. As discussed in Section 4.7.1(e), groundwater is anticipated at a depth of approximately 127 feet. Therefore, groundwater would not be encountered during grading and excavation activities for Class IV facilities. Thus, construction activities would not require groundwater dewatering and would not decrease groundwater supplies or interfere with recharge. No impacts to groundwater supplies or recharge would occur during construction.

Operation of the Class IV facilities would consist of bicycle travel along physically separated bikeways. The bikeways would be located adjacent to existing travel lanes and would consist of semi-permeable materials such as asphalt. Similar to existing conditions, stormwater from the bikeways would be directed to current drainage systems. Therefore, the Class IV facilities would not increase impervious surface area and would not substantially interfere with groundwater recharge such that the Class IV facilities would impede sustainable groundwater management of the basin. No impacts on groundwater supplies or recharge would occur during operation.

Enhanced Bicycle Treatments

Enhanced bicycle treatments would include street striping and restriping, signage and wayfinding, bicycle signals and detection at traffic signals, bicycle parking, and bicycle repair facilities. Construction of the enhanced bicycle treatments would not involve excavation and would not require groundwater dewatering, and therefore would not decrease groundwater supplies or interfere with recharge. Therefore, no impacts to groundwater supplies or recharge would occur during construction.

Operation of the enhanced bicycle treatments would include continued use of existing bicycle facilities, storing of bicycles at new parking facilities, and use of bicycle repair facilities. Enhanced bicycle treatments would be implemented at various locations throughout the city within or adjacent to existing, new, or improved bikeways and would not result in the addition of new, paved areas. Therefore, the enhanced bicycle treatments would not increase impervious surface area and would not substantially interfere with groundwater recharge such that the enhanced bicycle treatments would impede sustainable groundwater management of the basin. No impacts on groundwater supplies or recharge would occur during operation.

General Plan Amendments

As part of the proposed Project, the City must amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed

BMP. These General Plan Amendments shift the focus from prioritizing automobile mobility to reducing VMT through alternative transportation modes like walking and biking, guided by the BMP. The proposed General Plan Amendments would not result in construction or operation activities beyond existing conditions. Therefore, the Amendments would not substantially interfere with groundwater recharge such that the Amendments would impede sustainable groundwater management of the basin. No impact would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 3a: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?

Threshold 3b: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Threshold 3c: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Threshold 3d: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

Impact HYD-3 THE PROPOSED PROJECT WOULD NOT SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE PROJECT AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER OR THROUGH THE ADDITION OF IMPERVIOUS SURFACES, IN A MANNER WHICH WOULD RESULT IN SUBSTANTIAL EROSION OR SILTATION ON OR OFF SITE, WOULD RESULT IN FLOODING ON OR OFF SITE, WOULD PROVIDE SUBSTANTIAL ADDITIONAL SOURCES OF POLLUTED RUNOFF, OR WOULD IMPEDE OR REDIRECT FLOOD FLOWS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Class I Facilities

Construction of the Class I facilities would not substantially alter the existing drainage pattern of the Project area and would not alter the course of a stream or river because no streams or rivers are located within the individual Class I project sites. Construction and operation of the Class I facilities would not result in substantial erosion or siltation on or off site, flooding on or off site, substantial

additional sources of polluted runoff, or impeded or redirected flood flows, as discussed in the following analyses.

Erosion and siltation are effectively controlled through a combination of SWRCB permits and AHMC requirements. Class I facilities that disturb more than one acre of soil are subject to the SWRCB Construction General Permit, which mandates preparation and implementation of a SWPPP. The SWPPP identifies and prescribes sediment controls—such as silt fences, sediment basins, and stabilized construction entrances—to maintain pre-development flow paths and prevent on- or off-site siltation. Class I facilities that disturb between one and five acres of soil may opt for a Small Construction Rainfall Erosivity Waiver, but regardless of waiver applicability must comply with Article V, Chapter 5 of the AHMC, which would ensure BMPs for erosion and siltation are implemented. Class I facilities disturbing less than one acre of soil, though exempt from the Construction General Permit, are bound by the AHMC's BMP requirements, ensuring consistent erosion and sediment controls for construction of all Class I facilities. Therefore, construction of the Class I facilities would have a less than significant impact involving substation erosion or siltation.

Article V, Chapter 5 of the AHMC explicitly requires that post-development runoff rates and volumes do not exceed pre-development conditions, which would ensure construction of the Class I facilities would not increase downstream flood peaks. For larger Class I facilities covered by the Construction General Permit, hydrologic modeling submitted in the SWPPP would demonstrate that peak flow rates for the 10-, 25-, and 100-year storms remain unchanged. Therefore, construction of the Class I facilities would have a less than significant impact involving on- or off-site flooding.

The potential for additional pollutants to enter surface waters during construction of the Class I facilities would be addressed in the SWPPP (if required) and under the AHMC's BMP requirements. Specifically, the SWPPP prescribes pollution prevention measures for all potential sources of contamination including concrete washout areas, fuel and chemical storage zones, vehicle maintenance areas, and material stockpiles. These measures include covered staging areas, secondary containment, designated washout locations, and spill-response plans that together prevent oils, metals, and other chemicals from becoming entrained in stormwater. Article V applies these same standards to all Class I facilities, regardless of size, so even projects exempt from the Construction General Permit would implement run-on/run-off controls and strict handling procedures. Therefore, construction of the Class I facilities would have a less than significant impact involving additional sources of polluted runoff.

Construction activities associated with the Class I facilities would not impede or redirect flood flows because no permanent structures would be placed within mapped floodways or active channels, and natural overland flow paths would be preserved. Therefore, construction of the Class I facilities would have a less than significant impact involving impeded or redirected flood flows.

Operation of the Class I facilities would consist of bicycle and pedestrian travel along shared use paths and would not introduce new uses that discharge additional water pollutants relative to existing conditions. Operation of the Class I facilities would thus not have the potential to substantially alter the existing drainage pattern of the Project area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site, would result in flooding on or off site, would provide substantial additional sources of polluted runoff, or would impede or redirect flood flows. There would be no impact.

MEDEA CREEK PATH

Existing drainage across the Path's proposed alignment consists of shallow sheet flow over a gently sloping native soil surface that conveys rainfall downslope into intermittent swales and ultimately into Medea Creek. No defined channel crosses the Path alignment, and there is no current diversion or confinement of flows along the Path alignment. Construction of the Path would maintain nearly all pre-development infiltration: runoff would pass through the pavement, temporarily store in the aggregate bed, and then infiltrate into native soils. Therefore, construction of the Path would not substantially alter the existing drainage pattern of the Project area and would not alter the course of a stream or river. No construction work would occur within Medea Creek.

Construction of the Path would disturb more than one acre of soil, which would increase the potential for erosion and sedimentation. Construction of the Path would be required to comply with the Construction General Permit and Article V, Chapter 5 of the AHMC, which require preparation and implementation of a SWPPP and implementation of Erosion Control BMPs and Sediment Control BMPs designed to minimize erosion and retain sediment on-site. Additionally, the SWPPP would include construction BMPs to control and direct on-site surface runoff and would include detention facilities, if required, to minimize stormwater runoff from the construction site such that it does not exceed the capacity of the downstream stormwater drainage systems. Through compliance with the Construction Stormwater General Permit and implementation of the SWPPP and construction BMPs, as well as compliance with the AHMC, construction of the Path would not substantially alter the existing drainage pattern of the Project area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site, would result in flooding on or off site, would provide substantial additional sources of polluted runoff, or would impede or redirect flood flows. This impact would be less than significant.

Operation of the Path would not involve ground-disturbing activities that could increase the potential for erosion or siltation. Through the addition of paving for the proposed bike path, the Path would increase impervious surfaces. During precipitation events, stormwater would flow into adjacent permeable (grass or landscaped) areas, or onto existing streets, where it would be collected by the city's existing stormwater system. The Path would consist of a primarily ground-level bikeway, which would not constitute a barrier that could substantially increase on- or off-site flooding or impede or redirect flood flows when compared to existing conditions. Therefore, although the Path would result in an increase in impervious surface areas, operation of the Path would not substantially alter the existing drainage pattern of the Project area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site, would result in flooding on or off site, would provide substantial additional sources of polluted runoff, or would impede or redirect flood flows. This impact would be less than significant.

AGOURA HIGH SCHOOL CONNECTION

Construction of the Connection would not substantially alter the existing drainage pattern of the Project area and would not alter the course of a stream or river because no streams or rivers are located within the Project area. Construction of the Connection would disturb less than one acre of soil. Because construction of the Connection would disturb less than one acre of soil, the Connection would be exempt from the requirements of the Construction General Permit. However, construction of the Connection would comply with Article V, Chapter 5 of the AHMC, which requires implementation of BMPs to control erosion and sediment from construction sites. Therefore,

construction of the Connection would not substantially alter the existing drainage pattern of the Project area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site, would result in flooding on or off site, would provide substantial additional sources of polluted runoff, or would impede or redirect flood flows. This impact would be less than significant.

Operation of the Connection would not involve ground-disturbing activities that could increase the potential for erosion or siltation. Through the addition of paving for the proposed bike path, the Connection would increase impervious surfaces. During precipitation events, stormwater would flow into adjacent permeable (grass or landscaped) areas, or onto existing streets, where it would be collected by the city's stormwater system. The Connection would consist of a primarily ground-level bikeway that would not constitute a barrier that could substantially increase on- or off-site flooding or impede or redirect flood flows when compared to existing conditions. Therefore, although the Connection would result in an increase in impervious surface areas, operation of the Connection would not substantially alter the existing drainage pattern of the Project area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site, would result in flooding on or off site, would provide substantial additional sources of polluted runoff, or would impede or redirect flood flows. This impact would be less than significant.

Class II Facilities

Construction of the Class II facilities would not substantially alter the existing drainage pattern of the Project area and would not alter the course of a stream or river because no streams or rivers are located within the Project area. Construction of Class II facilities would generally require roadway restriping and reconfiguration of lane widths to accommodate new dedicated bike lanes, as well as pavement widening on Driver Avenue and on Cornell Road to allow for the addition of bicycle lanes. Pavement widening would require clearing and grubbing, subgrade stabilization, base course installation, and asphalt paving. These activities would result in soil disturbance, which would in turn increase the potential for erosion and sedimentation to occur.

Class II facilities that disturb more than one acre are subject to the SWRCB Construction General Permit, which mandates preparation and implementation of a SWPPP. The SWPPP identifies and prescribes sediment controls—such as silt fences, sediment basins, and stabilized construction entrances—to maintain pre-development flow paths and prevent on- or off-site siltation. Class II facilities that disturb between one and five acres may opt for a Small Construction Rainfall Erosivity Waiver, but must nonetheless comply with Article V, Chapter 5 of the AHMC, ensuring BMPs for erosion and siltation are implemented. Class II facilities under one acre, though exempt from the Construction General Permit, are bound by the AHMC's BMP requirements, ensuring consistent erosion and sediment controls for construction of all Class II facilities. Therefore, construction of the Class II facilities would have a less than significant impact involving substation erosion or siltation.

The AHMC explicitly requires that post-development runoff rates and volumes do not exceed pre-development conditions, which would ensure construction of the Class II facilities would not increase downstream flood peaks. For larger Class II facilities covered by the Construction General Permit, hydrologic modeling submitted in the SWPPP would demonstrate that peak flow rates for the 10-, 25-, and 100-year storms remain unchanged. Therefore, construction of the Class II facilities would have a less than significant impact involving on- or off-site flooding.

The potential for additional pollutants to enter surface waters during construction of the Class II facilities would be addressed in the SWPPP (if required) and under the AHMC's BMP requirements. The SWPPP prescribes pollution prevention measures for all potential sources of contamination—concrete washout areas, fuel and chemical storage zones, vehicle maintenance areas, and material stockpiles. These measures include covered staging areas, secondary containment, designated washout locations, and spill-response plans that together prevent oils, metals, and other chemicals from becoming entrained in stormwater. Article V applies these same standards to all Class II facilities, regardless of size, so even projects exempt from the Construction General Permit would implement run-on/run-off controls and strict handling procedures. Therefore, construction of the Class II facilities would have a less than significant impact involving additional sources of polluted runoff.

Construction activities associated with the Class II facilities would not impede or redirect flood flows because no permanent structures would be placed within mapped floodways or active channels, and natural overland flow paths would be preserved. Therefore, construction of the Class II facilities would have a less than significant impact involving impeded or redirected flood flows.

Operation of the Class II facilities would consist of bicycle travel along delineated bike lanes and would not introduce new land uses with the potential to generate erosion, sedimentation, or additional water pollutants relative to existing conditions. Operation of the Class II facilities would thus not have the potential to substantially alter the existing drainage pattern of the Project area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site, would result in flooding on or off site, would provide substantial additional sources of polluted runoff, or would impede or redirect flood flows. There would be no impact.

Class III Facilities

Construction of the Class III facilities would not substantially alter the existing drainage pattern of the Project area and would not alter the course of a stream or river because no streams or rivers are located within the Project area. Construction of the Class III facilities would be required to comply with Article V, Chapter 5 of the AHMC, which requires implementation of BMPs designed to minimize erosion and retain sediment on site. Compliance with Article V, Chapter 5 of the AHMC would minimize sediment discharge in stormwater runoff. Therefore, construction of the Class III facilities would not substantially alter the existing drainage pattern of the Project area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site, would result in flooding on or off site, would provide substantial additional sources of polluted runoff, or would impede or redirect flood flows. This impact would be less than significant.

Operation of the Class III facilities would consist of bicycle travel along shared use travel lanes and would not introduce new land uses with the potential to generate erosion, sedimentation, or additional water pollutants relative to existing conditions. Operation of the Class III facilities would thus not have the potential to substantially alter the existing drainage pattern of the Project area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site, would result in flooding on or off site, would provide substantial additional sources of polluted runoff, or would impede or redirect flood flows. There would be no impact.

Class IV Facilities

Construction of the Class IV facilities would not substantially alter the existing drainage pattern of the Project area and would not alter the course of a stream or river because no streams or rivers are located within the Project area. The Class IV facilities would be located within existing roadways, and would not result in the addition of new, paved areas.

Class IV facilities that disturb more than one acre are subject to the SWRCB Construction General Permit, which mandates preparation and implementation of a SWPPP. The SWPPP identifies and prescribes sediment controls—such as silt fences, sediment basins, and stabilized construction entrances—to maintain pre-development flow paths and prevent on- or off-site siltation. Class IV facilities that disturb between one and five acres may opt for a Small Construction Rainfall Erosivity Waiver, but must nonetheless comply with Article V, Chapter 5 of the AHMC, ensuring BMPs for erosion and siltation are implemented. Class IV facilities under one acre, though exempt from the Construction General Permit, are bound by the AHMC's BMP requirements, ensuring consistent erosion and sediment controls for construction of all Class II facilities. Therefore, construction of the Class IV facilities would have a less than significant impact involving substation erosion or siltation.

The AHMC explicitly requires that post-development runoff rates and volumes do not exceed pre-development conditions, which would ensure construction of the Class IV facilities would not increase downstream flood peaks. For larger Class IV facilities covered by the Construction General Permit, hydrologic modeling submitted in the SWPPP would demonstrate that peak flow rates for the 10-, 25-, and 100-year storms remain unchanged. Therefore, construction of the Class IV facilities would have a less than significant impact involving on- or off-site flooding.

The potential for additional pollutants to enter surface waters during construction of the Class IV facilities would be addressed in the SWPPP (if required) and under the AHMC's BMP requirements. The SWPPP prescribes pollution prevention measures for all potential sources of contamination—concrete washout areas, fuel and chemical storage zones, vehicle maintenance areas, and material stockpiles. These measures include covered staging areas, secondary containment, designated washout locations, and spill-response plans that together prevent oils, metals, and other chemicals from becoming entrained in stormwater. Article V applies these same standards to all Class IV facilities, regardless of size, so even projects exempt from the Construction General Permit would implement run-on/run-off controls and strict handling procedures. Therefore, construction of the Class IV facilities would have a less than significant impact involving additional sources of polluted runoff.

Construction activities associated with the Class IV facilities would not impede or redirect flood flows because no permanent structures would be placed within mapped floodways or active channels, and natural overland flow paths would be preserved. Therefore, construction of the Class IV facilities would have a less than significant impact involving impeded or redirected flood flows.

Operation of the Class IV facilities would consist of bicycle travel along physically separated bikeways and would not introduce new land uses with the potential to generate erosion, sedimentation, or additional water pollutants relative to existing conditions. Operation of the Class IV facilities would thus not have the potential to substantially alter the existing drainage pattern of the Project area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site, would result in flooding on or off site, would provide substantial additional sources of polluted runoff, or would impede or redirect flood flows. There would be no impact.

Enhanced Bicycle Treatments

Enhanced bicycle treatments would include street striping and restriping, signage and wayfinding, bicycle signals and detection at traffic signals, bicycle parking, and bicycle repair facilities. Construction and operation of the enhanced bicycle treatments would not result in the addition of new, paved areas. Therefore, the enhanced bicycle treatments would not increase impervious surface area. Construction of the enhanced bicycle treatments would comply with Article V, Chapter 5 of the AHMC, which requires implementation of BMPs to control runoff from construction sites. Construction and operation of the enhanced bicycle treatments would not have the potential to substantially alter the existing drainage pattern of the Project area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site, would result in flooding on or off site, would provide substantial additional sources of polluted runoff, or would impede or redirect flood flows. No impact would occur.

General Plan Amendments

As part of the proposed Project, the City must amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. These General Plan Amendments shift the focus from prioritizing automobile mobility to reducing VMT through alternative transportation modes like walking and biking, guided by the BMP. The proposed General Plan Amendments would not result in construction or operation activities beyond existing conditions. Therefore, the Amendments would not have the potential to substantially alter the existing drainage pattern of the Project area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on or off site, would result in flooding on or off site, would provide substantial additional sources of polluted runoff, or would impede or redirect flood flows. No impact would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 4:	In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Impact HYD-4 THE PROPOSED PROJECT WOULD NOT RISK THE RELEASE OF POLLUTANTS DUE TO PROJECT INUNDATION IN FLOOD HAZARD, TSUNAMI, OR SEICHE ZONES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Class I Facilities

The proposed Class I facilities are not located within a flood hazard zone, tsunami inundation zone, or seiche inundation zone (FEMA 2008, 2018). Therefore, the Class I facilities would not have the potential to be subject to inundation, and no impact would occur.

MEDEA CREEK PATH

The Path is not located within a tsunami inundation zone or a seiche inundation zone. However, the Path is located within FEMA Zone AE and Zone B, which are designated as special flood hazard areas (FEMA 2008, 2018). Implementation of erosion control measures and BMPs as part of the SWPPP, as required by the Construction General Permit, would reduce the potential for release of pollutants during construction of the Path. Operation of the Path would consist of bicycle and pedestrian travel along a shared use path and would not involve the use of hazardous materials, and thus would not create a risk associated with the release of pollutants should the Path be inundated during a flooding event. Therefore, impacts involving the release of pollutants due to inundation would be less than significant.

AGOURA HIGH SCHOOL CONNECTION

The Connection is not located within a flood hazard zone, tsunami inundation zone, or a seiche inundation zone. Therefore, the Connection would not have the potential to be subject to inundation, and no impact would occur.

Class II Facilities

The proposed Class II facilities are not located within a flood hazard zone, tsunami inundation zone, or a seiche inundation zone. Therefore, the Class II facilities would not have the potential to be subject to inundation, and no impact would occur.

Class III Facilities

The proposed Class III facilities are not located within a tsunami inundation zone or a seiche inundation zone. However, six of the proposed Class III facilities are located within FEMA Zone AE and Zone B, which are designated as special flood hazard areas (FEMA 2008, 2018). Construction of the Class III facilities would be limited to the restriping of existing roads to identify bike routes, which would not involve ground disturbance, and thus compliance with the Construction General Permit, and implementation of an associated SWPPP, would not be required. However, implementation of BMPs for runoff control as required by Article V, Chapter 5 of the AHMC would reduce the potential for release of pollutants during construction of the Class III facilities. Operation of the Class III facilities would not involve the use of hazardous materials and thus would not create a risk associated with the release of pollutants should the proposed Class III bike paths be inundated during a flooding event. Therefore, impacts involving the release of pollutants due to inundation would be less than significant.

Class IV Facilities

The proposed Class IV facilities are not located within a flood hazard zone, tsunami inundation zone, or a seiche inundation zone. Therefore, the Class IV facilities would not have the potential to be subject to inundation, and no impact would occur.

Enhanced Bicycle Treatments

The enhanced bicycle treatments are not located within a tsunami inundation zone or a seiche inundation zone. However, some of the enhanced bicycle treatments may be located within FEMA Zone AE and Zone B, which are designated as special flood hazard areas (FEMA 2008, 2018). Implementation of BMPs for runoff control, as required by Article V, Chapter 5 of the AHMC, would reduce the potential for release of pollutants during construction of the enhanced bicycle

treatments. Operation of the enhanced bicycle treatments would not involve the use of hazardous materials and thus would not create a risk associated with the release of pollutants, should the enhanced bicycle treatments be inundated during a flood event. Therefore, impacts involving the release of pollutants due to inundation would be less than significant.

General Plan Amendments

The Amendments would not facilitate direct or indirect development that could risk the release of pollutants due to inundation. No impact would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 5:	Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impact HYD-5 THE PROPOSED PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF A WATER QUALITY CONTROL PLAN OR SUSTAINABLE GROUNDWATER MANAGEMENT PLAN. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The Project area overlies the Russell Valley Groundwater Basin, which is designated as Very Low Priority and is not in a state of overdraft (DWR 2025). As discussed under Impact HYD-2, construction of the proposed Project would not require groundwater dewatering and therefore would not decrease groundwater supplies or interfere with recharge. The proposed Project would not require a water supply during operation. In addition, there is no Groundwater Sustainability Plan because the Basin is low priority and it is not required under SGMA. Therefore, the proposed Project would not conflict with or obstruct implementation of a Groundwater Sustainability Plan.

As discussed under Impact HYD-1, construction of the proposed Project would involve soil-disturbing activities that would effectively be controlled through implementation of erosion control measures and BMPs as required by the AHMC and Construction General Permit (if applicable). Impacts to water quality during operation of the proposed Project would be effectively controlled through compliance with existing water quality standards. Consequently, the proposed Project would not conflict with a water quality control plan, and impacts would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.7.4 Cumulative Impacts

The cumulative study area for hydrology and water quality is the Malibu Creek Watershed. Cumulative development in the Malibu Creek Watershed would be a continuation of the existing

urban pattern of development that has already resulted in extensive modifications to watercourses in the Project area. Specifically, many of the Project area's watercourses have been channelized, and drainage systems have been put into place to respond to the past urbanization that has occurred in this area. For the cumulative analysis related to hydrology and water quality, the cumulative projects being considered include the related projects listed in Chapter 3, *Environmental Setting*, which all discharge to the same watershed as the proposed Project. Each of these related projects could potentially increase impervious surfaces throughout the region, redirect stormwater runoff during storm events, increase the peak flow of stormwater runoff, and contribute to pollutant loading in stormwater runoff reaching both the storm drain system and the downstream receiving waters, such as Palo Comado Creek, Lake Lindero, Lindero Creek, and Medea Creek. However, all of the cumulative projects, including the proposed Project, would be required to comply with NPDES and local water quality requirements and drainage standards. All projects that disturb one acre or more of soil must comply with the requirements of the Construction General Permit. Furthermore, all projects in Agoura Hills must comply with Article V, Chapter 5 of the AHMC. Implementation of BMPs, as required, would address drainage and surface water quality protection. As a result, cumulative impacts on water quality, drainage, flooding, and sedimentation would be less than significant.

The cumulative study area for groundwater is the Russell Valley Groundwater Basin. For the cumulative analysis related to groundwater, the cumulative projects being considered include the related projects listed in Chapter 3, *Environmental Setting*, which are located above the same groundwater basin or would utilize groundwater from the same groundwater basin as the proposed Project. Cumulative increases in impervious surface areas above the groundwater basin could affect groundwater recharge, and additional water demand would occur due to population growth associated with buildout of the City of Agoura Hills. Potential increases in groundwater pumping above current levels due to buildout of the region could potentially decrease available groundwater supplies. However, each cumulative project, including the proposed Project, would be reviewed by the City of Agoura Hills to confirm adequate water supplies are available such that water supplied from groundwater sources would not substantially decrease groundwater supplies. Finally, the Russell Valley Groundwater Basin is not in a state of overdraft or designated as a medium or high priority groundwater basin, and water supplied to cumulative development from groundwater would not substantially decrease groundwater supplies. Therefore, cumulative impacts to groundwater resources would be less than significant.

The cumulative study area for flooding and inundation consists of special flood hazard areas within the City of Agoura Hills. Cumulative development within these areas, which include Lake Lindero, Lindero Creek, Medea Creek, and lands adjacent to these three waterbodies, could result in increased flooding, including redirection of flood flows, increases in flood boundaries, and increases in flood elevations. For the cumulative analysis related to flooding and inundation, the cumulative projects being considered include the related projects listed in Chapter 3, *Environmental Setting*, within the City of Agoura Hills. Each cumulative project that encroaches in a floodplain would be reviewed by the City of Agoura Hills and FEMA to verify compliance with all applicable regulations governing development within floodplain. If required, FEMA would revise the Flood Insurance Rate Map to reflect changes in floodplains resulting from the cumulative projects. Review of floodplain encroachments by the City of Agoura Hills and FEMA are designed to prevent substantial changes to the floodplain as a result of cumulative development in the region. As a result, cumulative impacts related to flooding would be less than significant.

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4.8 Land Use and Planning

The analysis in this section considers potential impacts to land use and planning. Specifically, this section discusses the environmental and regulatory setting; the criteria used to determine the significance of environmental impacts related to land use and planning; and potential impacts related to land use and planning that would result from implementation of the proposed Project.

4.8.1 Setting

a. Current Land Use Pattern

The Project area, which encompasses all of the City of Agoura Hills, is located in the foothills of the Santa Monica Mountains on the far western edge of Los Angeles County in the Conejo Valley. The city is located approximately 36 miles west of downtown Los Angeles, encompasses approximately 4,366 acres, and is bisected by U.S. Highway 101 (Ventura Freeway), which runs east-west in the southern portion of the city. Rolling hills and a blend of semi-rural and suburban development characterize the City of Agoura Hills, which is known for its distinct neighborhoods, natural landscapes, and recreational resources.

Residential development is the predominant land use in the city; housing accounts for approximately 38 percent of the city's land uses. Approximately 32 percent of the city's land use is park and open space, the second largest land use category. There are over 700 acres of vacant land in the city, which is approximately 16 percent of the city's land use (City of Agoura Hills 2010a). Vacant land includes land where development is currently proposed and pending but not yet constructed, such as land within an adopted Specific Plan and land with regulatory and/or topographical constraints.

b. Residential

Although residential uses in the city have some variety in development densities, the majority (65 percent) are considered single-family residential, ranging between two and six dwelling units per acre. Single-family residential uses are found throughout the city but are primarily concentrated north of the Ventura Freeway. Approximately 24 percent of residential uses are classified as low to very low density, with densities ranging between 0.2 and two dwelling units per acre. These low densities are concentrated in the eastern area of the city, known as Old Agoura. The city allows for medium- and high-density residential uses, but these areas represent a much smaller proportion of the total residences (11 percent) (City of Agoura Hills 2022).

c. Nonresidential

Commercial development occupies approximately 163 acres (less than 4 percent) of the city's total land area (City of Agoura Hills 2022). Commercial uses include neighborhood centers, shopping centers, mixed use centers, retail spaces, restaurants, hotels, and commercial recreation. Commercial uses are concentrated along Kanan Road, Agoura Road, and near the Ventura Freeway. Recent retail development near the Ventura Freeway includes household goods sales, such as furniture, rugs, and appliances. These developments are a regional commercial draw to Agoura Hills (City of Agoura Hills 2010a). Business parks occupy approximately 189 acres (four percent) of the city's total land area (City of Agoura Hills 2022). This land use is concentrated along Canwood Street and Agoura Road (City of Agoura Hills 2010a). Chapter 2, *Community Conservation & Development,*

of the City of Agoura Hills General Plan 2035 identifies approximately 875 acres of planned nonresidential development (City of Agoura Hills 2010a).

d. Parks and Open Space

Park and open space land uses include open space, local parks, and private recreation uses. Restricted open space accounts for approximately 1,000 acres (23 percent) of the city's land area, permanent open space (deed-restricted open space) accounts for approximately 304 acres (7 percent) of the city's land area, and local parks account for approximately 74 acres (less than 2 percent) of the city's total land area (City of Agoura Hills 2022).

e. Drainage, Floodplain, and Water Course

Drainages, floodplains, and watercourses comprise approximately 38 acres (less than 1 percent) of the city's total land use. Drainage areas consist of concrete-lined channels and Lake Lindero. There are approximately 15 acres of open water within the city (City of City of Agoura Hills 2010a; City of Agoura Hills 2022).

f. Government, School, and Utility

Public facilities account for approximately 90 acres (2 percent) of the city's total land use (City of Agoura Hills 2022). Public facilities include city, county, and other government properties and facilities. In the City of Agoura Hills, these facilities include public libraries, public schools, fire and police stations, City Hall, U.S. Post Offices, the County of Los Angeles Animal Shelter, and the County of Los Angeles Flood Control Yard. Public facilities also include public utilities and utility rights of way, including electrical utility facilities, water tanks, and a pump station (City of Agoura Hills 2010a).

4.8.2 Regulatory Setting

a. Federal Regulations

There are no federal regulations related to land use applicable to the proposed Project.

b. State Regulations

Senate Bill 375

Senate Bill (SB) 375 requires that a metropolitan planning organization adopt a sustainable communities strategy as part of its regional transportation plan to reduce GHGG emissions from cars and light trucks in a region. SB 375 requires the State Air Resources Board, working in consultation with metropolitan planning organization, to provide each region with GHG emission reduction targets for the automobile and light truck sector. Agoura Hills is located within the Regional Transportation Plan/Sustainable Communities Strategy developed by the Southern California Association of Governments.

c. Regional and Local Regulations

Connect SoCal 2024

The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties. SCAG addresses regional issues relating to transportation, the economy, community development, and the environment. Every four years, SCAG updates their Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), as required by federal and state regulations. On April 4, 2024, SCAG's Regional Council formally approved Connect SoCal 2024*,* the 2024-2050 RTP/SCS.

Connect SoCal 2024 builds upon the progress made through the 2020-2045 RTP/SCS. It includes ten goals focused on promoting economic prosperity, improving mobility, protecting the environment, and supporting healthy/complete communities. Implementation strategies include focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, and supporting implementation of sustainability policies.

The SCS portion of Connect SoCal 2024 establishes a land use vision of center-focused placemaking, concentrating growth in and near Priority Growth Areas, transferring development rights, implementing urban greening, creating greenbelts and community separators, and implementing regional advanced mitigation. Overall, the RTP/SCS contributes to the fundamental goals of making the SCAG region a better place to live, work, and play for all residents regardless of race, ethnicity, or income class. Thus, decisions regarding growth, transportation, land use, and economic development should be made to promote and sustain the region's mobility, livability, and prosperity for future generations.

City of Agoura Hills General Plan 2035

The City of Agoura Hills General Plan 2035 was adopted on March 24, 2010 (updated on August 10, 2022) by the City Council (City of Agoura Hills 2022). The City of Agoura Hills General Plan 2035 is a strategic document designed to guide the physical development of the city until the year 2035. Among other things, the City of Agoura Hills General Plan 2035 sets out the pattern of land uses, including residential, commercial, and industrial. It also establishes the system of streets, bikeways, and trails. The City of Agoura Hills General Plan 2035 addresses a wide variety of subject areas, including housing, traffic, natural resources, land uses, economic development, noise, and public safety.

The City of Agoura Hills General Plan 2035 contains the following goals and policies related to land use and planning, which would apply to the proposed Project

Goal LU-3. Open space lands that are preserved to maintain the visual quality of the City and provide recreational opportunities, protect the public from safety hazards, and conserve natural resources.

> **Policy LU-3.3.** Provide a network of open spaces and greenbelts with pedestrian access where appropriate.

Goal LU-4. Structure and form of development that respects Agoura Hills' natural setting; maintains distinct and interconnected places for residents to live, shop, work, and play; and is more compact to reduce automobile dependence.

Policy LU-4.2. Maintain and, where incomplete, develop a citywide network of open spaces that is connected to and provides access for all neighborhoods and districts incorporating greenbelts, drainage corridors, parklands, bicycle and pedestrian paths, equestrian trails, and natural open spaces.

Policy LU-4.8. Promote the development of complete pedestrian, bicycle, and vehicular connections that provide access from all residential neighborhoods to commercial, employment, cultural, civic, recreational, and open space destinations.

Goal LU-5. Development and land use practices that sustain natural environmental resources, the economy, and societal well-being for use by future generations, which, in turn, reduce greenhouse gas emissions and impacts on climate change.

Policy LU-5.4. Promote land development practices that reduce energy and water consumption, pollution, greenhouse gas emissions, and waste.

Goal LU-9. Maintenance of the identity, scale, and character of the City's distinct residential neighborhoods.

Policy LU-9.2. Ensure that existing neighborhoods contain a diverse mix of parks and open spaces that are connected by trails, pathways, and bikeways and are within easy walking distance of residents.

Goal LU-13. Retail centers and corridors that are well-designed and attractive, providing a positive experience for visitors and community residents, and fostering business activity.

Policy LU-13.1. Make centers more pedestrian friendly, reduce visual clutter associated with signage, and enhance the definition and character of the street frontage and associated streetscape.

Goal LU-19. Open space lands that provide an attractive environmental setting for Agoura Hills and visual relief from development, protect the viability of natural resources and habitat, offer passive recreational opportunities for residents and visitors, and protect residents from the risks of natural hazards.

Policy LU-19.1. Maintain a multi-functional "green infrastructure" consisting of natural areas, open spaces, urban forest, and parklands, which serves as a defining physical feature of Agoura Hills, provides visitors and residents with access to open spaces and recreation, is designed for environmental sustainability, and reduces greenhouse gas emissions.

Policy LU-19.2. Place a high priority on acquiring and preserving open space lands for purposes of passive recreation, habitat protection and enhancement, resource conservation, flood hazard management, public safety purposes, and overall community benefit.

Goal LU-21. An economically viable commercial center serving residents of adjoining neighborhoods, where the physical appearance of buildings, landscapes, and public rights-of-way are improved to complement the neighborhood's quality and character.

Policy LU-21.3. Improve the public streets and sidewalks that enhance the visual character and quality of the neighborhood commercial district, considering such elements as landscape; well-designed benches, trash receptacles, and other street furniture; decorative sidewalk and crosswalk paving; and pedestrian-oriented lighting; wayfinding signage.

Goal LU-27. Improvement of the economic vitality of the existing commercial shopping centers and re-positioning as a focal point of neighborhood identity, activity, and socialization.

> **Policy LU-27.4**. Improve sidewalks and crosswalks with distinctive paving materials and pedestrian-oriented amenities, provide bikeway connections, where feasible, to improve the inter-connectivity of the shopping centers with one another and adjoining residential neighborhoods.

Agoura Village Specific Plan

The Agoura Village Specific Plan, adopted in 2008 and updated in 2024, is a long-range planning effort intended to guide the revitalization, appropriate uses, and beautification of the Agoura Village (City of Agoura Hills 2024b). The Specific Plan area encompasses approximately 135 acres of developed and underdeveloped land running along both sides of Agoura Road, one block west of Kanan Road to approximately two blocks east of Cornell Road. Roadside Drive and the Ventura Freeway border the Specific Plan area to the north, and open space borders the Specific Plan area to the south.

Chapter 3, *Streetscape Beautification & Public Improvements,* of the Agoura Village Specific Plan provides recommendations for street beautification amenities and gateways. This Chapter indicates that bicycle racks shall be installed at convenient locations along Agoura Road, at any future bus stop, and conveniently located near building entries that are centrally located within development and not facing Agoura Road. Chapter 4, *Mobility,* of the Agoura Village Specific Plan identifies opportunities for new or improved pedestrian, bicycle, and transit infrastructure, and traffic calming concepts. This chapter also notes that all bicycle facilities within the Specific Plan area shall be constructed in accordance with Figure M-7 of the General Plan, which will be updated as part of the General Plan Amendments.

City of Agoura Hills Municipal Code

Article IX of the Agoura Hills Municipal Code (AHMC) contains the city's Zoning Code, which serves as the primary implementation tool of the City of Agoura Hills General Plan 2035. Whereas the City of Agoura Hills General Plan 2035 is a policy document and sets forth direction for development decisions, the Zoning Code is a regulatory document that establishes specific standards for the use and development of all land in the city. The specific zoning districts, identified in Chapter 1 of the Zoning Ordinance, guide which specific uses are permitted in which locations throughout the city.

4.8.3 Impact Analysis

a. Methodology and Significance Thresholds

As discussed in Section 4.0, *Environmental Impact Analysis*, all Project components are analyzed at the programmatic level. Project components include the Bicycle Master Plan (BMP), the VMT Mitigation Exchange and Banking Program (Program), and the General Plan Amendments (Amendments). Projects included within the BMP are grouped into Class I facilities, Class II facilities, Class III facilities, Class IV facilities, and enhanced bicycle treatments, as identified in Section 2.5, *Project Characteristics,* and in Table 1 of Chapter 2, *Project Description.* The impact analysis contained herein provides a programmatic analysis of anticipated impacts for each of the five facility classes, as the individual project impacts associated with each class of facility are expected to be similar. Because the City seeks to prioritize implementation of the Medea Creek Path (Path) and the Agoura High School Connection (Connection), the Path and the Connection have their own

subheadings within the Class I Facility impact analysis subsection to provide a more specific assessment of their environmental impacts. Impacts associated with the General Plan Amendments are analyzed within their own subsection.

As discussed in Chapter 2, *Project Description*, the only projects that are currently planned, unfunded, and could potentially be funded by the VMT Mitigation Exchange and Banking Program are those currently included within the BMP. Therefore, the impact analysis contained herein does not include a subsection for impacts associated with the Program, as the individual project list for the BMP and the Program are identical and impacts associated with the BMP would encompass impacts associated with the Program.

Within the following environmental analysis, impacts associated with each Project component are explicitly identified under the respective heading.

According to State CEQA Guidelines Appendix G, , impacts related to land use and planning would be significant if the proposed Project would:

1. Physically divide an established community; or,
2. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the Project physically divide an established community?

Impact LU-1 THE PROPOSED PROJECT WOULD RESULT IN THE ADDITION OF NEW AND IMPROVED BICYCLE AND PEDESTRIAN PATHWAYS IN THE CITY OF AGOURA HILLS, WHICH WOULD ENHANCE LOCAL AND REGIONAL CONNECTIVITY. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Implementation of individual projects identified within the BMP would involve construction activities such as clearing and grubbing, pavement demolition, grading, subgrade stabilization, utility relocation, construction of undercrossings and/or overcrossings, installation of retaining walls, construction of bollards and fencing, asphalt paving or repaving, striping, restriping, reconfiguration and/or revegetation. Construction activities would require use of delivery trucks, vehicles, and other construction equipment, as well as the creation of storage, staging, and active work areas. These areas would be located within or adjacent to the identified project boundaries. At the time of construction, should the construction contractor require additional staging areas, they would be responsible for identifying and securing long-term staging areas on previously disturbed storage yards, the locations of which are currently unknown. Nonetheless, construction of individual projects could affect roadways and the circulation system if construction were to occur within roadway rights-of-way (ROWs) or require temporary lane closures. A construction traffic control plan would be prepared and implemented for any construction activities occurring within the roadway ROW in accordance with the California Manual of Uniform Traffic Control Devices (MUTCD). The construction traffic control plan would include the use of flaggers during temporary lane closures and would ensure the use of proper signage, buffer zones, barriers, and reduced speed limits around construction zones consistent with Chapter 6 (Flagger Control) of the MUTCD, and no detours would be required (Caltrans 2014). Therefore, construction activities would not physically divide an established community.

Implementation of the Project would not result in the development of structures or buildings. Operation of individual projects identified within the BMP would consist of bicycle and pedestrian

travel along shared use paths, delineated bike lanes, shared use travel lanes, and physically separated bikeways. Operation of the enhanced bicycle treatments would also include continued use of existing bicycle facilities, storing of bicycles at new parking facilities, and use of bicycle repair facilities. Use of these bicycle facilities would result in improved connectivity within the city by enhancing local mobility options and providing a diverse network of interconnected bicycle and pedestrian corridors and support facilities that aim to link local and regional destinations.

As part of the proposed Project, the City must also amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. The proposed General Plan Amendments would not result in physical development that could physically divide an established community.

Overall, implementation of the proposed Project would not physically divide an established community. No impact would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

No impact would occur.

Threshold 2:	Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted to avoid or mitigate an environmental effect?

Impact LU-2 THE PROPOSED PROJECT WOULD BE CONSISTENT WITH CONNECT SOCAL 2024, THE CITY OF AGOURA HILLS GENERAL PLAN 2035, AND THE AGOURA VILLAGE SPECIFIC PLAN. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The primary land use plans relevant to the proposed Project are the RTP/SCS (Connect SoCal 2024) (SCAG 2024), the City of Agoura Hills General Plan 2035, and the Agoura Village Specific Plan.

Implementation of the proposed Project would result in shared use bicycle and pedestrian paths, delineated bike lanes, shared use travel lanes, and physically separated bikeways. Operation of these facilities would be consistent with the Connect SoCal 2024 goals aimed at reducing emissions from transportation sources, as the proposed Project would encourage alternative travel modes. The Connect SoCal 2024 goals that the project would advance are as follows:

Mobility. Build and maintain and integrated multimodal transportation network.

> **Mobility Goal 1.** Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions.

Environment. Create a healthy region for the people today and tomorrow.

> **Environment Goal 2**. Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water.

Implementation of the BMP would also be consistent with City of Agoura Hills General Plan 2035 goals and policies, including Policy LU-3.3, which aims to provide a network of open spaces and greenbelts with pedestrian access; Policy LU-4.8, which aims to promote the development of complete pedestrian, bicycle, and vehicular connections that provide access from all residential neighborhoods to commercial, employment, cultural, civic, recreational, and open space destinations; Policy LU-5.4, which aims to promote land development practices that reduce energy consumption, pollution, and greenhouse gas emissions; and, Policy LU-27.4, which aims to improve sidewalks and crosswalks with pedestrian-oriented amenities and provide bikeway connections.

