



Envicom Corporation

City of Santa Clarita

Golden Valley Road Mixed Use Project
(Master Case 21-036) Initial Study/
Mitigated Negative Declaration

Prepared for:

City of Santa Clarita

Community Development Department

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March 2026

**GOLDEN VALLEY ROAD
MIXED-USE PROJECT
(MASTER CASE 21-036)**

**INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION**

Prepared for:

**CITY OF SANTA CLARITA
COMMUNITY DEVELOPMENT DEPARTMENT**
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March 2026

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1.0 INTRODUCTION

The purpose of this Initial Study/Mitigated Negative Declaration (IS/MND) is to disclose and evaluate the environmental impacts of Master Case 21-036, the Golden Valley Road Mixed-Use Project (project), to be located at the northwest corner of the intersection of Golden Valley Road and Sierra Highway, in the City of Santa Clarita (City).

PROJECT SUMMARY

The project proposes to consolidate the existing 10 parcels on the approximately 28.13-acre site into four lots to construct a 47,344 square-foot hotel with 60 rooms, a 98,389 square-foot senior assisted-living facility with 151 rooms, and 73 age-restricted (55+) residential condominiums over 25 buildings totaling approximately 162,129 square-feet, plus associated parking. The parcels are currently vacant except for an abandoned single-family house and associated accessory buildings. Lot 1 will be 3.76 acres in size, adjacent to Golden Valley Road, and developed with the hotel. Lot 2 will be 5.43 acres in size, directly behind (north of) Lot 1, and developed with the senior assisted housing facility. Lot 3 will be 13.09 acres in size, behind Lot 2, and developed with 73 townhouses. Lot 4 will be 5.11 acres and reserved as open space.

LEGAL AUTHORITY

As lead agency, the City prepared this Initial Study in accordance with the California Environmental Quality Act (CEQA) of 1970 (Public Resources Code §§ 21000–21189) and the *CEQA Guidelines* (14 California Code of Regulations §§15000–15387).

Initial Study. CEQA Guidelines Section 15063(c) identifies an Initial Study as the proper preliminary method of analyzing the potential environmental consequences of a project. To paraphrase from this Section, the relevant purposes of an Initial Study are:

- (1) To provide the Lead Agency with the necessary information to decide whether to prepare an Environmental Impact Report (EIR) or a Negative Declaration (ND);
- (2) To enable the Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby, enabling the project to qualify for an ND; and
- (3) To provide sufficient technical analysis of the environmental effects of a project to permit a judgment based on the record as a whole, that the environmental effects of a project will not have a significant effect on the environment that would necessitate an EIR.

Negative Declaration or Mitigated Negative Declaration. CEQA Guidelines Section 15070 states a public agency shall prepare a negative declaration or mitigated negative declaration for a project subject to CEQA when:

- (a) The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or
- (b) The initial study identifies potentially significant effects, but:
 1. Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and
 2. There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

A ND or MND may be used to satisfy the requirements of CEQA when a project would have no significant unmitigable effects on the environment.

2.0 FINDINGS OF THIS INITIAL STUDY

The analysis in this IS/MND finds that with the implementation of mitigation measures, the project would have a less than significant impact on the environment with regard to all CEQA Checklist issues. For each issue addressed in Section 4.0, the impacts associated with development of the project have been determined to be “Significant Unless Mitigation Incorporated,” “Less than Significant,” or “No Impact.” For issues that were determined to be “Significant Unless Mitigation Incorporated,” mitigation measures are identified that would reduce impacts to below a level of significance.

3.0 PROJECT DESCRIPTION

The project is proposed for a 28.13-acre site located at the northwest corner of the intersection of Golden Valley Road and Sierra Highway in the City of Santa Clarita, as shown on **Figure 3-1, Regional Location Map**. The project site is accessed from Golden Valley Road which borders the site to the south. A small corner of the site is adjacent to Sierra Highway where it intersects with Golden Valley Road. Golden Valley Road is a large five to nine-lane arterial, and Sierra Highway is a four to six-lane arterial. State Route 14 is approximately .75 miles southeast from the project site connecting from Golden Valley Road, and 1.3 miles south connecting from Sierra Highway. Adjacent to the east of the site are residential subdivisions, adjacent to the west is a strip of land 330 feet wide owned by the City of Los Angeles Department of Water and Power, occupied by high-voltage transmission lines, which is then bordered by residential subdivisions and the Golden Valley High School. Adjacent to the north is vacant land and residential subdivisions, and to the south, on the other side of Golden Valley Road, is vacant land and an oil extraction field.