Implementation of the BMP would also result in the installation of enhanced bicycle treatments at various locations throughout the city. These facilities would include street striping and restriping, signage and wayfinding, bicycle signals and detection at traffic signals, bicycle parking, and bicycle repair facilities. Installation of these facilities would be consistent with Chapter 3, *Streetscape Beautification & Public Improvements,* of the Agoura Village Specific Plan, which calls for bicycle racks at convenient locations along Agoura Road, at any future bus stop, and conveniently located near building entries that are centrally located within development.

As part of the proposed Project, the City must also amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. These General Plan Amendments shift the focus from prioritizing automobile mobility to reducing VMT through alternative transportation modes like walking and biking, guided by the BMP. This shift in focus to reducing VMT would be consistent with the Connect SoCal 2024 goals aimed at reducing emissions from transportation sources and City of Agoura Hills General Plan 2035 Policy LU-5.4, which aims to promote land development practices that reduce energy consumption, pollution, and greenhouse gas emissions.

Implementation of the BMP would also be consistent with the City of Agoura Hills Zoning Code. The BMP proposes the installation and enhancement of bicycle and pedestrian infrastructure, including shared use paths, bike lanes, and support facilities, which are permitted within public rights-of-way and open space areas. It does not propose changes to existing land uses or introduce incompatible uses in any zoning district. Therefore, implementation of the BMP would not conflict with the City's Zoning Code and would result in a less than significant impact.

Overall, the proposed Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purposes of avoiding or mitigating an environmental effect.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.8.4 Cumulative Impacts

The geographic scope for cumulative impacts related to land use and planning is the Project area, which encompasses all of the City of Agoura Hills. Past, present, and reasonably foreseeable future projects, including the projects listed in Table 3-1, would not physically divide an established community because these cumulative projects do not involve the creation of new linear features, such as roads, that could divide the community or prohibit mobility within the community. Conflicts

regarding compatibility between past, present, and reasonably foreseeable future projects, and applicable land use plans, policies, or regulations would be localized and addressed on a case-by-case basis, with potential impacts being reduced through design review for consistency with the City of Agoura Hills General Plan 2035 and the Agoura Village Specific Plan. Therefore, cumulative development would not result in a significant cumulative impact related to land use and planning.

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4.9 Noise

The analysis in this section considers potential impacts related to noise and vibration. Specifically, this section discusses the environmental and regulatory setting; the criteria used to determine the significance of environmental impacts related to noise and vibration; and potential impacts related to noise and vibration that would result from implementation of the proposed Project.

4.9.1 Setting

a. Noise

Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by the hearing organs. *Noise* is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (California Department of Transportation [Caltrans] 2013).

Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighted scale is an adjustment to the actual sound pressure levels so that the levels are consistent with the human hearing response, which is most sensitive to frequencies around 4,000 Hertz (Hz) and less sensitive to frequencies around and below 100 Hz. In addition to the actual instantaneous measurement of sound levels, the duration of sound is important since sounds that occur over a long period of time are more likely to be an annoyance or cause direct physical damage or environmental stress. One of the most frequently used noise metrics that considers both duration and sound power level is the equivalent noise level (Leq). The Leq is defined as the single steady A-weighted level that is equivalent to the same amount of energy as contained in fluctuating levels of sound over a period of time. Typically, Leq is summed over a one-hour period (Caltrans 2013).

Sound pressure is measured on a logarithmic scale with the 0 dB level based on the lowest detectable sound pressure level that people can perceive (an audible sound that is not zero sound pressure level). Based on the logarithmic scale, a doubling of sound energy is equivalent to an increase of 3 dB and a sound that is 10 dB less than the ambient sound level has no effect on ambient noise. Because of the nature of the human ear, a sound must be approximately 10 dB greater than the reference sound to be judged as twice as loud. In general, a 3 dBA change in community noise levels is noticeable, while 1-2 dBA changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40 to 50 dBA, while noise levels along arterial streets are generally in the 50 to 60+ dBA range. Normal conversational levels are in the 60-65 dBA range and ambient noise levels greater than that can interrupt conversations.

Noise levels typically attenuate at a rate of 6 dBA per doubling of distance from point sources such as industrial machinery. Noise from roads typically attenuates at a rate of about 4.5 dBA per doubling of distance over absorptive ground surfaces (e.g., grass). Noise from roads typically attenuates at about 3 dBA per doubling of distance over reflective ground surfaces (e.g., pavement).

The actual time period in which noise occurs is also important since noise that occurs at night tends to be more disturbing than that which occurs during the daytime. To evaluate community noise on a 24-hour basis, the day-night average sound level was developed (Ldn). Ldn is the time average of all A-weighted levels for a 24-hour period with a 10 dB upward adjustment added to those noise levels

occurring between 10:00 PM and 7:00 AM to account for the general increased sensitivity of people to nighttime noise levels. The Community Noise Equivalent Level (CNEL) is identical to the Ldn with one exception. The CNEL adds 5 dB to evening noise levels (7:00 PM to 10:00 PM). Thus, both the Ldn and CNEL noise measures represent a 24-hour average of A-weighted noise levels with Ldn providing a nighttime adjustment and CNEL providing both an evening and nighttime adjustment (Caltrans 2013).

b. Vibration

Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent buildings or structures and vibration energy that may propagate through the buildings or structures. Vibration may be felt, may manifest as an audible low-frequency rumbling noise (referred to as groundborne noise), and may cause windows, items on shelves, and pictures on walls to rattle. Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern from vibration is that it can be intrusive and annoying to building occupants at vibration-sensitive land uses and may cause structural damage.

Typically, ground-borne vibration generated by manmade activities attenuates rapidly as distance from the source of the vibration increases. Vibration amplitudes are usually expressed in peak particle velocity (PPV). The PPV velocity is normally described in inches per second (in/sec). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used as it corresponds to the stresses that are experienced by buildings (Caltrans 2020).

High levels of groundborne vibration may cause damage to nearby building or structures; at lower levels, groundborne vibration may cause minor cosmetic (i.e., non-structural damage) such as cracks. These vibration levels are nearly exclusively associated with high impact activities such as blasting, pile-driving, vibratory compaction, demolition, drilling, or excavation.

c. Sources of Noise and Vibration

The Project area encompasses all of the City of Agoura Hills. Motor vehicles, including cars/light trucks, buses, and various types of heavy-duty trucks, are the most substantial sources of noise in most of the Project area. These sources can be attributed to the extensive network of major, primary, and secondary arterials located throughout the city, as well as the large number of vehicle trips that occur each day. Railway and airport noise sources are located far from the City of Agoura Hills and therefore noise levels associated with those sources are negligible; specifically, the nearest airport (Van Nuys Airport) is located approximately 14.2 miles east of the city, and the nearest railroad tracks are located approximately 7.4 miles to the north of the city.

In order to classify existing noise levels from mobile noise sources, existing roadway noise contours are shown in in Figure N-1 of the City of Agoura Hills General Plan 2035 (Agoura Hills 2022). U.S. Highway 101 (Ventura Freeway) and arterial roads, such as Kanan Road, Thousand Oaks Boulevard and Agoura Road, generate the greatest level of noise exposure in the community. Existing residential uses in close proximity to these roadway segments could be exposed to high noise levels on a regular basis; noise levels along the Ventura Freeway corridor could exceed 70 dBA CNEL near the freeway (Caltrans 2017).

d. Sensitive Receptors

Noise-sensitive land uses include locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. Chapter 5, *Community Safety,* of the City of Agoura Hills General Plan 2035 identifies noise-sensitive land uses as schools, libraries, hospitals, other medical facilities, and residences (Agoura Hills 2022). Vibration-sensitive receptors, which are similar to noise-sensitive receptors, include residences and institutional uses, such as schools, churches, and hospitals. Vibration-sensitive receptors also include buildings where vibrations may interfere with vibration-sensitive equipment or historic buildings that could sustain damage from strong vibrations. Sensitive receptors adjacent to individual project site boundaries include residences, schools, and medical facilities.

4.9.2 Regulatory Setting

a. Federal Regulations

FTA Transit and Noise Vibration Impact Assessment Manual

The FTA provides reasonable criteria for assessing construction noise impacts based on the potential for adverse community reaction in their *Transit and Noise Vibration Impact Assessment Manual* (FTA 2018). For residential, commercial, and industrial uses, the daytime noise threshold is 80 dBA L_{eq}, 85 dBA L_{eq}, and 90 dBA L_{eq} for an eight-hour period, respectively.

Occupational Health and Safety Administration

The federal government regulates occupational noise exposure common in the workplace through the Occupational Health and Safety Administration (OSHA) under the U.S. EPA. Noise limitations would apply to the operation of construction equipment and could also apply to operational equipment proposed as part of the Project. Noise exposure of this type is dependent on work conditions and is addressed through a facility's Health and Safety Plan, as required under OSHA.

b. State Regulations

California General Plan Guidelines, Government Code Section 65302(f)

State law requires general plans to include a Noise Element under Government Code Section 65302(f). The California General Plan Guidelines, published by the Governor's Office of Planning and Research, indicate acceptable, specific land use types in areas with specific noise exposure. The guidelines also offer adjustment factors that may be used to arrive at noise acceptability standards that reflect the noise control goals of the community, the community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution. These Guidelines are advisory, and local jurisdictions have the authority to set specific noise standards based on local conditions.

c. Local Regulations

City of Agoura Hills General Plan 2035

The City of Agoura Hills General Plan 2035 was adopted on March 24, 2010 (updated on August 10, 2022) by the City Council (City of Agoura Hills 2022). The City of Agoura Hills General Plan 2035 is a

strategic document designed to guide the physical development of the city until the year 2035. Among other things, the City of Agoura Hills General Plan 2035 sets out the pattern of land uses, including residential, commercial, and industrial. It also establishes the system of streets, bikeways, and trails. The City of Agoura Hills General Plan 2035 addresses a wide variety of subject areas, including housing, traffic, natural resources, land uses, economic development, noise, and public safety.

Chapter 5, *Community Safety,* of the City of Agoura Hills General Plan 2035 specifies acceptable ranges of noise levels for various land use categories. These ranges, shown in Table 4.9-1, help determine compatibility between existing and future land uses. The Community Safety chapter also contains interior and exterior noise standards for various land use categories, shown in Table 4.9-2.

The City of Agoura Hills General Plan 2035 (City of Agoura Hills 2010) also contains the following goals and policies related to noise and vibration, which would apply to the proposed Project:

Goal N-1. Minimized land use conflicts between various noise sources and other human activities.

Policy N-1.2. Require buildings and sites to be designed such that surrounding noise-sensitive uses are adequately buffered from noise-generating uses.

Policy N-1.6. Enforce standards that specify acceptable noise limits for various land uses throughout the City. Table 4.9-1 shows criteria used to assess the compatibility of proposed land uses with the noise environment. These criteria are the bases of specific Noise Standards. These standards, presented in Table 4.9-2, define City policy related to land uses and acceptable noise levels.

Goal N-3. Minimized non-transportation-related noise impacts on sensitive noise receptors.

Policy N-3.1. Continue to enforce interior and exterior noise standards to ensure that sensitive noise receptors are not exposed to excessive noise levels from stationary noise sources, such as machinery, equipment, fans, and air conditioning equipment.

Policy N-3.3. Continue to enforce restrictions on hours of construction activity so as to minimize the impacts of noise and vibration from the use of trucks, heavy drilling equipment, and other heavy machinery, including property maintenance equipment, to adjacent uses, particularly in residential areas.

Table 4.9-1 Noise/Land Use Compatibility Matrix

		Community Noise Equivalent Level (CNEL), dBA			
Categories	**Uses**	**Clearly Compatible**	**Normally Compatible**	**Normally Incompatible**	**Clearly Incompatible**
Residential	Single-Family, Duplex, Multiple Family	<55 – 59	60 – 69	70 – 74	75+
Residential	Mobile Homes	<55 – 59	60 – 64	65 – 74	75+
Commercial Regional, District	Hotels, Motels, Transient Lodging	<55 – 59	60 – 69	70 – 79	80+
Commercial Regional, Village District, Special	Commercial Retail, Banks, Restaurants, Movie Theaters	<55 – 69	70 – 79	80+	n/a
Commercial Industrial Institutional	Office Buildings, Research and Development, Professional Offices, City Office Building	<55 – 64	65 – 74	75 – 79	80+

Categories	Uses	Community Noise Equivalent Level (CNEL), dBA			
		Clearly Compatible	Normally Compatible	Normally Incompatible	Clearly Incompatible
Commercial Recreation **Institutional** Civic Center	Amphitheaters, Concert Halls, Auditoriums, Meeting Halls	n/a	<55 – 59	60 – 69	70+
Commercial Recreation	Children's Amusement Parks, Miniature Golf Courses, Go-cart Tracks, Equestrian Centers, Sports Clubs	<55 – 64	65 – 74	n/a	75+
Commercial General, Special **Industrial** **Institutional**	Automobile Service Stations, Auto Dealerships, Manufacturing, Warehousing, Wholesale, Utilities	<55 – 69	70+	n/a	n/a
Institutional General	Hospitals, Churches, Libraries, School Classrooms	<55 – 59	60 – 64	65 – 74	75+
Open Space	Parks	<55 – 64	65 – 69	70 – 74	75+
Open Space	Golf Courses, Cemeteries, Nature Centers, Wildlife Habitat	<55 – 69	70 – 74	75+	n/a

Clearly Compatible. Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

Normally Compatible. New construction or development should be undertaken only after detailed analysis of the noise reduction requirements is made and needed noise insulation features in the design are determined. Conventional construction, with closed windows and fresh air supply systems or air conditioning will normally suffice.

Normally Incompatible. New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Incompatible. New construction or development should generally not be undertaken.

Source: City of Agoura Hills 2022

Table 4.9-2 Interior and Exterior Noise Standards

Land Use Categories		CNEL	
Categories	Uses	Interior[a]	Exterior[b]
Residential	Single Family, Duplex, Multiple Family	45[c]	55
	Mobile Homes	45	55
Commercial	Hotels, Motels, Transient Lodging	45	n/a
	Commercial Retail, Banks, Restaurants	55	n/a
	Office Buildings, Research and Development, Professional Offices, City Office Building	50	n/a
	Amphitheaters, Concert Halls, Auditoriums, Meeting Halls	45	n/a
	Gymnasiums (multipurpose)	50	n/a
	Sports Clubs, Movie Theaters	55	n/a
Industrial	Manufacturing, Warehousing, Wholesale, Utilities	65	n/a
Institutional	Hospitals, School Classrooms	45	55
	Churches, Libraries	45	55

Land Use Categories		CNEL	
Categories	**Uses**	**Interior[a]**	**Exterior[b]**
Open Space	Parks	n/a	65

a. Includes bathrooms, toilets, closets, corridors

b. Limited to the following:

- Private yard of single-family.
- Multi-family private patio or balcony which is served by a means of exit from inside the dwelling.
- Balconies 6 feet deep or less are exempt.
- Mobile home park.
- Park's picnic area.
- Schools' playground.

c. Noise level requirement with closed windows. Mechanical ventilating system or other means of natural ventilation shall be provided as of Chapter 12, Section 1205 of UBC.

Source: City of Agoura Hills 2022

Agoura Hills Municipal Code

Chapter 6, Section 9656.2 of the Agoura Hills Municipal Code (AHMC) contains exterior noise standards based on time of day, as shown in Table 4.9-3. The AHMC prohibits the creation of any noise that exceeds these exterior noise limits, as measured at the property line of another residential property.

Table 4.9-3 City of Agoura Hills Exterior Noise Standards

Noise Zone[1]	Noise Level[2]	Time Period
1	55 dBA	7:00 a.m. – 10:00 p.m.
	50 dBA	10:00 p.m. – 7:00 a.m.

[1] Per Chapter 6, Section 9656.1, "[a]ll properties located in residential zone districts" are assigned to noise zone 1 (City of Agoura Hills 2024).

[2] In the event the alleged offensive noise consists entirely of impact noise, simple tone noise, speech, music, or any combination thereof, each of the above noise levels shall be reduced by five dBA.

Source: City of Agoura Hills Municipal Code, Chapter 6, Section 9656 (City of Agoura Hills 2024b)

Furthermore, Section 7.08.060(b) of the AHMC imposes additional limits to the exterior noise standards shown in Table 4.9-3 depending on the duration of the noise, stating it is unlawful for any person at any location within the city to create noise exceeding:

- The noise standard for a cumulative period of more than 15 minutes in any hour;
- The noise standard plus 5 dBA for a cumulative period of more than 10 minutes in any hour;
- The noise standard plus 10 dBA for a cumulative period of more than five minutes in any hour;
- The noise standard plus 15 dBA for a cumulative period of more than one minute in any hour; or
- The noise standard plus 20 dBA for any period of time.

Additionally, Section 9656.2(c) of the AHMC states "[i]n the event the ambient noise level exceeds any of the noise limit categories above, the noise level applicable to said category shall be increased to reflect said ambient noise level". However, Section 9656.4(e) exempts "noise sources associated with construction, repair, remodeling, or grading of any real property, provided said activities do not take place between the hours of 8:00 p.m. and 7:00 a.m. on weekdays, including Saturday, or at any time on Sunday or a legal holiday."

4.9.3 Impact Analysis

a. Methodology and Significance Thresholds

As discussed in Section 4.0, *Environmental Impact Analysis*, all Project components are analyzed at the programmatic level. Project components include the Bicycle Master Plan (BMP), the VMT Mitigation Exchange and Banking Program (Program), and the General Plan Amendments (Amendments). Projects included within the BMP are grouped into Class I facilities, Class II facilities, Class III facilities, Class IV facilities, and enhanced bicycle treatments, as identified in Section 2.5, *Project Characteristics,* and in Table 1 of Chapter 2, *Project Description.* The impact analysis contained herein provides a programmatic analysis of anticipated impacts for each of the five facility classes, as the individual project impacts associated with each class of facility are expected to be similar. Because the City seeks to prioritize implementation of the Medea Creek Path (Path) and the Agoura High School Connection (Connection), the Path and the Connection have their own subheadings within the Class I Facility impact analysis subsection to provide a more specific assessment of their environmental impacts. Impacts associated with the General Plan Amendments are analyzed within their own subsection.

As discussed in Chapter 2, *Project Description*, the only projects that are currently planned, unfunded, and could potentially be funded by the VMT Mitigation Exchange and Banking Program are those currently included within the Bicycle Master Plan. Therefore, the impact analysis contained herein does not include a subsection for impacts associated with the Program, as the individual project list for the BMP and the Program are identical and impacts associated with the BMP would encompass impacts associated with the Program.

Within the following environmental analysis, impacts associated with each Project component are explicitly identified under the respective heading.

According to Appendix G of the *California Environmental Quality Act* (CEQA) *Guidelines*, impacts related to noise and vibration would be significant if the proposed Project would:

1. Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies;
2. Generate excessive groundborne vibration or groundborne noise levels; or,
3. For a Project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of public airport or public use airport, expose people residing or working in the Project area to excessive noise levels.

Construction Noise

The City does not have a quantified noise level to assess noise impacts during construction, as daytime construction activities are exempt from noise thresholds under AHMC Section 9656.4(e). Therefore, implementation of individual projects identified within the BMP would result in a significant impact if temporary construction noise produced during daytime hours could expose noise-sensitive receptors to adverse noise levels that substantially exceed the FTA's standard of 80 dBA $L_{eq(8\text{-}hour)}$ at residential receptors. FTA's noise standard of 80 dBA $L_{eq(8\text{-}hour)}$ would also be applied to other sensitive receptors, including schools, libraries, hospitals or other medical facilities, in the vicinity of the project boundaries.

For the purpose of this analysis, construction noise associated with implementation of the proposed Bicycle Master Plan is estimated based on reference noise levels reported by the FTA's *Noise and Vibration Impact Assessment* (FTA 2018) for various pieces of construction equipment. Due to the linear nature of the proposed bicycle facilities, construction equipment would be mobile along individual project sites throughout the day. Therefore, it is conservatively assumed that construction equipment would generally operate as close as 25 feet from the nearest noise-sensitive receptors at any given time. Construction noise level estimates do not account for the presence of intervening structures or topography, which could reduce noise levels at receptor locations.

Operational Noise

Operational noise associated with the BMP would include landscaping and maintenance activities, portable amplified music from facility users, and people's voices. Pursuant to AHMC Section 9656.2, operational noise would be significant if exterior noise levels at residences exceed 55 dBA during daytime hours of 7:00 a.m. to 10:00 p.m., and 50 dBA during nighttime hours of 10:00 p.m. to 7:00 a.m.

Groundborne Vibration

The City does not have a quantified threshold to assess vibration impacts during construction and operation. Therefore, the *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018) is used to evaluate potential impacts from vibration during construction activities related to potential building damage. Construction vibration impacts from implementation of individual projects identified within the BMP would be significant if vibration levels exceed the FTA criteria identified in Table 4.9-4. For example, impacts would be significant if vibration levels exceed 0.12 in/sec PPV at buildings extremely susceptible to vibration damage (e.g. historical buildings), 0.2 in/sec PPV at non-engineered timber and masonry buildings (e.g. residential structures), 0.3 in/sec PPV at engineered concrete and masonry (no plaster) (e.g. commercial structures) and 0.5 in/sec PPV at reinforced-concrete, steel or timber (no plaster) (e.g. industrial buildings). These are the identified limits where minor cosmetic (i.e., non-structural) damage may occur to these buildings. Therefore, for a conservative analysis, construction vibration impacts would be significant if vibration levels exceed 0.12 in/sec PPV at nearby buildings.

Table 4.9-4 Vibration-related Building Damage Thresholds

Building Category	PPV (in/sec)
I. Reinforced-concrete, steel or timber (no plaster)	0.50
II. Engineered concrete and masonry (no plaster)	0.30
III. Non-engineered timber and masonry buildings	0.20
IV. Buildings extremely susceptible to vibration damage	0.12

PPV = peak particle velocity

in/sec = inches per second

L_v = root mean square velocity in decibels (VdB) re 1 micro-inch/second

Source: FTA 2018

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Impact NOI-1 CONSTRUCTION OF INDIVIDUAL BICYCLE FACILITIES IDENTIFIED IN THE BICYCLE MASTER PLAN WOULD TEMPORARILY PRODUCE HIGH NOISE LEVELS, POTENTIALLY IMPACTING NEARBY NOISE-SENSITIVE LAND USES. OPERATION OF THE BICYCLE FACILITIES IS NOT ANTICIPATED TO INCREASE ON-SITE NOISE LEVELS OR RESULT IN ADDITIONAL TRANSPORTATION NOISE. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

Class I Facilities

Construction of Class I facilities would require clearing and grubbing, pavement demolition, grading, utility relocation, retaining wall or fencing installation, asphalt paving or repaving, street and undercrossing improvements, striping, and revegetation. Table 4.9-5 illustrates typical noise levels associated with various common types of construction equipment required for these activities at a distance of 25 feet, which is a conservative assumption of the distance of construction activities to the nearest sensitive receptors. Noise from stationary sources of construction equipment typically drops off at a rate of six dBA per doubling of distance; therefore, as shown in the table, noise levels would be approximately six dBA lower than shown in the table at 50 feet from source construction site and 12 dBA lower at a distance of 100 feet from source construction site.

Table 4.9-5 Typical Noise Levels for Construction Equipment (dBA)

Equipment	Typical Level 25 feet from the Source	Typical Level 50 feet from the Source	Typical Level 100 feet from the Source
Air Compressor	86	80	74
Backhoe	86	80	74
Concrete Mixer	91	85	79
Dozer	91	85	79
Grader	91	85	79
Jack Hammer	94	88	82[1]
Loader	86	80	74
Paver	91	85	79
Roller	91	85	79
Saw	82	76	70
Scarified	89	83	77
Scraper	91	85	79
Truck	90	84	78

Source: FTA 2018

[1] A jackhammer would exceed 80 dBA within 125 feet.

As shown in Table 4.9-5, construction noise levels could exceed 80 dBA $L_{eq(8\text{-hour})}$ at adjacent sensitive receptors located up to 125 feet away from construction activities associated with implementation of the Class I facilities, including at the residences located on Medfield Street adjacent to the

proposed Medfield Path and the residences on Dovetail Drive adjacent to the proposed Class I facility on Reyes Adobe Road.

Section 9656.4 of the AHMC exempts specified activities from the provisions of Section 9656 including noise sources associated with construction, repair, remodeling, or grading of any real property, provided said activities do not take place between the hours of 8:00 p.m. and 7:00 a.m. on weekdays, including Saturday, or at any time on Sunday or a legal holiday. Implementation of General Plan Policy N-3.3 would also minimize construction noise through restrictions on construction hours. Nonetheless, construction noise levels may exceed FTA's standard of 80 dBA L_{eq} within a distance of 125 feet, and construction noise impacts would be potentially significant. Therefore, construction would result in a potentially significant impact, and mitigation would be required..

Operation of the Class I facilities would consist of bicycle and pedestrian travel along shared use paths. These activities would not contribute to existing traffic noise on or off-site. Operation could result in new sources of noise associated with landscaping and maintenance activities, portable amplified music from facility users, and people's voices. Noise from these sources would be required to comply with AHMC Section 9656.2. Therefore, operation of the Class I facilities would not expose neighboring noise-sensitive land uses to noise levels exceeding the City's existing standards shown in Table 4.9-3. Noise impacts associated with operation of the Class I facilities would be less than significant.

MEDEA CREEK PATH

Construction of the Madea Creek Path would temporarily increase ambient noise levels on and adjacent to areas where construction is occurring. As shown in Table 4.9-5, noise levels from individual pieces of construction equipment could exceed 80 dBA $L_{eq(8\text{-}hour)}$ at adjacent sensitive receptors located up to 125 feet away from construction activities, including at residences located adjacent to the proposed Path's alignment, and may temporarily disturb people at neighboring properties. Although implementation of General Plan Policy N-3.3 would minimize construction noise through restrictions on construction hours, construction noise levels would still exceed 80 dBA L_{eq} within a distance of 125 feet. Therefore, this impact would be potentially significant, and mitigation would be required.

Operation of the Path would consist of bicycle and pedestrian travel along a shared use path. These activities would not contribute to existing traffic noise on or off-site. Operation could result in new sources of noise associated with landscaping and maintenance activities, portable amplified music from facility users, and people's voices. Noise from these sources would be required to comply with AHMC Section 9656.2. Therefore, operation of the Path would not expose neighboring noise-sensitive land uses to noise levels exceeding the City's existing standards shown in Table 4.9-3. Noise impacts associated with operation of the Path would be less than significant.

AGOURA HIGH SCHOOL CONNECTION

Construction of the Agoura High School Connection would temporarily increase ambient noise levels on and adjacent to areas where construction is occurring. As shown in Table 4.9-5, noise levels from individual pieces of construction equipment could exceed 80 dBA $L_{eq(8\text{-}hour)}$ at adjacent sensitive receptors located up to 125 feet away from construction activities, which include residences located on Carell Avenue and Agoura High School. Although implementation of General Plan Policy N-3.3 would minimize construction noise through restrictions on construction hours, construction noise

levels would still exceed 80 dBA L_{eq} within a distance of 125 feet. Therefore, this impact would be potentially significant, and mitigation would be required during construction.

Operation of the Connection would consist of bicycle and pedestrian travel along a shared use path. These activities would not contribute to existing traffic noise on or off-site. Operation could result in new sources of noise associated with landscaping and maintenance activities, portable amplified music from facility users, and people's voices. Noise from these sources would be required to comply with AHMC Section 9656.2. Therefore, operation of the Connection would not expose neighboring noise-sensitive land uses to noise levels exceeding the City's existing standards shown in Table 4.9-3. Noise impacts associated with operation of the Connection would be less than significant.

Class II Facilities

Construction of Class II facilities would generally require roadway restriping and reconfiguration of lane widths to accommodate new dedicated bike lanes. Pavement widening would be necessary on Driver Avenue, between Easterly Road and Colodny Drive, and on Cornell Road, between Agoura Road and Cornell Way to allow for the addition of bicycle lanes. Pavement widening would require clearing and grubbing, subgrade stabilization, base course installation, and asphalt paving. Common types of construction equipment required for these activities include concrete mixers, dozers, graders, pavers, rollers, scrapers, and haul trucks. Table 4.9-5 illustrates typical noise levels associated with these types of construction equipment. As shown therein, noise levels from individual pieces of construction equipment could exceed 80 dBA $L_{eq(8\text{-}hour)}$ at adjacent sensitive receptors located up to 50 feet away from construction activities, including at the residences adjacent to Driver Road Avenue. Although implementation of General Plan Policy N-3.3 would minimize construction noise through restrictions on construction hours, construction noise levels would still exceed 80 dBA L_{eq} within a distance of 50 feet. Therefore, this impact would be potentially significant, and mitigation would be required during construction.

Operation of the Class II facilities would consist of bicycle travel along delineated bike lanes. These activities would not contribute to existing traffic noise on or off-site. Operation could result in new sources of noise associated with landscaping and maintenance activities, portable amplified music from facility users, and people's voices. Noise from these sources would be required to comply with AHMC Section 9656.2. Therefore, operation of the Class II facilities would not expose neighboring noise-sensitive land uses to noise levels exceeding the City's existing standards shown in Table 4.9-3. Noise impacts associated with operation of the Class II facilities would be less than significant.

Class III Facilities

Construction of Class III facilities would require roadway restriping to identify bike routes. Common types of construction equipment required for these activities include an air compressor. Typical noise levels associated with this type of construction equipment is 86 dBA at a distance of 25 feet, which would exceed 80 dBA $L_{eq(8\text{-}hour)}$ at adjacent residences located approximately 25 feet away from restriping activities. Although implementation of General Plan Policy N-3.3 would minimize construction noise through restrictions on construction hours, construction noise levels would exceed 80 dBA L_{eq} within a distance of 25 feet. Therefore, this impact would be potentially significant, and mitigation would be required during construction.

Operation of the Class III facilities would consist of bicycle travel along shared use travel lanes. These activities would not contribute to existing traffic noise on or off-site. Operation could result in new sources of noise associated with landscaping and maintenance activities, portable amplified

music from facility users, and people's voices. Noise from these sources would be required to comply with AHMC Section 9656.2. Therefore, operation of the Class III facilities would not expose neighboring noise-sensitive land uses to noise levels exceeding the City's existing standards shown in Table 4.9-3. Noise impacts associated with operation of the Class III facilities would be less than significant.

ClassI IV Facilities

Construction of Class IV facilities would require pavement demolition, minor grading, bollard or fencing installation, asphalt paving or repaving, and striping. Table 4.9-5 illustrates typical noise levels associated with various common types of construction equipment required for these activities. As shown therein, noise levels from individual pieces of construction equipment could exceed 80 dBA $L_{eq(8\text{-}hour)}$ at adjacent sensitive receptors located up to 125 feet away from construction activities, including at the residences adjacent to Thousand Oaks Boulevard and Kanan Road. Although implementation of General Plan Policy N-3.3 would minimize construction noise through restrictions on construction hours, construction noise levels would still exceed 80 dBA L_{eq} within a distance of 125 feet. Therefore, this impact would be potentially significant, and mitigation would be required during construction.

Operation of the Class IV facilities would consist of bicycle travel along physically separated bikeways adjacent to travel lanes. These activities would not contribute to existing traffic noise on or off-site. Operation could result in new sources of noise associated with landscaping and maintenance activities, portable amplified music from facility users, and people's voices. Noise from these sources would be required to comply with AHMC Section 9656.2. Therefore, operation of the Class IV facilities would not expose neighboring noise-sensitive land uses to noise levels exceeding the City's existing standards shown in Table 4.9-3. Noise impacts associated with operation of the Class IV facilities would be less than significant.

Enhanced Bicycle Treatments

Enhanced bicycle treatments would include street striping and restriping, signage and wayfinding, bicycle signals and detection at traffic signals, bicycle parking, and bicycle repair facilities. Construction activities associated with these facilities would be generally minor but may still require use of some of construction equipment identified in Table 4.9-5, such as an air compressor for restriping. Typical noise levels associated with this type of construction equipment is 86 dBA at a distance of 25 feet, which would exceed 80 dBA $L_{eq(8\text{-}hour)}$ at adjacent sensitive receptors located approximately 25 feet away from the restriping activities. Although implementation of General Plan Policy N-3.3 would minimize construction noise through restrictions on construction hours, construction noise levels would exceed 80 dBA L_{eq} within a distance of 25 feet. Therefore, impacts would be potentially significant, and mitigation would be required during construction.

Operation of the enhanced bicycle treatments would include continued use of existing bicycle facilities, storing of bicycles at new parking facilities, and use of bicycle repair facilities. These activities would not contribute to existing traffic noise on or off-site. Furthermore, operation of these facilities would not be expected to result in new sources of noise associated with landscaping and maintenance activities, portable amplified music from facility users, or people's voices. Nonetheless, any operational noise associated with the use of the enhanced bicycle treatments would be required to comply with AHMC Section 9656.2. Therefore, operation of the enhanced bicycle treatments would not expose neighboring noise-sensitive land uses to noise levels exceeding the City's existing standards shown in Table 4.9-3. Noise impacts associated with the enhanced bicycle treatments of the Class I facilities would be less than significant.

General Plan Amendments

As part of the proposed Project, the City must amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. These General Plan Amendments shift the focus from prioritizing automobile mobility to reducing vehicle miles traveled (VMT) through alternative transportation modes like walking and biking, guided by the BMP. The proposed General Plan Amendments would not result in construction or operation activities beyond existing conditions. Therefore, the Amendments would not expose any noise-sensitive land uses to noise levels exceeding the FTA's or the City's existing noise standards. No impact would occur.

Mitigation Measures

N-1 Construction Noise Reduction Measures

The following construction noise reduction measures shall be included as standard conditions of approval for projects involving construction within 125 feet of a sensitive receptor:

- Properly muffle and maintain all construction equipment powered by internal combustion engines;
- Prohibit unnecessary idling of combustion engines;
- Locate all stationary noise-generating construction equipment (such as air compressors) as far as practical from existing nearby residences and other noise-sensitive land uses;
- Select quiet construction equipment, particularly air compressors, whenever possible;
- Fit motorized equipment with proper mufflers in good working order;
- Residences, schools, libraries, hospitals or other medical care facilities adjacent to individual project sites shall be notified, in advance and by writing, of the proposed construction schedule before construction activities commence, including details for the noise disturbance coordinator; and,
- Construction of each individual project identified within the BMP shall have a designated "noise disturbance coordinator" responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of noise complaints and shall require that reasonable measures be implemented to correct the problem. A telephone number for the disturbance coordinator shall be posted at the construction site.

Significance After Mitigation

Implementation of Mitigation Measure N-1 would require all construction equipment powered by internal combustion engines be properly muffled and maintained. Properly muffling and maintaining construction equipment would reduce construction noise impacts by 10 dBA (FHWA 2017). Properly muffling and maintaining all construction equipment powered by internal combustion engines in combination with the other identified noise reduction measures would ensure construction noise levels would not exceed 80 dBA $L_{eq(8\text{-}hour)}$. Therefore, with implementation of Mitigation Measure N-1, construction noise impacts would be less than significant.

Threshold 2:	Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?

Impact NOI-2 CONSTRUCTION OF INDIVIDUAL BICYCLE FACILITIES IDENTIFIED IN BICYCLE MASTER PLAN WOULD TEMPORARILY GENERATE GROUNDBORNE VIBRATION, POTENTIALLY AFFECTING ADJACENT SENSITIVE LAND USES. OPERATION ACTIVITIES ARE NOT ANTICIPATED TO INCREASE ON-SITE VIBRATION LEVELS. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

Class I Facilities

Construction of Class I facilities would require clearing and grubbing, pavement demolition, grading, utility relocation, retaining wall or fencing installation, asphalt paving or repaving, street and undercrossing improvements, striping, and revegetation. Typical construction equipment used for these types of activities that produce vibration include vibratory rollers, caisson drills, bulldozers, loaded trucks, and jackhammers. Use of these types of construction equipment could intermittently generate strong vibration on and adjacent to construction sites. Table 4.9-6 identifies the estimated vibration levels from the use of typical construction equipment, based on reference levels provided by the FTA. As identified therein, vibration-sensitive receptors located within 25 feet of construction activities would experience the strongest vibration during the use of vibratory rollers at neighboring construction sites. Specifically, vibration levels during use of vibratory rollers could approach 0.210 in/sec PPV at a distance of 25 feet from the source, and 0.074 in/sec PPV at 50 feet.

Table 4.9-6 Vibration Levels for Typical Construction Equipment

	Estimated in/sec PPV at Nearest Sensitive Receptors			
Equipment	**25 Feet**	**50 Feet**	**100 Feet**	**200 Feet**
Vibratory Roller	0.210	0.074	0.026	0.009
Caisson Drilling	0.089	0.031	0.011	0.004
Large Bulldozer	0.089	0.031	0.011	0.004
Loaded Trucks	0.076	0.027	0.010	0.003
Jackhammer	0.035	0.012	0.004	0.002
Small Bulldozer	0.003	0.001	0.000	0.000

Source: FTA 2006

Compliance with AHMC Section 9656.4 and adherence to General Plan Policy N-3.3 would restrict construction activities to the hours of 7:00 a.m. to 8:00 p.m. Monday through Saturday, which would reduce the exposure of vibration to people who are sleeping during the nighttime hours. Nonetheless, vibration from a vibratory roller would exceed the FTA's threshold of 0.12 in/sec PPV for buildings extremely susceptible to vibration damage (e.g. historical buildings) at distances of 37 feet or less. At distances of 26 feet or less, vibration from a vibratory roller would exceed the FTA's threshold of 0.2 in/sec PPV for non-engineered timber and masonry buildings (e.g., a typical residential structure). For a conservative analysis, it is assumed that construction vibration levels would be significant if the 0.12 in/sec PPV threshold is exceeded for any off-site structures. Therefore, use of a vibratory roller during construction would exceed FTA's threshold of 0.12 in/sec PPV at off-site structures within 37 feet, and this impact would be potentially significant. Implementation of mitigation would be required.

Operation of the Class I facilities would consist of bicycle and pedestrian travel along shared use paths. These activities would not result in a new substantial source of vibration. Therefore, operational groundborne vibration impacts would be less than significant.

MEDEA CREEK PATH

Construction of the Medea Creek Path could intermittently generate strong vibration on and adjacent to areas where construction is occurring. As shown in Table 4.9-6, vibration levels during use of a vibratory roller within 25 feet of a nearby building would exceed the FTA's threshold of 0.12 in/sec PPV and may temporarily disturb people at neighboring properties. This impact would be potentially significant, and implementation of mitigation would be required.

Operation of the Path would consist of bicycle and pedestrian travel along a shared use path. These activities would not result in a new substantial source of vibration. Therefore, operational groundborne vibration impacts would be less than significant.

AGOURA HIGH SCHOOL CONNECTION

Construction of the Agoura High School Connection could intermittently generate strong vibration on and adjacent to areas where construction is occurring. As shown in Table 4.9-6, vibration levels during use of a vibratory roller within 25 feet of a nearby building would exceed the FTA's threshold of 0.12 in/sec PPV and may temporarily disturb people at neighboring properties. This impact would be potentially significant, and implementation of mitigation would be required.

Operation of the Connection would consist of bicycle and pedestrian travel along a shared use path. These activities would not result in a new substantial source of vibration. Therefore, operational groundborne vibration impacts would be less than significant.

Class II Facilities

Construction of Class II facilities would generally require roadway restriping and reconfiguration of lane widths to accommodate new dedicated bike lanes. Pavement widening would be necessary on Driver Avenue, between Easterly Road and Colodny Drive, and on Cornell Road, between Agoura Road and Cornell Way to allow for the addition of bicycle lanes. Pavement widening would require clearing and grubbing, subgrade stabilization, base course installation, and asphalt paving. A vibratory roller would be required for paving activities. As shown in Table 4.9-6, vibration levels during use of a vibratory roller within 25 feet of a nearby building would exceed the FTA's threshold of 0.12 in/sec PPV and may temporarily disturb people at neighboring properties. This impact would be potentially significant, and implementation of mitigation would be required.

Operation of the Class II facilities would consist of bicycle travel along delineated bike lanes. These activities would not result in a new substantial source of vibration. Therefore, operational groundborne vibration impacts would be less than significant.

Class III Facilities

Construction of Class III facilities would require roadway restriping to identify bike routes. Roadway restriping would not require the use of construction equipment that would produce vibration. Therefore, vibration levels during implementation of the Class III facilities would not exceed the FTA's threshold of 0.12 in/sec PPV. This impact would be less than significant.

Operation of the Class III facilities would consist of bicycle travel along shared use travel lanes. These activities would not result in a new substantial source of vibration. Therefore, operational groundborne vibration impacts would be less than significant.

Class IV Facilities

Construction of Class IV facilities would require pavement demolition, minor grading, bollard or fencing installation, asphalt paving or repaving, and striping. Typical construction equipment used for these types of activities that produce vibration include vibratory rollers, caisson drills, bulldozers, loaded trucks, and jackhammers. Use of these types of construction equipment could intermittently generate strong vibration on and adjacent to construction sites. As shown in Table 4.9-6, vibration levels during use of a vibratory roller within 25 feet of a nearby building would exceed the FTA's threshold of 0.12 in/sec PPV and may temporarily disturb people at neighboring properties. This impact would be potentially significant, and implementation of mitigation would be required.

Operation of the Class IV facilities would consist of bicycle travel along physically separated bikeways adjacent to travel lanes. These activities would not result in a new substantial source of vibration. Therefore, operational groundborne vibration impacts would be less than significant.

Enhanced Bicycle Treatments

Enhanced bicycle treatments would include street striping and restriping, signage and wayfinding, bicycle signals and detection at traffic signals, bicycle parking, and bicycle repair facilities. Implementation of these facilities would not require the use of construction equipment that would produce vibration. Therefore, vibration levels during implementation of the Class enhanced bicycle treatments would not exceed the FTA's threshold of 0.12 in/sec PPV. This impact would be less than significant.

Operation of the enhanced bicycle treatments would include continued use of existing bicycle facilities, storing of bicycles at new parking facilities, and use of bicycle repair facilities. These activities would not result in a new substantial source of vibration. Therefore, operational groundborne vibration impacts would be less than significant.

General Plan Amendments

As part of the proposed Project, the City must amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. These General Plan Amendments shift the focus from prioritizing automobile mobility to reducing vehicle miles traveled VMT through alternative transportation modes like walking and biking, guided by the BMP. The proposed General Plan Amendments would not result in construction or operation activities beyond existing conditions. Therefore, the Amendments would not generate vibration. No impact would occur.

Mitigation Measures

N-2 Construction Vibration Control Plan

Prior to the issuance of any Grading Permit, the Public Works Department shall verify that the Project plans and specifications include provisions that require that paving activities within 37 feet of off-site structures utilize a static roller in lieu of a vibratory roller.

Significance After Mitigation

Mitigation Measure N-2 would require a static roller be used in lieu of a vibratory roller within 37 feet of an off-site structure. Use of a static roller would generate vibration levels of approximately 0.05 in/sec PPV at a distance of 25 feet (McIver 2012). With implementation of Mitigation Measure N-2, groundborne vibration associated with construction of individual projects would be less than the most conservative significance threshold of 0.12 in/sec PPV at adjacent off-site sensitive receptors in the vicinity of individual project sites. Therefore, with mitigation, impacts associated with project construction vibration at all surrounding sensitive receptors would be less than significant.

Threshold 3:	For a Project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels?

Impact NOI-3 NOISE-SENSITIVE RECEPTORS IN AGOURA HILLS WOULD BE LOCATED OUTSIDE OF NOISE CONTOURS ASSOCIATED WITH NEARBY AIRPORTS. NO IMPACT WOULD OCCUR.

The Van Nuys Airport is located approximately 14.2 miles east of the Project area. According to the Los Angeles County Airport Land Use Commission's Airport Influence Area Figure, the City of Agoura Hills, and therefore the Project area, is not located within the noise contours of the Van Nuys Airport or any other nearby airport (Los Angeles County Airport Land Use Commission 2003). Therefore, the implementation of the proposed Project would not expose people residing or working in the Project area to excessive aircraft noise levels. No impact would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

No impact would occur.

4.9.4 Cumulative Impacts

The geographic scope for cumulative noise and vibration impacts includes the areas immediately adjacent to the individual bicycle facilities proposed within the BMP, as noise and vibration attenuates rapidly when it travels from the source to the receiver. A cumulative assessment of noise and vibration considers the proposed Project in combination with ambient growth and other past, present, and reasonably foreseeable future projects, including the projects listed in Table 3-1, within the vicinity of the Project area. As discussed in Chapter 3, *Environmental Setting*, cumulative development would include recreation, residential, commercial, and office uses. Each proposed development would generate temporary noise and vibration impacts during construction. Construction schedules for some of the cumulative projects considered may align with implementation of the proposed Project. Construction noise and vibration are localized impacts that rapidly attenuate as distance from the source increases, especially within an urban environment. In addition, each individual project would need to comply with City standards regarding construction. Therefore, cumulative impacts related to construction noise and vibration would be less than significant.

The Project would have no impact related to noise or vibration during operation, nor is the Project area located within two miles of a public airport or within the noise contours identified in an airport land use plan. Therefore, the Project cannot contribute to a cumulative impact related to noise or vibration during operation, or excessive noise levels from aircraft operations.

4.10 Recreation

This section analyzes potential impacts to recreation. Specifically, this section discusses the environmental and regulatory setting, the criteria used to determine the significance of environmental impacts related to recreation, and potential impacts related to recreation that would result from implementation of the proposed Project.

4.10.1 Setting

a. Regional Parks and Recreation Facilities

The Project area encompasses all of the City of Agoura Hills. The Santa Monica Mountains National Recreation Area (SMMNRA) borders the City to the east and south. The SMMNRA is comprised of approximately 153,075 acres, features over 500 miles of trails, and is considered one of the largest urban national recreation areas in the country (City of Agoura Hills 2010a). SMMNRA is jointly operated by the National Park Service, California State Parks, Santa Monica Mountains Conservancy, and Mountains Recreation and Conservation Authority. Popular recreation sites within the SMMNRA include (National Park Service 2025):

- **Cheesebro/Palo Comado Canyon**. This recreation area features hiking, biking, and equestrian routes through generally undisturbed areas. The area is joined to the east by the Upper Las Virgenes Canyon Open Space Preserve (formerly Ahmanson Ranch), which consists of nearly 3,000 acres of open space.
- **Paramount Ranch**. This 2,700-acre resource offers hiking trails, a picnic area, and a western town movie set.
- **Peter Strauss Ranch**. This resource offers hiking, concerts, picnics, and art exhibits on approximately 78 acres.
- **Malibu Creek State Park**. This recreation area provides over 4,000 acres of open space land and features hiking and equestrian trails that lead through the wilderness preserve and across Mulholland Highway.

Other recreation facilities located near the city include parks within the Conejo Valley Recreation and Park District, parks within the community of Oak Park, and recreational resources within the communities of Thousand Oaks and Westlake Village (City of Agoura Hills 2022).

b. Local Parks and Recreation Facilities

The City of Agoura Hills has a variety of parks, recreation, and open space areas that provide land for recreational uses and the preservation of natural features. There are approximately 1,378 acres of land within the city classified as Local Park, Restricted Open Space, and Open Space/Deed Restricted land uses, all of which are intended to protect lands for open space uses. The Restricted Open Space land use includes areas for which development rights are assumed to exist, but development potential is constrained because of natural habitats, oak trees, visual/aesthetic values or other constraints. The Open Space/Deed Restricted land use includes areas with deed restrictions that provide additional limitations on their use as open space. Open Space/Deed Restricted areas are owned by both public agencies and private homeowners' associations; Morrison Ranch and Chateau Park are two residential tracks with large open space acreages that are maintained by private homeowners' associations. The city also has approximately 28 acres of Commercial Recreation land

use, which include commercial uses that are recreation-oriented with ancillary retail sales and restaurants, such as golf courses (City of Agoura Hills 2022).

There are seven key open space resources within the city including Lindero Canyon, Medea Creek, Ladyface Mountain, Palo Comado Hills, Morrison Hills, Southeast Ridge, and Indian Hills. These resources provide access to active and passive open spaces throughout the city and the surrounding area, as well as biological habitats for wildlife and visual value for the community (City of Agoura Hills 2022). In addition to open space areas, the City owns and maintains eight local neighborhood parks and two community centers including Chumash Park, Forest Cove Park, Morrison Park, Old Agoura Park, Reyes Adobe Park, Sumac Park, Agoura Hills Community Center, Agoura Hills/Calabasas Community Center. Local schools also serve as recreational facilities. Specifically, the Las Virgenes Unified School District includes five school sites that offer recreational uses outside of school hours. These sites offer open playfields and specialized facilities such as a pool, tennis courts, and a gymnasium (City of Agoura Hills 2022).

c. Trails

There is a network of existing trails throughout the City of Agoura Hills. This trail system links open space and recreational resources within the City of Agoura Hills to surrounding communities, including Thousand Oaks, Oak Park, and Westlake Village. Equestrian trails throughout the Old Agoura area provide equestrian access to the Santa Monica Mountains. The Zuma Ridge Trail also traverses the city, which allows for both pedestrian and equestrian access and connects to the national parklands surrounding the city (City of Agoura Hills 2010a).

4.10.2 Regulatory Setting

a. Federal Regulations

There are no federal regulations related to recreation that apply to the proposed Project.

b. State Regulations

State Public Park Preservation Act of 1971

The State Public Park Preservation Act is an instrument for protecting and preserving parkland in California. Under Division 5, Chapter 2.5 of the Public Resource Code, cities and counties may not acquire any real property that is in use as a public park for any non-park use unless compensation, land, or both, are provided to replace the parkland acquired. This provides no net loss of parkland and facilities.

c. Regional and Local Regulations

City of Agoura Hills General Plan 2035

The City of Agoura Hills General Plan 2035 was adopted on March 24, 2010 (updated on August 10, 2022) by the City Council (City of Agoura Hills 2022). The City of Agoura Hills General Plan 2035 is a strategic document designed to guide the physical development of the city until the year 2035. Among other things, the City of Agoura Hills General Plan 2035 sets out the pattern of land uses, including residential, commercial, and industrial. It also establishes the system of streets, bikeways, and trails. The City of Agoura Hills General Plan 2035 addresses a wide variety of subject areas,

including housing, traffic, natural resources, land uses, economic development, noise, and public safety.

The City of Agoura Hills General Plan 2035 contains the following goals and policies related to recreation, which would apply to the proposed Project.

Goal M-8. Enhanced bicycle facilities throughout Agoura Hills for short trips and recreational uses.

> **Policy M-8.1.** Provide bikeway connectivity between residential areas and surrounding natural resource areas, parks, schools, employment centers, and other activity centers in the community.
>
> **Policy M-8.3**. Encourage recreational biking and promote the community's mountain biking trail system to residents and visitors.

Goal CS-1. Balanced and comprehensive recreation facilities for the Agoura Hills community.

> **Policy CS-1.1**. Develop and maintain parks and recreational areas in accordance with the goals in Table CS-1.
>
> **Policy CS-1.3**. Connect recreational facilities with walking paths, trails, bikeways, and equestrian trails.
>
> **Policy CS-1.5**. Ensure that the location and design of all parks, recreation, and community centers are compatible with existing adjoining uses.
>
> **Policy CS-1.6.** Distribute parks and facilities so that they are well dispersed throughout the community, and include recreation opportunities for all residents
>
> **Policy CS-1.7**. When renovating and creating new recreational facilities, ensure accessible standards as specified in state and federal laws, such as the Americans with Disabilities Act (ADA).

Goal CS-2. Recreational programs and services that promote personal enrichment, healthy lifestyles, wellness, fun, lifelong learning, skill development, and community relationships.

> **Policy CS-2.1**. Provide a wide range of recreation opportunities designed to enrich the lives of all residents, including passive, active, individual, and organized recreational services, including reasonable accommodations for special needs individuals and groups.

In accordance with Goal CS-1 of the City of Agoura Hills General Plan 2035, the city seeks to maintain eight acres of parks and open space areas for every 1,000 residents. This goal is further divided into three acres of local park and recreational spaces for every 1,000 residents and five acres of open space areas for every 1,000 residents (City of Agoura Hills 2022). According to the California Department of Finance (DOF), the City of Agoura Hills had a population of 19,904 on January 1, 2025 (DOF 2025). Based on the approximately 1,378 acres of park and open space land uses, the city currently maintains nearly 70 acres of park and open space area for every 1,000 residents.

City of Agoura Hills Municipal Code

Article IX of the Agoura Hills Municipal Code (AHMC) contains the city's Zoning Code, which serves as the primary implementation tool of the City of Agoura Hills General Plan 2035. The Zoning Code designates certain zoning districts to maintain open space and recreation areas within the city.

Specifically, Section 9481 of the Zoning Ordinance designates the Open Space-Restricted District (OS-R) for areas that should be preserved as natural open space because of natural habitat, visual and aesthetic value or other reasons by restricting or transferring development rights. Section 9490 of the Zoning Ordinance designates the Open Space – Deed Restricted District (OS-DR) for areas which should be preserved as natural open space because of natural habitat, visual and aesthetic value or other reason by restricting development rights through deed restrictions. Section 9411 of the Zoning Ordinance designates the Local Park District (P) for local recreational and passive uses compatible with the nearby residential areas and the community.

Article X, Chapter 8 of the AHMC defines parkland dedication fees and codifies the parkland service level goals outlined in Chapter 3, *Infrastructure and Community Services,* of the City of Agoura Hills General Plan 2035. The regulations require subdividers to dedicate land to the city at a ratio based on proposed dwelling units to create parkland and recreation space.

4.10.3 Impact Analysis

a. Methodology and Significance Thresholds

As discussed in Section 4.0, *Environmental Impact Analysis*, all Project components are analyzed at the programmatic level. Project components include the Bicycle Master Plan (BMP), the VMT Mitigation Exchange and Banking Program (Program), and the General Plan Amendments (Amendments). Projects included within the BMP are grouped into Class I facilities, Class II facilities, Class III facilities, Class IV facilities, and enhanced bicycle treatments, as identified in Section 2.5, *Project Characteristics,* and in Table 1 of Chapter 2, *Project Description.* The impact analysis contained herein provides a programmatic analysis of anticipated impacts for each of the five facility classes, as the individual project impacts associated with each class of facility are expected to be similar. Because the City seeks to prioritize implementation of the Medea Creek Path (Path) and the Agoura High School Connection (Connection), the Path and the Connection have their own subheadings within the Class I Facility impact analysis subsection to provide a more specific assessment of their environmental impacts. Impacts associated with the General Plan Amendments are analyzed within their own subsection.

As discussed in Chapter 2, *Project Description*, the only projects that are currently planned, unfunded, and could potentially be funded by the VMT Mitigation Exchange and Banking Program are those currently included within the Bicycle Master Plan. Therefore, the impact analysis contained herein does not include a subsection for impacts associated with the Program, as the individual project list for the BMP and the Program are identical and impacts associated with the BMP would encompass impacts associated with the Program.

Within the following environmental analysis, impacts associated with each Project component are explicitly identified under the respective heading.

According to State CEQA Guidelines Appendix G, impacts related to recreation would be significant if the proposed Project would:

1. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or,
2. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Impact REC-1 BICYCLE FACILITIES IMPLEMENTED UNDER THE PROPOSED BMP WOULD NOT INCREASE THE USE OF RECREATIONAL FACILITIES SUCH THAT PHYSICAL DETERIORATION WOULD OCCUR OR BE ACCELERATED. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Class I Facilities

Construction of the Class I facilities would require clearing and grubbing, pavement demolition, grading, utility relocation, retaining wall or fencing installation, asphalt paving or repaving, street and undercrossing improvements, striping, and revegetation. Storage, staging, and active work areas would be established during the construction period for Class I facilities. These areas would be located outside of existing roadways within the individual project boundaries. At the time of construction, should the construction contractor require additional staging areas, they would be responsible for identifying and securing long-term staging areas on previously disturbed storage yards, the locations of which are currently unknown. Given the known locations of proposed Class I facilities, storage, staging, and active work areas would not occur within or adjacent to recreational facilities. Therefore, construction impacts associated with the implementation of Class I facilities would be less than significant

Operation of the Class I facilities would consist of bicycle and pedestrian travel along shared use paths. Implementation of Class I facilities would result in new and improved multimodal access throughout the city, including to existing parks and open space resources. Improved access could incrementally increase the number of visitors at recreational facilities within and surrounding the city. However, as determined in Section 4.13.5, *Population and Housing,* the proposed Project would not induce substantial population growth. Therefore, operation of the Class I facilities would not result in an increase in the use of existing recreational facilities such that the city would be unable to meet their service ratio goals, nor would substantial physical deterioration of recreational facilities occur or be accelerated. Operational impacts would be less than significant.

MEDEA CREEK PATH

The proposed Path would result in construction of a Class I facility along Medea Creek from Agoura Road to the northern city limit. Storage, staging, and active work areas would be established during construction activities. Because there is designated open space surrounding Medea Creek, the establishment of storage, staging, and active work areas could occur within or adjacent to this open space, which could restrict access to this recreational resource.

The City of Agoura Hills General Plan 2035 includes ratio goals for park and open space resources. Specifically, the city seeks to maintain eight acres of park and open space areas for every 1,000 residents. The city currently maintains nearly 70 acres of park and open space areas for every 1,000 residents. Therefore, if the establishment of storage, staging, and active work areas were to restrict access to an open space area, residents could access alternative recreational facilities within and immediately surrounding the city while the city continues to meet its ratio goals for park and open space resources. As such, any temporary increase in the use of alternative recreational facilities

would not result in substantial physical deterioration of the alternative recreational facility. Construction impacts associated with the implementation of the Path would be less than significant.

Operation of the Path would consist of bicycle and pedestrian travel along a shared use path. Implementation of the Path would result in improved access to Chumash Park and the established open space areas surrounding Medea Creek, which could incrementally increase the number of visitors at these recreational resources. As determined in Section 4.13.5, *Population and Housing,* the proposed Project would not induce substantial population growth. Therefore, operation of the Path would not result in an increase in the use of existing recreational facilities such that the city would be unable to meet their service ratio goals, nor would substantial physical deterioration of recreational facilities occur or be accelerated. Operational impacts would be less than significant.

AGOURA HIGH SCHOOL CONNECTION

The proposed Connection would result in construction of a Class I facility connecting Thousand Oaks Boulevard to Fountain Place along the northern border of Agoura High School. Storage, staging, and active work areas would be established during construction activities. Although Agoura High School does offer recreational uses near the location of this proposed facility, storage, staging, and active work areas would not be established on school property. Therefore, construction activities would not result in the increased use of existing neighborhood and regional parks or other recreational facilities. No construction impacts would occur.

Operation of the Connection would consist of bicycle and pedestrian travel along a shared use path. Implementation of the Connection would result in improved access to the recreational features of Agoura High School, which could incrementally increase the number of visitors at this recreational resource. As determined in Section 4.13.5, *Population and Housing,* the proposed Project would not induce substantial population growth. Therefore, operation of the Connection would not result in an increase in the use of existing recreational facilities such that the city would be unable to meet their service ratio goals, nor would substantial physical deterioration of recreational facilities occur or be accelerated. Operational impacts would be less than significant.

Class II Facilities

The establishment of Class II facilities would generally require roadway restriping and reconfiguration of lane widths to accommodate new dedicated bike lanes. Restriping can be completed within a single work period and does not require the establishment of storage, staging, or work areas. As such, restriping activities would not restrict access to or result in temporary closures of existing parks or recreational facilities throughout the city.

Pavement widening would be necessary on Driver Avenue, between Easterly Road and Colodny Drive, and on Cornell Road, between Agoura Road and Cornell Way, to allow for the addition of bicycle lanes. These activities would require the establishment of storage, staging, or work areas. Although unanticipated, pavement widening on Driver Avenue and the establishment of storage, staging, or work areas could restrict access to or result in temporary closures of the Old Agoura Park. If temporary construction impacts to Old Agoura Park were to occur, residents could access alternative recreational facilities within and immediately surrounding the city while the city continues to meet its ratio goals for park and open space resources. As such, any temporary increase in the use of recreational facilities would not result in substantial physical deterioration of the facility. Construction impacts associated with the implementation of Class II facilities would be less than significant.

Operation of the Class II facilities would consist of bicycle travel along delineated bike lanes on existing roadways. Implementation of these facilities would not provide new or improved access to existing parks and open space resources within and surrounding the city given that no new roadways are proposed. Furthermore, as determined in Section 4.13.5, *Population and Housing,* the proposed Project would not induce substantial population growth. Therefore, operation of the Class II facilities would not result in an increase in the use of existing recreational facilities such that the city would be unable to meet their service ratio goals, nor would substantial physical deterioration of recreational facilities occur or be accelerated. Operational impacts would be less than significant.

Class III Facilities

Establishment of Class III facilities would be limited to the restriping of existing roads to identify bike routes. Restriping can be completed within a single work period and does not require the establishment of storage, staging, or work areas. As such, restriping activities associated with the implementation of Class III facilities would not restrict access to or result in temporary closures of existing parks or recreational facilities throughout the city.

Operation of the Class III facilities would consist of bicycle travel along shared use travel lanes on existing roadways. Implementation of these facilities would not provide new or improved access to existing parks and open space resources within and surrounding the city given that no new roadways are proposed. Furthermore, as determined in Section 4.13.5, *Population and Housing,* the proposed Project would not induce substantial population growth. Therefore, operation of the Class III facilities would not result in an increase in the use of existing recreational facilities such that the city would be unable to meet their service ratio goals, nor would substantial physical deterioration of recreational facilities occur or be accelerated. Operational impacts would be less than significant.

Class IV Facilities

Construction of Class IV facilities would require pavement demolition, minor grading, bollard or fencing installation, asphalt paving or repaving, and striping. Implementation of the Class IV facilities would occur adjacent to but separate from existing roadway ROWs. These activities could require the establishment of storage, staging, or work areas. Given the known locations of proposed Class I facilities, storage, staging, and active work areas could occur within or adjacent to recreational facilities, which could restrict access to or result in temporary closures of the recreational facilities. If temporary construction impacts to recreational facilities were to occur, residents could access alternative recreational facilities within and immediately surrounding the city while the city continues to meet its ratio goals for park and open space resources. As such, any temporary increase in the use of recreational facilities would not result in substantial physical deterioration of the facility. Construction impacts associated with the implementation of Class IV facilities would be less than significant

Operation of the Class IV facilities would consist of bicycle travel along physically separated bikeways adjacent to existing travel lanes. Implementation of these facilities would not provide new or improved access to existing parks and open space resources within and surrounding the city given that no new roadways are proposed. Furthermore, as determined in Section 4.13.5, *Population and Housing,* the proposed Project would not induce substantial population growth. Therefore, operation of the Class IV facilities would not result in an increase in the use of existing recreational facilities such that the city would be unable to meet their service ratio goals, nor would substantial physical deterioration of recreational facilities occur or be accelerated. Operational impacts would be less than significant.

Enhanced Bicycle Treatments

Enhanced bicycle treatments could include street striping and restriping, signage and wayfinding, bicycle signals and detection at traffic signals, bicycle parking, and bicycle repair facilities. These facilities would be implemented at various locations throughout the city within or adjacent to existing, new, or improved bikeways. Construction and implementation of these facilities would be completed within a single work period and would not require the establishment of storage, staging, or work areas. As such, implementation of the enhanced bicycle treatments would not restrict access to or result in temporary closures of existing parks or recreational facilities throughout the city. Construction impacts would be less than significant.

Operation of the enhanced bicycle treatments would include continued use of existing bicycle facilities, storing of bicycles at new parking facilities, and use of bicycle repair facilities. Operation of these facilities would not provide new or improved access to existing parks and open space resources within and surrounding the city. Furthermore, as determined in Section 4.13.5, *Population and Housing,* the proposed Project would not induce substantial population growth. Therefore, operation of the enhanced bicycle treatments would not result in an increase in the use of existing recreational facilities such that the city would be unable to meet their service ratio goals, nor would substantial physical deterioration of recreational facilities occur or be accelerated. Operational impacts would be less than significant.

General Plan Amendments

As part of the proposed Project, the City must amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. These General Plan Amendments shift the focus from prioritizing automobile mobility to reducing VMT alternative transportation modes like walking and biking, guided by the BMP. The proposed General Plan Amendments would not result in construction or operation activities beyond existing conditions. Therefore, the Amendments would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. No impact would occur.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 2:	Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might adversely affect the environment?

Impact REC-2 IMPLEMENTATION OF THE PROPOSED PROJECT WOULD RESULT IN THE CONSTRUCTION OR EXPANSION OF RECREATIONAL FACILITIES THAT COULD ADVERSELY AFFECT THE ENVIRONMENT. THOSE IMPACTS ARE IDENTIFIED THROUGHOUT THIS PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT. IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.

The proposed Project consists of a Bicycle Master Plan, which proposes to build upon the city's existing bicycle network by constructing approximately 30 miles of new bikeways, implementing improvements to existing bikeways, and providing new enhanced bicycle treatments throughout the

city. Implementation of the BMP would result in the construction and expansion of recreational facilities. The environmental impacts of implementing the BMP have been evaluated throughout this Programmatic Environmental Impact Report (PEIR). No additional impacts outside those disclosed herein would occur. With the implementation of mitigation measures identified throughout this PEIR, impacts related to Cultural Resources would remain significant and unavoidable; impacts related to Biological Resources, Geology and Soils, Hazards and Hazardous Materials, and Noise would be potentially significant and would require the implementation of mitigation measures. All other impacts would be less than significant. No additional impacts related to Recreation would occur.

As part of the proposed Project, the City must also amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. The proposed General Plan Amendments would not result in physical development includes recreational facilities or requires the construction or expansion of recreational facilities. No impact would occur.

Mitigation Measures

Refer to Section 4.3, *Biological Resources,* Section 4.4, *Cultural Resources,* Section 4.5, *Geology and Soils*, Section 4.6, *Hazards and Hazardous Materials,* and Section 4.9, *Noise*, for full text of relevant mitigation measures.

No additional mitigation measures related to Recreation would be required.

Significance After Mitigation

Following the implementation of mitigation measures, impacts related to Cultural Resources would remain significant and unavoidable; impacts related to Biological Resources, Geology and Soils, Hazards and Hazardous Materials, and Noise, would be reduced to less than significant.

No additional impacts related to Recreation would occur.

4.10.4 Cumulative Impacts

The geographic scope for cumulative impacts to recreation is the City of Agoura Hills and adjoining recreational and open space facilities. This geographic scope is appropriate because of the connectivity of recreational resources within and surrounding the city. Past, present, and reasonably foreseeable future projects, as identified in Table 3-1, include residential, commercial, and recreational development. Cumulative development could directly and indirectly result in population growth within the City of Agoura Hills, which could increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. This impact would be potentially significant if population growth associated with cumulative development were to prevent the city from meeting its recreation service goals, as identified within the City of Agoura Hills General Plan 2035. The proposed Project would result in new and improved multimodal access throughout the city, including access to existing parks and open space resources, but would not result in population growth such that the city would be unable to meet its recreation service goals. Therefore, the Project would not contribute considerably to a cumulative impact.

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4.11 Transportation

The analysis in this section considers potential impacts to transportation. Specifically, this section discusses the environmental and regulatory setting; the criteria used to determine the significance of environmental impacts related to transportation; and potential impacts related to transportation that would result from implementation of the proposed Project.

4.11.1 Setting

a. Roadway System

Regional Highways

The Project area encompasses all of the City of Agoura Hills. U.S. Highway 101 (Ventura Freeway) is the only major highway in the city, connecting it to other communities in Southern California. It runs east-west in the southern portion of the city. There are four interchanges along the Ventura Freeway that provide access to the city including the Reyes Adobe interchange, the Kanan interchange, the Chesebro/Palo Comado Canyon interchange, and the Liberty Canyon interchange (City of Agoura Hills 2022a).

Primary Arterials

Primary arterials are streets and highways that are designed to move high volumes of traffic between the freeway and local circulation system. Primary arterials typically include four to six divided lanes, and access to primary arterials from private properties and collector streets is limited. Primary arterials in the City of Agoura Hills include (City of Agoura Hills 2022a):

- Kanan Road, a north-south corridor that spans the entirety of the central portion of the city. This facility generally provides two travel lanes in each direction and is divided by a raised median. As Kanan Road approaches the Ventura Freeway, three lanes are provided in the southbound direction beginning at Canwood Street. South of Agoura Road to the southern city limit, Kanan Road provides one travel lane in each direction. Limited access is provided to development along this corridor and street parking is prohibited. The posted speed limit is 45 miles per hour (mph) south of Agoura Road and north of Laro Drive, 40 mph between Canwood Street and Laro Drive, and 35 mph between Agoura Road and Canwood Street.
- Thousand Oaks Boulevard, an east-west corridor between Carell Avenue and the western city limit. This facility provides two travel lanes in each direction. There is limited access to development along this corridor, and street parking is prohibited west of Kanan Road. The posted speed limit is 45 mph.

Secondary Arterials

Secondary arterials are similar to primary arterials but serve a more localized function. Secondary arterials generally have a narrower right-of-way (ROW) than primary arterials and provide two to four divided or undivided travel lanes. Secondary arterials provide more access to adjacent development and have less parking restrictions. Secondary arterials in the city include (City of Agoura Hills 2022a):

- Agoura Road, an east-west corridor that spans the entirety of the southernmost part of the city. This facility provides one travel lane in each direction between the eastern city limits and just

west of Kanan Road and two travel lanes in each direction from just west of Kanan Road to the western city limits. The segment of Agoura Road east of Cornell Road to the eastern boundary of the Agoura Village Specific Plan Area is semi-rural with no curb, gutter, sidewalk, or streetlights. On-street parking is permitted along this facility from Kanan Road to Cornell Road and in the Old Agoura commercial area. The posted speed limit is 45 mph.

- Reyes Adobe Road, a north-south corridor between the northwestern city limit and Agoura Road. This facility provides two travel lanes in each direction between Canwood Street and Lake Lindero Road; south of Canwood Street, the facility narrows to one travel lane in each direction over the Ventura Freeway overcrossing, then widens again to two lanes in each direction south of the Ventura Freeway. There are no driveways north of the Ventura Freeway and access to cross streets is limited. On-street parking is prohibited along the entire corridor, and the posted speed limit is 40 mph.
- Canwood Street, an east-west corridor between Driver Avenue and Lake Crest Drive running parallel to the north side of the Ventura Freeway. This facility provides one travel lane in each direction between Lake Lindero Road and Chesebro Road. Access is provided to adjacent development, and on-street parking is permitted west of Reyes Adobe Road. On-street parking is prohibited between Reyes Adobe Road and Chesebro Road. The posted speed limit is 35 mph, except between Reyes Adobe Road and Chesebro Road where it increases to 40 mph.
- Palo Comado Canyon Road, a north-south corridor that connects the Driver Avenue/Chesebro Road intersection north of the Ventura Freeway to Chesebro Road south of the Ventura Freeway. This facility provides one travel lane in each direction, development along the corridor is limited, and on-street parking is prohibited. The posted speed limit is 35 mph.
- Liberty Canyon Road, a north-south corridor that extends from the Ventura Freeway south to the southern city limit. One travel lane is provided in each direction and on-street parking is permitted. The posted speed limit is 40 mph.

Semi-Rural Arterials

Semi-Rural Arterials reflect semi-rural character. They lack continuous curbs, gutters, sidewalks, and streetlights, and allow for narrower rights-of-way (minimum 36 feet). The semi-rural arterial classification also involves two travel lanes and Class II bicycle lanes. Semi-rural arterials in the city include (City of Agoura Hills 2024):

- Agoura Road, an east-west corridor that spans the entirety of the southernmost part of the city. From Cornell Road to the eastern Agoura Village Specific Plan Area, this facility is classified as a semi-rural arterial.

Collector Streets

Collector streets are designed to distribute traffic from higher classified arterial streets to local access streets and adjacent properties. Collector streets generally provide two to three undivided travel lanes. Collector streets in the city include (City of Agoura Hills 2022a):

- Driver Avenue, an east-west corridor between Chesebro Road and Argos Street. This facility has one travel lane in each direction and provides local access to adjacent neighborhoods. On-street parking is allowed, and the posted speed limit is 30 mph.
- Chesebro Road, an east-west corridor between the eastern city limit and Canwood Street. Chesebro also serves as a north-south collector street between Palo Comado Canyon Road and the Ventura Freeway eastbound on-ramp. This facility has one travel lane in each direction and

provides on-street parking on the north side of the road between Canwood Street and Palo Comado Canyon Road, along both sides of the road south of Dorothy Drive, and along the south side of the road between Palo Comado Canyon Road and Agoura Road. The posted speed limit ranges from 25 mph to 35 mph.

Local Streets

Local streets typically have two undivided lanes and are designed to be low-volume and low-speed, providing access to individual properties. Local residential streets are generally not intended to handle through traffic. Arterial, connector, and local streets within the City of Agoura Hills are shown in Figure 4.11-1, below (City of Agoura Hills 2022a).

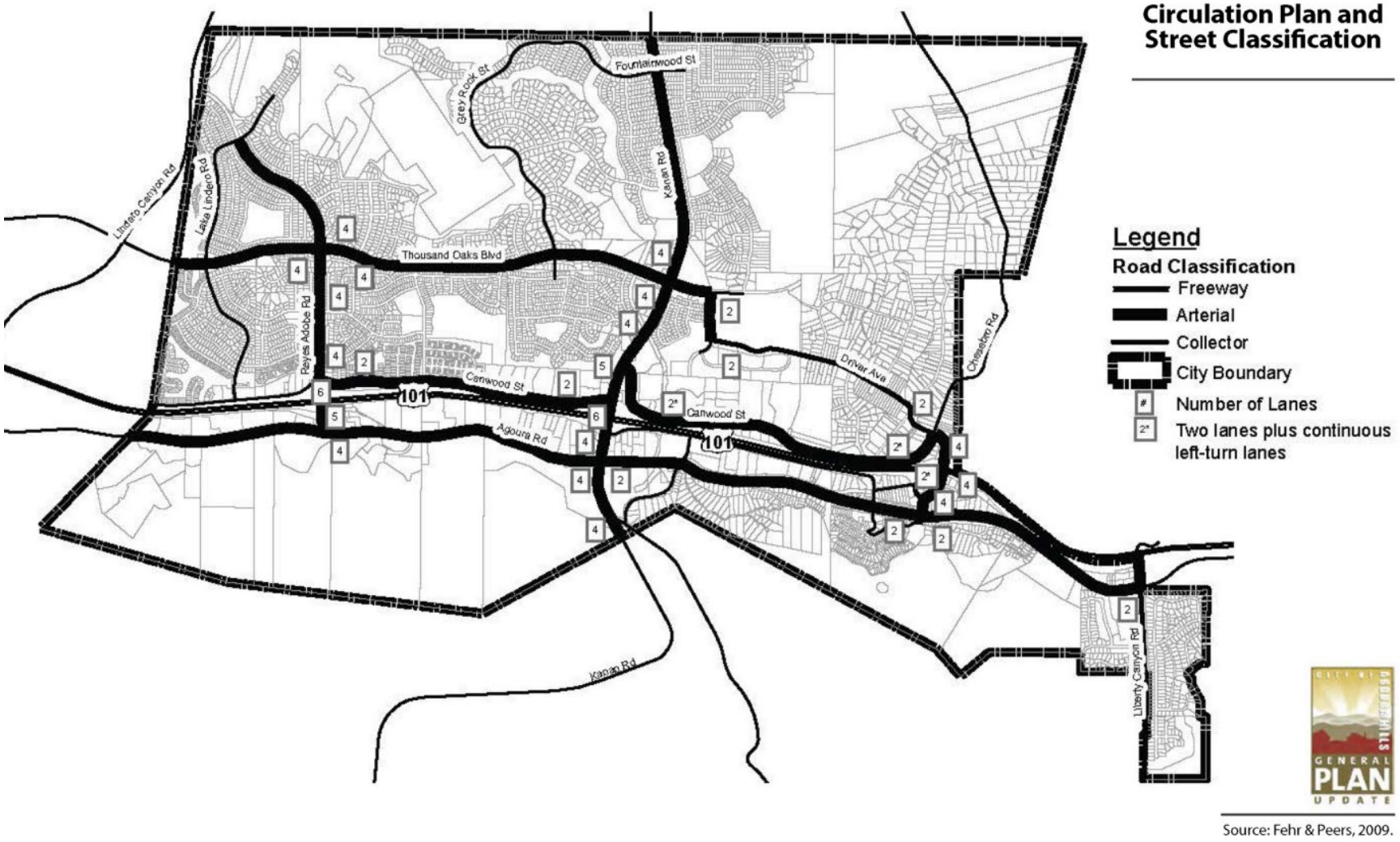
b. Transit System

The Los Angeles County Metropolitan Transportation Authority (Metro) and the City of Los Angeles Department of Transportation (LADOT) provide regional public transit services to the City of Agoura Hills. Metro service provides access between Thousand Oaks and Warner Center in the west San Fernando Valley while the LADOT Commuter Express provides service between Downtown Los Angeles and Thousand Oaks/Newbury Park (City of Agoura Hills 2022a). Specifically, Metro Line 161 provides local service between Warner Center and the City of Thousand Oaks. Within the City of Agoura Hills, this route generally runs along Agoura Road to Roadside Drive, Kanan Road, and Thousand Oaks Boulevard. Overall, this bus line includes 15 stops within the city limits. LADOT Commuter Express 422 and LADOT Commuter Express 423 are express commuter lines that travel from Downtown Los Angeles to the City of Thousand Oaks. Within the City of Agoura Hills, these lines operate on Kanan Road and Thousand Oaks Boulevard and include seven stops in the western portion of the city.

In addition to the regional transit services described above, the City of Agoura Hills operates a dial-a-ride service and a seasonal shuttle service (City of Agoura Hills 2022a). The Agoura Hills Dial-A-Ride service provides a demand-responsive door-to-door transportation service Monday through Friday at a reduced fare to residents who are 65 or older and to individuals with disabilities. Services are provided between any two points within the city limits of Agoura Hills and the Malibu Lake area. There are also trips to the cities of Westlake Village and Thousand Oaks, to the community of Oak Park, and appointment-based destinations to the community of Woodland Hills for an increased fare. The Summer Beach Bus provides service between the City of Agoura Hills and local beach communities during the summer season (June to August), typically to Zuma and Leo Carrillo Beaches. Bus stops include Lindero Canyon Middle School, Agoura High School, and Agoura Road at Liberty Canyon Road.

Transit available in the City of Agoura Hills also includes the Kanan Shuttle, which is operated by the City of Thousand Oaks. The Kanan Shuttle, which runs on clean natural gas and is ADA-compliant, travels to residential areas and neighborhood schools near Kanan Road in the City of Agoura Hills and Oak Park community. The Kanan Shuttle service is provided by the County of Ventura in partnership with the City of Agoura Hills, Oak Park Unified School District, and the Oak Park County Service Area #4 (City of Thousand Oaks 2025).

Figure 4.11-1 Circulation Plan and Street Classification



Source: City of Agoura Hills 2022a

c. Bicycle Network

The existing bicycle network in the City of Agoura Hills is comprised of 1.3 miles of bicycle routes and 9.2 miles of bicycle lanes (City of Agoura Hills 2022b). The bicycle network is generally comprised of Class II and Class III facilities, which are shared facilities on roadways. Bicycle facilities within the city will be described as follows in Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 following adoption of the proposed General Plan Amendments:

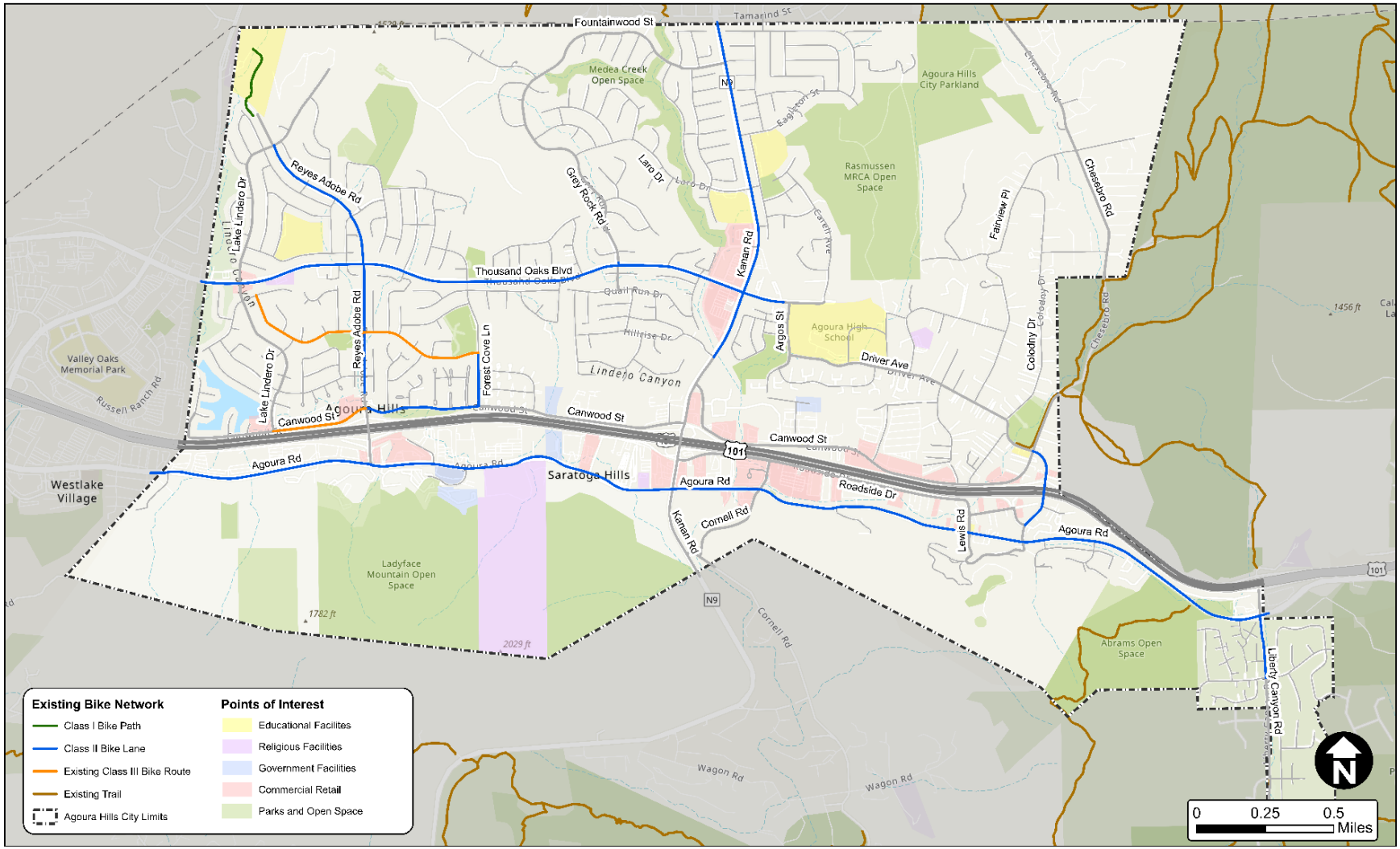
- Kanan Road—A Class II facility between the northern City limits and Hillrise Drive.
- Reyes Adobe Road—A mixed Class I and Class II facility between Lindero Canyon Road and Canwood Street. The Class II facility comprises the majority of the bicycle route on Reyes Adobe Road between Lindero Canyon Road and Passageway Place; the Class III section lies between Passageway Place and Canwood Street.
- Forest Cove Lane—A mixed Class II and Class III facility between Thousand Oaks Boulevard and Canwood Street. The Class II facility is available between Rainbow Creek Drive and Canwood Street. The Class III facility is provided in the northbound direction between Rainbow Crest Drive and Thousand Oaks Boulevard.
- Thousand Oaks Boulevard—A Class II facility that spans between the western City limits and Argos Street (eastbound only) or Kanan Road (westbound only).
- Agoura Road—A Class II facility spanning the entire width of the City between the western and eastern City limits.
- Rainbow Crest Drive—A Class III facility that crosses Reyes Adobe Road and provides access between Forest Cove Lane and Mainmast Drive.
- Canwood Street—A mixed Class II and Class III facility that crosses Reyes Adobe Road. The Class II facility is provided east of Reyes Adobe Road to Forest Cove Drive; the Class III facility is available west of Reyes Adobe Road to Lake Lindero Road.
- Palo Comado Canyon Road—A Class II facility between Chesebro Road and Agoura Court, crossing the Palo Comado Canyon Interchange; this was implemented after the General Plan Update and coincided with the Palo Comado Canyon Interchange improvement.