The project site has a General Plan land use designation of Mixed Use – Neighborhood (MX-N) and is zoned MXN (Mixed Use Neighborhood) with a PD (Planned Development) overlay. It is currently vacant with the exception of an abandoned single-family house and accessory structures built close to Golden Valley Road. The house sits upon a hill that is roughly the same elevation as the road while the rest of the property is below the elevation of the road. The property is hilly and descends in elevation overall from south to north, with elevations ranging between roughly 1750 AMSL at the location of the house to 1570 ASML at the rear-most parcel. The project site and its immediate surroundings are shown in **Figure 3-2, Vicinity Map**.

PROJECT COMPONENTS AND OPERATIONS

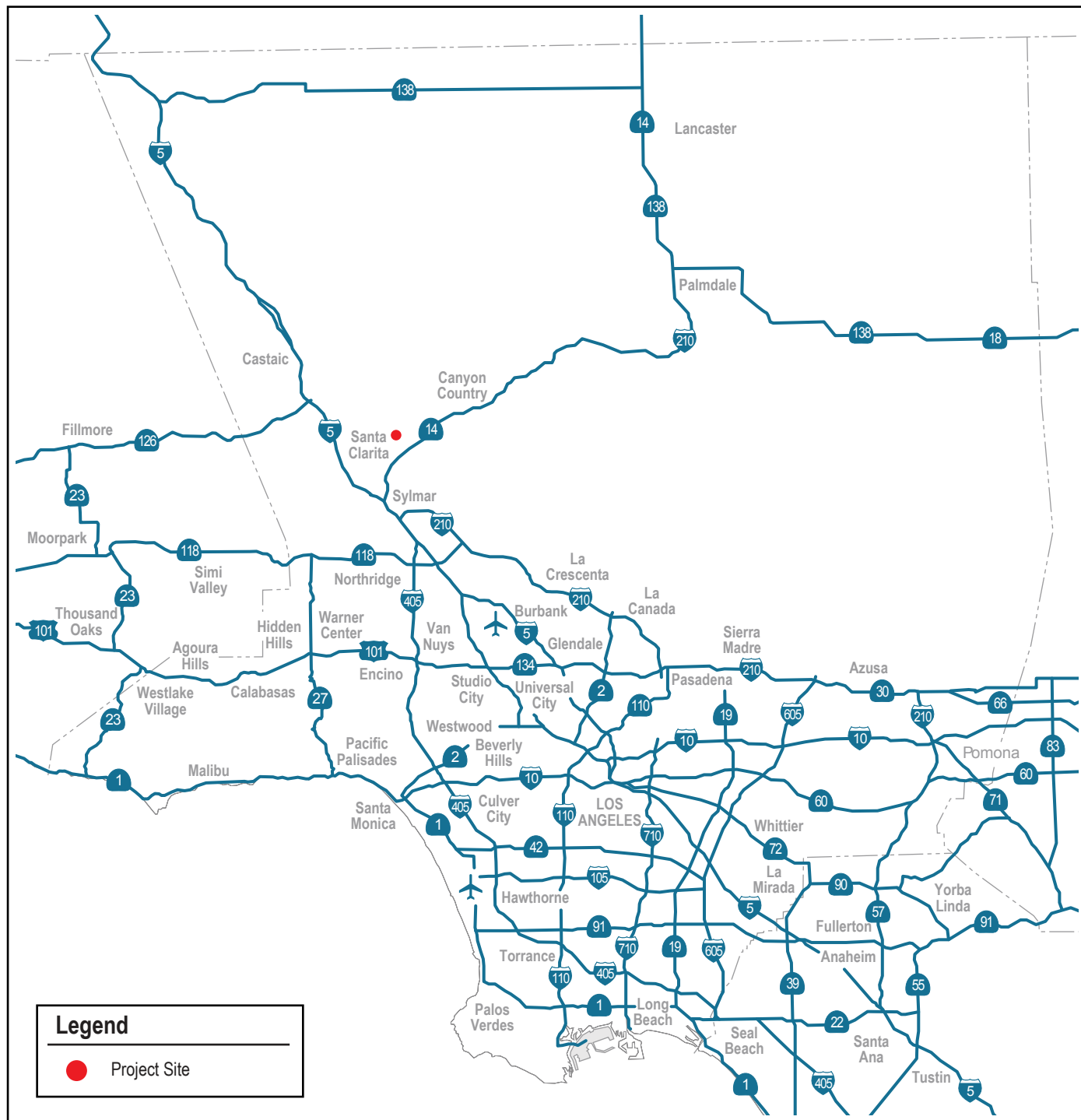
The project applicant proposes to consolidate the existing 10 parcels on the approximately 28.13-acre site into four lots, developing Lots 1 through 3 and reserving Lot 4 for recreational open space. Lot 1 will be 3.76 acres in size and developed with a hotel. Lot 2 will be 5.43 acres in size and developed with a senior assisted housing facility. Lot 3 will be 13.09 acres in size and developed with 73 residential condominiums. Lot 4 will be 5.11 acres and reserved as recreational open space for tenants. Approximately 0.74 acres will be dedicated as a public street. The project site plan is shown in **Figure 3-3, Proposed Site Plan**.