The existing bicycle facility network is shown in Figure 4.11-2, below.

d. Pedestrian Facilities

Pedestrian facilities available within the city are comprised of sidewalks, crosswalks, and a footbridge over the Ventura Freeway. Sidewalks are generally available to link the residential communities to arterial roads. Several sections of roadways do not currently have sidewalks available including Driver Avenue, between Easterly Road and Chesebro Road; Kanan Road, between Laro Drive and the northern city limit; portions of Agoura Road, between the western city limit and Kanan Road, and east of Kanan Road to the eastern city limit; and, Reyes Adobe Road, north of Rainbow Hill Road to Lake Lindero Drive. There are crosswalks available at all signalized intersections. Pedestrian linkages between the northern and southern sides of the Ventura Freeway are available through sidewalks on the bridges of Reyes Adobe Road, Kanan Road, and Palo Comado Canyon Road overpasses. There is also a footbridge available across the Ventura Freeway, joining Canwood Street and Roadside Drive west of the Palo Comado Canyon Interchange (City of Agoura Hills 2022a).

Figure 4.11-2 Agoura Hills Existing Bike Network



Source: City of Agoura Hills 2024

4.11.2 Regulatory Setting

a. Federal Regulations

There are no federal regulations related to transportation applicable to the proposed Project.

b. State Regulations

Caltrans Highway Design Manual

Chapter 200 and 1000, *Geometric Design and Structure Standards* and *Bicycle Transportation Design*, of the California Department of Transportation (Caltrans) Highway Design Manual outlines safe geometric design of bicycle facilities and serves as the official design standard for bikeways in California. Chapter 200 focuses on appropriate stopping distances, curvatures, superelevation transitions, overcrossings/undercrossings, and bicycle railings for Class II and III facilities. Chapter 1000 intends to help accommodate motor vehicle and bicycle traffic on the roadway system, or as a complement to the road system, to meet the needs of cyclists for Class I facilities. This chapter also classifies and defines bicycle facilities (Caltrans 2020, 2025). Design Information Bulletin 89 provides similar guidance specifically for Class IV bikeways (Caltrans 2022).

Caltrans Manual on Uniform Traffic Control Devices

Chapter 6C of the California Manual on Uniform Traffic Control Devices (CA MUTCD) outlines the essential components and principles for establishing safe and effective Temporary Traffic Control zones during road work or incidents. The goal is to ensure the safety of road users and workers while maintaining efficient traffic flow. Key guidance elements include proper signage, buffer zones, barriers and channelizing devices, reduced speed limits, and lane closure (Caltrans 2014).

California Transportation Plan 2050

The California Transportation Plan is prepared by Caltrans every five years to provide a long-range policy framework to meet the State's future mobility needs and reduce greenhouse gas (GHG) emissions to goals set by the California Global Warming Solutions Act of 2006 (Assembly Bill [AB 32], and implementing legislation Senate Bill (SB) 375 (discussed below). The most recent California Transportation Plan 2050 was adopted in 2021 (Caltrans 2021). The California Transportation Plan defines goals, performance-based policies, and strategies to achieve the State's collective vision for California's future Statewide, integrated, multimodal transportation system by envisioning a sustainable system that improves mobility and enhances quality of life. Through ongoing engagement, the California Transportation Plan is intended to provide goals and visions to support a fully integrated, multimodal, sustainable transportation system that supports the quality of life, prosperous economy, human and environmental health, and social equity.

Assembly Bill 1358

Assembly Bill (AB) 1358 requires the legislative body of a city or county, upon revision of the circulation element of their general plan, to identify how the jurisdiction will provide for the routine accommodation of all users of the roadway including drivers, pedestrians, cyclists, individuals with disabilities, seniors, and public transit users. The characteristics of complete streets include the following: integrated and comprehensive transportation network; multi-model design

accommodating walking, cycling, transit, driving, parking, and deliveries; street design correlating to the adjacent land uses; pedestrian and bicycle facilities providing connectivity and promoting safety; uniform landscaping, including street trees and landscaped medians and sidewalks; and sustainable design minimizing runoff, heat island effects, and responding to climatic demands and conservation of scarce resources. (City of Agoura Hills 2022b).

Senate Bill 375

Senate Bill (SB) 375 requires that a metropolitan planning organization adopt a sustainable communities strategy as part of its regional transportation plan to reduce GHG emissions from cars and light trucks in a region. SB 375 requires the State Air Resources Board, working in consultation with metropolitan planning organizations, to provide each region with GHG emission reduction targets for the automobile and light truck sector. Agoura Hills is included within the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) developed by the Southern California Association of Governments (SCAG).

Senate Bill 743

On September 27, 2013, Governor Jerry Brown signed SB 743 into law. SB 743 changed the way transportation impact analysis is conducted as part of California Environmental Quality Act (CEQA) compliance. These changes eliminated automobile delay, level of service, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts under CEQA.

Prior rules treated automobile delay and congestion as an environmental impact. SB 743 requires the State CEQA Guidelines to prescribe an analysis that better accounts for transit and reductions of greenhouse gas emissions. In December 2018, Office of Planning and Research (OPR) released the final update to State CEQA Guidelines consistent with SB 743, which recommends using vehicle miles traveled (VMT) as the most appropriate metric of transportation impact to align local environmental review under CEQA with California's long-term greenhouse gas emissions reduction goals. The *Guidelines* require all jurisdictions in California to use VMT-based thresholds of significance no later than July 1, 2020.

At the same time as the release of the updated State CEQA Guidelines*,* OPR also released a non-binding *Technical Advisory on Evaluating Transportation Impacts in CEQA*, which outlines potential VMT analysis methodologies and thresholds of significance for use by agencies in California based on substantial evidence developed by OPR related to achievement of the State's greenhouse gas emissions reductions targets (GOLUCI 2018).

State CEQA Guidelines Section 15064.3 and OPR Technical Advisory

State CEQA Guidelines Section 15064.3 implements SB 743 and establishes VMT as the most appropriate measure of transportation impacts. The primary components of Section 15064.3 include:

- Identifies VMT as the most appropriate measure of transportation impacts;
- Declares that a project's effect on automobile delay shall not constitute a significant environmental impact (except for projects increasing roadway capacity);
- Creates a rebuttable presumption of no significant transportation impacts for (a) land use projects within one-half mile of either an existing major transit stop or a stop along an existing

high quality transit corridor, (b) land use projects that reduce VMT below existing conditions, and (c) transportation projects that reduce or have no impact on VMT;

- Allows a lead agency to qualitatively evaluate VMT if existing models are not available; and
- Gives lead agencies discretion to select a methodology to evaluate a project's VMT, but requires lead agencies to document that methodology in the environmental document prepared for the project.

CEQA lead agencies were required to comply with the State Guideline Section 15064.3 no later than July 1, 2020.

c. Regional Regulations

Connect SoCal 2024

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties. SCAG addresses regional issues relating to transportation, the economy, community development, and the environment. Every four years, SCAG updates their Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), as required by federal and state regulations. On April 4, 2024, SCAG's Regional Council formally approved Connect SoCal 2024, the 2024-2050 RTP/SCS.

Connect SoCal 2024 builds upon the progress made through implementation of the 2020-2045 RTP/SCS. Using growth forecasts and economic trends that project out over a 20-year period, Connect SoCal 2024 considers the role of transportation in the broader context of economic, environmental, and quality-of-life goals for the future, identifying regional transportation strategies to address our mobility needs. Compared to previous RTPs, Connect SoCal 2024 places a greater emphasis on sustainability and integrated planning and includes a strong commitment to reduce emissions from transportation sources to comply with California SB 375, improve public health, and meet the National Ambient Air Quality Standards as set forth by the federal Clean Air Act.

d. Local Regulations

City of Agoura Hills General Plan 2035

The City of Agoura Hills General Plan 2035 was adopted on March 24, 2010 (updated on August 10, 2022) by the City Council (City of Agoura Hills 2022a). The City of Agoura Hills General Plan 2035 is a strategic document designed to guide the physical development of the city until the year 2035. Among other things, the City of Agoura Hills General Plan 2035 sets out the pattern of land uses, including residential, commercial, and industrial. It also establishes the system of streets, bikeways, and trails. The City of Agoura Hills General Plan 2035 addresses a wide variety of subject areas, including housing, traffic, natural resources, land uses, economic development, noise, and public safety.

The City of Agoura Hills General Plan 2035 contains the following goals and policies related to transportation, which would apply to the proposed Project.

Goal M-1. A safe and efficient roadway system in Agoura Hills that facilitates the movement of goods and people while utilizing advanced technologies to minimize travel delays.

Policy M-1.1. Maintain a safe and efficient system of circulation.

Goal M-2. A transportation system that serves all modes of travel and meets the needs of all users, as specified in the Complete Streets Act of 2007.

Policy M-2.1. Ensure that the existing and future transportation system serves multiple modes of travel, such as driving, walking, biking, and transit.

Policy M-2.1. Develop an interconnected mobility system that allows travel on alternative routes and modes.

Policy M-2.5. Develop and maintain a safe, integrated, and comprehensive bicycle and pedestrian system that serves all ages and abilities in Agoura Hills.

Goal M-6. Reduced reliance on single-occupancy vehicle travel and VMT through the provision of alternative travel modes and enhanced system design.

Policy M-6.1. Promote the most efficient use of the City's existing transportation network and encourage the integration of alternative modes into design standards and future improvements.

Policy M-6.2. Expand the choices of available travel modes to increase the freedom of movement for residents and reduce reliance on the automobile. Ensure that existing and future infrastructure will be adequate for future transportation modes.

Goal M-8. Enhanced bicycle facilities throughout Agoura Hills for short trips and recreational uses.

Policy M-8.1. Provide bikeway connectivity between residential areas and surrounding natural resource areas, parks, schools, employment centers, and other activity centers in the community.

Policy M-8.2. Provide a bicycle network that is continuous, closes gaps in the existing system, and permits easy bicycle travel throughout the community and the region.

Policy M-8.4. Establish a Bicycle Safety Program that aims to educate the public about the safe use of bicycles on the City’s bikeways.

Goal M-12. A comprehensive transportation system that is coordinated with adjacent jurisdictions and regional planning efforts.

Policy M-12.2. Support regional efforts by the Los Angeles County Metropolitan Transportation Authority (Metro or MTA) and the Southern California Association of Governments (SCAG) to reduce single-occupancy vehicle travel, such as goals and measures identified in Metro’s Long Range Transportation Plan and SCAG’s Regional Transportation Improvement Program.

Policy M-12.3. Support regional planning efforts that maximize the efficiency of existing transportation facilities.

Goal S-21. Decrease Greenhouse Gas Emissions through a Reduction in VMT.

Policy S-21.1. Develop a Citywide network that ensures access to safe bicycle facilities, and connects to regional bicycle facilities.

Agoura Village Specific Plan

The Agoura Village Specific Plan, adopted in 2008 and updated in 2024, is a long-range planning effort intended to guide the revitalization, appropriate uses, and beautification of the Agoura Village (City of Agoura Hills 2024). The Specific Plan area encompasses approximately 135 acres of

developed and underdeveloped land running along both sides of Agoura Road, one block west of Kanan Road to approximately two blocks east of Cornell Road. Roadside Drive and the Ventura Freeway border the Specific Plan area to the north, and open space borders the Specific Plan area to the south.

Chapter 3, *Streetscape Beautification & Public Improvements,* of the Agoura Village Specific Plan provides recommendations for street beautification amenities and gateways. This Chapter indicates that bicycle racks shall be installed at convenient locations along Agoura Road, at any future bus stop, and conveniently located near building entries that are centrally located within development and not facing Agoura Road. Chapter 4, *Mobility,* of the Agoura Village Specific Plan identifies opportunities for new or improved pedestrian, bicycle, and transit infrastructure, and traffic calming concepts. This chapter also notes that all bicycle facilities within the Specific Plan area shall be constructed in accordance with Figure M-7 of the General Plan, which will be updated as part of the General Plan Amendments.

Ladyface Mountain Specific Plan

The Ladyface Mountain Specific Plan, adopted in 1991 and amended in 2010, is a long-range planning effort intended to guide development at the base of Ladyface Mountain in the City of Agoura Hills. The Ladyface Mountain Specific Plan area covers approximately 747 acres, of which about 225 are developable while 520 acres are designated as permanent open space. The Ladyface Mountain Specific Plan area is bounded by Agoura Road to the north, Kanan Road to the east, the Agoura Hills city limit along the Ladyface ridgeline to the south, and the Agoura Hills-Westlake Village city limits to the west.

The Ladyface Mountain Specific Plan establishes hillside development standards to preserve the natural character of the mountain. Chapter III, Design Guidelines, emphasizes oak tree preservation, natural grading techniques, and architecture that blends in with the hillside environment. It also includes standards for drought-tolerant landscaping and signage. Chapter IV, Development Regulations, includes requirements for building coverages and grading, mandates transportation demand management strategies, LEED-equivalent construction practices, and water-efficiency. Chapter V, Implementation, establishes procedures for Conditional Use Permits, architectural review, and environmental review under CEQA.

City of Agoura Hills Municipal Code

The City of Agoura Hills Municipal Code (AHMC) includes provisions for development standards in regard to bicycles and emergency vehicle access. Article III, Chapter 2 of the AHMC discusses public safety in regard to traffic regulations. Specifically, Section 3206 states that bicycles are prohibited on sidewalks, pedestrian walkways, and parking areas within a shopping center, shopping district, or business district. Section 9654.3(L) of the AHMC identifies bicycle parking standards.

4.11.3 Impact Analysis

a. Methodology and Significance Thresholds

As discussed in Section 4.0, *Environmental Impact Analysis*, all Project components are analyzed at the programmatic level. Project components include the Bicycle Master Plan (BMP), the VMT Mitigation Exchange and Banking Program (Program), and the General Plan Amendments (Amendments). Projects included within the BMP are grouped into Class I facilities, Class II facilities, Class III facilities, Class IV facilities, and enhanced bicycle treatments, as identified in Section 2.5,

Project Characteristics, and in Table 1 of Chapter 2, *Project Description.* The impact analysis contained herein provides a programmatic analysis of anticipated impacts for each of the five facility classes, as the individual project impacts associated with each class of facility are expected to be similar. Because the City seeks to prioritize implementation of the Medea Creek Path (Path) and the Agoura High School Connection (Connection), the Path and the Connection have their own subheadings within the Class I Facility impact analysis subsection to provide a more specific assessment of their environmental impacts. Impacts associated with the General Plan Amendments are analyzed within their own subsection.

As discussed in Chapter 2, *Project Description*, the only projects that are currently planned, unfunded, and could potentially be funded by the VMT Mitigation Exchange and Banking Program are those currently included within the Bicycle Master Plan. Therefore, the impact analysis contained herein does not include a subsection for impacts associated with the Program, as the individual project list for the BMP and the Program are identical and impacts associated with the BMP would encompass impacts associated with the Program.

Within the following environmental analysis, impacts associated with each Project component are explicitly identified under the respective heading.

According to Appendix G of the *California Environmental Quality Act* (CEQA) *Guidelines*, impacts related to transportation would be significant if the proposed project would:

1. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;
2. Conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b);
3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or,
4. Result in inadequate emergency access?

b. Project Impacts and Mitigation Measures

Threshold 1:	Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Impact TRA-1 THE PROPOSED PROJECT WOULD BE CONSISTENT WITH CONNECT SOCAL 2024, THE CITY OF AGOURA HILLS GENERAL PLAN 2035, AND THE AGOURA VILLAGE SPECIFIC PLAN. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The primary plans addressing the circulation system in the Project area are the RTP/SCS (SCAG 2024), the City of Agoura Hills General Plan 2035, and the Agoura Village Specific Plan. These plans address various modes of transportation, including roadway vehicle, transit, bicycle, and pedestrian facilities, and include goals, policies, and objectives related to these modes of transportation.

Implementation of individual projects identified within the BMP would involve construction activities such as clearing and grubbing, pavement demolition, grading, subgrade stabilization, utility relocation, construction of undercrossings and/or overcrossings, installation of retaining walls, construction of bollards and fencing, asphalt paving or repaving, striping, restriping, reconfiguration and/or revegetation. Construction would require use of delivery trucks, vehicles, and other construction equipment, as well as the creation of storage, staging, and active work areas. These areas would be located within or adjacent to the identified project boundaries. At the time of

construction, should the construction contractor require additional staging areas, they would be responsible for identifying and securing long-term staging areas on previously disturbed storage yards, the locations of which are currently unknown. Nonetheless, construction of individual projects could affect roadways and the circulation system if construction were to occur within roadway rights-of-way (ROWs) or require temporary lane closures, which would conflict with Goal M-1 of the City of Agoura Hills General Plan 2035, which calls for a safe and efficient roadway system. A construction traffic control plan would be prepared and implemented for any construction activities occurring within the roadway ROW in accordance with the CA MUTCD. The construction traffic control plan would include the use of flaggers during temporary lane closures and would ensure the use of proper signage, buffer zones, barriers, and reduced speed limits around construction zones consistent with Chapter 6 (Flagger Control) of the CA MUTCD, and no detours would be required (Caltrans 2014). Therefore, temporary construction impacts resulting in conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, would be less than significant.

Operation of individual projects identified within the BMP would consist of bicycle and pedestrian travel along shared use paths, delineated bike lanes, shared use travel lanes, and physically separated bikeways. These activities would be consistent with the SoCal Connect 2024 goals aimed at reducing emissions from transportation sources, as the proposed Project would encourage alternative travel modes. Implementation of the BMP would also be consistent with City of Agoura Hills General Plan 2035 goals and policies including Goal M-2, which aims to create a transportation system that serves all modes of travel, Goal M-6, which aims to reduce reliance on single-occupancy vehicle travel and VMT through the provision of alternative travel modes, Goal M-8, which aims to enhance bicycle facilities throughout Agoura Hills, and Goal M-21, which aims to decrease GHG emissions through a reduction in VMT.

Implementation of the BMP would result in the installation of enhanced bicycle treatments at various locations throughout the city. These facilities would include street striping and restriping, signage and wayfinding, bicycle signals and detection at traffic signals, bicycle parking, and bicycle repair facilities. Installation of these facilities would be consistent with Chapter 3, *Streetscape Beautification & Public Improvements,* of the Agoura Village Specific Plan, which calls for bicycle racks at convenient locations along Agoura Road, at any future bus stop, and conveniently located near building entries that are centrally located within development

As part of the proposed Project, the City must also amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. These General Plan Amendments shift the focus from prioritizing automobile mobility to reducing VMT through alternative transportation modes like walking and biking, guided by the BMP. This shift in focus to reducing VMT would be consistent with the SoCal Connect 2024 goals aimed at reducing emissions from transportation sources, City of Agoura Hills General Plan 2035 Goal M-6, which aims to reduce reliance on single-occupancy vehicle travel and VMT through the provision of alternative travel modes, and City of Agoura Hills General Plan 2035 Goal M-21, which aims to decrease GHG emissions through a reduction in VMT.

Overall, this impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 2:	Would the project conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b)?

Impact TRA-2 CONSTRUCTION ACTIVITIES ASSOCIATED WITH THE PROPOSED PROJECT WOULD NOT RESULT IN LONG-TERM TRIP GENERATION, AND ANY TEMPORARY INCREASE IN VMT WOULD NOT SUBSTANTIALLY IMPACT REGIONAL VMT. ACTIVE TRANSPORTATION PROJECTS GENERALLY REDUCE VMT. THEREFORE, THE PROPOSED PROJECT IS PRESUMED TO RESULT IN A LESS-THAN-SIGNIFICANT IMPACT.

State CEQA Guidelines Section 15064.3(b)describes considerations for evaluating a project's transportation impacts. Specifically, this section of the State CEQA Guidelines includes criteria for analyzing transportation impacts, such as:

1. Land Use Projects. VMT exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.
2. Transportation Projects. Transportation projects that reduce, or have no impact on, VMT should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements.
3. Qualitative Analysis. If existing models or methods are not available to estimate the VMT for the particular project being considered, a lead agency may analyze the project's VMT qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.
4. Methodology. A lead agency has discretion to choose the most appropriate methodology to evaluate a project's VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's VMT, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate VMT and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section

Impacts related to VMT during construction of individual projects identified within the BMP would be primarily associated with the construction equipment, worker vehicles, and truck deliveries accessing individual project sites. Pursuant to State CEQA Guidelines Section 15064.3(b), construction-related VMT is generally evaluated qualitatively. Any increase in the number of trips taken on roadways in the Project area due to construction activities for individual projects would be temporary in nature and would cease to occur once the construction period is over. Construction would not result in long-term trip generation, and any temporary increase in VMT would not substantially impact regional VMT. Therefore, construction impacts related to VMT would be less than significant.

The City of Agoura Hills adopted their own Transportation Assessment Guidelines in 2020, which establish city-specific protocols for transportation assessments. These guidelines identify a variety of screening thresholds that can be used to determine if the facts of a project can result in the presumption of a less than significant transportation impact. These guidelines do not establish protocols for determining transportation impacts of active transportation projects (City of Agoura Hills 2020). Therefore, this analysis relies on the Governor's Office of Land Use and Innovation's Technical Advisory on Evaluating Transportation Impacts in CEQA (2018). As identified therein, active transportation projects generally reduce VMT and therefore are presumed to cause a less-than-significant impact on transportation.

As part of the proposed Project, the City must amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. These General Plan Amendments shift the focus from prioritizing automobile mobility to reducing VMT through alternative transportation modes like walking and biking, guided by the BMP. Additionally, the General Plan Amendments would include the addition of Policy M-6.7, which would require new development projects to minimize VMT and submit a VMT analysis as part of a development application. Overall, the proposed Project would not conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b). This impact would be less than significant.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 3:	Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Impact TRA-3 DUE TO THE IMPLEMENTATION OF A TRAFFIC CONTROL PLAN DURING ACTIVITIES OCCURRING WITHIN THE ROADWAY, CONSTRUCTION WOULD NOT SUBSTANTIALLY INCREASE HAZARDS DUE TO A GEOMETRIC DESIGN FEATURE OR INCOMPATIBLE USE. INDIVIDUAL PROJECTS IDENTIFIED WITHIN THE BMP WOULD BE DESIGNED TO COMPLY WITH THE CALTRANS HIGHWAY DESIGN MANUAL. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Class I Facilities

Construction of Class I facilities would include clearing and grubbing, pavement demolition, grading, utility relocation, retaining wall or fencing installation, asphalt paving or repaving, street improvements and/or construction of undercrossings and/or overcrossings, striping, and revegetation. These activities would require the use of delivery trucks, vehicles, and other construction equipment, as well as the creation of storage, staging, and active work areas. These areas would be located within or adjacent to the identified project boundaries and outside of existing roadway ROWs. At the time of construction, should the construction contractor require additional staging areas, they would be responsible for identifying and securing long-term staging areas on previously disturbed storage yards, the locations of which are currently unknown. Nonetheless, construction of Class I facilities could temporarily increase hazards due to geometric design features or incompatible uses from the temporary presence of construction equipment on

local roadways and the potential for lane closures. A construction traffic control plan would be prepared and implemented for any construction activities occurring within the roadway ROW in accordance with the CA MUTCD. The construction traffic control plan would include the use of flaggers during temporary lane closures and would ensure the use of proper signage, buffer zones, barriers, and reduced speed limits around construction zones, consistent with Chapter 6 (Flagger Control) of the CA MUTCD (Caltrans 2014). Therefore, construction of the Class I facilities would not substantially increase hazards due to a geometric design feature or incompatible uses.

Operation of the Class I facilities would consist of bicycle and pedestrian travel along shared use paths. These facilities would provide a completely separate ROW designated for the exclusive use of bicycles and pedestrians with minimal vehicle crossflows. All Class I facilities would be designed in adherence with the Caltrans Highway Design Manual Chapter 1000, which specifies the appropriate width, clearance, signage, intersection design, crossing pavement, horizontal alignment, and superelevation (Caltrans 2025). Prior to approval of individual Class I facilities identified within the BMP, design review would ensure all standards outlined in the Caltrans Highway Design Manual are met. Therefore, proposed Class I facilities would not substantially increase hazards due to a geometric design feature or incompatible use. This impact would be less than significant.

MEDEA CREEK PATH

Construction of the Path would require the use of delivery trucks, vehicles, and other construction equipment, as well as the creation of storage, staging, and active work areas. These areas would be located within or adjacent to the identified project boundary and outside of existing roadway ROWs. At the time of construction, should the construction contractor require additional staging areas, they would be responsible for identifying and securing long-term staging areas on previously disturbed storage yards, the locations of which are currently unknown. Nonetheless, construction activities could result in a temporary increase in hazards due to geometric design features or incompatible uses if construction equipment is present on local roadways or if temporary lane closures are required. Although not currently anticipated, if future construction activities require work within the roadway, a construction traffic control plan would be prepared and implemented in accordance with the CA MUTCD. The construction traffic control plan would include the use of flaggers during temporary lane closures and would ensure the use of proper signage, buffer zones, barriers, and reduced speed limits around construction zones, consistent with Chapter 6 (Flagger Control) of the CA MUTCD (Caltrans 2014). Therefore, construction of the Path would not substantially increase hazards due to a geometric design feature or incompatible uses.

Operation of the Path would consist of bicycle and pedestrian travel along a shared use path designated for the exclusive use of bicycles and pedestrians. As currently proposed, the Path would include four roadway crossings with bicycle and pedestrian access ramps and/or crosswalks at Kanan Road, Thousand Oaks Boulevard, Laro Drive, and Fountainwood Street, an undercrossing beneath the Ventura Freeway, and an undercrossing beneath Oak Creek Lane. During design advancement, all components of the Path would comply with the Caltrans Highway Design Manual Chapter 1000, which specifies the appropriate width, clearance, signage, intersection design, crossing pavement, horizontal alignment, and superelevation (Caltrans 2025). Prior to final approval of the Path, design review would ensure all standards outlined in the Caltrans Highway Design Manual are met. Therefore, operation of the Path would not substantially increase hazards due to a geometric design feature or incompatible use. This impact would be less than significant.

AGOURA HIGH SCHOOL CONNECTION

Construction of the Connection would require the use of delivery trucks, vehicles, and other construction equipment, as well as the creation of storage, staging, and active work areas. These areas would be located within or adjacent to the identified project boundary and outside of existing roadway ROWs. At the time of construction, should the construction contractor require additional staging areas, they would be responsible for identifying and securing long-term staging areas on previously disturbed storage yards, the locations of which are currently unknown. Implementation of the Connection would involve roadway and intersection improvements on Thousand Oaks Boulevard near Argos Street. Specifically, improvements would include relocation of the existing signal head and modifications to the existing median on Thousand Oaks Boulevard. Construction of these improvements could result in a temporary increase in hazards due to geometric design features or incompatible uses due to construction equipment on local roadways or if temporary lane closures are required. A construction traffic control plan would be prepared and implemented for any construction activities occurring within the roadway ROW in accordance with the CA MUTCD. The construction traffic control plan would include the use of flaggers during temporary lane closures and would ensure the use of proper signage, buffer zones, barriers, and reduced speed limits around construction zones, consistent with Chapter 6 (Flagger Control) of the CA MUTCD (Caltrans 2014). Therefore, construction of the Connection would not substantially increase hazards due to a geometric design feature or incompatible uses.

Operation of the Connection would consist of bicycle and pedestrian travel along a shared use path designated for the exclusive use of bicycles and pedestrians. As currently proposed, the Connection would include modifications to the existing median on Thousand Oaks Boulevard, construction of a sidewalk connection at the intersection of Thousand Oaks Boulevard and Argos Street, construction of a sidewalk extension at the eastern end of Thousand Oaks Boulevard, and construction of a bicycle and pedestrian access ramp at Easterly Road near Fountain Place. During design advancement, all components of the Connection would comply with the Caltrans Highway Design Manual Chapter 1000, which specifies the appropriate lane width, clearance, signage, intersection design, crossing pavement, horizontal alignment, and superelevation (Caltrans 2025). Prior to final approval of the Connection, design review would ensure all standards outlined in the Caltrans Highway Design Manual are met. Therefore, operation of the Connection would not substantially increase hazards due to a geometric design feature or incompatible use. This impact would be less than significant.

Class II Facilities

Construction of Class II facilities would generally consist of roadway restriping and reconfiguration of lane widths. These activities would require the use of paint trucks and similar equipment along existing roadways. Restriping can be completed within a single work period and does not require the establishment of storage, staging, or work areas. Nonetheless, the presence of paint trucks could result in a temporary increase in hazards due to incompatible uses from construction equipment on local roadways. A construction traffic control plan would be prepared and implemented for any activities occurring within the roadway ROW in accordance with the CA MUTCD. Therefore, construction of the Class II facilities would not substantially increase hazards due to a geometric design feature or incompatible uses.

Implementation of Class II facilities would also require pavement widening on Driver Avenue and Cornell Road to allow for the addition of bicycle lanes. Construction would require the use of delivery trucks, vehicles, and other construction equipment, as well as the creation of storage,

staging, and active work areas. These areas would be located within or adjacent to the identified project boundaries and outside of existing roadway ROWs. At the time of construction, should the construction contractor require additional staging areas, they would be responsible for identifying and securing long-term staging areas on previously disturbed storage yards, the locations of which are currently unknown. Nonetheless, pavement widening could temporarily increase hazards due to geometric design features or incompatible uses from the temporary presence of construction equipment on local roadways and the potential for lane closures. A construction traffic control plan would be prepared and implemented for any construction activities occurring within the roadway ROW in accordance with the CA MUTCD. The construction traffic control plan would include the use of flaggers during temporary lane closures and would ensure the use of proper signage, buffer zones, barriers, and reduced speed limits around construction zones, consistent with Chapter 6 (Flagger Control) of the CA MUTCD (Caltrans 2014). Therefore, pavement widening during construction of the Class II facilities on Driver Avenue and Cornell Road would not substantially increase hazards due to a geometric design feature or incompatible uses.

Operation of the Class II facilities would consist of bicycle travel along delineated bike lanes, which would separate vehicles and bicyclists into distinct lanes. Class II bike lanes would be designed in adherence with the City and County guidelines as well as the Caltrans Highway Design Manual. Therefore operation of the Class II facilities would not substantially increase hazards due to a geometric design feature or incompatible use. This impact would be less than significant.

Class III Facilities

Construction of the Class III facilities would be limited to the restriping of existing roads to identify bike routes. These activities would require the use of paint trucks and similar equipment along existing roadways. Restriping can be completed within a single work period and does not require the establishment of storage, staging, or work areas. Nonetheless, the presence of paint trucks could result in a temporary increase in hazards due to incompatible uses from construction equipment on local roadways. A construction traffic control plan would be prepared and implemented for any activities occurring within the roadway ROW in accordance with the CA MUTCD. Therefore, construction of the Class III facilities would not substantially increase hazards due to a geometric design feature or incompatible uses.

Operation of the Class III facilities would consist of bicycle travel along shared use travel lanes. Class III bike routes would be designed in adherence with City and County Guidelines and the Caltrans Highway Design Manual. Therefore operation of the Class III facilities would not substantially increase hazards due to a geometric design feature or incompatible use. This impact would be less than significant.

Class IV Facilities

Construction of Class IV facilities would require pavement demolition, minor grading, bollard or fencing installation, asphalt paving or repaving, and striping. Construction would require use of delivery trucks, vehicles, and other construction equipment, as well as the creation of storage, staging, and active work areas. These areas would be located within or adjacent to the identified project boundaries and outside of existing roadway ROWs. At the time of construction, should the construction contractor require additional staging areas, they would be responsible for identifying and securing long-term staging areas on previously disturbed storage yards, the locations of which are currently unknown. Nonetheless, construction of Class IV facilities could temporarily increase hazards due to geometric design features or incompatible uses from the temporary presence of

construction equipment on local roadways and the potential for lane closures. A construction traffic control plan would be prepared and implemented for any construction activities occurring within the roadway ROW in accordance with the CA MUTCD. The construction traffic control plan would include the use of flaggers during temporary lane closures and would ensure the use of proper signage, buffer zones, barriers, and reduced speed limits around construction zones, consistent with Chapter 6 (Flagger Control) of the CA MUTCD (Caltrans 2014). Therefore, construction of the Class IV facilities would not substantially increase hazards due to a geometric design feature or incompatible uses.

Operation of the Class IV facilities would consist of bicycle travel along physically separated bikeways adjacent to travel lanes, which would physically separate vehicles and bicyclists into ROWs within the roadway due to the presence of vertical barriers. All Class IV facilities would be designed in adherence with City and County guidelines and the Caltrans Highway Design Manual Chapter 1000, which specifies the appropriate width, signage, intersection design, crossing points, and physical separation for Class IV facilities (Caltrans 2022). Therefore, proposed Class IV facilities would not substantially increase hazards due to a geometric design feature or incompatible use. This impact would be less than significant.

Enhanced Bicycle Treatments

Enhanced bicycle treatments would include street striping and restriping, signage and wayfinding, bicycle signals and detection at traffic signals, bicycle parking, and bicycle repair facilities. Construction and implementation of these facilities would be completed within a single work period and would not require the establishment of storage, staging, or work areas. Nonetheless, implementation of the enhanced bicycle treatments could result in a temporary increase in hazards due to incompatible uses from construction equipment on local roadways. A construction traffic control plan would be prepared and implemented for any activities occurring within the roadway ROW in accordance with the CA MUTCD. Therefore, construction of the enhanced bicycle treatments would not substantially increase hazards due to a geometric design feature or incompatible uses.

Operation of the enhanced bicycle treatments would include continued use of existing bicycle facilities, storing of bicycles at new parking facilities, and use of bicycle repair facilities. Enhanced bicycle treatments would be implemented at various locations throughout the city, but these facilities would generally be placed within or adjacent to existing, new, or improved bikeways. Therefore, the enhanced bicycle treatments would not substantially increase hazards due to a geometric design feature or incompatible uses. This impact would be less than significant

General Plan Amendments

As part of the proposed Project, the City must amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. These General Plan Amendments shift the focus from prioritizing automobile mobility to reducing VMT through alternative transportation modes like walking and biking, guided by the BMP. The proposed General Plan Amendments would not result in construction or operation activities beyond existing conditions. Therefore, the Amendments would not result in safety hazards due to a geometric design feature or incompatible uses. No impact would occur.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

Threshold 4:	Would the project result in inadequate emergency access?

Impact TRA-4 **DUE TO THE IMPLEMENTATION OF A TRAFFIC CONTROL PLAN DURING ACTIVITIES OCCURRING WITHIN THE ROADWAY, CONSTRUCTION WOULD NOT RESULT IN INADEQUATE EMERGENCY ACCESS. COORDINATION WITH THE AGOURA HILLS FIRE DEPARTMENT PRIOR TO DESIGN REVIEW AND FUTURE PROJECT APPROVAL WOULD ENSURE EMERGENCY ACCESS IS MAINTAINED DURING OPERATION. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.**

Class I Facilities

Construction of Class I facilities would involve the establishment of storage, staging, and active work areas. These areas would be located within or adjacent to the identified project boundaries and outside of existing roadway ROWs. Nonetheless, construction activities could have temporary effects on vehicle flow due to the temporary presence of construction equipment on local roadways and the potential for lane closures. Construction activities could also temporarily block access to roadways that are currently used by emergency response vehicles. A construction traffic control plan would be prepared and implemented for any construction activities occurring within the roadway ROW in accordance with the CA MUTCD. The construction traffic control plan would include the use of flaggers during temporary lane closures and would ensure the use of proper signage, buffer zones, barriers, and reduced speed limits around construction zones, consistent with Chapter 6 (Flagger Control) of the CA MUTCD. Furthermore, the CA MUTCD stipulates that a construction traffic control plan must include provisions for acceptable access to abutting property owners and businesses, and when work occurs on a high-volume or highly congested facility, vehicle storage or staging spaces must be provided for emergency vehicles (Caltrans 2014). Therefore, construction of the Class I facilities would not result in inadequate emergency access.

Operation of the Class I facilities would consist of bicycle and pedestrian travel along shared use paths away from existing roadway ROWs. In accordance with Chapter 1000 of the Caltrans Highway Design Manual, Class I facilities would be designed with widths of eight to 10 feet wide, with an additional two-foot buffer on either side (Caltrans 2025). As identified in the 2021 International Fire Code, fire apparatus access roads should have a minimum width of 20 feet (International Code Council 2021). Prior to design review and future approval of Class I facilities, coordination with the City of Agoura Hills Fire Department would be required to confirm the minimum sufficient widths for emergency access along the Class I facilities. Therefore, Class I facilities would not result in inadequate emergency access. This impact would be less than significant.

MEDEA CREEK PATH

Construction of the Path would involve the establishment of storage, staging, and active work areas. These areas would be located within or adjacent to the identified project boundary and outside of existing roadway ROWs. Nonetheless, construction activities could have temporary effects on vehicle flow due to the temporary presence of construction equipment on local roadways and the potential for lane closures. Construction activities could also temporarily block access to roadways that are currently used by emergency response vehicles. A construction traffic control plan would be prepared and implemented for any construction activities occurring within the roadway ROW in accordance with the CA MUTCD. The construction traffic control plan would include the use of

flaggers during temporary lane closures and would ensure the use of proper signage, buffer zones, barriers, and reduced speed limits around construction zones, consistent with Chapter 6 (Flagger Control) of the CA MUTCD. Furthermore, the CA MUTCD stipulates that a construction traffic control plan must include provisions for acceptable access to abutting property owners and businesses, and when work occurs on a high-volume or highly congested facility, vehicle storage or staging spaces must be provided for emergency vehicles (Caltrans 2014). Therefore, construction of the Path would not result in inadequate emergency access.

Operation of the Path would consist of bicycle and pedestrian travel along a shared use path away from existing roadway ROWs. As identified in Figure 2-3 through Figure 2-10, the width of the Path would range from 10 feet to 14 feet. Prior to design review and future approval of the Path, coordination with the City of Agoura Hills Fire Department would be required to confirm the minimum sufficient widths for emergency access along the Path. Therefore, the Path would not result in inadequate emergency access. This impact would be less than significant.

AGOURA HIGH SCHOOL CONNECTION

Construction of the Connection would involve the establishment of storage, staging, and active work areas. These areas would be located within or adjacent to the identified project boundary and outside of existing roadway ROWs. Nonetheless, construction activities could have temporary effects on vehicle flow due to the temporary presence of construction equipment on local roadways and the potential for lane closures. Construction activities could also temporarily block access to roadways that are currently used by emergency response vehicles. A construction traffic control plan would be prepared and implemented for any construction activities occurring within the roadway ROW in accordance with the CA MUTCD. The construction traffic control plan would include the use of flaggers during temporary lane closures and would ensure the use of proper signage, buffer zones, barriers, and reduced speed limits around construction zones, consistent with Chapter 6 (Flagger Control) of the CA MUTCD. Furthermore, the CA MUTCD stipulates that a construction traffic control plan must include provisions for acceptable access to abutting property owners and businesses, and when work occurs on a high-volume or highly congested facility, vehicle storage or staging spaces must be provided for emergency vehicles (Caltrans 2014). Therefore, construction of the Connection would not result in inadequate emergency access.

Operation of the Connection would consist of bicycle and pedestrian travel along a shared use path away from existing roadway ROWs. As identified in Figure 2-11 and Figure 2-12, the width of the Connection would range from 10 feet to 14 feet. Prior to design review and future approval of the Connection, coordination with the City of Agoura Hills Fire Department would be required to confirm the minimum sufficient widths for emergency access along the Connection. Therefore, the Connection would not result in inadequate emergency access. This impact would be less than significant.

Class II Facilities

Construction of Class II facilities would generally consist of roadway restriping and reconfiguration of lane widths. These activities would require the use of paint trucks and similar equipment along existing roadways. Restriping can be completed within a single work period and does not require the establishment of storage, staging, or work areas. Therefore, restriping activities would not result in inadequate emergency access.

Implementation of Class II facilities would also require pavement widening on Driver Avenue and Cornell Road to allow for the addition of bicycle lanes. Construction would require the use of

delivery trucks, vehicles, and other construction equipment, as well as the creation of storage, staging, and active work areas. These areas would be located within or adjacent to the identified project boundaries and outside of existing roadway ROWs. Nonetheless, construction activities could have temporary effects on vehicle flow due to the temporary presence of construction equipment on local roadways and the potential for lane closures. Construction activities could also temporarily block access to roadways that are currently used by emergency response vehicles. A construction traffic control plan would be prepared and implemented for any construction activities occurring within the roadway ROW in accordance with the CA MUTCD. The construction traffic control plan would include the use of flaggers during temporary lane closures and would ensure the use of proper signage, buffer zones, barriers, and reduced speed limits around construction zones, consistent with Chapter 6 (Flagger Control) of the CA MUTCD. Furthermore, the CA MUTCD stipulates that a construction traffic control plan must include provisions for acceptable access to abutting property owners and businesses, and when work occurs on a high-volume or highly congested facility, vehicle storage or staging spaces must be provided for emergency vehicles (Caltrans 2014). Therefore, construction of the Class II facilities would not result in inadequate emergency access.

Operation of the Class II facilities would consist of bicycle travel along delineated bike lanes on existing roadways. Therefore, there would be no change in emergency access from existing conditions. This impact would be less than significant.

Class III Facilities

Construction of the Class III facilities would be limited to the restriping of existing roads to identify bike routes. These activities would require the use of paint trucks and similar equipment along existing roadways. Restriping can be completed within a single work period and does not require the establishment of storage, staging, or work areas. Therefore, implementation of Class III facilities would not result in inadequate emergency access.

Operation of the Class III facilities would consist of bicycle travel along shared use travel lanes on existing roadways. Therefore, there would be no change in emergency access from existing conditions. This impact would be less than significant.

Class IV Facilities

Construction of Class IV facilities would involve the establishment of storage, staging, and active work areas. These areas would be located within or adjacent to the identified project boundaries and outside of existing roadway ROWs. Nonetheless, construction activities could have temporary effects on vehicle flow due to the temporary presence of construction equipment on local roadways and the potential for lane closures. Construction activities could also temporarily block access to roadways that are currently used by emergency response vehicles. A construction traffic control plan would be prepared and implemented for any construction activities occurring within the roadway ROW in accordance with the CA MUTCD. The construction traffic control plan would include the use of flaggers during temporary lane closures and would ensure the use of proper signage, buffer zones, barriers, and reduced speed limits around construction zones, consistent with Chapter 6 (Flagger Control) of the CA MUTCD. Furthermore, the CA MUTCD stipulates that a construction traffic control plan must include provisions for acceptable access to abutting property owners and businesses, and when work occurs on a high-volume or highly congested facility, vehicle storage or staging spaces must be provided for emergency vehicles (Caltrans 2014). Therefore, construction of the Class IV facilities would not result in inadequate emergency access.

Operation of the Class IV facilities would consist of bicycle travel along physically separated bikeways adjacent to travel lanes, which would physically separate vehicles and bicyclists into ROWs within the roadway due to the presence of vertical barriers such as mountable curbs or flexible barriers. Use of mountable curbs or flexible barriers would maintain separation between vehicles and bicyclists while allowing for emergency access from the adjacent travel lanes. Therefore, implementation of the Class IV facilities would not result in inadequate emergency access. This impact would be less than significant.

Enhanced Bicycle Treatments

Enhanced bicycle treatments would include street striping and restriping, signage and wayfinding, bicycle signals and detection at traffic signals, bicycle parking, and bicycle repair facilities. Construction and implementation of these facilities would be completed within a single work period and would not require the establishment of storage, staging, or work areas. Therefore, implementation of enhanced bicycle treatments would not result in inadequate emergency access.

Operation of the enhanced bicycle treatments would include continued use of existing bicycle facilities, storing of bicycles at new parking facilities, and use of bicycle repair facilities. Enhanced bicycle treatments would be implemented at various locations throughout the city, but these facilities would generally be placed within or adjacent to existing, new, or improved bikeways. These facilities would not be placed in locations that would block ingress or egress, or would otherwise impede emergency access while in use. Therefore, enhanced bicycle treatments would not result in inadequate emergency access. This impact would be less than significant.

General Plan Amendments

As part of the proposed Project, the City must amend Chapter 3, *Infrastructure and Community Services,* of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. The proposed General Plan Amendments would not result in construction or operation activities beyond existing conditions. Therefore, the Amendments would not result in inadequate emergency access. No impact would occur.

Mitigation Measures

No mitigation measures are required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.11.4 Cumulative Impacts

The geographic scope for cumulative impacts related to transportation is the Project area, which encompasses all of the City of Agoura Hills. This geographic scope is appropriate because cumulative development would have a cascading effect on the overall circulation network throughout the city. A cumulative impact would occur if cumulative development from past, present, and reasonably foreseeable future projects, including the projects listed in Table 3-1, would have the potential to conflict with transportation programs, plans, ordinances, and policies; conflict with or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b); substantially increase hazards due to a geometric design features or incompatible uses; or result in inadequate emergency access.

Past, present, and reasonably foreseeable future projects, including the projects listed in Table 3-1 and other cumulative development in the geographic scope defined above, would be required to comply with all local regulations and policies related to public transit, bicycle, and pedestrian facilities. Therefore, no cumulative impacts related to conflict with transportation programs, plans, ordinances, and policies would occur.

Cumulative development could facilitate an increase in VMT that may exceed applicable VMT thresholds. This would be a potentially significant cumulative impact. As described under Impact TRA-2, the proposed Project is an active transportation project that generally reduces VMT by encouraging alternative modes of travel. Therefore, implementation of the Project would not contribute to additional VMT in the City of Agoura Hills, and the Project would not have a considerable contribution to cumulative impacts related to VMT.

Past, present, and reasonably foreseeable future projects, including the projects listed in Table 3-1 and other cumulative development in the geographic scope defined above, would be required to comply with the applicable regulations and design standards set forth by the City. Discretionary projects would undergo a project-level design review to ensure individual development projects comply with such regulations and standards related to hazards, incompatible uses, and emergency access. Therefore, cumulative impacts related to hazards due to geometric design features or incompatible uses, and cumulative impacts related to emergency access would be less than significant.

4.12 Tribal Cultural Resources

The analysis in this section considers potential impacts to tribal cultural resources. Specifically, this section discusses the environmental and regulatory setting; the criteria used to determine the significance of environmental impacts related to tribal cultural resources; and potential impacts related to tribal cultural resources that would result from implementation of the proposed Project.

Tribal cultural resources are those resources identified by California Native American tribes in consultation with lead agencies during tribal consultation (also referred to as Assembly Bill [AB] 52 consultation]. Local governments must also contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan (also referred to as Senate Bill [SB] 18 consultation). The analysis in this section is based on the results of the City's AB 52 and Senate Bill (SB) 18 consultation efforts.

4.12.1 Setting

a. Ethnographic Context

The Project area, which encompasses all of the City of Agoura Hills, is situated near the boundaries of several Native American groups including the Ventureño Chumash, the Gabrieleño, and the Tataviam. Below are synopses of ethnographic data for each of these three Native American groups.

Chumash

The Chumash spoke six closely related Chumashan languages that have been divided into three branches—Northern Chumash (consisting only of Obispeño), Central Chumash (consisting of Purisimeño, Ineseño, Barbareño, and Ventureño), and Island Chumash (Golla 2007). The name "Ventureño Chumash" denotes the people who were administered by the Spanish from the Mission San Buenaventura during the historic period. At the time of European-Native contact, the Ventureño Chumash occupied areas along creek corridors that provided intermittent or perennial fresh water sources. A series of trailways into these areas facilitated trade between coastal and other neighboring groups such as the Salinan to the north, the Southern Valley Yokuts and Tataviam to the east, and the Gabrielino (Tongva and Kizh) to the south (Roman 2017).

Early Spanish accounts from European-Native contact describe the Santa Barbara Channel as heavily populated. Estimates of the Chumash total population range from 8,000 to 10,000 (Kroeber 1925: 551) to 18,000 to 22,000 (Cook and Heizer 1965; Grant 1978a). Santa Cruz Island had at least six villages observed by Juan Rodriguez Cabrillo in 1542 (Johnson 1982). Typical house structures were large (up to 55 feet in diameter) and could accommodate 70 people (Kroeber 1925; Grant 1978b). The village of *šukuw*, (or *shuku*), at Rincon Point, was encountered by Gaspar de Portola in 1769. This village had 60 houses and seven canoes, with an estimated population of 300 (Grant 1978b). At this time, Western coastal Chumash lived in hemispherical dwellings covered by interwoven grasses, such as tule, carrizo grass, wild alfalfa, and fern (Grant 1978b). Other structures in a village included small sweathouses and a large ceremonial chamber (Kroeber 1925: 557).

Historic Spanish period accounts suggest the overarching social structure to be patrilineal chiefdoms. These have been separated into three sub-chief categories: "Big Chief," who lead groups of settlements, "Chief," who was head of a single village, and "Lesser Chief," who was subordinate to the others (Gamble et al. 2001). Social or economic status may also have been indicated through mortuary practices, although this is debated by archaeologists. Mourning rituals consisted of burials

in cemeteries with grave goods, such as *Olivella* shell beads, and beads made from other local shells. Other recorded mortuary rituals included burying individuals in the floor of a residence and burning the deceased's house and possessions (Gamble et al. 2001; Arnold and Green 2002).

During this period, Chumash populations exploited multiple subsistence strategies. The acorn was an especially important resource. It could be gathered, stored, ground into meal, or cooked into paste. Other seeds or fruits like pine nuts and wild cherries would be gathered and processed with a mortar. Hunting and fishing were also an important aspect of Chumash subsistence. Hunters would use a bow and arrow for land mammals like deer, coyote, and fox (Grant 1978b). Sea mammals were hunted with harpoons, while deep-sea fish were caught using nets, hooks, and lines. Shellfish were gathered from beaches using digging sticks, and mussels and abalone were pried from rocks using wood or bone wedges (Johnson 1982). Other subsistence technology included skillet-like flat stones called *comals*, sandstone storage bowls, and wooden plates and bowls. Archaeological evidence suggests the Ventureño Chumash practiced lithic production of tools from quartzite, chalcedony, and chert in separate lithic workspaces near their occupation sites (Roman 2017). Woven baskets were also used for food storage and food preparation. Tightly woven baskets for holding or draining water were made with coiling or twining techniques (Grant 1978b).

The Chumash were heavily affected by the arrival of Europeans. The Spanish missions and later Mexican and American settlers dramatically altered traditional Chumash lifeways. The Chumash population was considerably reduced by the introduction of European diseases. Many Chumash descendants still inhabit the region (Grant 1978a).

Gabrieleño

Archaeological evidence suggests the Gabrieleño arrived in the Los Angeles Basin sometime around 500 BCE; however, this has been a subject of debate. Many contemporary Gabrieleño identify themselves as descendants of the indigenous people living across the plains of the Los Angeles Basin and use the native term Tongva (King 1994). This term is used in the remainder of this section to refer to the pre-contact inhabitants of the Los Angeles Basin and their descendants. Surrounding native groups included the Chumash and Tataviam to the northwest, the Serrano and Cahuilla to the northeast, and the Juaneño and Luiseño to the southeast.

Tongva lands encompassed the greater Los Angeles Basin and three Channel Islands, San Clemente, San Nicolas, and Santa Catalina. The Tongva established large, permanent villages in the fertile lowlands along rivers and streams, and in sheltered areas along the coast, stretching from the foothills of the San Gabriel Mountains to the Pacific Ocean. Tribal population has been estimated to have been at least 5,000 (Bean and Smith 1978: 540), but recent ethnohistoric work suggests a number approaching 10,000 (O'Neil 2002). Houses constructed by the Tongva were large, circular, domed structures made of willow poles thatched with tule holding up to 50 people (Bean and Smith 1978). Other structures served as sweathouses, menstrual huts, ceremonial enclosures, and probably communal granaries. Cleared fields for races and games, such as lacrosse and pole throwing, were created adjacent to Tongva villages (McCawley 1996: 27). Archaeological sites composed of villages with various sized structures have been identified.

The Tongva subsistence economy was centered on gathering and hunting. The surrounding environment was rich and varied, and the tribe exploited mountains, foothills, valleys, deserts, riparian, estuarine, and open and rocky coastal eco-niches. Like most native Californians, acorns were the staple food (an established industry by the time of the early Intermediate Period). Acorns were supplemented by the roots, leaves, seeds, and fruits of a wide variety of flora (e.g., islay, cactus, yucca, sages, and agave). Fresh water and saltwater fish, shellfish, birds, reptiles, and insects,

as well as large and small mammals, were also consumed (Bean and Smith 1978: 546; Kroeber 1925: 631–632; McCawley 1996: 119–123, 128–131).

A wide variety of tools and implements were used by the Tongva to gather and collect food resources. These included the bow and arrow, traps, nets, blinds, throwing sticks and slings, spears, harpoons, and hooks. Groups residing near the ocean used oceangoing plank canoes and tule balsa canoes for fishing, travel, and trade between the mainland and the Channel Islands (McCawley 1996: 7). Tongva people processed food with a variety of tools, including hammerstones and anvils, mortars and pestles, manos and metates, strainers, leaching baskets and bowls, knives, bone saws, and wooden drying racks. Food was consumed from a variety of vessels. Catalina Island steatite was used to make ollas and cooking vessels (Blackburn 1963; Kroeber 1925: 629; McCawley 1996: 129–138).

At the time of Spanish contact, the basis of Tongva religious life was the Chinigchinich cult, centered on the last of a series of heroic mythological figures. Chinigchinich gave instruction on laws and institutions, and taught the people how to dance, the primary religious act for this society. He later withdrew into heaven, where he rewarded the faithful and punished those who disobeyed his laws (Kroeber 1925: 637–638). The Chinigchinich religion seems to have been relatively new when the Spanish arrived. It was spreading south into the Southern Takic groups even as Christian missions were being built and may represent a mixture of native and Christian belief and practices (McCawley 1996: 143–144).

Deceased Tongva were either buried or cremated, with inhumation more common on the Channel Islands and the neighboring mainland coast and cremation predominating on the remainder of the coast and in the interior (Harrington 1942; McCawley 1996: 157). At the behest of the Spanish missionaries, cremation essentially ceased during the post-Contact period (McCawley 1996: 157).

Tataviam

The Tataviam were not well documented by early ethnographers. John P. Harrington was a primary source ethnographer, who conducted interviews with Tataviam descendants in the early twentieth century (Johnson and Earle 1990). Today, researchers generally agree the Tataviam spoke an Uto-Aztecan language, most likely a Takic language (Hudson 1982). This language is now dead (Johnson and Earle 1990).

Tataviam territory included the upper Santa Clara River from Piru Creek eastward, extending over the Sawmill Mountains to the southwest edge of the Antelope Valley (King and Blackburn 1978). Their territory was bounded on the west and north by various Chumash groups, to the east by the Kitanemuk and Serrano, and on the south by the Tongva (Gabrieleño and Fernandeño, although some Tataviam were also identified as Fernandeño because of their association with Mission San Fernando). Environmentally, their lands consisted of sloped areas surrounded by desert (Stickel and Weinman-Roberts 1980). Dwellings were domed-thatch shelters under shady overhanging rocks that aided in cooling (Eargle 2008). Settlement size ranged from 10 to 200 persons, with small settlements often ancillary to large villages.

Archaeological evidence from Bower's Cave—located between Newhall and Piru—combined with ethnographic evidence suggest their ritual organization was similar to both the Chumash and Gabrieliño, two groups whose lifestyles were distinct from one another. Rock art found in their traditional territory included representational and abstract pictographs, incised pictographs, petroglyphs, and cupules (Knight 2010).

The Tataviam were a hunting and gathering society. Acorns were a main food source and were ground into flour (Eargle 2008; Garza 2012). King and Blackburn (1978) hypothesize that because of the predominance of large south-facing slopes in their territory, the Tataviam relied on yucca as a food source more than their neighbors (Garza 2012). Additional food resources included sage seeds, berries, small mammals, deer, and possibly antelope.

Exogamous marriage was commonly practiced and Tataviam intermarried with Tongva, Chumash, and Kitanemuk neighbors (King and Blackburn 1978). Genealogical research suggests that Tataviam individuals and families persisted into the twentieth century in other communities (Johnson and Earle 1990). Spanish missions developed in the area relatively early, with records of Tataviam baptisms as early as 1803. By 1810, the Tataviam were virtually completely missionized through baptism at Mission San Fernando (King and Blackburn 1978; Johnson and Earle 1990).

4.12.2 Regulatory Setting

a. Federal Regulations

There are no federal regulations related to Tribal Cultural Resources applicable to the proposed Project.

b. State Regulations

Assembly Bill 52

AB 52 of 2015 expanded the California Environmental Quality Act (CEQA) by defining a new resource category, "tribal cultural resources." AB 52 establishes, "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (Public Resources Code [PRC] Section 21084.2). It further states the CEQA lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

PRC Section 21074 (a)(1)(A) and (B) define tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and that meets at least one of the following criteria, as summarized in *CEQA Guidelines* Appendix G:

1) Listed or eligible for listing in the California Register of Historic Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k)
2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process with California Native American tribes that must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." California Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

Senate Bill 18

California Government Code Section 65352.3 (adopted pursuant to the requirements of SB 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan. The tribal organizations eligible to consult have traditional lands in a local government's jurisdiction and are identified, upon request, by the NAHC. As noted in the California Office of Planning and Research's Tribal Consultation Guidelines (2005), "the intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places." SB 18 refers to PRC Section 5097.9 and 5097.995 to define cultural places as:

- A Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine (PRC Section 5097.9)
- A Native American historic, cultural, or sacred site, that is listed or may be eligible for listing in the California Register of Historical Resources pursuant to Section 5024.1, including any historic or prehistoric ruins, any burial ground, any archaeological or historic site (PRC Section 5097.995.

Health and Safety Code Sections 7050.5 and 7052

California Health and Safety Code Section 7050.5 provides legal protection for human remains discovered outside of a dedicated cemetery. Specifically, subsection (a) makes it a misdemeanor offense to knowingly mutilate, disinter, disturb, or remove human remains without lawful authority. Subsection (b) requires that if human remains are discovered in any location other than a dedicated cemetery, all excavation or disturbance must cease until the county coroner has made a determination regarding the nature of the remains. The coroner must assess whether the remains fall under their jurisdiction according to Government Code Section 27491 and related provisions, and must provide treatment and disposition recommendations within two working days, consistent with PRC Section 5097.98. Subsection (c) mandates that if the coroner determines the remains are not under their jurisdiction and identifies or suspects the remains to be Native American, the NAHC must be notified by telephone within 24 hours. This provision ensures timely tribal notification and potential involvement in the treatment and disposition of Native American remains.

California Health and Safety Code Section 7052 establishes felony penalties for further unlawful treatment of human remains and reinforces the legal and ethical standards for the respectful treatment of human remains.

c. Local Regulations

The City of Agoura Hills General Plan 2035 was adopted on March 24, 2010 (updated on August 10, 2022) by the City Council (City of Agoura Hills 2022). The City of Agoura Hills General Plan 2035 is a strategic document designed to guide the physical development of the city until the year 2035. Among other things, the City of Agoura Hills General Plan 2035 sets out the pattern of land uses, including residential, commercial, and industrial. It also establishes the system of streets, bikeways, and trails. The City of Agoura Hills General Plan 2035 addresses a wide variety of subject areas, including housing, traffic, natural resources, land uses, economic development, noise, and public safety.

The City of Agoura Hills General Plan 2035 contains the following goals and policies related to tribal cultural resources, which would apply to the proposed Project.

Goal HR-3 City That Recognizes its Prehistoric Resources. The protection of significant archaeological and paleontological resources in Agoura Hills.

HR-3.1 Recognition of Resources. Require that the potential for the presence of significant archaeological and paleontological resources be considered prior to the development of a property. (Imp HR-5).

HR-3.2 Protection of Resources. Require that significant archaeological and paleontological resources be preserve in-situ, as feasible. When avoidance of impacts is not possible, require data recovery mitigation for all significant resources. Require that excavation of deposits of Native American origin be coordinated with and monitored by recognized Chumash representatives. (Imp HR-6).

HR-3.3 Discovery of Resources. Require that if human remains or funerary objects are discovered and unearthed during any soil disturbing activity, the discoveries shall be treated in compliance with applicable state and federal laws, including notifying the County Coroner and the California Native American Heritage Commission, as appropriate, and following relevant procedures.

4.12.3 Impact Analysis

a. Methodology and Significance Thresholds

As discussed in Section 4.0, *Environmental Impact Analysis*, all Project components are analyzed at the programmatic level. Project components include the Bicycle Master Plan (BMP), the VMT Mitigation Exchange and Banking Program (Program), and the General Plan Amendments (Amendments). Projects included within the BMP are grouped into Class I facilities, Class II facilities, Class III facilities, Class IV facilities, and enhanced bicycle treatments, as identified in Section 2.5, Project Characteristics, and in Table 1 of Chapter 2, Project Description. The impact analysis contained herein provides a programmatic analysis of anticipated impacts for each of the five facility classes, as the individual project impacts associated with each class of facility are expected to be similar. Because the City seeks to prioritize implementation of the Medea Creek Path (Path) and the Agoura High School Connection (Connection), the Path and the Connection have their own subheadings within the Class I Facility impact analysis subsection to provide a more specific assessment of their environmental impacts. Impacts associated with the General Plan Amendments are analyzed within their own subsection.

As discussed in Chapter 2, Project Description, the only projects that are currently planned, unfunded, and could potentially be funded by the VMT Mitigation Exchange and Banking Program are those currently included within the Bicycle Master Plan. Therefore, the impact analysis contained herein does not include a subsection for impacts associated with the Program, as the individual project list for the BMP and the Program are identical and impacts associated with the BMP would encompass impacts associated with the Program.

Within the following environmental analysis, impacts associated with each Project component are explicitly identified under the respective heading.

According to State CEQA Guidelines Appendix G, impacts related to tribal cultural resources would be significant if the proposed Project would:

1. Cause a substantial adverse change in the significance of a TCR, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size

and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:

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

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

AB 52 and SB 18 Consultation

On November 23, 2024, the California Native American Heritage Commission (NAHC) conducted a Sacred Lands File (SLF) search for the Project area. The SLF search did not identify the presence of known tribal cultural resources within or in the vicinity of the Project area. The NAHC identified a list of tribal contacts known to be traditionally and culturally affiliated with the Place of Use.

The City of Agoura Hills sent AB 52 notification letters via certified mail to the following Native American tribal contacts:

- Barbareño/Ventureño Band of Mission Indians
- Chumash Council of Bakersfield
- Fernandeño Tataviam Band of Mission Indians
- Gabrieleno/Tongva San Gabriel Band of Mission Indians

The City of Agoura Hills sent SB 18 notification letters via certified mail to the following Native American tribal contacts:

- Barbareño/Ventureño Band of Mission Indians
- Chumash Council of Bakersfield
- Coastal Band of the Chumash Nation
- Northern Chumash Tribal Council
- Santa Ynez Band of Chumash Indians
- Fernandeño Tataviam Band of Mission Indians
- Gabrieleno/Tongva San Gabriel Band of Mission Indians
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino/Tongva Nation
- Gabrielino-Tongva Tribe

Under AB 52 and SB 18, tribes have 30 and 90 days to respond and request consultation, respectively. The City received one response from the Fernandeño Tataviam Band of Mission Indians (FTBMI). No responses were received from the other three groups notified.

On January 24, 2025, Miguel Luna, Chief Administrative Officer for the FTMBI, responded via email requesting additional details regarding the proposed Project. City staff responded to Mr. Luna's inquiry the same day providing the requested details. On February 18, 2025, Mr. Luna responded by referring to previous consultation efforts undertaken between the City and FTBMI in December 2022, wherein the following Conditions of Approval (COAs) were recommended by FTBMI for projects that would impact a tribal cultural resource:

- CUL-1. Retention of a Qualified Archaeologist
- CULT-2. Retention of tribal monitors affiliated with the FTBMI
- CUL-3. Implementation of a Worker Environmental Awareness Program (WEAP)
- CUL-4. Inadvertent discovery protocols for archaeological resources
- CUL-5. Inadvertent discovery protocols for human remains

Mr. Luna requested revisions to the COA language and asked that the final revisions be provided to him. As discussed below, no tribal cultural resources were identified as part of the consultation process to date. Therefore, the COAs do not apply to the proposed Project. Consultation between the City and FTBMI officially concluded in November 2025.

Threshold 1:	Would the project cause a substantial adverse change in the significance of a TCR, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is: a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k), or b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

Impact TCR-1 NO TRIBAL CULTURAL RESOURCES WERE IDENTIFIED AS A RESULT OF THE CITY'S REQUIRED AB 52 AND SB 18 CONSULTATION PROCESSES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

No tribal cultural resources listed or eligible for listing in the California Register of Historical Resources or determined by the lead agency, in its discretion and supported by substantial evidence, to be significant were identified as a result of the City's consultation process. As outlined in PRC Section 21080(e)(1-2), substantial evidence is defined as a reasonable assumption predicated upon fact, or expert opinion supported by fact, and is not an argument, speculation, or unsubstantiated opinion or narrative. Therefore, no mitigation measures are warranted, and impacts to tribal cultural resources would be less than significant.

Mitigation Measures

No mitigation measures would be required.

Significance After Mitigation

Impacts would be less than significant without mitigation.

4.12.4 Cumulative Impacts

The geographic scope for cumulative impacts related to tribal cultural resources is the Project area, which encompasses all of the City of Agoura Hills. This geographic scope is appropriate because TCRs have the potential to extend across large areas.

Past, present, and reasonably foreseeable future projects, including the projects listed in Table 3-1 in Chapter 3, *Environmental Setting*, would result in ground disturbance in locations with the potential to contain tribal cultural resources, anticipated or unanticipated. As such, cumulative development could adversely impact tribal cultural resources. Tribal cultural resources evaluations and AB 52 consultations would be completed by the appropriate jurisdiction on a case-by-case basis for all future development. Compliance with applicable regulations and implementation of appropriate mitigation measures, including resource avoidance measures, monitoring during ground disturbance within culturally sensitive areas, and preparation of mitigation plans for the inadvertent discovery of tribal cultural resources, would address impacts related to tribal cultural resources associated with future development. Therefore, cumulative development would have a less-than-significant cumulative impact involving substantial adverse changes in the significance of a tribal cultural resources.

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4.13 Effects Found Not to be Significant

Section 15128 of the *California Environmental Quality Act* (*CEQA) Guidelines* requires an Environmental Impact Report (EIR) to briefly describe any possible significant effects that were determined not to be significant and were therefore not discussed in detail in the EIR. This section is based on State CEQA Guidelines Appendix G and addresses the potential environmental effects of the project that clearly would not be significant and are not addressed in the preceding sections of this PEIR, including Agriculture and Forestry Resources, Energy, Greenhouse Gas Emissions, Mineral Resources, Utilities and Service Systems, Population and Housing, Public Services, and Wildfire. Any items not addressed in this section are addressed in Sections 4.1 through 4.12 of this PEIR.

4.13.1 Agriculture and Forestry Resources

All thresholds pertaining to Agriculture and Forestry Resources (from State CEQA Guidelines Appendix G) are discussed below.

Would the Project:

A. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use;
B. Conflict with existing zoning for agricultural use, or a Williamson Act contract;
C. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g));
D. Result in the loss of forest land or conversion of forest land to non-forest use; or,
E. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

The Project area encompasses all of the City of Agoura Hills. According to the California Department of Conservation's (DOC's) Important Farmland Finder, the city is characterized by "Urban and Built-Up Land" and "Other Land." "Other Land" is land not included in any other mapping category. Common examples of "Other Land" include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than forty acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is also mapped as "Other" Land (DOC 2025a). There is no prime farmland, unique farmland, or farmland of statewide importance located within the boundaries of the city (DOC 2022). No impact would occur.

The City of Agoura Hills does not contain lands zoned for agricultural use, and there are no parcels under a Williamson Act contract within the city (City of Agoura Hills 2023; DOC 2025b). The closest parcel under a Williamson Act contract is located approximately six miles west of the city in Hidden Valley. Therefore, the proposed Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. No impact would occur.

There are currently no existing zoning districts for forest land, timberland, or timberland production within the City of Agoura Hills (City of Agoura Hills 2023). Therefore, the Project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned

Timberland Production. Also, the Project would not result in the loss of forest land or conversion of forest land to non-forest use. Overall, the Project would not involve changes to the existing environment that could result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. No impact would occur.

4.13.2 Energy

All thresholds pertaining to Energy (from State CEQA Guidelines Appendix G) are discussed below.

Would the Project:

A. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or,
B. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

During construction of individual bicycle facilities identified within the Bicycle Master Plan (BMP), energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment on the Project site, construction workers traveling to and from the Project site, and vehicles used to deliver or haul materials. Construction equipment would be maintained to applicable standards, and construction activities and associated fuel consumption and energy use would be temporary and typical for construction sites. It is reasonable to assume contractors would avoid wasteful, inefficient, and unnecessary fuel consumption during construction to reduce construction costs. Therefore, the Project would not involve inefficient, wasteful, and unnecessary energy use during construction, and construction-phase impacts related to energy consumption would be less than significant.

Operation of bicycle facilities identified within the BMP would consist of bicycle and pedestrian travel along shared use paths, delineated bike lanes, shared use travel lanes, and physically separated bikeways adjacent to travel lanes. Use of these facilities would not consume gas or electricity. Implementation of the BMP would also result in the installation of enhanced bicycle treatments including street striping and restriping, signage and wayfinding, bicycle signals and detection at traffic signals, bicycle parking, and bicycle repair facilities. Operation of these facilities may require minimal amounts of electricity, such as bicycle signals or detection at traffic signals. These features would be anticipated to rely on existing electrical infrastructure and would tie into nearby transmission lines without the need for new or expanded electrical infrastructure. As part of the proposed Project, the City must also amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. These General Plan Amendments would shift the focus from prioritizing automobile mobility to reducing VMT through alternative transportation modes like walking and biking, guided by the BMP, which would reduce the consumption of gas and electricity in the city. Therefore, this impact would be less than significant.

The 2022 Scoping Plan for Achieving Carbon Neutrality outlines a strategy to meet carbon neutrality goals and cut human-caused greenhouse gas (GHG) emissions in accordance with the directive of Assembly Bill 1279. The Scoping Plan includes several goals and policies related to reducing energy and petroleum consumption and energy efficiency. The proposed Project would align with these goals and policies through its objective to increase transportation choices by providing viable alternatives to driving. These objectives would reduce overall energy consumption due to the potential for a reduction in petroleum use from mobile sources. As such, the Project would be consistent with the 2022 Scoping Plan that states under Chapter 5, *Challenge Accepted,* "*[state*

funding] strategies aid in developing new technologies, in ramping up access for all, and in shifting to cleaner, modes of transport; for instance, by supporting investments in walkable, bikeable communities and transit, as well as in vehicles." The Project would also allow for local residents to avoid vehicle trips (and thus petroleum use from mobile sources) into the area in accordance with its objective to improve accessibility through local and regional connectivity by providing dedicated bicycle lanes. Appendix D of the Scoping Plan discusses local actions that can occur to support State Greenhouse Gas (GHG) reduction and energy efficiency goals. Included in this discussion is a key priority area of VMT reduction that calls for increasing *"public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking"* and *"amend(ing) zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development,"* which the Bicycle Master Plan would support through its objective to provide a mechanism for developers to mitigate VMT impacts from development projects.

Appendix E of the 2022 Scoping Plan discusses sustainable and equitable communities. Specifically, part of the vision of the 2022 Scoping Plan is to help meet the State carbon neutrality goal no later than 2045 and advance energy efficiency and equity by providing *"complete networks of safe and accessible bicycle and pedestrian infrastructure to make those modes of transportation the preferred travel mode for short distances."* The proposed Project would implement up to 30.1 miles of new bikeways and bikeway improvements in the City of Agoura Hills, which would improve accessibility through local and regional connectivity, improve safety by providing separate biking facilities, and improve the public health by creating facilities that allow for more biking. Therefore, the Project would be consistent with the energy efficiency goals and vision of the 2022 Scoping Plan. This impact would be less than significant.

4.13.3 Greenhouse Gas Emissions

All thresholds pertaining to Greenhouse Gas Emissions (from State CEQA Guidelines Appendix G) are discussed below.

Would the Project:

A. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or,
B. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Operation of bicycle facilities identified within the BMP would consist of bicycle and pedestrian travel along shared use paths, delineated bike lanes, shared use travel lanes, and physically separated bikeways adjacent to travel lanes. Operation of enhanced bicycle treatments would consist of the continued use of existing bicycle facilities, storing of bicycles at new parking facilities, and use of bicycle repair facilities. As part of the proposed Project, the City must also amend Chapter 3, *Infrastructure and Community Services*, of the City of Agoura Hills General Plan 2035 to ensure consistency with the proposed BMP. These General Plan Amendments would shift the focus from prioritizing automobile mobility to reducing VMT through alternative transportation modes like walking and biking, guided by the BMP. Therefore, during operation, the Amendments would result in fewer vehicular trips. Overall, operational activities would not generate GHG emissions, either directly or indirectly. Rather, the Project would be expected to reduce vehicle trips due the addition of bicycle facilities, which would reduce GHG emissions in the Project area. No impact would occur.

As identified in Section 4.13.2, *Energy,* the proposed Project would be consistent with the goals and vision of the 2022 Scoping Plan. No impact would occur.

4.13.4 Mineral Resources

All thresholds pertaining to Mineral Resources (from State CEQA Guidelines Appendix G) are discussed below.

Would the Project:

A. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; or,
B. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

According to the City of Agoura Hills General Plan 2035, there are no significant mineral deposits known to exist within the city (City of Agoura Hills 2022). The majority of the city is classified as Mineral Resource Zone (MRZ)-1, which indicates an area has a low likelihood for significant mineral deposits to be present. Those areas not classified as MRZ-1 include Ladyface Mountain, a small portion of Palo Comado Canyon, and the Liberty Canyon area. These areas are classified as MRZ-3, which indicates the significance of mineral deposits cannot be evaluated with available data (City of Agoura Hills 2022). The Liberty Canyon area is the only location within Agoura Hills where mining activities have been documented. Elsewhere in the city, large-scale movements of earth materials have been associated with grading operations for urban developments, but not for the purpose of extracting minerals or construction aggregates. Despite no record of significant mineral deposits in the city, the City of Agoura Hills General Plan 2035 includes Goal NR-8, which aims to protect access to and availability of mineral resources while maintaining environmental protection. Specifically, Policy NR-8.1 focuses on the protection of lands designated as MRZ for potential future mining and the regulation of such activities in accordance with relevant laws and regulations. These goals are likely precautionary. Nonetheless, future development of individual bicycle facilities identified within the BMP would be required to comply with Goal NR-8 and Policy NR-8.1 of the City of Agoura Hills General Plan 2035. Thus, the proposed Project would not result in the loss of availability of a known mineral resource or locally important mineral resource recovery site. No impact would occur.

4.13.5 Population and Housing

All thresholds pertaining to Population and Housing (from State CEQA Guidelines Appendix G) are discussed below.

Would the Project:

A. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure); or,
B. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The proposed Project would consist of the implementation of shared use paths, delineated bike lanes, shared use travel lanes, physically separated bike lanes adjacent to travel lanes, enhanced bicycle treatments, and General Plan Amendments. The proposed Project would generate temporary employment opportunities during construction activities for individual projects identified

within the BMP. Construction activities would be short term in nature and construction workers are expected to be drawn from the existing regional work force. Therefore, construction of the Project would not induce growth due to temporary employment opportunities or the relocation of construction workers. The proposed Project would not result in long-term employment opportunities, as it would not result in new commercial or industrial development that would require daily employees. Furthermore, the proposed Project would not involve the construction of infrastructure that could induce substantial population growth, such as new homes, new or increased capacity sewer or water lines, or new streets or roads. Although local bicycle improvements would make the area more attractive to residents and visitors, implementation of the Project would not induce substantial unplanned population growth directly or indirectly. No impact would occur.

The Project would not require demolition of existing residences nor create long-term disturbances to residential land uses that would lead to the displacement of substantial numbers of people or necessitate construction of replacement housing. No impact would occur.

4.13.6 Public Services

All thresholds pertaining to Public Services (from State CEQA Guidelines Appendix G) are discussed below.

Would the Project:

A. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
    1. Fire protection;
    2. Police protection;
    3. Schools;
    4. Parks; or,
    5. Other public facilities?

The Project area encompasses all of the City of Agoura Hills, which is currently served by police and fire protection. As identified in Section 4.13.6 *Population and Housing,* the proposed Project would not induce substantial unplanned population growth that could result in the need for new or physically altered fire or police protection services or facilities. The shared use paths, delineated bike lanes, shared use travel lanes, physically separated bike lanes adjacent to travel lanes, and enhanced bicycle treatments would not require specialized or additional fire or police services since they are along existing paths and roads. Furthermore, the Project would not result in unplanned population growth as new or improved bicycle facilities would not generate new residents that would increase the demand for school facilities, parks, or other public facilities such as libraries. No impact would occur.

4.13.7 Utilities and Service Systems

All thresholds pertaining to Utilities and Service Systems (from State CEQA Guidelines Appendix G) are discussed below.

Would the Project:

A. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;
B. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years;
C. Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments;
D. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; or,
E. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The proposed Project would consist of the implementation of shared use paths, delineated bike lanes, shared use travel lanes, physically separated bike lanes adjacent to travel lanes, enhanced bicycle treatments, and General Plan amendments. These features would not require new or expanded utility services such as expanded water, wastewater, storm water drainage, electric power, natural gas, or telecommunication facilities. Furthermore, the Project would not involve or facilitate physical development requiring permanent utility services.

As discussed in Section 4.7, *Hydrology and Water Quality*, individual projects that disturb over one acre of soil would comply with the Construction General Permit, and all projects would have to comply with Article V, Chapter 5 of the Agoura Hills Municipal Code, requiring the preparation of a Stormwater Pollution Control Plan and implementation of Best Management Practices to control runoff from construction sites. During precipitation events, stormwater would flow from proposed facilities into adjacent permeable (grass or landscaped) areas or onto existing streets, where it would be collected by the city's existing stormwater system. Therefore, the proposed Project would not require new or expanded storm water drainage facilities.

Enhanced bicycle treatments would consist of components that may require minimal amounts of electricity, such as bicycle signals or detection at traffic signals. These features would be anticipated to rely on existing electrical infrastructure and would tie into nearby transmission lines without the need for new or expanded electrical infrastructure. Implementation of some components, such as Class I and Class IV facilities, may necessitate the relocation of existing utility infrastructure. The relocation of such utilities would not result in environmental impacts beyond what is evaluated throughout this environmental document. Therefore, Project impacts involving the construction or relocation of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities would be less than significant.

During ground disturbance associated with implementation of individual projects identified within the BMP, small quantities of potable or non-potable water would be required for dust control and suppression. Construction activities requiring dust suppression would be temporary in nature and water needs would be minimal. Water needs in the City of Agoura Hills are accounted for by the Las

Virgenes Municipal Water District's (LVMWD) Urban Water Management Plan. According to LVMWD's Urban Water Management Plan (2020), it is anticipated that water supplies will reliably meet all of LVMWD's water demands through 2040 during average, single dry-, and five-year drought. Operation of the Project would not require a permanent water supply. Therefore, sufficient water supplies would be available to serve Project construction. This impact would be less than significant.

During construction activities associated with implementation of individual projects identified within the BMP, portable toilets may be required for construction personnel, which would generate a minor amount of wastewater that would be hauled to the Tapia Water Reclamation Facility for disposal. The Tapia Water Reclamation Facility is permitted and designed to treat up to 16.1 million gallons per day. This facility is currently operating at approximately 59 percent of its permitted capacity, averaging approximately 9.5 million gallons per day in daily wastewater treatment (LVMWD 2025). Therefore, the Tapia Water Reclamation Facility would have adequate capacity to serve the projected wastewater generation during individual project construction in addition to existing commitments. Project components would not include new restrooms or septic systems, result in operational activities that would result in the ongoing generation of wastewater, or involve or facilitate physical development that would generate wastewater. Therefore, the Project would not result in the generation of wastewater exceeding the existing capacity of a wastewater treatment provider. This impact would be less than significant.

Construction activities may temporarily generate solid waste, including soil spoils or crushed asphalt, which would be disposed of in accordance with all applicable federal, State, and local statutes and regulations. Construction waste would be disposed of at the Calabasas Landfill, which has a permitted daily capacity of 1,000 tons per day, and an expected remaining life of 10 years (Los Angeles County Sanitation Districts 2025). Due to the temporary nature of construction activities and the minimal amount of construction waste anticipated, the Project would not generate quantities of solid waste that would account for a substantial percentage of the total daily regional permitted capacity available at the Calabasas Landfill. Trash cans may be installed on some segments of the proposed Class I facilities, including the Medea Creek Path and Agoura High School Connection. Disposal of waste by users of the Class I facilities would generate a minimal amount of solid waste, which would also be disposed of at Calabasas Landfill. Overall, implementation of the Project would not generate solid waste in excess of state or local standards or in excess of the capacity of local infrastructure. Impacts related to solid waste would be less than significant.

4.13.8 Wildfire

All thresholds pertaining to Wildfire (from State CEQA Guidelines Appendix G) are discussed below.

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

A. Substantially impair an adopted emergency response plan or emergency evacuation plan;
B. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;
C. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or,

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

The City of Agoura Hills is located in a Very High Fire Hazard Severity Zone (VHFHSZ) in a Local Responsibility Area and is bordered to the north and south by VHFHSZ in a State Responsibility Area (California Department of Forestry and Fire Protection 2025).

As discussed in Section 4.6 *Hazards and Hazardous Material*s, if future construction activities require work within the roadway, a construction traffic control plan would be prepared and implemented in accordance with the MUTCD. The construction traffic control plan would include the use of flaggers during any temporary lane closures, consistent with Chapter 6 (Flagger Control) of the MUTCD, and no detours would be required (Federal Highway Administration 2023). Therefore, construction of individual projects identified within the BMP would not impair an adopted emergency response plan or emergency evacuation plan.

During construction, there would be a temporary increase in human activity and potential ignition sources, including equipment that could create sparks, be a source of heat, or leak flammable materials on individual project sites. Heat or sparks from construction equipment, vehicles, and the use of flammable hazardous materials have the potential to ignite adjacent vegetation and start a fire, especially during weather events that include low-humidity and high wind speeds. Compliance with rules and regulations including Hazardous Material Transportation Act, Occupational Safety and Health Administration's Standard 1917.156, CCR Title 22, Hazardous Waste Control Law, Environmental Health Standards for the Management of Hazardous Waste Law, CCR Title 8 Section 1532.1, and the City of Agoura Hills General Plan 2035, all of which establish procedures for the proper transport, use, storage, and disposal of hazardous materials that have potential to ignite, would reduce the construction impact to a less than significant level.

The proposed Project would not include structural components or physical development that would exacerbate wildfire risk due to slope, prevailing winds, or other factors that would expose bike riders to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. The Project would not require installation or maintenance of roads, fuel breaks, emergency water sources, power lines or other utilities. Implementation of Class I bicycle facilities would result in the construction of new paved bicycle paths away from existing roadway rights-of-way. Operation of Class I facilities would consist of bicycle and pedestrian travel along these shared use paths. Although the Agoura Hills Municipal Code does not include regulations that pertain to the use of electric bicycles (E-bikes), Assembly Bill 1096, adopted in October 2015, limits the use of E-bikes on Class I and Class IV facilities. Furthermore, Senate Bill 1271, adopted in September 2024, establishes stricter battery safety rules and motor requirements to reduce fire risk associated with the use of E-bikes. Therefore, the Project would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. This impact would be less than significant.

As discussed in Section 4.5, *Geology and Soils,* several areas within the City of Agoura Hills are located within liquefaction zones. The Project would not result in physical development that could exacerbate seismic risks related to landslides. Furthermore, as discussed in Section 4.7, *Hydrology and Water Quality,* the Project would not substantially alter the topography of individual project sites, nor would the Project substantially alter existing drainage patterns. Overall, the Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires, as the Project would not exacerbate wildfire risk. No impact would occur.

5 Other CEQA Required Discussions

This chapter discusses other issues for which the California Environmental Quality Act (CEQA) requires analysis in addition to the specific issue areas discussed in Chapter 4, *Environmental Impact Analysis*, of this Programmatic Environmental Impact Report (EIR). These additional issues include the potential to induce population growth and/or economic growth; removal of obstacles to growth; significant irreversible effects; and mandatory findings.

5.1 Growth Inducement

State CEQA Guidelines Section 15126(d) requires a discussion of a proposed project's potential to foster economic or population growth, including ways in which a project could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. The proposed project's growth inducing potential is therefore considered significant if project-induced growth could result in significant physical effects in one or more environmental issue areas.

5.1.1 Population Growth

As discussed in Section 4.13.6, *Population and Housing*, the proposed Project would consist of the implementation of shared use paths, delineated bike lanes, shared use travel lanes, physically separated bike lanes adjacent to travel lanes, enhanced bicycle treatments, and General Plan Amendments. The proposed Project would generate temporary employment opportunities during construction activities for individual projects identified within the Bicycle Master Plan (BMP). Construction activities would be short term in nature and construction workers are expected to be drawn from the existing regional work force. Following construction, the proposed Project would not result in long-term employment opportunities, as it would not result in new commercial or industrial development that would require daily employees. Furthermore, the proposed Project would not involve the construction of infrastructure that could induce substantial population growth, such as new homes, new or increased capacity sewer or water lines, or new streets or roads.

5.1.2 Economic Growth

The proposed Project would generate temporary employment opportunities during construction. Because construction workers would be drawn from the existing regional work force, construction of the Project would not be growth-inducing. Following construction, the proposed Project would not result in long-term employment opportunities, as it would not result in new commercial or industrial development that would require daily employees. Therefore, the proposed Project would not contribute to the city's economic growth.

5.1.3 Removal of Obstacles to Growth

As identified is Section 4.8, *Land Use and Planning,* the City of Agoura Hills is comprised of a blend of semi-rural and suburban development. As discussed in Section 4.13.5, *Utilities and Service Systems,* existing infrastructure in the City of Agoura Hills would be adequate to serve the Project. The Project

would not result in the modification to or addition of water or wastewater facilities in the Project area that would facilitate or accommodate new development. Furthermore, the Project does not involve the extension of new water, wastewater, or vehicular transportation infrastructure through undeveloped areas, nor does the Project propose to increase the capacity of existing infrastructure. The Project does propose to implement paved Class I facilities away from existing roadways; these facilities would not provide access to currently undeveloped areas. Rather, these facilities would provide improved access for bicycles and pedestrians to existing developed areas within the city. Because the Project would not result in new infrastructure, require the extension of existing infrastructure to undeveloped areas, or increase the capacity of existing infrastructure in a way that would support new development or increase development intensity, Project implementation would not remove an obstacle to growth.

5.2 Irreversible Environmental Effects

State CEQA Guidelines Section 15126.2(d) require that EIRs contain a discussion of significant irreversible environmental changes which would be caused by the project should it be implemented. Such significant irreversible environmental changes may include the following:

- Use of non-renewable resources during the initial and continued phases of the project which would be irreversible because a large commitment of such resources makes removal or non-use unlikely;
- Primary impacts and, particularly secondary impacts (such as highway improvement which provides access to a previously inaccessible area) which generally commit future generations to similar uses; or
- Irreversible damage which may result from environmental accidents associated with the project.

This section addresses non-renewable resources, the commitment of future generations to the proposed uses, and irreversible impacts associated with the proposed Project.

Construction of individual projects identified within the BMP would involve an irreversible commitment of construction materials and non-renewable energy resources, including petroleum-based fuels used to power construction vehicles and equipment. Construction of bicycle facilities is generally low impact in that the requirements for construction materials is less than that of a typical roadway in the same extent. Following construction, implementation of the Project would not involve the development of new land uses resulting in the need for expanded electricity or creating additional vehicular trips. Rather, the Project would be expected to reduce vehicular trips by providing alternative travel modes, thereby reducing the consumption of non-renewable energy resources such as petroleum-based fuels. Some Project components, such as bicycle signals or detection at traffic signals, may require minimal amounts of electricity. These features would be anticipated to rely on existing electrical infrastructure and would tie into nearby transmission lines. Therefore, operation of individual projects would not increase the local demand for non-renewable energy resources such as petroleum products and natural gas. As discussed in Section 4.13.2, *Energy,* neither construction nor operation of the proposed Project would result in wasteful, inefficient or unnecessary consumption of energy resources. Although construction activities for individual projects would involve the use of energy, energy usage would be negligible and would not result in irreversible environmental effects. Consumption of construction materials and energy resources would occur with any development in the region and is not unique to the proposed Project.

Implementation of individual projects identified within the BMP would not involve land development requiring a commitment of law enforcement, fire protection, water supply, wastewater treatment, or solid waste disposal services such that new or increased public services or utility services would be necessary. As discussed in Section 4.13.6, *Public Services,* and Section 4.13.7, *Utilities and Service Systems,* impacts to these services and systems would not be significant. As discussed in Section 4.11, *Transportation,* active transportation projects, including the proposed Project, generally reduce VMT. Therefore, implementation of the Project would not result in additional vehicle trips, and thus would not increase local traffic or regional air pollutants and greenhouse gas emissions. Furthermore, as discussed in Section 4.2, *Air Quality*, and Section 4.13.3, *Greenhouse Gas Emissions*, construction and operation of the individual projects would not generate air emissions or greenhouse gas emissions that would result in a significant impact. As such, the Project would not result in irreversible effects.

5.3 Mandatory Findings

State CEQA Guidelines Section 15065 requires the following specific Mandatory Findings of Significance be addressed as part of the environmental review for the project.

- The potential for the project to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory
- Project impacts that are individually limited, but cumulatively considerable ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)
- Environmental effects of the project which will cause substantial adverse effects on human beings, either directly or indirectly

Section 4.3, *Biological Resources*, describes the Project's potential effects on plant and animal species populations, habitats, communities, and migratory patterns and concluded that there would be a less than significant impact to biological resources with implementation of mitigation measures. Section 4.4, *Cultural Resources*, and Section 4.12, *Tribal Cultural Resources*, describe the Project's potential effects on important historical and prehistorical cultural and tribal cultural resources. Section 4.4, *Cultural Resources*, concluded that impacts to cultural resources would be significant and unavoidable, while Section 4.12, *Tribal Cultural Resources*, concluded that there would be no impact to tribal cultural resources. Potential adverse environmental effects to human beings are discussed in Section 4.2, *Air Quality*, Section 4.5, *Geology and Soils*, Section 4.6, *Hazards and Hazardous Materials*, Section 4.9, *Noise*, and Section 4.13.8, *Wildfire*. As identified therein, impacts related to air quality and wildfire would be less than significant; impacts related to geology and soils, hazards and hazardous materials, and noise would be less than significant with mitigation. Therefore, the Project would not have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or cause substantial adverse effects on human beings, either directly or indirectly. Furthermore, the environmental analyses in Sections 4.1 through 4.12 of this EIR conclude with a discussion of the Project's contribution to cumulative effects; as discussed in

these sections, the Project would not result in a cumulatively considerable environmental impacts. Due to the significant and unavoidable impacts to cultural resources, the Project could eliminate important examples of the major periods of California history or prehistory; thus, implementation of the Project could substantially degrade the quality of the environment.

6 Alternatives

As required by State CEQA Guidelines Section 15126.6 of the *California Environmental Quality Act (CEQA) Guidelines,* this Programmatic Environmental Impact Report (EIR) examines a range of reasonable alternatives to the proposed Project that would feasibly attain most of the Project's basic objectives but would avoid or substantially lessen the significant environmental impacts of the project.

6.1 Development of Alternatives

State CEQA Guidelines Section 15126.6(c) requires that a EIR identify alternatives that were considered but rejected as infeasible and provide a brief explanation as to why such alternatives were not fully considered in the EIR. As required by the State CEQA Guidelines, the selection of alternatives for this PEIR included a screening process to determine a reasonable range of alternatives, which could reduce significant effects but also feasibly meet Project objectives. Alternatives that do not clearly provide any environmental advantages compared to the Project, do not meet basic Project objectives, or do not achieve overall lead agency policy goals, have been eliminated from further consideration. The factors that may be considered when addressing the feasibility of alternatives include site suitability, economic viability, availability of infrastructure, General Plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (State CEQA Guidelines Section 15126.6[f][1]). To develop a reasonable range of alternatives to the project, the City considered the following Project objectives and potentially significant impacts of the proposed Project.

6.1.1 Project Objectives

As discussed in Chapter 2, *Project Description*, the objectives for the proposed Project, are as follows:

- Increase transportation choices by providing viable alternatives to driving and improved equity to include all bikers, those who choose not to drive and those who cannot drive.
- Improve accessibility through local and regional connectivity. Local connections include residential communities, schools, commercial centers, and parks whereas regional connections include the surrounding communities and recreational trail network.
- Improve safety by providing separate biking facilities, reducing bicycle collisions, creating greater visibility for bikers, and raising awareness to both bicyclists and road users.
- Improve the public health by creating facilities that allow for more biking.
- Enhance sustainability and environmental benefits by reducing air pollution, greenhouse gas emissions, and noise pollution.
- Enhance community character by constructing bicycle facilities near areas of high scenic value, such as along greenbelts or near surface waters.
- Provide a mechanism for developers to mitigate VMT impacts from development projects.

6.1.2 Potentially Significant Impacts of the Project

As discussed throughout Chapter 4, *Environmental Impact Analysis*, and summarized in Table ES-1 in the Executive Summary, the proposed Project would cause significant and unavoidable environmental impacts related to Cultural Resources. The proposed Project would require mitigation to reduce potentially significant impacts related to biological resources, geology and soils, hazards and hazardous materials, and noise to less-than-significant levels. All other impacts identified in Chapter 4 would be less than significant or no impact.

6.1.3 Alternatives Considered but Rejected

State CEQA Guidelines Section 15126.6(a) states that "an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation." Thus, alternatives shall be limited to those that would avoid or substantially lessen any of the significant effects of the Project. Of those alternatives, the EIR need only examine in detail the ones that the lead agency determines could feasibly attain most of the basic objectives of the Project. Other alternatives may be considered but are not required to satisfy the requirements of CEQA. For the proposed Project, characteristics used to reject alternatives from further consideration include:

- Failure to meet basic Project objectives;
- Limited effectiveness in reducing project environmental impacts;
- Inconsistency with City policies; and
- Potential for inconsistency with adopted agency plans and policies.

The following alternatives were considered but eliminated from further analysis by the City due to one or more of these factors.

Alternative Location

The first step in considering an off-site alternative is identifying whether any of the significant impacts of the Project would be avoided or substantially lessened by the relocation. Only locations that would avoid or substantially lessen any of the significant impacts of the Project need be considered for inclusion in the EIR (State CEQA Guidelines Section 15126.6[f][2][A]). If it is determined that no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion (State CEQA Guidelines Section 15126.6[f][2][B]).

No alternative Project locations are analyzed in this EIR. The Project area encompasses all of the City of Agoura Hills. It would be infeasible to relocate the proposed Project outside of the city boundaries.

Only Class IV Facilities

This alternative would involve implementation of the BMP, Program, and Amendments. However, this alternative would limit projects identified within the BMP to just the proposed Class IV facilities. There are two Class IV facilities proposed within the BMP: Kanan Road, from Thousand Oaks Boulevard to the northern city limits, and Thousand Oaks Boulevard, from the western city limits to Kanan Road. These two proposed Class IV facilities would consist of replacing approximately three miles of existing Class II facilities with new Class IV facilities. Therefore, implementing only the Class IV facilities would not result in the addition of new bicycle facilities within the City of Agoura Hills;

up to 28 miles of new bikeways and bikeway improvements would not be implemented under this alternative. Furthermore, given that no new bicycle facilities would be included within the BMP, this alternative would not facilitate the establishment of a VMT Mitigation Exchange and Banking Program because there would be no active transportation projects available for VMT reduction credits to fund. This alternative would not fulfill the basic Project Objectives as it would not increase transportation choices, improve accessibility through Agoura Hills, improve public health, enhance sustainability, or enhance community character by constructing bicycle facilities near areas of high scenic value. For this reason, this alternative has been considered but rejected from further analysis.

6.1.4 Project Alternatives

State CEQA Guidelines Section 15126.6(a) states that "an [P]EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation." The selected alternatives are limited to those that would avoid or substantially lessen any of the significant effects of the project, and those that the lead agency determines could feasibly attain most of the basic objectives of the Project. This section presents the selected alternatives and includes an evaluation for the environmental topics addressed in Sections 4.1 to 4.12, although at a more general level to compare the merits of the alternatives to the proposed Project (as allowed by State CEQA Guidelines Section 15126.6[d]).

The following alternatives are evaluated in this PEIR, including the CEQA-required "no project" alternative:

- Alternative 1: No Project Alternative
- Alternative 2: Project Minus Medea Creek Path and Agoura High School Connection
- Alternative 3: Only Class II and Class III Facilities

Table 6-1 provides a summary comparison of the characteristics of the proposed Project and each of the alternatives considered. Detailed descriptions of the alternatives are included in the impact analysis for each alternative. The potential environmental impacts of each alternative are analyzed in Sections 6.1 through 6.4.

Table 6-1 Comparison of Project Alternatives' Characteristics

Feature	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Project Minus Medea Creek Path and Agoura High School Connection	Alternative 3: Only Class II and Class III Facilities
Medea Creek Path	✓	✗	✗	✗
Agoura High School Connection	✓	✗	✗	✗
Class I Facilities	✓	✗	✓	✗
Class II Facilities	✓	✗	✓	✓
Class II Facilities	✓	✗	✓	✓
Class IV Facilities	✓	✗	✓	✗
Enhanced bicycle treatments	✓	✗	✓	✓
VMT Mitigation Exchange and Banking Program	✓	✗	✓	✓

Feature	Proposed Project	Alternative 1: No Project Alternative	Alternative 2: Project Minus Medea Creek Path and Agoura High School Connection	Alternative 3: Only Class II and Class III Facilities
General Plan Amendments	✓	✗	✓	✓
Total mileage of bicycle paths	**31.35 miles**	**0 miles**	**29 miles**	**25.6 miles**

6.2 Alternative 1: No Project Alternative

6.2.1 Description

The purpose of describing and analyzing the no Project alternative is to allow decision-makers to compare the impacts of approving the proposed Project with the impacts of not approving the proposed Project. According to State CEQA Guidelines Section 15126.6(e)(3)(c), the lead agency should analyze the impacts of the no Project alternative by projecting what would reasonably be expected to occur in the foreseeable future if the Project were not approved. The No Project Alternative assumes that the Bicycle Master Plan (BMP), including Medea Creek Path (Path) and Agoura High School Connection (Connection), would not be implemented, the VMT Mitigation Exchange and Banking Program (Program) would not be established, and General Plan Amendments (Amendments) and would not be adopted. Under this alternative, no construction activities associated with the Path, Connection, Class I through Class IV facilities, or enhanced bicycle treatments would occur, and the city's existing 1.3 miles of bicycle routes and 9.2 miles of bicycle lanes would remain unchanged. Furthermore, the General Plan would not include the General Plan Amendments prioritizing non-vehicular mobility and would continue to prioritize the preservation of auto mobility rather than reducing vehicle miles traveled (VMT). The No Project Alternative would not fulfill any Project Objectives, as the No Project Alternative would not increase transportation choices, improve accessibility through Agoura Hills, improve bicycle safety, improve public health, enhance sustainability, or enhance community character by constructing bicycle facilities near areas of high scenic value, or provide a mechanism for developers to mitigate VMT impacts from development projects.

6.2.2 Impact Analysis

a. Aesthetics

The proposed Project would result in a less than significant impact involving adverse effects to scenic vistas, conflicts with applicable zoning and other regulations that govern scenic quality, and the creation of new sources of light or glare that would adversely affect views. Because there are no officially designated state scenic highways within the City of Agoura Hills, the proposed Project would result in no impact to scenic resources within a State scenic highway.

Under the No Project Alternative, the proposed Project would not be implemented, and the visual character and quality of the overall Project area would remain similar to existing conditions. The No Project Alternative would not require construction activities that could impact scenic vistas of hillsides, scenic resources, and the Santa Monica Mountains. Thus, the No Project Alternative would result in no impact to scenic vistas. Furthermore, because the No Project Alternative would not involve construction activities, this alternative would not result in a temporary change in the existing visual character or quality of the Project area by introducing vehicles, equipment, or construction activities. Thus, the No Project Alternative would result in no impact related to conflict

with the City of Agoura Hills General Plan 2035 goals and policies that pertain to scenic quality, AHMC development standards that govern the preservation of views and aesthetic character, or the Agoura Village Specific Plan viewshed standards that protect the view of Ladyface Mountain. The No Project Alternative would also result in no impact related to the creation of new sources of light or glare, as no storage, staging, or active work areas would be established, no construction equipment would be utilized, no bicycle signals, signage, or other reflective elements would be installed, and no bicycles would utilize new facilities. Given that the proposed Project would result in less than significant impacts, this would be a reduced level of impact as compared to the proposed Project.

There are no designated state scenic highways within the Project area. Thus, similar to the proposed Project, the No Project Alternative would result in no impact to scenic resources within a State scenic highway.

Overall, the No Project Alternative would have no impact on aesthetics. This would be a reduced level of impact as compared to the proposed Project.

b. Air Quality

The proposed Project would result in a less than significant impact involving conflict with or obstruction of the 2022 Air Quality Management Plan (AQMP), a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment, exposure of sensitive receptors to substantial pollutant concentrations, and odors.

Under the No Project Alternative, the proposed Project would not be implemented. Growth in the City of Agoura Hills would continue to occur as anticipated based on the SCAG growth forecast, or other growth forecasts on which the 2022 AQMP is based. Similar to the Proposed Project, the No Project Alternative would not directly result in the construction of new residential or businesses; thus population, housing, and employment would not grow such that the SCAG growth forecast for the City of Agoura Hills, or other growth forecasts on which the 2022 AQMP is based, would be exceeded. Furthermore, because no construction activities would occur, the No Project Alternative would not generate criteria pollutant emissions from construction equipment, vehicle trips, or fugitive dust. Therefore, the No Project Alternative would result in impact involving conflict with or obstruction of the 2022 AQMP or involving a net increase of any criteria pollutants. This would be a level of impact as compared to the proposed Project.

Similarly, because no construction activities would occur, the No Project Alternative would not generate toxic air contaminants above a localized significance threshold, nor would this alternative result in odors emitted during construction activities. Therefore, the No Project Alternative would result in no impact involving exposure of sensitive receptors to substantial pollutant concentrations, or odors. This would be a reduced level of impact as compared to the proposed Project.

Overall, the No Project Alternative would have no impact on air quality. This would be a reduced level of impact as compared to the proposed Project.

c. Biological Resources

The proposed Project would result in potentially significant impacts to special-status species, riparian habitat or other sensitive natural communities, and state or federally protected wetlands due to construction activities in previously undisturbed areas. The proposed Project would also result in a potentially significant impact related to a conflict with local policies or ordinances protecting biological resources due to the potential for direct impact to oak trees during construction activities in previously undisturbed areas. The proposed Project would result in a less

than significant impact involving interference with wildlife movement and nursery sites. Furthermore, the proposed Project would result in no impact related to a conflict with Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans within the boundaries of the City of Agoura Hills.

Under the No Project Alternative, the proposed Project would not be implemented, and no construction activities would occur. Because construction activities would not occur, this alternative would not have a substantial adverse effect, either directly or through habitat modifications, on any special-status species, riparian habitat or other sensitive natural communities, or state or federally protected wetlands. Mitigation Measures BIO-1a, BIO-1b, BIO-1c, BIO-2a, BIO-2b, and BIO-2c would not be required, and no impact would occur. This would be a reduced level of impact as compared to the proposed Project.

Because no physical improvements would occur, the No Project Alternative would not interfere with wildlife movement and nursery sites, nor would this alternative conflict with a local policy protecting biological resources such as a tree preservation ordinance. Mitigation Measures BIO-5a would not be required, and no impact would occur. These would be reduced levels of impact as compared to the proposed Project.

Because there are no existing landscape-level Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans within the boundaries of the City of Agoura Hills, the No Project Alternative would result in no impact related to a conflict with such plans, similar to the proposed Project.

Overall, the No Project Alternative would have no impact on biological resources, and no mitigation measures would be required. This would be a reduced level of impact as compared to the proposed Project.

d. Cultural Resources

Due to the cultural sensitivities within the City of Agoura Hills, the proposed Project would result in a significant and unavoidable impact to historical resources even with implementation of Mitigation Measure CUL-1, which would require preparation of a Historical Resources Evaluation for individual projects that could result in impacts to structures 45 years or older. The proposed Project would also result in a significant and unavoidable impact to archaeological resources even with implementation of Mitigation Measure CUL-2, which would require preparation of an Archaeological Resources Assessment for individual projects that would involve ground-disturbing activities. The proposed Project would result in a less than significant impact involving the disturbance of human remains.

Under the No Project Alternative, the proposed Project would not be implemented, and no construction activities would occur. Because construction activities would not occur, this alternative would not have the potential to directly impact historical structures and/or objects, have the potential to encounter or impact surficial and subsurface archaeological resources or have the potential to disturb human remains. Mitigation Measures CUL-1 and CUL-2 would not be required, and no impact would occur. This would be a reduced level of impact as compared to the proposed Project.

e. Geology and Soils

The proposed Project would result in less than significant impacts involving risk of loss, injury, or death due to rupture of a known earthquake fault, strong seismic ground shaking, seismic-related

ground failure including liquefaction, or landslides; substantial soil erosion or the loss of topsoil; unstable soils; and expansive soils. Furthermore, because the proposed Project would not result in the construction of buildings or habitable structures requiring a sanitary sewer system, there would be no impact involving the use of septic tanks or alternative wastewater disposal systems. The proposed Project would result in a potentially significant impact involving the destruction of paleontological resources due to ground-disturbing activities within geologic units with high or undetermined paleontological sensitivity.

Under the No Project Alternative, the proposed Project would not be implemented, and no construction activities would occur. Because construction activities would not occur, this alternative would not have the potential to exacerbate risks due to rupture of a known earthquake fault, seismic ground shaking, liquefaction, or landslides, nor would this alternative result in soil erosion. Furthermore, because no physical improvements would occur, the No Project Alternative would not increase exposure of people or property to the risk of loss, injury or death from structural failure, development on unstable soils, or development on expansive soils. No impact would occur, which would be a reduced level of impact as compared to the proposed Project.

Neither the proposed Project nor the No Project Alternative would result in the construction of buildings or habitable structures requiring a sanitary sewer system. Thus, similar to the proposed Project, the No Project Alternative would result in no impact related to the use of septic tanks or alternative wastewater disposal systems.

Given that no construction activities would occur under the No Project Alternative, this alternative would not have the potential to damage or destroy paleontological resources that may be present on or below the ground surface in areas of high or undetermined paleontological sensitivity. Mitigation Measure GEO-9 would not be required, and no impact would occur. This would be a reduced level of impact as compared to the proposed Project.

Overall, the No Project Alternative would have no impact on geology and soils. This would be a reduced level of impact as compared to the proposed Project.

f. Hazards and Hazardous Materials

The proposed Project would result in potentially significant impacts involving the creation of a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; the creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials; emissions of hazardous materials within 0.25 mile of a school; and creation of a significant hazard to the public or the environment due to a known hazardous material site. The proposed Project would result in a less than significant impact related to interference with the implementation of an adopted emergency response or evacuation plan and a less than significant impact related to wildland fires. Furthermore, because the City of Agoura Hills is not located within an airport land use plan or within two miles of a public airport or public use airport, the proposed Project would result in no impact involving safety hazards or excessive noise from airports.

Under the No Project Alternative, the proposed Project would not be implemented, and no construction activities would occur. Therefore, this alternative would not require the transport, use, or disposal of hazardous materials, nor would this alternative have the potential to release hazardous materials into the environment. Furthermore, because no ground-disturbing activities would occur, this alternative would not require handling of or have the potential to emit hazardous emissions, substances, or waste near a school. Mitigation Measure HAZ-1 would not be required

and no impact would occur, which would be a reduced level of impact as compared to the proposed Project.

Because no physical improvements would occur, the No Project Alternative would not result in the development of a bicycle facility on a known site included on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Mitigation Measure HAZ-1 would not be required and no impact would occur, which would be a reduced level of impact as compared to the proposed Project.

Because no construction activities would occur, this alternative would not temporarily or permanently impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan due to the establishment of storage, staging, and active work areas within the roadway right-of-way (ROW). Furthermore, the No Project Alternative would not result in a temporary increase in potential ignition sources. No impacts would occur, which would be reduced levels of impact as compared to the proposed Project.

There are no airports located within the City of Agoura Hills, nor is the city located within the noise contours of an airport. Thus, similar to the proposed Project, the No Project Alternative would result in no impact related to safety hazard or excessive noise for people residing or working in the area.

Overall, the No Project Alternative would have no impact related to hazards and hazardous materials, and no mitigation measures would be required. This would be a reduced level of impact as compared to the proposed Project.

g. Hydrology and Water Quality

The proposed Project would result in less than significant impacts involving violation of water quality standards or waste discharge requirements; a reduction in groundwater supplies or interference with groundwater recharge; alteration of existing drainage patterns such that erosion, siltation, increased runoff, polluted runoff, or redirected flood flows would occur; the release of pollutants due to project inundation; and conflict with a water quality control plan or sustainable groundwater management plan.

Under the No Project Alternative, the proposed Project would not be implemented. No construction activities or ground disturbance would occur. Thus, the No Project Alternative would not have the potential to degrade surface or ground water quality due to runoff from a construction site. Furthermore, because no physical improvements would occur, the No Project Alternative would not result in an increase in impervious surface area or otherwise interfere with groundwater recharge, nor would this alternative alter drainage patterns that erosion, siltation, increased runoff, polluted runoff, or redirected flood flows would occur. No impacts would occur, which would be reduced levels of impact as compared to the proposed Project.

There are no tsunami inundation zones or seiche inundation zones within the Project area. Thus, similar to the proposed Project, the No Project Alternative would result in no impact related to the risk release of pollutants due to tsunami or seiche inundation events. However, given that the No Project Alternative would not result in any physical improvements within a flood hazard area, this alternative would not risk release of pollutants due to inundation within a flood hazard area; no impact would occur, which would be a reduced level of impact as compared to the proposed Project.

Overall, the No Project Alternative would have no impact on hydrology and water quality. This would be a reduced level of impact as compared to the proposed Project.

h. Land Use and Planning

The proposed Project would result in less than significant impacts related to the physical division of an established community and related to a conflict with any land use plan, policy, or regulation adopted to avoid or mitigate an environmental effect.

Under the No Project Alternative, the proposed Project would not be implemented, and no construction activities would occur. Therefore, this alternative would not have the potential to impact the circulation system due to construction activities within the ROW. No impact would occur during construction, which would be a reduced level of impact as compared to the proposed Project. Similar to the proposed Project, the No Project Alternative would not result in physical development such that an established community would be physically divided during operational activities.

Under the No Project Alternative, existing bicycle infrastructure would remain unchanged within the City of Agoura Hills, and no Amendments would be made to the City of Agoura Hills General Plan 2035. This alternative would not improve connectivity or address existing gaps in the bicycle network, nor would this alternative shift the focus from prioritizing automobile trips to reducing VMT. As such, this alternative would be inconsistent with the SoCal Connect 2024 goals aimed at reducing emissions from transportation sources and the City of Agoura Hills General Plan 2035 goals and policies related to providing bicycle connections, improving pedestrian-oriented amenities, and promoting land development practices that reduce energy consumption, pollution, and greenhouse gas emissions, and improving. While no direct land use conflicts would occur, the No Project Alternative would not advance local or regional land use plans or policies. Nonetheless, no impact would occur.

Overall, the No Project Alternative would have no impact on land use and planning. This would be a reduced level of impact as compared to the proposed Project.

i. Noise

The proposed Project would result in a potentially significant impact related to the generation of noise in excess of applicable noise standards. The proposed Project would also result in a potentially significant impact involving the generation of excessive groundborne vibration. Because the City of Agoura Hills is not located within an airport land use plan or within two miles of a public airport or public use airport, the proposed Project would result in no impact involving excessive noise levels from airports.

Under the No Project Alternative, the proposed Project would not be implemented. Thus, the No Project Alternative would not generate construction noise or operational noise associated with landscaping or maintenance activities, or portable amplified music or people's voices from facility users. Furthermore, the No Project Alternative would not generate groundborne vibration due to construction activities. Mitigation Measures N-1 and N-2 would not be required, and no impact would occur. This would be a reduced level of impact as compared to the proposed Project.

Similar to the proposed Project, the No Project Alternative would not generate groundborne vibration during operational activities. Furthermore, there are no airports located within the City of Agoura Hills, nor is the city located within the noise contours of an airport. Thus, similar to the proposed Project, the No Project Alternative would result in no impact related to exposure to excessive noise levels for people residing or working in the area.

Overall, the No Project Alternative would have no impact related to noise, and no mitigation measures would be required. This would be a reduced level of impact as compared to the proposed Project.

j. Recreation

The proposed Project would result in a less than significant impact involving the physical deterioration of recreational facilities.

Under the No Project Alternative, the proposed Project would not be implemented. No new bicycle infrastructure would be constructed, and no improvements to existing facilities would occur. As a result, the No Project Alternative would not involve construction activities that could temporarily impact access to parks, open space, or recreational facilities such that alternative facilities would be utilized. Furthermore, the No Project Alternative would not result in new or improved multimodal access to existing recreational resources throughout the city. While the No Project Alternative would not result in or accelerate the physical deterioration of a recreational facility, the No Project Alternative would not advance local or regional plans or policies related to recreation access and mobility. Nonetheless, no impact would occur, which would be a reduced level of impact as compared to the proposed Project.

k. Transportation

The proposed Project would result in less than significant impacts related to a conflict with a program, plan, ordinance or policy addressing the circulation system; a conflict with State CEQA Guidelines Section 15064.3, subdivision (b); substantially increased hazards due to geometric design features or incompatible uses; and inadequate emergency access.

Under the No Project Alternative, the proposed Project would not be implemented, and no construction activities would occur. Therefore, this alternative would not have the potential to impact roadways or the circulation system due to construction activities within the ROW or require temporary lane closures, which would conflict with Goal M-1 of the City of Agoura Hills General Plan 2035 that calls for a safe and efficient roadway system. However, under the No Project Alternative, existing bicycle infrastructure would remain unchanged within the City of Agoura Hills, and no Amendments would be made to the City of Agoura Hills General Plan 2035. This alternative would not improve connectivity or address existing gaps in the bicycle network, nor would this alternative shift the focus from prioritizing automobile trips to reducing VMT. As such, this alternative would be inconsistent with the SoCal Connect 2024 goals aimed at reducing emissions from transportation sources and the City of Agoura Hills General Plan 2035 goals and policies related to creating a transportation system that serves all modes of travel, reducing reliance on single-occupancy vehicle travel through the provision of alternative travel modes, enhancing bicycle facilities, and decreasing GHG emissions through a reduction in VMT. While no direct conflicts would occur with a program, plan, ordinance or policy addressing the circulation system, the No Project Alternative would not advance local or regional land use plans or policies related to transportation. Nonetheless, no impact would occur.

Because no physical improvements would occur, the No Project Alternative would not conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b), increase hazards due to a geometric design feature or incompatible use within the roadway, or result in inadequate emergency access to existing land uses. No impact would occur, which would be a reduced level of impact as compared to the proposed Project.

Overall, the No Project Alternative would have no impact on transportation. This would be a reduced level of impact as compared to the proposed Project.

I. Tribal Cultural Resources

The proposed Project would result in less than significant impacts to tribal cultural resources, as no tribal cultural resources were identified during the City's required AB 52 and SB 18 consultation processes. Under the No Project Alternative, the proposed Project would not be implemented, and no construction activities would occur. Therefore, the No Project Alternative would result in no impact related to tribal cultural resources, which would be a reduced level of impact as compared to the proposed Project.

6.3 Alternative 2: Project Minus Medea Creek Path and Agoura High School Connection

6.3.1 Description

Similar to the proposed Project, Alternative 2 would involve implementation of the BMP, Program, and Amendments. However, the BMP implemented under Alternative 2 would only include Class I facilities on Ladyface Greenway, Reyes Adobe Road, and Medfield Path; the Medea Creek Bike Path and the Agoura High School Connection would be removed from the list of bicycle facilities. All Class II facilities, Class III facilities, Class IV facilities, and enhanced bicycle treatments would be included within the BMP under Alternative 2. The Program would be revised to reflect the ability to purchase VMT reduction credits only for the funding of individual projects identified within the BMP under this alternative, which would exclude the Path and the Connection. The Amendments would also be revised to exclude the Path and Connection from the City's planned additions to its system of bikeways. Under Alternative 2, the Amendments would still shift the focus from prioritizing automobile mobility to reducing VMT through alternative transportation modes like walking and biking.

Construction activities under Alternative 2 would consist of:

- **Class I:** Clearing and grubbing, pavement demolition, grading, utility relocation, retaining wall or fencing installation, asphalt paving or repaving, street improvements, striping, and revegetation;
- **Class II:** Restriping and reconfiguration of lane widths to accommodate new dedicated bike lanes; pavement widening on Driver Avenue, between Easterly Road and Colodny Drive, and on Cornell Road, between Agoura Road and Cornell Way, which would require clearing and grubbing, subgrade stabilization, base course installation, and asphalt paving;
- **Class III:** Restriping to identify bike routes;
- **Class IV:** Pavement demolition, minor grading, bollard or fencing installation, asphalt paving or repaving, and striping;
- **Enhanced Bicycle Treatments:** street striping/re-striping, installation of signage and wayfinding, installation of bicycle signals, installation of bicycle parking, and installation of bicycle repair facilities.

Under Alternative 2, approximately 29 miles of bicycle facilities would be implemented. Alternative 2 would fulfill the Project Objectives that aim to increase transportation choices, improve accessibility through Agoura Hills, improve bicycle safety, improve public health, enhance

sustainability, and provide a mechanism for developers to mitigate VMT impacts from development projects. However, Alternative 2 would meet Project Objectives to a lesser extent given the reduced miles of bicycle facilities implemented and improved under this alternative. Alternative 2 would not fulfill the Project Objective that aims to enhance community character by constructing bicycle facilities near areas of high scenic value, such as along greenbelts or near surface waters.

6.3.2 Impact Analysis

a. Aesthetics

The proposed Project would result in a less than significant impact involving adverse effects to scenic vistas, conflicts with applicable zoning and other regulations that govern scenic quality, and the creation of new sources of light or glare that would adversely views. Because there are no officially designated state scenic highways within the City of Agoura Hills, the proposed Project would result in no impact to scenic resources within a State scenic highway.

Similar to the proposed Project, construction activities under Alternative 2 would be visible from City-designated scenic corridors, including Agoura Road, Thousand Oaks Boulevard, and Kanan Road. Due to the removal of the Path from the BMP, Alternative 2 would result in fewer temporary visual impediments from the scenic corridors on Thousand Oaks Boulevard and Agoura Road where the Path's alignment is proposed to intersect. Furthermore, due to the removal of the Connection from the BMP, Alternative 2 would result in fewer temporary visual impediments to existing views of nearby ridgelines from Thousand Oaks Boulevard. Impacts under Alternative 2 would remain less than significant but would be reduced as compared to the proposed Project. However, following construction, Alternative 2 would not provide new views of the natural habitat surrounding Medea Creek, nor would Alternative 2 provide enhanced opportunities to view scenic ridgelines from the Connection.

Similar to the proposed Project, construction activities under Alternative 2 could cause a temporary change in the existing visual character and quality of the Project area. These activities would not permanently impair or block any sensitive or unique visual resources or landscapes, nor would the BMP under Alternative 2 result in the construction of new structures that could permanently disrupt existing views. Similar to the proposed Project, all facilities implemented under Alternative 2 would be required to comply with applicable goals, policies, and regulations identified within the City of Agoura Hills General Plan 2035, the Agoura Hills Municipal Code (AHMC), and the Agoura Village Specific Plan. Thus, impacts related to a conflict with applicable zoning and other regulations governing scenic quality under Alternative 2 would remain less than significant and would be similar to the proposed Project.

Similar to the proposed Project, Alternative 2 would result in temporary sources of light and glare due to the creation of storage, staging, or active work areas. Alternative 2 would also result in permanent sources of light and glare due to the implementation of bicycle signals, signage, or other reflective elements, as well as the operation of bicycles on new facilities. However, due to the exclusion of the Path and the Connection, Alternative 2 would result in less sources of temporary and permanent light and glare than the proposed Project. Impacts under Alternative 2 related to light and glare would remain less than significant but would be reduced as compared to the proposed Project.

There are no designated state scenic highways within the Project area. Thus, similar to the proposed Project, Alternative 2 would result in no impact to scenic resources within a State scenic highway.

Overall, impacts to aesthetics would remain less than significant under Alternative 2 but would be reduced as compared to the proposed Project.

b. Air Quality

The proposed Project would result in a less than significant impact involving conflict with or obstruction of the 2022 Air Quality Management Plan, a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment, exposure of sensitive receptors to substantial pollutant concentrations, and odors.

Alternative 2 would result in the implementation of a smaller set of bicycle facilities. Similar to the proposed Project, normal background growth in the City of Agoura Hills would continue to occur but no residential or businesses would be built under Alternative 2. Thus population, housing, and employment would not grow such that the SCAG growth forecast for the City of Agoura Hills, or other growth forecasts on which the 2022 AQMP is based, would be exceeded.

Alternative 2 would exclude the Path and the Connection from the BMP. The Path, a two-mile bicycle path, is the longest new facility proposed in the BMP under the proposed Project. Construction of the Path would result in the largest area of disturbance with the most construction activities. Thus, exclusion of the Path and the Connection under Alternative 2 would reduce the scope, extent, and duration of construction activities, and criteria pollutant emissions from construction equipment, vehicle trips, or fugitive dust would be reduced as compared to the proposed Project. Therefore, Alternative 2 would result in a less than significant impact involving conflict with or obstruction of the 2022 AQMP, and a less than significant impact involving a net increase of any criteria pollutants. Although impacts would remain less than significant, these impacts would be reduced as compared to the proposed Project due to the reduction in scope, extent, and duration of construction activities.

Similarly, because less construction activities would occur, Alternative 2 would generate fewer toxic air contaminants and result in less odors. Although impacts would remain less than significant, these impacts would be reduced as compared to the proposed Project.

Overall, impacts to air quality would remain less than significant under Alternative 2 but would be reduced as compared to the proposed Project.

c. Biological Resources

The proposed Project would result in potentially significant impacts to special-status species, riparian habitat or other sensitive natural communities, and state or federally protected wetlands due to construction activities in previously undisturbed areas. The proposed Project would also result in a potentially significant impact related to a conflict with local policies or ordinances protecting biological resources due to the potential for direct impact to oak trees during construction activities in previously undisturbed areas. The proposed Project would result in a less than significant impact involving interference with wildlife movement and nursery sites. Furthermore, the proposed Project would result in no impact related to a conflict with Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans within the boundaries of the City of Agoura Hills.

Alternative 2 would exclude the Path and the Connection from the BMP. Under the proposed Project, the Path and the Connection are proposed away from the existing roadway in areas with higher biological sensitivity where there is potential for wetlands and riparian habitats to occur. Although these facilities would be excluded under Alternative 2, other Class I facilities and all Class

IV facilities would still be constructed under Alternative 2. Furthermore, some Class II facilities would require pavement widening outside of the existing roadway. Construction activities associated with the remaining Class I facilities, all Class IV facilities, and the Class II facilities that require pavement widening could occur in locations where sensitive biological resources exist. Therefore, Alternative 2 could still result in potentially significant impacts to special-status species, riparian habitat or other sensitive natural communities, and state or federally protected wetlands due to construction activities in previously undisturbed areas. Furthermore, Alternative 2 could still result in a potentially significant impact related to a conflict with local policies or ordinances protecting biological resources due to the potential for direct impact to oak trees. Mitigation Measures BIO-1a, BIO-1b, BIO-1c, BIO-2a, BIO-2b, BIO-2c, and BIO-5 would be required to reduce these potentially significant impacts to a less-than-significant level. Although impacts would remain less than significant with mitigation, these impacts would be reduced as compared to the proposed Project due to the reduced construction footprint in previously undisturbed areas.

Alternative 2 would result in implementation of the remaining Class I facilities, all Class IV, and Class II facilities that require pavement widening outside of the existing roadway. Wildlife adjacent to these facilities would be expected to be urban tolerant. Furthermore, use of these bicycle facilities would not prevent wildlife movement or disrupt nursery sites. Although impacts would remain less than significant, this impact would be reduced as compared to the proposed Project due to the reduced construction footprint.

Because there are no existing landscape-level Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans within the boundaries of the City of Agoura Hills, Alternative 2 would result in no impact related to a conflict with such plans, similar to the proposed Project.

Overall, impacts to biological resources would remain less than significant with mitigation under Alternative 2 but would be reduced as compared to the proposed Project.

d. Cultural Resources

Due to the cultural sensitivities within the City of Agoura Hills, the proposed Project would result in a significant and unavoidable impact to historical resources even with implementation of Mitigation Measure CUL-1, which would require preparation of a Historical Resources Evaluation for individual projects that could result in impacts to structures 45 years or older. The proposed Project would also result in a significant and unavoidable impact to archaeological resources even with implementation of Mitigation Measure CUL-2, which would require preparation of an Archaeological Resources Assessment for individual projects that would involve ground-disturbing activities. The proposed Project would result in a less than significant impact involving the disturbance of human remains.

Alternative 2 would result in the implementation of a smaller set of bicycle facilities, excluding the Path and the Connection. Other Class I facilities and all Class IV facilities would still be constructed under Alternative 2. Furthermore, some Class II facilities would require pavement widening outside of the existing roadway. Construction activities associated with the remaining Class I facilities, all Class IV facilities, and the Class II facilities that require pavement widening would include ground disturbance in previously undisturbed areas. Thus, Alternative 2 would still have the potential to directly impact historical structures and/or objects, encounter or impact surficial and subsurface archaeological resources, and disturb human remains. Mitigation Measures CUL-1 and CUL-2 would be required under Alternative 2. Although impacts would remain significant and unavoidable, these

impacts would be reduced as compared to the proposed Project due to the reduced construction footprint in previously undisturbed areas.

e. Geology and Soils

The proposed Project would result in less than significant impacts involving risk of loss, injury, or death due to rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure including liquefaction, or landslides; substantial soil erosion or the loss of topsoil; unstable soils; and expansive soils. Furthermore, because the proposed Project would not result in the construction of buildings or habitable structures requiring a sanitary sewer system, there would be no impact involving the use of septic tanks or alternative wastewater disposal systems. The proposed Project would result in a potentially significant impact involving the destruction of paleontological resources due to ground-disturbing activities within geologic units with high or undetermined paleontological sensitivity.

Similar to the proposed Project, there are no faults or Alquist-Priolo Special Studies Zones within the Project area for Alternative 2, which would encompass all of the City of Agoura Hills; the nearest fault would be the Simi-Santa Rosa Fault, located approximately seven miles north of the city. Therefore, Alternative 2 would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. This impact would remain less than significant, similar to the proposed Project.

Alternative 2 would exclude the Path and the Connection from the BMP. Although these facilities would be excluded, other Class I facilities would still be constructed under Alternative 2. These Class I facilities, the Class III facilities, and the enhanced bicycle treatments would be located within identified liquefaction zones and within areas identified as at risk of landslides. Under the proposed Project, the Path and Connection are not located within identified liquefaction zones; thus, impacts related to the risk of loss, injury, or death due to liquefaction under Alternative 2 would remain less than significant and would be similar as compared to the proposed Project. The Path and the Connection are located within areas identified as at risk of landslides; thus, although impacts would remain less than significant, impacts related to the risk of loss, injury, or death due to landslides would be reduced under Alternative 2 as compared to the proposed Project due to the removal of facilities from the BMP within areas identified as at risk of landslides.

Although Alternative 2 would exclude the Path and the Connection from the BMP, construction activities associated with the remaining Class I facilities, all Class IV facilities, and the Class II facilities that require pavement widening would include ground disturbance in previously undisturbed areas. Thus, Alternative 2 would still have the potential to result in soil erosion and the loss of topsoil. Similar to the proposed Project, soil erosion that occurs due to implementation of individual projects involving earth-disturbing construction activities would be effectively controlled through a combination of State Water Resources Control Board (SWRCB) permits and AHMC requirements. Although impacts would remain less than significant, impacts related to soil erosion and the loss of topsoil would be reduced under Alternative 2 as compared to the proposed Project due to fewer earth-moving construction activities.

Because construction activities associated with the remaining Class I facilities, all Class IV facilities, and the Class II facilities that require pavement widening would include ground disturbance in previously undisturbed areas, Alternative 2 would still have the potential to damage or destroy paleontological resources that may be present on or below the ground surface in areas of high or undetermined paleontological sensitivity. Mitigation Measure GEO-9 would be required to reduce this potentially significant impact to a less-than-significant level. Although impacts would remain

less than significant with mitigation, this impact would be reduced as compared to the proposed Project due to the reduced construction footprint in previously undisturbed areas.

Similar to the proposed Project, a geotechnical investigation would be prepared prior to construction of aboveground features under Alternative 2 to determine the potential for risks of lateral spreading, subsidence problems, and expansive soils. Furthermore, similar to the proposed Project, the BMP under Alternative 2 would not result in the construction of buildings or habitable structures on soils subject to lateral spreading or subsidence, or on expansive soils. These impacts would remain less than significant and would be similar as compared to the proposed Project.

Neither the proposed Project nor Alternative 2 would result in the construction of buildings or habitable structures requiring a sanitary sewer system. Thus, similar to the proposed Project, Alternative 2 would result in no impact related to the use of septic tanks or alternative wastewater disposal systems.

Overall, Alternative 2 would have a reduced level of impact as compared to the proposed Project. Nonetheless, mitigation measures would still be required to reduce impacts related to geology and soils to a less-than-significant level.

Overall, impacts related to geology and soils would remain less than significant with mitigation under Alternative 2 but would be reduced as compared to the proposed Project.

f. Hazards and Hazardous Materials

The proposed Project would result in potentially significant impacts involving the creation of a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; the creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials; emissions of hazardous materials within 0.25 mile of a school; and creation of a significant hazard to the public or the environment due to a known hazardous material site. Implementation of Mitigation Measure HAZ-1 would be required, which would involve the preparation of a Soil Management Plan. The proposed Project would result in a less than significant impact related to interference with the implementation of an adopted emergency response or evacuation plan and the risk of loss, injury, or death involving wildland fires. Furthermore, because the City of Agoura Hills is not located within an airport land use plan or within two miles of a public airport or public use airport, the proposed Project would result in no impact involving safety hazards or excessive noise from airports.

Construction activities under Alternative 2 would involve the transport, use, and disposal of hazardous materials such as fuels, solvents, and asphalt products. These activities would be subject to existing federal, state, and local regulations governing hazardous materials management. Nonetheless, Class IV facilities and enhanced bicycle treatments implemented under Alternative 2 may still be located within 1,000 feet of known hazardous materials sites. Therefore, Alternative 2 would have the potential to create a significant hazard to the public or the environment, either through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment or through the implementation of a project on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and Mitigation Measure HAZ-1 would be required. However, Alternative 2 would exclude the Path, which is proposed within 1,000 feet of three closed leaking underground storage tank (LUST) sites. Therefore, although impacts would remain less than significant with mitigation, these impacts would be reduced as compared to the proposed Project because the chance of

encountering contaminated soils on a known hazardous materials site during construction activities would be reduced.

Alternative 2 would exclude the Path and the Connection from the BMP. The Path and the Connection are located adjacent to Willow Elementary School and Agoura High School, respectively. While there are known hazardous materials sites located within 1,000 feet of the Path, none are located within 0.25 mile of a school, and there are no known hazardous materials sites within 1,000 feet of the Connection. Class IV facilities would still be implemented under Alternative 2 and would be constructed near schools, including Lindero Canyon Middle School, Willow Elementary School, and Sumac Elementary School. There is one closed Cleanup Program Site (Joe Martin Commercial Property) located with 0.25 mile of Lindero Canyon Middle School. Therefore, Alternative 2 would have the potential for hazardous emissions or handling of hazardous materials near schools, and Mitigation Measure HAZ-1 would be required. Impacts would remain less than significant with mitigation and would be similar to the proposed Project.

Under Alternative 2, construction activities associated with implementing the Class I facilities on Reyes Adobe Road and Agoura Road, the Class II facility proposed on Driver Avenue, and the Class IV facility proposed on Kanan Road north of Thousand Oaks Boulevard would occur on or near identified evacuation routes. Similar to the proposed Project, a construction traffic control plan would be prepared and implemented in accordance with the California Manual on Uniform Traffic Control Devices (MUTCD) should construction within the roadway or should temporary lane closures occur. Thus, Alternative 2 would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. This impact would remain less than significant and would be similar to the proposed Project.

Because Alternative 2 would exclude the Path and the Connection from the BMP, there would be a lesser increase in human activity and potential ignition sources during construction activities in undeveloped areas. Nonetheless, construction of the remaining Class I facilities, some Class II facilities, and all Class IV facilities would still result in a temporary increase in potential ignition sources during construction activities in undeveloped areas. Compliance with OSHA fire prevention standards would ensure that risks are minimized. Furthermore, similar to the proposed Project, Alternative 2 would not include structural components or physical development that would expose people or structures to a significant risk involving wildland fire. Although this impact would remain less than significant, impacts would be reduced as compared to the proposed Project due to the reduced construction footprint in previously undisturbed areas.

There are no airports located within the City of Agoura Hills, nor is the city located within the noise contours of an airport. Thus, similar to the proposed Project, Alternative 2 would result in no impact related to exposure to excessive noise levels for people residing or working in the area.

Overall, impacts related to hazards and hazardous materials would remain less than significant with mitigation under Alternative 2 but would be reduced as compared to the proposed Project.

g. Hydrology and Water Quality

The proposed Project would result in less than significant impacts involving violation of water quality standards or waste discharge requirements; a reduction in groundwater supplies or interference with groundwater recharge; alteration of existing drainage patterns such that erosion, siltation, increased runoff, polluted runoff, or redirected flood flows would occur; the release of pollutants due to project inundation; and conflict with a water quality control plan or sustainable groundwater management plan.

Although Alternative 2 would exclude the Path and the Connection from the BMP, construction activities associated with the remaining Class I facilities, all Class IV facilities, and the Class II facilities that require pavement widening would still involve clearing, grading, paving, and excavation. Similar to the proposed Project, these activities would be subject to the Construction General Permit and Article V, Chapter 5 of the AHMC, which require the implementation of Best Management Practices (BMPs) and, where applicable, a Stormwater Pollution Prevention Plan (SWPPP). With adherence to these requirements, impacts related to water quality standards, erosion, and runoff would remain less than significant, but would be reduced as compared to the proposed Project given the reduced scope of construction activities.

Exclusion of the Path and Connection would reduce the amount of new impervious surfaces introduced within the Project area. Nonetheless, the remaining Class I facilities, all Class IV facilities, and the Class II facilities that require pavement widening would still result in minor increases in impervious surfaces. Due to the known depths of groundwater in the Russell Valley Groundwater Basin, construction activities under Alternative 2 would not require groundwater dewatering. Furthermore, similar to the proposed Project, semipermeable materials would be utilized when feasible to construct the remaining Class I facilities, all Class IV facilities, and the Class II facilities that require pavement widening, and during precipitation events, stormwater would flow into adjacent permeable areas, or onto existing streets where it would be collected by the city's existing stormwater system. Impacts to groundwater supplies or recharge would remain less than significant, but would be reduced as compared to the proposed Project given the reduced amount of new impervious surfaces introduced.

Similar to the proposed Project, Alternative 2 would not substantially alter the existing drainage pattern of the Project area or alter the course of a stream or river because no streams or rivers are located within individual project sites. Furthermore, Alternative 2 would not result in substantial erosion or siltation on or off site, flooding on or off site, substantial additional sources of polluted runoff, or impeded or redirected flood flows, nor would Alternative 2 introduce structures that could redirect floodwaters. These impacts would remain less than significant and would be similar to the proposed Project.

There are no tsunami inundation zones or seiche inundation zones within the Project area. Thus, similar to the proposed Project, Alternative 2 would result in no impact related to the risk of release of pollutants due to tsunami or seiche inundation events. However, Alternative 2 would exclude the Path from the BMP, which is located within a flood hazard area. Class III facilities and enhanced bicycle treatments included in the BMP under Alternative 2 would still be constructed within flood hazard areas. Implementation of BMPs as required by the AHMC would reduce the potential for release of pollutants during construction of these facilities. Impacts related to the risk of release of pollutants due to project inundation within a flood hazard area would remain less than significant but would be reduced as compared to the proposed Project due to the removal of facilities from the BMP within flood hazard areas.

Overall, impacts to hydrology and water quality would remain less than significant under Alternative 2 but would be reduced as compared to the proposed Project.

h. Land Use and Planning

The proposed Project would result in less than significant impacts related to the physical division of an established community and related to a conflict with any land use plan, policy, or regulation adopted to avoid or mitigate an environmental effect.

Although Alternative 2 would exclude the Path and the Connection from the BMP, construction activities associated with the remaining Class I facilities, all Class IV facilities, and the Class II facilities that require pavement widening could still occur within or adjacent to existing ROW. These construction activities could temporarily impact the circulation system. Similar to the proposed Project, a construction traffic control plan would be prepared and implemented in accordance with the MUTCD should construction within the roadway or should temporary lane closures occur. Following construction, Alternative 2 would not result in physical development such that an established community would be physically divided. Thus, Alternative 2 would not result in the physical division of an established community. This impact would remain less than significant and would be similar to the proposed Project.

Alternative 2 would implement approximately 29 miles of new bikeways within the City of Agoura Hills and would amend the City of Agoura Hills General Plan 2035 to shift the focus from prioritizing automobile mobility to reducing VMT. Therefore, Alternative 2 would be consistent with the SoCal Connect 2024 goals aimed at reducing emissions from transportation sources and the City of Agoura Hills General Plan 2035 goals and policies related to providing bicycle connections, improving pedestrian-oriented amenities, and promoting land development practices that reduce energy consumption, pollution, and greenhouse gas emissions, and improving. This impact would remain less than significant and would be similar to the proposed Project.

Overall, impacts related to land use and planning would be generally similar under Alternative 2 as compared to the proposed Project and would remain less than significant.

i. Noise

The proposed Project would result in a potentially significant impact related to the generation of noise in excess of applicable noise standards. The proposed Project would also result in a potentially significant impact involving the generation of excessive groundborne vibration. Because the City of Agoura Hills is not located within an airport land use plan or within two miles of a public airport or public use airport, the proposed Project would result in no impact involving excessive noise levels from airports.

Alternative 2 would result in the implementation of a smaller set of bicycle facilities, excluding the Path and the Connection from the BMP. Exclusion of the Path and the Connection under Alternative 2 would reduce the scope, extent, and duration of construction activities, which would reduce noise and groundborne vibration generated during construction activities as compared to the proposed Project. Nonetheless, the remaining Class I facilities, all Class IV facilities, and the Class II facilities that require pavement widening would still result in construction noise that could exceed the Federal Transit Administration's (FTA) threshold of 80 dBA L_{eq}(8-hour) at sensitive receptors located within 125 feet of construction. Similarly, use of vibratory rollers and other heavy equipment during construction of the remaining Class I facilities, all Class IV facilities, and the Class II facilities that require pavement widening could generate vibration levels exceeding the FTA threshold of 0.12 in/sec PPV at nearby structures. Mitigation Measures N-1 and N-2 would be required to reduce these potentially significant impacts to a less-than-significant level. Although these impacts would remain less than significant with mitigation, impacts would be reduced as compared to the proposed Project due to the reduced the scope, extent, and duration of construction activities.

Similar to the proposed Project, operational noise under Alternative 2 would be limited to landscaping and maintenance activities, portable amplified music from facility users, and people's voices. Noise from these sources would be required to comply with AHMC Section 9656.2.

Operational activities would not introduce new sources of vibration. Operational impacts would remain less than significant and would be similar to the proposed Project.

Overall, impacts related to noise would remain less than significant with mitigation under Alternative 2 but would be reduced as compared to the proposed Project.

j. Recreation

The proposed Project would result in a less than significant impact involving the physical deterioration of recreational facilities.

Alternative 2 would exclude construction of the Path and the Connection. As such, this alternative would not require the establishment of storage, staging, and active work areas within or adjacent to the designated open space surrounding Medea Creek, which would reduce the potential to restrict access to recreational resources. However, pavement widening on Driver Avenue associated with the construction of the Class II facilities under this Alternative could still restrict access to or result in temporary closures of the Old Agoura Park. Construction of the Class IV facilities could also restrict access to or result in temporary closures of nearby recreational facilities. Operation of all facilities included in the BMP under Alternative 2 would result in new and/or improved multimodal access to existing recreational resources throughout the city. Nonetheless, under both the proposed Project and Alternative 2, the city would continue to exceed their service ratio goals of eight acres of parks and open space areas for every 1,000 residents during both construction and operation. Therefore, impacts to recreation would be generally similar under Alternative 2 as compared to the proposed Project and would remain less than significant.

k. Transportation

The proposed Project would result in less than significant impacts related to a conflict with a program, plan, ordinance or policy addressing the circulation system; a conflict with State CEQA Guidelines Section 15064.3, subdivision (b); substantially increased hazards due to geometric design features or incompatible uses; and inadequate emergency access.

Although Alternative 2 would exclude the Path and the Connection from the BMP, construction activities associated with the remaining Class I facilities, all Class IV facilities, and the Class II facilities that require pavement widening could still occur within or adjacent to existing ROW. These construction activities could temporarily impact the circulation system, which would conflict with Goal M-1 of the City of Agoura Hills General Plan 2035 that calls for a safe and efficient roadway system. Similar to the proposed Project, a construction traffic control plan would be prepared and implemented in accordance with the MUTCD should construction within the roadway or should temporary lane closures occur. Following construction, Alternative 2 would implement approximately 29 miles of new bikeways within the City of Agoura Hills and amend the City of Agoura Hills General Plan 2035 to shift the focus from prioritizing automobile mobility to reducing VMT. Therefore, Alternative 2 would be consistent with the SoCal Connect 2024 goals aimed at reducing emissions from transportation sources and the City of Agoura Hills General Plan 2035 goals and policies related to creating a transportation system that serves all modes of travel, reducing reliance on single-occupancy vehicle travel through the provision of alternative travel modes, enhancing bicycle facilities, and decreasing GHG emissions through a reduction in VMT. Impacts related to a conflict with local or regional land use plans or policies would remain less than significant under Alternative 2 and would be generally similar as compared to the proposed project.

The temporary presence of construction equipment on local roadways and the potential for lane closures under Alternative 2 could temporarily increase hazards due to geometric design features or incompatible uses, and could temporarily block access to roadways that are currently used by emergency response vehicles. Similar to the proposed Project, a construction traffic control plan would be prepared and implemented in accordance with the MUTCD should construction within the roadway or should temporary lane closures occur. Therefore, construction impacts related transportation hazards, incompatible uses, and emergency access would remain less than significant under Alternative 2 and would be generally similar as compared to the proposed Project.

All bicycle facilities proposed under Alternative 2 would be designed in adherence with the Caltrans Highway Design Manual Chapter 1000 and would undergo design review prior to approval to ensure the appropriate standards are met. Therefore, operational impacts related transportation hazards and incompatible uses would remain less than significant and would be generally similar as compared to the proposed Project.

Alternative 2 would exclude the Path and the Connection from the BMP. The operation of both the Path and Connection would consist of bicycle and pedestrian travel along a shared use path away from existing roadway ROWs. All remaining facilities included within the BMP under Alternative 2 would be construction within or adjacent to existing roadways, which could be accessed by emergency vehicles. Therefore, although impacts related to emergency access would remain less than significant, this impact would be reduced as compared to the proposed Project because fewer facilities would be implemented away from existing roadway ROWs.

Alternative 2 would be considered an active transportation project that would generally reduce VMT. Therefore, Alternative 2 would be presumed to cause a less-than-significant impact on transportation, similar to the proposed Project.

Overall, impacts to transportation would remain less than significant under Alternative 2 but would be reduced as compared to the proposed Project.Overall, Alternative 2 would have a reduced level of impact related to transportation as compared to the proposed Project. Impacts would remain less than significant.

I. Tribal Cultural Resources

The proposed Project would result in less than significant impacts to tribal cultural resources, as no tribal cultural resources were identified during the City's required AB 52 and SB 18 consultation processes. Given that there are no known tribal cultural resources within the Project area for Alternative 2, which would encompass all of the City of Agoura Hills, Alternative 2 would result in less than significant impacts to tribal cultural resources, similar to the proposed Project.

6.4 Alternative 3: Only Class II and Class III Facilities

6.4.1 Description

Similar to the Project, Alternative 3 would involve implementation of the BMP, Program, and Amendments. However, the BMP implemented under Alternative 3 would only include Class II and Class III facilities. Class I facilities, including the Path, Connection, and Class IV facilities would be removed from the BMP. All Class II facilities, Class III facilities, and enhanced bicycle treatments would be included within the BMP under Alternative 3. The Program would be revised to reflect the ability to purchase VMT reduction credits only for the funding of individual projects identified within the BMP under this alternative, which would exclude Class I facilities, including the Path,

Connection, and Class IV facilities. The Amendments would also be revised to exclude Class I facilities, including the Path, Connection, and Class IV facilities from the City's planned additions to its system of bikeways. Under Alternative 3, the Amendments would still shift the focus from prioritizing automobile mobility to reducing VMT through alternative transportation modes like walking and biking.

Construction activities under Alternative 3 would consist of:

- **Class II:** Restriping and reconfiguration of lane widths to accommodate new dedicated bike lanes; pavement widening on Driver Avenue, between Easterly Road and Colodny Drive, and on Cornell Road, between Agoura Road and Cornell Way, which would require clearing and grubbing, subgrade stabilization, base course installation, and asphalt paving;
- **Class III:** Restriping to identify bike routes;
- **Enhanced Bicycle Treatments:** street striping/re-striping, installation of signage and wayfinding, installation of bicycle signals, installation of bicycle parking, and installation of bicycle repair facilities.

Under Alternative 3, approximately 25.6 miles of bicycle facilities would be implemented. Alternative 3 would fulfill the Project Objectives that aim to increase transportation choices, improve accessibility through Agoura Hills, improve bicycle safety, improve public health, enhance sustainability, and provide a mechanism for developers to mitigate VMT impacts from development projects. However, Alternative 3 would meet Project Objectives to a lesser extent given the reduced miles of bicycle facilities implemented and improved under this alternative. Alternative 3 would not fulfill the Project Objective that aims to enhance community character by constructing bicycle facilities near areas of high scenic value, such as along greenbelts or near surface waters.

6.4.2 Impact Analysis

a. Aesthetics

The proposed Project would result in a less than significant impact involving adverse effects to scenic vistas, conflicts with applicable zoning and other regulations that govern scenic quality, and the creation of new sources of light or glare that would adversely views. Because there are no officially designated state scenic highways within the City of Agoura Hills, the proposed Project would result in no impact to scenic resources within a State scenic highway.

Similar to the proposed Project, construction activities under Alternative 3 would require the creation of storage, staging, and active work areas during pavement widening for construction of some Class II facilities. These areas could be visible from public ROWs and could result in minor, temporary effects to publicly-accessible views of hillsides and other scenic resources. However, due to the exclusion of Class I and Class IV facilities from the BMP, construction activities under Alternative 3 would not be visible from City-designated scenic corridors, including Agoura Road, Thousand Oaks Boulevard, and Kanan Road. Impacts under Alternative 3 would remain less than significant but would be reduced as compared to the proposed Project. However, following construction, Alternative 3 would not provide new views from Class I or Class IV facilities, including views of the natural habitat surrounding Medea Creek or enhanced opportunities to view scenic ridgelines from the Connection.

Similar to the proposed Project, construction activities under Alternative 3 could cause a temporary change in the existing visual character and quality of the Project area. These activities would not permanently impair or block any sensitive or unique visual resources or landscapes, nor would the BMP under Alternative 3 result in the construction of new structures that could permanently disrupt existing views. Similar to the proposed Project, all facilities implemented under Alternative 3 would be required to comply with applicable goals, policies, and regulations identified within the City of Agoura Hills General Plan 2035, the AHMC, and the Agoura Village Specific Plan. Thus, impacts related to a conflict with applicable zoning and other regulations governing scenic quality under Alternative 2 would remain less than significant and would be similar to the proposed Project.

Similar to the proposed Project, Alternative 3 would result in temporary sources of light and glare due to the creation of storage, staging, or active work areas during pavement widening for construction of some Class II facilities. Alternative 3 would also result in permanent sources of light and glare due to the implementation of bicycle signals, signage, or other reflective elements, as well as the operation of bicycles on new Class II and Class III facilities. However, due to the exclusion of the Class I and Class IV facilities, Alternative 3 would result in less sources of temporary and permanent light and glare than the proposed project. Impacts under Alternative 2 related to light and glare would remain less than significant but would be reduced as compared to the proposed Project.

There are no designated state scenic highways within the Project area. Thus, similar to the proposed Project, Alternative 3 would result in no impact to scenic resources within a State scenic highway.

Overall, impacts to aesthetics would remain less than significant under Alternative 3 but would be reduced as compared to the proposed Project.

b. Air Quality

The proposed Project would result in a less than significant impact involving conflict with or obstruction of the 2022 Air Quality Management Plan, a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment, exposure of sensitive receptors to substantial pollutant concentrations, and odors.

Alternative 3 would result in the implementation of a smaller set of bicycle facilities. Similar to the proposed Project, normal background growth in the City of Agoura Hills would continue to occur but no residential or businesses would be built under Alternative 3. Thus population, housing, and employment would not grow such that the SCAG growth forecast for the City of Agoura Hills, or other growth forecasts on which the 2022 AQMP is based, would be exceeded.

Alternative 3 would exclude Class I and Class IV facilities from the BMP. Thus, Alternative 3 would result in a reduced scope, extent, and duration of construction activities, and criteria pollutant emissions from construction equipment, vehicle trips, or fugitive dust would be reduced as compared to the proposed Project. Therefore, Alternative 3 would result in a less than significant impact involving conflict with or obstruction of the 2022 AQMP, and a less than significant impact involving a net increase of any criteria pollutants. Although impacts would remain less than significant, these impacts would be reduced as compared to the proposed Project due to the reduction in scope, extent, and duration of construction activities.

Similarly, because less construction activities would occur, Alternative 3 would generate fewer toxic air contaminants and result in less odors. Although impacts would remain less than significant, these impacts would be reduced as compared to the proposed Project.

Overall, impacts to air quality would remain less than significant under Alternative 3 but would be reduced as compared to the proposed Project.

c. Biological Resources

The proposed Project would result in potentially significant impacts to special-status species, riparian habitat or other sensitive natural communities, and state or federally protected wetlands due to construction activities in previously undisturbed areas.

The proposed Project would also result in a potentially significant impact related to a conflict with local policies or ordinances protecting biological resources due to the potential for direct impact to oak trees during construction activities in previously undisturbed areas.

The proposed Project would result in a less than significant impact involving interference with wildlife movement and nursery sites. Furthermore, because there are no existing landscape-level Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans within the boundaries of the City of Agoura Hills, the proposed Project would result in no impact related to a conflict with such plans

Alternative 3 would exclude Class I and Class IV facilities from the BMP. Under the proposed Project, Class I and Class IV facilities are proposed away from the existing roadway ROWs in areas with higher biological sensitivity. Nonetheless, pavement widening would still be necessary on Driver Avenue and on Cornell Road to allow for the addition of Class II bicycle lanes. Construction activities for pavement widening would require grading and/or excavation in natural and undisturbed habitats. Therefore, Alternative 3 could still result in potentially significant impacts to special-status species, riparian habitat or other sensitive natural communities, and state or federally protected wetlands due to construction activities in previously undisturbed areas. Furthermore, Alternative 3 could still result in a potentially significant impact related to a conflict with local policies or ordinances protecting biological resources due to the potential for direct impact to oak trees. Mitigation Measures BIO-1a, BIO-1b, BIO-1c, BIO-2a, BIO-2b, BIO-2c, and BIO-5 would be required to reduce these potentially significant impacts to a less-than-significant level. Although impacts would remain less than significant with mitigation, these impacts would be reduced under Alternative 3 as compared to the proposed Project due to the reduced construction footprint in previously undisturbed areas.

Alternative 3 would require pavement widening on Driver Avenue and on Cornell Road to allow for the addition of Class II bicycle lanes. Wildlife adjacent to these facilities would be expected to be urban tolerant. Furthermore, use of these bicycle facilities would not prevent wildlife movement or disrupt nursery sites. Nonetheless, although impacts would remain less than significant, this impact would be reduced as compared to the proposed Project due to the reduced construction footprint.

Because there are no existing landscape-level Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans within the boundaries of the City of Agoura Hills, Alternative 3 would result in no impact related to a conflict with such plans, similar to the proposed Project.

Overall, impacts to biological resources would remain less than significant with mitigation under Alternative 3 but would be reduced as compared to the proposed Project.

d. Cultural Resources

Due to the cultural sensitivities within the City of Agoura Hills, the proposed Project would result in a significant and unavoidable impact to historical resources even with implementation of Mitigation Measure CUL-1, which would require preparation of a Historical Resources Evaluation for individual projects that could result in impacts to structures 45 years or older. The proposed Project would also result in a significant and unavoidable impact to archaeological resources even with implementation of Mitigation Measure CUL-2, which would require preparation of an Archaeological Resources Assessment for individual projects that would involve ground-disturbing activities. The proposed Project would result in a less than significant impact involving the disturbance of human remains.

Alternative 3 would result in the implementation of a smaller set of bicycle facilities, excluding Class I and Class IV facilities. Class II and Class III facilities would still be constructed under Alternative 3. Some Class II facilities would require pavement widening outside of the existing roadway. Construction activities associated with these Class II facilities that require pavement widening would include ground disturbance in previously undisturbed areas. Thus, Alternative 3 would still have the potential to directly impact historical structures and/or objects, encounter or impact surficial and subsurface archaeological resources, and disturb human remains. Mitigation Measures CUL-1 and CUL-2 would be required under Alternative 3. Although impacts would remain significant and unavoidable, these impacts would be reduced as compared to the proposed Project due to the reduced construction footprint in previously undisturbed areas.

e. Geology and Soils

The proposed Project would result in less than significant impacts involving risk of loss, injury, or death due to rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure including liquefaction, or landslides; substantial soil erosion or the loss of topsoil; unstable soils; and expansive soils. Furthermore, because the proposed Project would not result in the construction of buildings or habitable structures requiring a sanitary sewer system, there would be no impact involving the use of septic tanks or alternative wastewater disposal systems. The proposed Project would result in a potentially significant impact involving the destruction of paleontological resources due to ground-disturbing activities within geologic units with high or undetermined paleontological sensitivity.

Similar to the proposed Project, there are no faults or Alquist-Priolo Special Studies Zones within the Project area for Alternative 3, which would encompass all of the City of Agoura Hills; the nearest fault would be the Simi-Santa Rosa Fault, located approximately seven miles north of the city. Therefore, Alternative 3 would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. This impact would remain less than significant, similar to the proposed Project.

Alternative 3 would exclude Class I and Class IV facilities from the BMP. Although these facilities would be excluded, Class II facilities, Class III facilities, and the enhanced bicycle treatments would still be implemented. Class III facilities and enhanced bicycle treatments would be located within identified liquefaction zones and within areas identified as at risk of landslides. Under the proposed Project, Class I facilities would be located within identified liquefaction zones and within areas identified as at risk of landslides; Class IV facilities are not located within identified liquefaction zones or within areas identified as at risk of landslides. Therefore, although impacts would remain less than significant, impacts related to liquefaction and landslides would be reduced under

Alternative 3 as compared to the proposed Project due to the removal of facilities from the BMP within areas identified liquefaction zones and within areas identified as at risk of landslides.

Class II facilities that require pavement widening would include ground disturbance in previously undisturbed areas. Thus, Alternative 3 would still have the potential to result in soil erosion and the loss of topsoil. Similar to the proposed Project, soil erosion that occurs due to implementation of individual projects involving earth-disturbing construction activities would be effectively controlled through a combination of State Water Resources Control Board (SWRCB) permits and AHMC requirements. Although impacts would remain less than significant, impacts related to soil erosion and the loss of topsoil would be reduced under Alternative 3 as compared to the proposed Project due to fewer earth-moving construction activities.

Because construction activities associated with implementation of the Class II facilities that require pavement widening would include ground disturbance in previously undisturbed areas, Alternative 3 would still have the potential to damage or destroy paleontological resources that may be present on or below the ground surface in areas of high or undetermined paleontological sensitivity. Mitigation Measure GEO-9 would be required to reduce this potentially significant impact to a less-than-significant level. Although impacts would remain less than significant with mitigation, this impact would be reduced as compared to the proposed Project due to the reduced construction footprint in previously undisturbed areas.

Similar to the proposed Project, a geotechnical investigation would be prepared prior to construction of aboveground features under Alternative 3, including the enhanced bicycle treatments, to determine the potential for risks of lateral spreading, subsidence problems, and expansive soils. Furthermore, similar to the proposed Project, the BMP under Alternative 3 would not result in the construction of buildings or habitable structures on soils subject to lateral spreading or subsidence, or on expansive soils. These impacts would remain less than significant and would be similar as compared to the proposed Project.

Neither the proposed Project nor Alternative 3 would result in the construction of buildings or habitable structures requiring a sanitary sewer system. Thus, similar to the proposed Project, Alternative 3 would result in no impact related to the use of septic tanks or alternative wastewater disposal systems.

Overall, impacts related to geology and soils would remain less than significant with mitigation under Alternative 3 but would be reduced as compared to the proposed Project.

f. Hazards and Hazardous Materials

The proposed Project would result in potentially significant impacts involving the creation of a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; the creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials; emissions of hazardous materials within 0.25 mile of a school; and creation of a significant hazard to the public or the environment due to a known hazardous material site. The proposed Project would result in a less than significant impact related to interference with the implementation of an adopted emergency response or evacuation plan and the risk of loss, injury, or death involving wildland fires. Furthermore, because the City of Agoura Hills is not located within an airport land use plan or within two miles of a public airport or public use airport, the proposed Project would result in no impact involving safety hazards or excessive noise from airports.

Construction activities under Alternative 3 would involve the transport, use, and disposal of hazardous materials such as fuels, solvents, and asphalt products. These activities would be subject to existing federal, state, and local regulations governing hazardous materials management. However, Alternative 3 would exclude Class I facilities and Class IV facilities, some of which are proposed within 1,000 feet of known hazardous materials sites. There are no known hazardous materials sites within 1,000 feet of proposed Class II facilities. There are 19 known hazardous materials sites located within 1,000 feet of proposed Class III; however, due to the lack of ground disturbance required for implementation, implementation of these facilities would not create a significant hazard to the public or the environment, either through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment or through the implementation of a project on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Alternative 3 would not require the implementation of Mitigation Measure HAZ-1 and impacts would be less than significant without mitigation, which would be a reduced level of impact as compared to the proposed Project.

Class II and III facilities would still be constructed near schools, including Lindero Canyon Middle School and Sumac Elementary School. However, because there are no known hazardous materials sites within 1,000 feet of proposed Class II facilities, and due to the lack of ground disturbance required for implementation required for implementation of Class III facilities, Alternative 3 would not require the implementation of Mitigation Measure HAZ-1. Impacts would be less than significant without mitigation, which would be a reduced level of impact as compared to the proposed Project.

Under Alternative 3, construction activities associated with implementing the Class II facility proposed on Driver Avenue would occur on or near identified evacuation routes. Similar to the proposed Project, a construction traffic control plan would be prepared and implemented in accordance with the MUTCD should construction within the roadway or should temporary lane closures occur. Thus, Alternative 3 would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Although this impact would remain less than significant, impacts would be reduced as compared to the proposed Project because fewer construction activities would occur on or near identified evacuation routes.

Because Alternative 3 would exclude Class I facilities, including the Path and the Connection, from the BMP, there would be a lesser increase in human activity and potential ignition sources during construction activities in undeveloped areas. Nonetheless, pavement widening for some Class II facilities would still result in a temporary increase in potential ignition sources during construction activities in undeveloped areas. Compliance with OSHA fire prevention standards would ensure that risks are minimized. Furthermore, similar to the proposed Project, Alternative 3 would not include structural components or physical development that would expose people or structures to a significant risk involving wildland fire. Although this impact would remain less than significant, impacts would be reduced as compared to the proposed Project due to the reduced construction footprint in previously undisturbed areas.

There are no airports located within the City of Agoura Hills, nor is the city located within the noise contours of an airport. Thus, similar to the proposed Project, Alternative 3 would result in no impact related to exposure to excessive noise levels for people residing or working in the area.

Overall, impacts related to hazards and hazardous materials would be less than significant without mitigation under Alternative 3, which would be reduced as compared to the proposed Project.

g. Hydrology and Water Quality

The proposed Project would result in less than significant impacts involving violation of water quality standards or waste discharge requirements; a reduction in groundwater supplies or interference with groundwater recharge; alteration of existing drainage patterns such that erosion, siltation, increased runoff, polluted runoff, or redirected flood flows would occur; the release of pollutants due to project inundation; and conflict with a water quality control plan or sustainable groundwater management plan.

Although Alternative 3 would exclude Class I and Class IV facilities from the BMP, construction activities associated with the Class II facilities that require pavement widening would still involve clearing, grading, paving, and excavation. Similar to the proposed Project, these activities would be subject to the Construction General Permit and/or Article V, Chapter 5 of the AHMC, which require the implementation of BMPs and, where applicable, a SWPPP. With adherence to these requirements, impacts related to water quality standards, erosion, and runoff would remain less than significant, but would be reduced as compared to the proposed Project given the reduced scope of construction activities.

Alternative 3 would reduce the potential for impacts to groundwater recharge by excluding the Class I and Class IV facilities, which would reduce the amount of new impervious surfaces introduced within the Project area. Nonetheless, the Class II facilities that require pavement widening would still result in minor increases in impervious surfaces. Due to the known depths of groundwater in the Russell Valley Groundwater Basin, construction activities associated with pavement widening under Alternative 3 would not require groundwater dewatering. Furthermore, similar to the proposed Project, semipermeable materials would be utilized when feasible for pavement widening, and during precipitation events, stormwater would flow into adjacent permeable areas, or onto existing streets where it would be collected by the city's existing stormwater system. Impacts to groundwater supplies or recharge would remain less than significant, but would be reduced as compared to the proposed Project given the reduced amount of new impervious surfaces .

Similar to the proposed Project, Alternative 3 would not substantially alter the existing drainage pattern of the Project area or alter the course of a stream or river because no streams or rivers are located within individual project sites. Furthermore, Alternative 3 would not result in substantial erosion or siltation on or off site, flooding on or off site, substantial additional sources of polluted runoff, or impeded or redirected flood flows, nor would Alternative 3 introduce structures that could redirect floodwaters. These impacts would remain less than significant and would be similar to the proposed Project.

There are no tsunami inundation zones or seiche inundation zones within the Project area. Thus, similar to the proposed Project, Alternative 3 would result in no impact related to the risk of release of pollutants due to tsunami or seiche inundation events. Alternative 3 would exclude some individual projects from the BMP that would be located within a flood hazard area under the proposed Project. Nonetheless, Class III facilities and enhanced bicycle treatments included in the BMP under Alternative 3 would be constructed within flood hazard areas. Implementation of BMPs as required by the AHMC would reduce the potential for release of pollutants during construction of these facilities. Impacts related to the risk of release of pollutants due to project inundation within a flood hazard area would remain less than significant under Alternative 3 but would be reduced as compared to the proposed Project due to the removal of facilities from the BMP within flood hazard areas.

Overall, impacts to hydrology and water quality would remain less than significant under Alternative 3 but would be reduced as compared to the proposed Project.

h. Land Use and Planning

The proposed Project would result in less than significant impacts related to the physical division of an established community and related to a conflict with any land use plan, policy, or regulation adopted to avoid or mitigate an environmental effect.

Although Alternative 3 would exclude Class I facilities and Class IV facilities from the BMP, construction activities associated with the Class II facilities that require pavement widening could occur within or adjacent to existing ROW. These construction activities could temporarily impact the circulation system. Similar to the proposed Project, a construction traffic control plan would be prepared and implemented in accordance with the MUTCD should construction within the roadway or should temporary lane closures occur. Following construction, Alternative 3 would not result in physical development such that an established community would be physically divided. Thus, Alternative 3 would not result in the physical division of an established community. This impact would remain less than significant and would be similar to the proposed Project .

Alternative 3 would implement approximately 25.6 miles of new bikeways within the City of Agoura Hills and amend the City of Agoura Hills General Plan 2035 to shift the focus from prioritizing automobile mobility to reducing VMT. Therefore, similar to the proposed Project, Alternative 3 would be consistent with the SoCal Connect 2024 goals aimed at reducing emissions from transportation sources and the City of Agoura Hills General Plan 2035 goals and policies related to providing bicycle connections, improving pedestrian-oriented amenities, and promoting land development practices that reduce energy consumption, pollution, and greenhouse gas emissions, and improving. This impact would remain less than significant and would be similar to the proposed Project.

Overall, impacts related to land use and planning would be generally similar under Alternative 3 as compared to the proposed Project and would remain less than significant.

i. Noise

The proposed Project would result in a potentially significant impact related to the generation of noise in excess of applicable noise standards. The proposed Project would also result in a potentially significant impact involving the generation of excessive groundborne vibration. Because the City of Agoura Hills is not located within an airport land use plan or within two miles of a public airport or public use airport, the proposed Project would result in no impact involving excessive noise levels from airports.

Alternative 3 would result in the implementation of a smaller set of bicycle facilities, excluding the Class I and Class IV facilities from the BMP. Exclusion of the Class I and Class IV facilities under Alternative 3 would reduce the scope, extent, and duration of construction activities, which would reduce noise and groundborne vibration generated during construction activities as compared to the proposed Project. Nonetheless, implementation of the Class II facilities that require pavement widening would still result in construction noise that could exceed the FTA threshold of 80 dBA L_{eq} at sensitive receptors located within 125 feet of construction. Similarly, use of vibratory rollers and other heavy equipment during construction of the Class II facilities that require pavement widening could generate vibration levels exceeding the FTA threshold of 0.12 in/sec PPV at nearby structures. Mitigation Measures N-1 and N-2 would be required to reduce these potentially significant impacts

to a less-than-significant level. Although these impacts would remain less than significant with mitigation, impacts under Alternative 3 would be reduced as compared to the proposed Project due to the reduced the scope, extent, and duration of construction activities.

Similar to the proposed Project, operational noise under Alternative 3 would be limited to landscaping and maintenance activities, portable amplified music from facility users, and people's voices. Noise from these sources would be required to comply with AHMC Section 9656.2. Operational activities would not introduce new sources of vibration. Operational impacts would remain less than significant and would be similar to the proposed Project.

Overall, impacts related to noise would remain less than significant with mitigation under Alternative 3 but would be reduced as compared to the proposed Project .

j. Recreation

The proposed Project would result in a less than significant impact involving the physical deterioration of recreational facilities.

Alternative 3 would exclude construction of the Class I and Class IV facilities. As such, this alternative would not require the establishment of storage, staging, and active work areas within or adjacent to the designated open space surrounding Medea Creek or within recreational facilities near Class IV facilities, which would reduce the potential to restrict access to recreational resources. However, pavement widening on Driver Avenue associated with the construction of the Class II facilities under this alternative could still restrict access to or result in temporary closures of the Old Agoura Park. Operation of all facilities included in the BMP under Alternative 3 would result in new and/or improved multimodal access to existing recreational resources throughout the city. Nonetheless, under both the proposed Project and Alternative 3, the city would continue to exceed their service ratio goals of eight acres of parks and open space areas for every 1,000 residents during both construction and operation. Therefore, impacts to recreation would be generally similar under Alternative 3 as compared to the proposed Project and would remain less than significant.

k. Transportation

The proposed Project would result in less than significant impacts related to a conflict with a program, plan, ordinance or policy addressing the circulation system; a conflict with State CEQA Guidelines Section 15064.3, subdivision (b); substantially increased hazards due to geometric design features or incompatible uses; and inadequate emergency access.

Although Alternative 3 would exclude Class I facilities and Class IV facilities from the BMP, construction activities associated with implementing the Class II facilities that require pavement widening could still occur within or adjacent to existing ROW. These construction activities could temporarily impact the circulation system, which would conflict with Goal M-1 of the City of Agoura Hills General Plan 2035 that calls for a safe and efficient roadway system. Similar to the proposed Project, a construction traffic control plan would be prepared and implemented in accordance with the MUTCD should construction within the roadway or should temporary lane closures occur. Following construction, Alternative 3 would implement approximately 25.6 miles of new bikeways within the City of Agoura Hills and amend the City of Agoura Hills General Plan 2035 to shift the focus from prioritizing automobile mobility to reducing VMT. Therefore, Alternative 3 would be consistent with the SoCal Connect 2024 goals aimed at reducing emissions from transportation sources and the City of Agoura Hills General Plan 2035 goals and policies related to creating a transportation system that serves all modes of travel, reducing reliance on single-occupancy vehicle

travel through the provision of alternative travel modes, enhancing bicycle facilities, and decreasing GHG emissions through a reduction in VMT. Impacts related to a conflict with local or regional land use plans or policies would remain less than significant under Alternative 3 and would be generally similar as compared to the proposed project.

The temporary presence of construction equipment on local roadways and the potential for lane closures under Alternative 3 could temporarily increase hazards due to geometric design features or incompatible uses, and could temporarily block access to roadways that are currently used by emergency response vehicles. Similar to the proposed Project, a construction traffic control plan would be prepared and implemented in accordance with the MUTCD should construction within the roadway or should temporary lane closures occur. Therefore, construction impacts related transportation hazards, incompatible uses, and emergency access would remain less than significant under Alternative 3 and would be generally similar as compared to the proposed Project.

All bicycle facilities proposed under Alternative 3 would be designed in adherence with the Caltrans Highway Design Manual Chapter 1000 and would undergo design review prior to approval to ensure the appropriate standards are met. Therefore, operational impacts related transportation hazards and incompatible uses would remain less than significant and would be generally similar as compared to the proposed Project.

Alternative 3 would exclude construction of Class I facilities and Class IV facilities; the operation of both Class I facilities and Class IV facilities would consist of bicycle and pedestrian travel along a shared use path away from or along physically separated from existing roadway ROWs. Class II and Class III facilities constructed under Alternative 3 would be implemented within existing roadway ROWs with no physical barriers. Therefore, although operational impacts related to emergency access would remain less than significant, this impact would be reduced under Alternative 3.

Alternative 3 would be considered an active transportation project that would generally reduce VMT. Therefore, Alternative 3 would be presumed to cause a less-than-significant impact on transportation, similar to the proposed Project.

Overall, impacts to transportation would remain less than significant under Alternative 3 but would be reduced as compared to the proposed Project .

I. Tribal Cultural Resources

The proposed Project would result in less than significant impacts to tribal cultural resources, as no tribal cultural resources were identified during the City's required AB 52 and SB 18 consultation processes. Given that there are no known tribal cultural resources within the Project area for Alternative 3, which would encompass all of the City of Agoura Hills, Alternative 3 would result in less than significant impacts to tribal cultural resources, similar to the proposed Project.

6.5 Environmentally Superior Alternative

CEQA requires the identification of an environmentally superior alternative among the alternatives evaluated in a EIR. State CEQA Guidelines Section 15126.6(e)(2) provides that, if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

This discussion identifies the environmentally superior alternative by assessing the degree to which each alternative avoids or minimizes environmental impacts. In some cases, an alternative will avoid

or minimize one or more impacts identified for the proposed project but then introduce one or more new impacts. Therefore, selection of the environmentally superior alternative requires an overall assessment of the changes in the number and type of significant impacts.

The State CEQA Guidelines do not define a specific methodology for determining the environmentally superior alternative. For the purposes of this analysis, the Project alternatives have been compared within each issue area to the proposed Project, and a determination has been made as to whether the potential environmental effects of each alternative would be reduced, increased, or is similar in comparison to the proposed project (refer to Table 6-2). For the purpose of this PEIR, each impact is equally weighted. Decision makers and the community in general may choose to emphasize one issue or another, which could lead to differing conclusions regarding environmental superiority.

The No Project Alternative would result in the fewest adverse environmental effects when compared to existing conditions because no construction activities would occur; therefore the No Project Alternative would be considered environmentally superior. However, the No Project Alternative would not fulfill any Project objectives.

As stated above, State CEQA Guidelines Section 15126.6(e)(2) provides that, if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. The environmentally superior alternative among the other alternatives would be Alternative 3 (Only Class II and Class III Facilities). Due to Alternative 3's reduced construction footprint, Alternative 3 would have less potential than the proposed Project and Alternative 2 (Project Minus Medea Creek Path and Agoura High School Connection) to result in impacts related to aesthetics, air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, and transportation.

Alternative 3 would not meet the following Project objectives to the same extent as the proposed Project, as it would only include the Class II and Class III facilities:

- Increase transportation choices by providing viable alternatives to driving and improved equity to include all bikers, those who choose not to drive and those who cannot drive.
- Improve accessibility through local and regional connectivity. Local connections include residential communities, schools, commercial centers, and parks whereas regional connections include the surrounding communities and recreational trail network.
- Improve safety by providing separate biking facilities, reducing bicycle collisions, creating greater visibility for bikers, and raising awareness to both bicyclists and road users.
- Improve the public health by creating facilities that allow for more biking.
- Enhance sustainability and environmental benefits by reducing air pollution, greenhouse gas emissions, and noise pollution.
- Provide a mechanism for developers to mitigate VMT impacts from development projects.

Alternative 2 would not meet the following Project objective, as it would not result in the implementation of the Minus Medea Creek Path and Agoura High School Connection facilities:

- Enhance community character by constructing bicycle facilities near areas of high scenic value, such as along greenbelts or near surface waters.

Table 6-2 Impact Comparison of Alternatives

Issue	Proposed Project Impact Classification	Alternative 1: No Project Alternative	Alternative 2: Project Minus Medea Creek Path and Agoura High School Connection	Alternative 3: Only Class II and Class III Facilities
Aesthetics	LTS	NI +	LTS +	LTS +
Air Quality	LTS	NI +	LTS +	LTS +
Biological Resources	LTSM	NI +	LTSM +	LTSM +
Cultural Resources	SU	NI +	SU +	SU +
Geology and Soils	LTSM	NI +	LTSM +	LTSM +
Hazards and Hazardous Materials	LTSM	NI +	LTSM +	LTS +
Hydrology and Water Quality	LTS	NI +	LTS +	LTS +
Land Use and Planning	LTS	NI +	LTS =	LTS =
Noise	LTSM	NI +	LTSM +	LTSM +
Recreation	LTS	NI +	LTS =	LTS =
Transportation	LTS	NI +	LTS +	LTS +
Tribal Cultural Resources	LTS	NI +	LTS =	LTS =

NI: No Impact
LTS: Less than Significant Impact
LTSM: Less than Significant Impact with Mitigation Incorporated
SU: Significant and Unavoidable Impact

+ Superior to the proposed project (reduced impact)
- Inferior to the proposed project (increased impact)
= Similar impact to the proposed project

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7 References

7.1 List of Preparers

This EIR was prepared by the City of Agoura Hills, with the assistance of Rincon Consultants, Inc. Consultant staff involved in the preparation of the EIR are listed below.

RINCON CONSULTANTS, INC.

Kim Avila, Principal-in-Charge
Taylor Freeman, Senior Project Manager
Nicholas Carter, Environmental Planner & Deputy Project Manager
Ryan Perry, Environmental Planner
Monet Bernard, Environmental Planner
Brooke Baranek, Environmental Planner
Jesse McCandless, Noise Specialist
Jessie Jaegar, Air Quality Specialist
Bill Vosti, Air Quality and Noise QA/QC
Michael Vader, Senior Cultural Resources Specialist
JulieAnn Murphy, Senior Architectural Historian
Monica Strauss, Senior Principal and Cultural Resources QA/QC
Tyler Barns, Supervising Biologist
Jennifer Turner, Natural Resources Director and Biological Resources QA/QC
Dario Campos, Technical Editor
Debra Seltzer, Publishing Specialist
Yaritza Ramirez, Publishing Specialist

7.2 Bibliography

Executive Summary

Introduction

California Department of Transportation (Caltrans). 2025. Highway Design Manual: Chapter 100 – Bicycle Transportation Design. https://dot.ca.gov/-/media/dot-media/programs/design/documents/chp1000-a11y.pdf (accessed June 2025).

Project Description

Fehr and Peers. 2020. *VMT Mitigation through Fees, Banks, and Exchanges: Understanding New Mitigation Approaches.* April 2020. https://www.fehrandpeers.com/wp-content/uploads/2020/04/VMT-Fees_Exchanges_Banks-White-Paper_Apr2020.pdf (accessed May 2024).

Environmental Setting

City of Agoura Hills. 2010. General Plan. https://www.agourahillscity.org/home/showpublisheddocument/30826/638644930871500000 (accessed January 2025).

_____. 2022. Bicycle Master Plan. https://www.agourahillscity.org/home/showpublisheddocument/26973/637965041760970000 (accessed January 2025).

_____. 2025. Transportation Services. https://www.agourahillscity.org/our-city/residents/transportation-services/alternative-transportation (accessed March 2025).

Aesthetics

California Department of Finance (DOF), Counties, and State 2021-2025, with 2020 Benchmark. May 1, 2025. E-4 Population Estimates for Cities, Counties, and the State, 2021-2025 with 2020 Census Benchmark | Department of Finance (accessed July 2025).

California Department of Transportation (Caltrans). 2018. California State Scenic Highway System Map. https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa (Accessed June 2025).

City of Agoura Hills. 2024b. Agoura Village Specific Plan. https://www.agourahillscity.org/home/showpublisheddocument/30782/638630207576870000 (Accessed June 2025).

City of Agoura Hills. 2022. City of Agoura Hills General Plan Update. https://www.agourahillscity.org/home/showpublisheddocument/30826/638644930871500000 (Accessed February 2025).

City of Agoura Hills. 2010a. City of Agoura Hills General Plan 2035 Environmental Impact Report. Accessed February 2025.

Air Quality

Agoura Hills, City of. 2022. Agoura Hills General Plan. https://www.agourahillscity.org/department/planning-community-development/general-plan (accessed February 2025).

California Air Resources Board (CARB). 2023. Maps of State and Federal Area Designations. https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations (accessed February 2025).

_____. 2024a. Overview: Diesel Exhaust & Health. https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health (accessed February 2025).

_____. 2024b. Top 4 Pollutant Summary. https://www.arb.ca.gov/adam/topfour/topfourdisplay.php (accessed February 2025).

_____. 2024c. National Ambient Air Quality Standards. https://ww2.arb.ca.gov/resources/national-ambient-air-quality-standards (accessed February 2025).

_____. 2024d. California Ambient Air Quality Standards. https://ww2.arb.ca.gov/resources/california-ambient-air-quality-standards (accessed February 2025).

_____. 2024e. Table of Ambient Air Quality Standards. https://ww2.arb.ca.gov/sites/default/files/2024-08/AAQS%20Table_ADA_FINAL_07222024.pdf (accessed February 2025).

Southern California Association of Governments (SCAG). 2020. The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments. https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176 (accessed February 2025).

Southern California Air Quality Management District (SCAQMD). 2003. Final 2003 AQMP Appendix V. Modeling and Attainment Demonstrations. https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2003-air-quality-management-plan/2003-aqmp-appendix-v.pdf (accessed February 2025).

_____. 2005. Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning A Reference for Local Governments Within the South Coast Air Quality Management District. https://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf (accessed February 2025).

_____. 2008. Final Localized Significance Threshold Methodology. https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf (accessed February 2025).

_____. 2009. 2006 – 2008 Thresholds for Construction and Operation. https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf (accessed February 2025).

_____. 2017. Final 2016 Air Quality Management Plan. https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf (accessed February 2025).

_____. 2022. 2022 Air Quality Management Plan. https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=16 (accessed February 2025).

_____. 2023. South Coast AQMD Air Quality Significance Thresholds. https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25 (accessed February 2025).

_____. 2025. Southern California Air Basins. https://www.aqmd.gov/docs/default-source/default-document-library/map-of-jurisdiction.pdf (accessed June 2025).

United States Environmental Protection Agency (USEPA). 2014. Policy Assessment for the Review of the Lead National Ambient Air Quality Standards. https://www3.epa.gov/ttn/naaqs/standards/pb/data/140501_pa_pb_fin.pdf (accessed February 2025).

_____. 2015. Overview of EPA's Updates to the Air Quality Standards for Ground-Level Ozone. https://www.epa.gov/sites/default/files/2015-10/documents/overview_of_2015_rule.pdf (accessed February 2025).

_____. 2024a. Health Effects of Ozone Pollution. https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution (accessed February 2025).

_____. 2024b. Basic Information about Carbon Monoxide (CO) Outdoor Air Pollution. https://www.epa.gov/co-pollution/basic-information-about-carbon-monoxide-co-outdoor-air-pollution#Effects (accessed February 2025).

_____. 2024c. Basic Information about NO2. https://www.epa.gov/no2-pollution/basic-information-about-no2#Effects (accessed February 2025).

_____. 2024d. Sulfur Dioxide Basics. https://www.epa.gov/so2-pollution/sulfur-dioxide-basics#effects (accessed February 2025).

_____. 2024e. Basic Information about Lead Air Pollution. https://www.epa.gov/lead-air-pollution/basic-information-about-lead-air-pollution#health (accessed February 2025).

_____. 2024f. Health and Environmental Effects of Hazardous Air Pollutants. https://www.epa.gov/haps/health-and-environmental-effects-hazardous-air-pollutants (accessed February 2025).

_____. 2024g. NAAQS Table. https://www.epa.gov/criteria-air-pollutants/naaqs-table (accessed February 2025).

_____. 2024h. Process of Reviewing the National Ambient Air Quality Standards. https://www.epa.gov/criteria-air-pollutants/process-reviewing-national-ambient-air-quality-standards (accessed February 2025).

Western Regional Climate Center. 2003. Oxnard, California Period of Record Monthly Climate Summary. https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca6569 (accessed February 2025).

Biological Resources

Barbour, M. G., T. Keeler-Wolf, and A. A. Schoenherr, eds. 2007. Terrestrial Vegetation of California. 3rd ed. University of California Press. Brady, Roland H., III, and Kris Vyverberg. 2013. Methods to Describe and Delineate Episodic Stream Processes on Arid Landscapes for Permitting Utility-scale Solar Power Plants: With the MESA Field Guide. Final Project Report. Sacramento: California Energy Commission. California Department of Fish and Game. 1994. A Field Guide to Lake and Streambed Alteration Agreements

California Department of Fish and Wildlife (CDFW). "Special Animals List." California Natural Diversity Database, 2025, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406&inline California Department of Fish and Wildlife (CDFW). 2025a. California Natural Diversity Database, Rarefind V. Accessed January 2025.

_____. 2025b. Special Vascular Plants, Bryophytes, and Lichens List. Biogeographic Data Branch, California Natural Diversity Database. Accessed January 2025.

California Department of Fish and Wildlife (CDFW). (2025a). Special Vascular Plants, Bryophytes, and Lichens List. California Natural Diversity Database. Sacramento, CA. Retrieved from https://wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

California Native Plant Society. 2025. Inventory of Rare and Endangered Plants. V.7-08c-Interim 8-22-02. Updated online and accessed via: www.rareplants.cnps.org.

City of Agoura Hills. General Plan 2035. Agoura Hills, CA: City of Agoura Hills, 2022. Significant Ecological Area (SEA) | County Of Los Angeles Enterprise GIS, Los Angeles County 2025

Sawyer, J. O., T. Keeler-Wolf, and J.M. Evens. 2009. A Manual of California Vegetation, Second Edition. California Native Plant Society, Sacramento, California.

Soil Survey Staff, Natural Resources Conservation Service, United States Department of Agriculture. 2025. Web Soil Survey. Available online at http://websoilsurvey.sc.egov.usda.gov/. Accessed February 2025.

Spencer, W.D., P. Beier, K. Penrod, K. Winters, C. Paulman, H. Rustigian-Romsos, J. Strittholt, M. Parisi, and A. Pettler. 2010. California Essential Habitat Connectivity Project: A Strategy for Conserving a Connected California. Prepared for California Department of Transportation, California Department of Fish and Game, and Federal Highways Administration.

State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State. Published by the California State Water Resources Control Board (SWRCB), with an effective date of May 28, 2020Final 2018 National Wetland Plant List, USACE Regulatory, Published May 22, 2020, https://www.usace.army.mil/Media/Announcements/Article/2876007/22-may-2020-final-2018-national-wetland-plant-list/

Environmental Laboratory. 1987. "Corps of Engineers Wetlands Delineation Manual" Technical Report Y-87-1. U.S. Army Engineer Waterways Experiment Station, Vicksburg, MS.

United States Fish and Wildlife Service (USFWS). 2025a. Information for Planning and Consultation online project planning tool. https://ecos.fws.gov/ipac/.

_____. 2025b. Critical Habitat Portal. https://ecos.fws.gov/ecp/report/table/critical-habitat.html.

_____. 2025c. National Wetlands Inventory. https://www.fws.gov/program/national-wetlands-inventory.

United States Geological Survey. 2025. National Hydrography Dataset. Accessed via the national map. https://apps.nationalmap.gov/viewer/ and https://usgs.maps.arcgis.com/apps/MapTools/index.html?appid=41a5c2ca49bd4a83b239450e61022d53. Accessed January 2025.

Cultural Resources

Arnold, Jeanne E. 1995. Transportation Innovation and Social Complexity among Maritime Hunter-Gatherer Societies. *American Anthropologist* 97(4): 733–747.

Bancroft, Hubert Howe. History of California. 1885.Bean, Lowell John. The Impact of California Missions. The Union-Tribune Publishing Company, 1968.California Office of Historic Preservation 2025. Built Environment Resources Directory for Los Angeles County. Electronic Resource, https://ohp.parks.ca.gov/pages/1068/files/Los%20Angeles.csv (accessed October 2025).

City of Agoura Hills 2022. General Plan Chapter 1. Electronic resource, https://cms2.revize.com/revize/agourahillsca/Documents/Government/Departments/Community%20Development/Planning%20and%20Zoning/General%20Plan/General%20Plan%20Chapter%201%20Introduction.pdf (accessed March 2025).

LA County Library. (2023, August 15). Agoura Hills local history. Retrieved from https://lacountylibrary.org/agoura-hills-local-history/. Dumke, Glenn S. The Boom of the Eighties in Southern California. San Marino, CA: Huntington Library, 1944. Erlandson, Jon M. 1991. Early Maritime Adaptations on the Northern Channel Islands in Hunter-Gatherers of Early Holocene Coastal California. Volume 1: Perspectives in California Archaeology. J. M. Erlandson and R. Colten, eds. Pp. 101–111. Los Angeles, California: Costen Institute of Archaeology Press.

_____. 1994. Early Hunter-Gatherers of the California Coast. New York, New York: Plenum Press.

Erlandson, Jon M., Theodore Cooley, and Richard Carrico. 1987. A Fluted Projectile Point Fragment from the Southern California Coast: Chronology and Context at CA-SBA-1951. *Journal of California and Great Basin Anthropology* 9: 120–128.

Erlandson, Jon M., Torben C. Rick, Terry L. Jones, and Judith F. Porcasi. 2007. One If by Land, Two If by Sea: Who Were the First Californians? *in* California Prehistory: Colonization, Culture, and Complexity. Terry L. Jones and Kathryn A. Klar, eds. Pp. 53–62. Lanham, Maryland: AltaMira Press.

Galvin Preservation Associates 2009

Glassow, Michael A., Lynn H. Gamble, Jennifer E. Perry, and Glenn S. Russell. 2007. Prehistory of the Northern California Bight and the Adjacent Transverse Ranges. *California Prehistory: Colonization, Culture, and Complexity.* Terry L. Jones and Kathryn A. Klar, eds. Pp. 191–213. Lanham, Maryland: AltaMira Press.

Graffy, Colleen. Spanish and Mexican Land Grants in New Mexico and the American Southwest. Sunstone Press, 2010.Gumprecht, Blake. 1999. The Los Angeles River: Its Life, Death, and Possible Rebirth. Baltimore: The Johns Hopkins University Press.Huckell, Bruce B. 1996. The Archaic Prehistory of the North American Southwest. Journal of World Prehistory 10(3): 305–373.

Johnson, J.R., T.W. Stafford, Jr., H.O. Ajie, and D.P. Morris. 2002. Arlington Springs Revisited in Proceedings of the Fifth California Islands Symposium. D. Browne, K. Mitchell, and H. Chaney, eds. Pp. 541–545. Santa Barbara, California: USDI Minerals Management Service and the Santa Barbara Museum of Natural History.

Jones, Terry L., and Jennifer A. Ferneau. 2002. Deintensification along the Central California Coast. In *Catalysts to Complexity, Late Holocene Societies of the California Coast*, edited by Jon M. Erlandson and Terry L. Jones, pp. 205-232. *Perspectives in California Archaeology Vol. 6.* Costen Institute of Archaeology, University of California, Los Angeles.

Jones, Terry L. and Kathryn A. Klar. 2005. Diffusionism Reconsidered: Linguistic and Archaeological Evidence for Prehistoric Polynesian Contact with Southern California. *American Antiquity*. 70(3): 457–484.

_____. 2007. *California Prehistory: Colonization, Culture, and Complexity.* Berkeley, California: AltaMira Press.

Jones, Terry L., Nathan E. Stevens, Deborah A. Jones, Richard T. Fitzgerald, and Mark G. Hylkema. 2007. The Central Coast: A Midlatitude Milieu. In *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, pp. 125–146. AltaMira Press, Lanham, Maryland.

Justice, Noel D. 2002. *Stone Age Spear and Arrow Points of California and the Great Basin.* Bloomington, Indiana: Indiana University Press.

King, Chester D. 1990. Evolution of Chumash Society: A Comparative Study of Artifacts Used in Social System Maintenance in the Santa Barbara Channel Region Before A.D. 1804. *The Evolution of North American Indians.* David Hurst Thomas, ed. New York, New York: Garland Publishing.

Library of Congress 2024a

Library of Congress 2024b

Livingston 1914

McLaren, Duncan, Daryl Fedje, Quentin Mackie, Loren Davis, Jon Erlandson, Alisha Gauvreau, and Colton Vogelaar. 2019. Late Pleistocene Archaeological Discovery Models on the Pacific Coast of North America. *PaleoAmerica* 6(1):43-63.

Moratto, Michael. 1984. *California Archaeology*. Orlando, Florida: Academic Press, Inc.

NETR Online 2023

Orsi and Gutierrez 1998

Pascal 2013

Rolle, Andrew F. California: A History of the Golden State. 7th ed. Wheeling, IL: Harlan Davidson, 2003.SCCIC 2025

Treganza, Adan E. and Agnes Bierman. 1958. The Topanga Culture: Final Report on Excavations, 1948. *University of California Anthropological Records* 20(2): 45–86.

USGS 1932

Wallace, William. 1955. Suggested Chronology for Southern California Coastal Archaeology. *Southwestern Journal of Anthropology* 11(3):214–230.

_____. 1978. Post-Pleistocene Archaeology, 9000 to 2000 B.C. *California. Handbook of North American Indians Volume 8.* Robert F. Heizer, ed. and William C. Sturtevant, general eds. Washington D.C.: Smithsonian Institution Scholarly Press. 505–508.

Warren, Claude N. 1968. Cultural Tradition and Ecological Adaptation on the Southern California Coast in Archaic Prehistory in the Western United States. C. Irwin-Williams, ed. Eastern New Mexico University Contributions in Anthropology 1(3): 1–14.

Waugh, John C. On the Brink of Civil War: The Compromise of 1850 and How It Changed American History. Rowman & Littlefield Publishers, 2003. Geology and Soils

Agoura Hills, City of. 2022. City of Agoura Hills General Plan. https://www.agourahillscity.org/home/showpublisheddocument/30826/638644930871500000 (accessed February 2025).

Bedrossian, T.L. and P.D. Roffers. 2012. Geologic compilation of Quaternary surficial deposits in southern California: Los Angeles 30’ x 60’ quadrangle. [map.] California Geological Survey. CGS Special Report 217, Plate 9, scale 1:100,000.

California Department of Conservation. 2018. Earthquake Fault Zones. https://www.conservation.ca.gov/cgs/documents/publications/special-publications/SP_042-a11y.pdf (accessed February 2025).

California Geological Survey (CGS). 2002. California Geomorphic Provinces. https://www.conservation.ca.gov/cgs/documents/publications/cgs-notes/CGS-Note-36.pdf (accessed February 2025).

_____. 2025. Earthquake Zones of Required Investigation. https://maps.conservation.ca.gov/cgs/informationwarehouse/eqzapp/ (accessed February 2025).

Dibblee, T.W. and H.E. Ehrenspeck. 1992. Geologic map of the Calabasas quadrangle, Los Angeles and Ventura Counties, California. [map]. Dibblee Geologic Foundation, Dibblee Foundation Map DF-37, scale 1:24,000.

_____. 1993. Geologic map of the Thousand Oaks quadrangle, Los Angeles and Ventura Counties, California. [map]. Dibblee Geologic Foundation, Dibblee Foundation Map DF-49, scale 1:24,000.

Jefferson, G.T. 2010. A catalogue of late Quaternary vertebrates from California. Natural History Museum of Los Angeles County Technical Report. Volume 7, pp. 5-172.

Norris, R.M., and R.W. Webb. 1976. Geology of California. John Wiley and Sons, Inc. New York.

Paleobiology Database. 2025. The Paleobiology Database, http://paleobiodb.org/ (accessed March 2025).

Society of Vertebrate Paleontology (SVP). 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Society of Vertebrate Paleontology Impact Mitigation Guidelines Revision Committee. https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines-1.pdf.

Yerkes, R.F. and R.H. Campbell. 2005. Preliminary geologic map of the Los Angeles 30’ x 60’ quadrangle, southern California. United States Geological Survey. [map]. Open-File Report 2005-1019, scale 1:100,000.

Hazards and Hazardous Materials

Agoura Hills, City of. 2022. General Plan Update 2022. Community Safety Element. https://www.agourahillscity.org/home/showpublisheddocument/30836/638644930916770000 (accessed February 2025).

_____. 2025. Know Your Evacuation Zone. Know Your Evacuation Zone | City of Agoura Hills, CA (accessed February 2025).

_____. 2020. Evacuation Plan. https://www.agourahillscity.gov/government/departments/city_manager/emergency_preparedness/agoura_hills_ready.php#collapselinks-182-20b0 (accessed February 2025).

California Department of Forestry and Fire Protection (CAL FIRE). 2025. Wildland Urban Interface (WUI). https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/calfire-website/what-we-do/fire-resource-assessment-program---frap/pdf-maps/wildland-urban-interface-2019.pdf?rev=e44c740c777940c6bda816c42c886c87&hash=52A9A0873B1CBF3E468DC52D4E5CB5B5 (accessed February 2025).

_____. 2024. Fire Hazard severity Zone Viewer. https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/ (accessed February 2025).

California Department of Transportation (Caltrans). 2014. California Manual of Uniform Traffic Control Devices Chapter 6C, Temporary Traffic Control Elements. https://dot.ca.gov/-/media/dot-media/programs/safety-programs/documents/ca-mutcd/rev8/camutcd2014-part6c-rev8-a11y.pdf (accessed July 2025).

CalEPA. 2025. Cortese List Data Resources. Cortese List Data Resources | CalEPA (accessed March 2025).

Los Angeles County Airport Land Use Commission (LACLUC). 2003. Van Nuys Airport. file:///L:/EPS/LA%20Co/Agoura%20Hills/23-14553%20Agoura%20Hills%20Bicycle%20Master%20Plan%20CEQA/Report/Drafts/03_Admin%20Draft%20EIR/02_Admin%20Record/Noise/LACLUC_Van%20Nuys%20Airport.pdf (accessed July 2025).

LVMCOG. 2024. Multi-Jurisdictional Hazard Mitigation Plan. https://www.cityofcalabasas.com/home/showpublisheddocument/32212/638654752876330000 (accessed February 2025).

U.S. EPA. 2024a. USEPA Researchers Investigate the Impacts of Everyday Products on Air Quality. https://www.epa.gov/sciencematters/epa-researchers-investigate-impacts-everyday-products-air-quality (accessed March 2025).

_____. 2024b. Definition of hazardous chemical and OSHA's MSDS requirement for determining applicability of EPCRA 311/312. https://www.epa.gov/epcra/definition-hazardous-chemical-and-oshas-msds-requirement-determining-applicability-epcra (accessed March 2025).

_____. 2024c. Learn About Asbestos. https://www.epa.gov/asbestos/learn-about-asbestos (accessed July 2025).

_____. 2024d. Learn about Lead. https://www.epa.gov/lead/learn-about-lead (accessed March 2025).

Occupational Safety and Health Administration (OSHA). 2025. Diesel Exhaust/Diesel Particulate Matter Hazard Alert. https://www.osha.gov/sites/default/files/publications/OSHA-3590.pdf (accessed March 2025).

State Water Resources Control Board (SWRCB). 2025. GeoTracker. https://geotracker.waterboards.ca.gov/map/?global_id=T0611100192 (accessed February 2025).

Hydrology and Water Quality

Agoura Hills, City of. 2022. City of Agoura Hills General Plan. https://www.agourahillscity.org/home/showpublisheddocument/30836/638644930916770000 (accessed February 2025).

California Department of Conservation. 2025. Tsunami Hazard Area Map. https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/ (accessed February 2025).

California Department of Transportation. No date. Caltrans Water Quality Planning Tool. https://svctenvims.dot.ca.gov/wqpt/wqpt.aspx (accessed June 2025).

California Department of Water Resources (DWR). 2003. California's Groundwater Update 2003: South Coast Hydrologic Region. https://content.rcflood.org/permittrackerreports/reports/bulletin118_4-sc.pdf (accessed June 2025).

_____. 2004. Russell Valley Groundwater Basin. https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/4_020_RussellValley.pdf (accessed February 2025).

_____. 2013. California Water Plan Update 2013, South Coast Hydrologic Region. https://cawaterlibrary.net/wp-content/uploads/2014/10/CWP-Update-2013-South-Coast-Hydrologic-Region.pdf (accessed February 2025).

_____. 2025. SGMA Basin Prioritization Dashboard. https://gis.water.ca.gov/app/bp-dashboard/final/ (accessed February 2025).

Federal Emergency Management Agency. 2008. National Flood Hazard Layer Viewer. https://www.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd (accessed February 2025).

_____. 2018. National Flood Hazard Layer Viewer. https://www.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd (accessed February 2025).

Las Virgenes Malibu Conejo Council of Governments. 2001. Watershed Management Area Plan for the Malibu Creek Watershed. January 2001. https://acz.qcy.temporary.site/wp-content/uploads/2019/05/Watershed-mgmt-plan-Malibu-Creek-2001.pdf (accessed June 2025).

United States Environmental Protection Agency (U.S. EPA). 2024. "How's My Waterway?" https://mywaterway.epa.gov/community/agoura%20hills/overview (accessed February 2025).

United States Geological Survey. 2025. USGS Groundwater Historical Instantaneous Data for California. https://waterdata.usgs.gov/ca/nwis/uv/?referred_module=gw (accessed June 2025).

Land Use and Planning

Caltrans (2014). California Manual on Uniform Traffic Control Devices (CA MUTCD), 2014 Edition. Sacramento, CA: California Department of TransportationCity of Agoura Hills. 2024b. Agoura Village Specific Plan. https://www.agourahillscity.org/home/showpublisheddocument/30782/638630207576870000 (Accessed June 2025).

City of Agoura Hills. 2022. City of Agoura Hills General Plan Update. https://www.agourahillscity.org/home/showpublisheddocument/30826/638644930871500000 (Accessed February 2025).

City of Agoura Hills. 2010a. City of Agoura Hills General Plan 2035 Environmental Impact Report (Accessed February 2025).

Southern California Association of Governments (SCAG). 2024. Final Connect Socal 2024. https://scag.ca.gov/sites/default/files/2024-05/23-2987-connect-socal-2024-final-complete-040424.pdf (Accessed June 2025).

Noise

Agoura Hills, City of. 2010. *City of Agoura Hills General Plan, Noise Element*. March 2010. https://www.agourahillscity.org/home/showpublisheddocument/27652/638060875782730000 (accessed February 2025).

_____ .2022. City of Agoura Hills General Plan Update. https://www.agourahillscity.org/home/showpublisheddocument/30826/638644930871500000 (Accessed February 2025).

_____. 2024. *Agoura Hills Code of Ordinances.* October 28, 2024. (Accessed February 2025).

California Department of Transportation (Caltrans). 2017. *2017 Traffic Volumes*. March 2010. https://dot.ca.gov/programs/traffic-operations/census/traffic-volumes/2017/route-101 (accessed February 2025).

California Department of Transportation. Technical Noise Supplement to the Caltrans Traffic Noise Analysis Protocol. Sacramento, CA: California Department of Transportation, 2013. California Department of Transportation (Caltrans). (2020). Transportation and construction vibration guidance manual. Caltrans, Division of Environmental Analysis. Federal Highway Administration (FHWA). 2017, June. *Special Report – Measurement, Prediction, and Mitigation.* 2017.

Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment*. November. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. Accessed February 2025.

Los Angeles County Land Use Commission, 2003. *Van Nuys Airport – Airport Influence Area*. May 13, 2003. https://case.planning.lacounty.gov/assets/upl/project/aluc_airport-van-nuys.pdf. (Accessed February 2025).

McIver, IR. 2012. Ground Vibration from Road Construction. https://www.epa.govt.nz/assets/FileAPI/proposal/NSP000005/Hearings/f73d4769a3/APSOC-Closing-Subs-Attachment-report.pdf (accessed June 2025).

Transportation

Agoura Hills, City of. 2024. Agoura Village Specific Plan. https://cms2.revize.com/revize/agourahillsca/Documents/Government/Departments/Community%20Development/Planning%20and%20Zoning/Specific%20Plans/Agoura%20Village%20Specific%20Plan_FINAL.pdf (accessed July 2025).

_____. 2022a. General Plan Infrastructure and Community Services. https://cms2.revize.com/revize/agourahillsca/Documents/Government/Departments/Community%20Development/Planning%20and%20Zoning/General%20Plan/General%20Plan%20Chapter%203%20InfrastructureandCommunityServices.pdf (accessed July 2025).

_____. 2022b. DRAFT Bicycle Master Plan. https://cms2.revize.com/revize/agourahillsca/Documents/Government/Departments/Public%20Works/Capital%20Improvement%20Projects/Bike%20Master%20Plan/Agoura%20Hills%20Bicycle%20Master%20Plan%20Final%20Report_111422.pdf (accessed July 2025).

_____. 2020. Transportation Assessment Guidelines. https://cms2.revize.com/revize/agourahillsca/Documents/Government/Departments/Community%20Development/Planning%20and%20Zoning/Documents/FINAL_Agoura%20Hills%20Transportation%20Assessment%20Guidelines_08112020.pdf (accessed July 2025).

Caltrans. 2025. Highway Design Manual Chapter 1000 – Bicycle Transportation Design. https://dot.ca.gov/-/media/dot-media/programs/design/documents/chp1000-a11y.pdf (accessed July 2025).

_____. 2022. Highway Design Manual BIB 89-02. https://dot.ca.gov/-/media/dot-media/programs/design/documents/dib-89-02-final-a11y.pdf (accessed July 2025).

_____. 2021. California Transportation Plan 2050. February 2021. https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/ctp-2050-v3-a11y.pdf. (accessed July 2025).

_____. 2020. Highway Design Manual Chapter 200 – Geometric Design and Structure Standards. https://dot.ca.gov/-/media/dot-media/programs/design/documents/chp0200-092923-a11y.pdf (accessed July 2025).

_____. 2014. California Manual of Uniform Traffic Control Devices Chapter 6C, Temporary Traffic Control Elements. https://dot.ca.gov/-/media/dot-media/programs/safety-programs/documents/ca-mutcd/rev8/camutcd2014-part6c-rev8-a11y.pdf (accessed July 2025).

Governor's Office of Land Use and Climate Innovation. 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA. https://lci.ca.gov/docs/20180416-743_Technical_Advisory_4.16.18.pdf (accessed February 2025).

International Code Council. 2021. International Fire Code. https://codes.iccsafe.org/content/IFC2021P2 (accessed July 2025).

Southern California Association of Governments (SCAG). 2024. Connect SoCal. https://scag.ca.gov/sites/default/files/2024-05/23-2987-connect-socal-2024-final-complete-040424.pdf (accessed July 2025).

Thousand Oaks, City of. 2025. Kanan Shuttle. https://toaks.gov/kanan (accessed October 2025).

Recreation

California State Parks. 2025. Malibu Creek State Park. https://www.parks.ca.gov/?page_id=614 (Accessed July 2025).

City of Agoura Hills. 2022. City of Agoura Hills General Plan Update. https://www.agourahillscity.org/home/showpublisheddocument/30826/638644930871500000 (Accessed February 2025).

City of Agoura Hills. 2010a. City of Agoura Hills General Plan 2035 Environmental Impact Report. Accessed February 2025.

Department of Finance. 2025. Estimates-E1: Population and Housing Estimates for Cities, Counties, and the State — January 1, 2024 and 2025. https://dof.ca.gov/forecasting/demographics/estimates-e1/ (Accessed July 2025).

National Park Service. 2025. Paramount: Past, Present, and Future. https://www.nps.gov/samo/learn/historyculture/paramount-past-present-and-future.htm (Accessed July 2025).

Tribal Cultural Resources

Arnold, Jeanne E. and Teresa Green. 2002. “Mortuary Ambiguity: The Ventureño Chumash Case.” *American Antiquity* 67(4): 760–771.

Bean, Lowell J., and Charles R. Smith. 1978. Gabrielino. In California, edited by Robert F. Heizer, pp. 538–549. Handbook of North American Indians, Vol. 8, William G. Sturtevant, general editor, Smithsonian Institution, Washington, D.C.

Blackburn, Thomas. 1963. Ethnohistoric Descriptions of Gabrielino Material Culture. Annual Report, Archaeological Survey. University of California, Los Angeles.

Cook, S.F., and Robert F. Heizer. 1965. The Quantitative Approach to the Relation between Population and Settlement Size. Reports of the University of California Archaeological Survey No. 64. University of California Archaeological Research Facility, Berkeley.

Eargle, Dolan H. 2008. “Native California: An Introductory Guide to the Original Peoples from Earliest to Modern Times.” *Book One: The Evolution of Native Cultures in the Land that Became California.* Trees Company Press, San Francisco, California.

Gamble, Lynn. H., Philip. L. Walker, and Glenn S. Russell. 2001. Integrative Approach to Mortuary Analysis: Social and Symbolic Dimensions of Chumash Burial Practices. *American Antiquity* 66: 185–212.

Garza, Sebastian C. 2012. “Social Complexity at Vasquez Rocks: A Bioarcheological Study of a Middle Period Cemetery.” Master’s Thesis, California State University Northridge.

Grant, Campbell. 1978a. “Chumash: Introduction.” In *California*. Volume 8: Handbook of North American Indians, edited by Robert F. Heizer and William C. Sturtevant, pp. 505–508. Smithsonian Institution Scholarly Press, Washington D.C.

_____. 1978b. “Eastern Coastal Chumash.” In *California*. Volume 8: Handbook of North American Indians, edited by Robert F. Heizer and William C. Sturtevant, pp. 505–508. Smithsonian Institution Scholarly Press, Washington D.C.

Golla, Victor. 2007. Linguistic Prehistory. In *California Prehistory: Colonization, Culture, and Complexity*. AltaMira Press, Lanham, Maryland.

Harrington, John P. 1942. Culture Element Distributions: XIX, Central California Coast. Anthropological Records 7:1. University of California Press: Berkeley.

Hudson, Travis. 1982. "The Alliklik-Tataviam Problem." *Journal of California and Great Basin Anthropology* 4: 222–232.

Johnson, John R. 1982. "An Ethnohistoric Study of the Island Chumash." M.A. Thesis, University of California Santa Barbara.

Johnson, John R. and David D. Earle. 1990. "Tataviam Geography and Ethnohistory." *Journal of California and Great Basin Anthropology* 12(2): 191–214.

King, Chester D. 1994. Native American Placenames in the Santa Monica Mountains National Recreational Area, Agoura Hills. Topanga Anthropological Consultants, California Koerper, Henry C., and Christopher E. Drover

King, Chester D., and Thomas C. Blackburn. 1978. "Tataviam." In *Handbook of North American Indians,* Vol. 8, California, R. F. Heizer, ed., pp. 535–537. Washington: Smithsonian Institution.

Knight, Albert. 2010. "The Rock Art of the Sierra Pelona Mountains, Central Los Angeles County, California." *American Indian Rock Art,* 36: 1–14.

Kroeber, Alfred J. 1925. *Handbook of the Indians of California.* Unabridged reprint 1976. New York, New York: Dover Publications, Inc.

McCawley, William. 1996. The First Angelinos: The Gabrielino Indians of Los Angeles. Malki Museum/Ballena Press Cooperative Publication, Banning or Novato, California.

O'Neil, Stephen. 2002. The Acjachemen in the Franciscan Mission System: Demographic Collapse and Social Change. Master's thesis, Department of Anthropology, California State University, Fullerton.

Roman, Deborah V. 2017. "New AMS Dating Sequences for the Chumash Ventureño Early Period: Revisiting the Question of Antiquity of Ventureño Chumash Inland Occupation." *SCA Proceedings* 31: 181–194.

Stickel, E. Gary and Lois J. Weinman-Roberts. 1980. "An Overview of the Cultural Resources of the Western Mojave Desert." California Desert Planning Program, Riverside, California.

Effects Found Not to be Significant

Agoura Hills, City of. 2023. City Of Agoura Hills Zoning Map. https://www.agourahillscity.org/home/showpublisheddocument/29202/638411046713200000 (accessed February 2025).

_____. 2022. General Plan Update SEIR 2022. https://files.ceqanet.opr.ca.gov/273228-3/attachment/_LbvOhs_r_Qk_RWlVSJbDINJP6k9aATbx0k5c9tKLjZhTQRz5N8yRyxt63V2hec3nEfgflUDP5OyE3PR0 (accessed February 2025).

_____. 2022. General Plan Update 2022. https://www.agourahillscity.org/home/showpublisheddocument/30826/638644930871500000 (accessed February 2025).

California Department of Conservation (DOC). 2022. California Important Farmland Finder. https://maps.conservation.ca.gov/DLRP/CIFF/ (accessed February 2025).

_____. 2025a. Important Farmland Categories. https://www.conservation.ca.gov/dlrp/fmmp/Pages/Important-Farmland-Categories.aspx (accessed July 2025).

_____. 2025b. California Williamson Act Enrollment Finder. https://maps.conservation.ca.gov/dlrp/WilliamsonAct/App/index.html (accessed February 2025).

California Department of Forestry and Fire Protection (CalFire). 2025. Fire Hazards Severity Zone Viewer. https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/ (accessed February 2025).

Federal Highway Administration. (2023). Manual on Uniform Traffic Control Devices for Streets and Highways (11th Edition). U.S. Department of Transportation, (accessed February 2025).

Las Virgenes Municipal Water District (LVMWD.) 2025. Tapia Water Reclamation Facility. https://www.lvmwd.com/our-services/wastewater-services/tapia-water-reclamation-facility-copy (accessed July 2025).

_____. 2020. 2020 Urban Water Management Plan for Las Virgenes Municipal Water District. https://www.lvmwd.com/home/showpublisheddocument/13459/637616788962730000(accessed July 2025).

Los Angeles County Sanitation Districts. 2025. Calabasas Landfill Gas-to-Energy Facility. https://www.lacsd.org/services/solid-waste/energy-recovery-and-fueling-facilities/landfill-gas-to-energy-facilities/calabasas-landfill-gas-to-energy-facility (accessed July 2025).

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