Lot 1

Lot 1 will host the proposed hotel which is a 47,828 square-foot, one and four-story building with 60 rooms, and a parking lot with 143 parking spaces, 32 of those located in a small subterranean parking area. The hotel will include a 2,360 square-foot restaurant, a 1,974 square-foot banquet facility, and 3,320 square-feet of retail space. The hotel will be sited adjacent to the intersection of Golden Valley Road and Sierra Highway with the parking lot behind it to the northwest. The site will be accessed from a new 64-foot-wide public street leading off of Golden Valley Road. The street curves behind the lot and ends in a cul-de-sac, at which point a private street leading to the rest of the project site begins.

Lot 2

Lot 2 will be developed with a senior assisted-living housing facility. The building will be a four-story large E-shaped building totaling 101,166 square-feet in size, containing 151 senior assisted-living housing units. The facility will include a commercial kitchen and community dining area, an on-site dental office and health clinic, and multiple smaller resident amenity spaces. The facility will have a parking lot with 92 spaces and include outdoor courtyards and a large water feature. The facility is accessed by a 58-foot-wide private street that connects to the public street that serves the hotel. The private street continues behind the assisted-living facility and ends in a cul-de-sac at Lot 3.





Aerial Source: GoogleEarth Pro, November 11, 2025

Date - 12/26/25

GOLDEN VALLEY ROAD MIXED-USE PROJECT

Vicinity Map

FEET

0

290

580



FIGURE

3-2

enviCOM



Source: Tentative Tract Map 068203, Land Design Consultants, Inc., May 27, 2025

Date - 12/26/25

GOLDEN VALLEY ROAD MIXED-USE PROJECT

Proposed Site Plan



FIGURE 3-3

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Lot 3

Lot 3 will be developed with 25 duplex, triplex, and quadplex townhouse-style buildings, plus one detached unit, for a total of 73 units, totaling approximately 162,129 square-feet. There are six models of condos ranging in size from 2,072 to 2,405 square-feet, each with three bedrooms and a two-car garage on the ground floor. These for-sale units will be age-restricted to people 55 years and older. The grounds will include common areas and 37 surface parking spaces. The northwest corner of Lot 3 will remain vacant and an approximately 12,000 square-foot portion of it developed into a park for residents.

Lot 4

Lot 4 will remain vacant of structures but a large underground stormwater detention basin will be installed in the southern portion of the lot, topped by an approximately 62,000 square-foot park, and the northern portion of the lot will remain in a natural state with the exception of the installation of a loop hiking trail and construction of two pedestrian bridges over the natural drainage which crosses through the site.

Landscaping

Project landscaping will include a mix of native and non-native shrubs and perennials, and 454 trees planted throughout the modified areas. The northwest corner of Lot 3 and portions of Lot 4 will remain undisturbed with their existing mix of native and non-native vegetation. **Figure 3-4, Proposed Landscaping**, provides an overall view of the areas that will be landscaped.

Architecture

The project utilizes earth tones and materials with a traditional appearance throughout the craftsman-inspired architecture of the development. Design elements common throughout the structures are gabled roofs, open eaves, exposed rafters and beams, and window casings, with stone and clapboard siding. **Figures 3-5a-c, Project Architecture**, provides views of the proposed structures.

The hotel has a large porte cochere at the entrance, tall shopfront windows wrapping around the ground floor of most of the building, balconies with painted wood railings on three sides, and a seamed metal roof with wide fascia in the gables. The assisted living facility is similar, using the same materials and similar styling, but on a larger scale and using a repeating fenestration pattern to define the composition. The townhouses come in two styles with one style used as the center of three or four attached units, and the other used on the sides in right or left orientation. The townhouses use only clapboard for siding and reserve stone for pedestal bases, and have metal-shingle roofs rather than seamed roofs.

CONSTRUCTION AND EARTHWORK

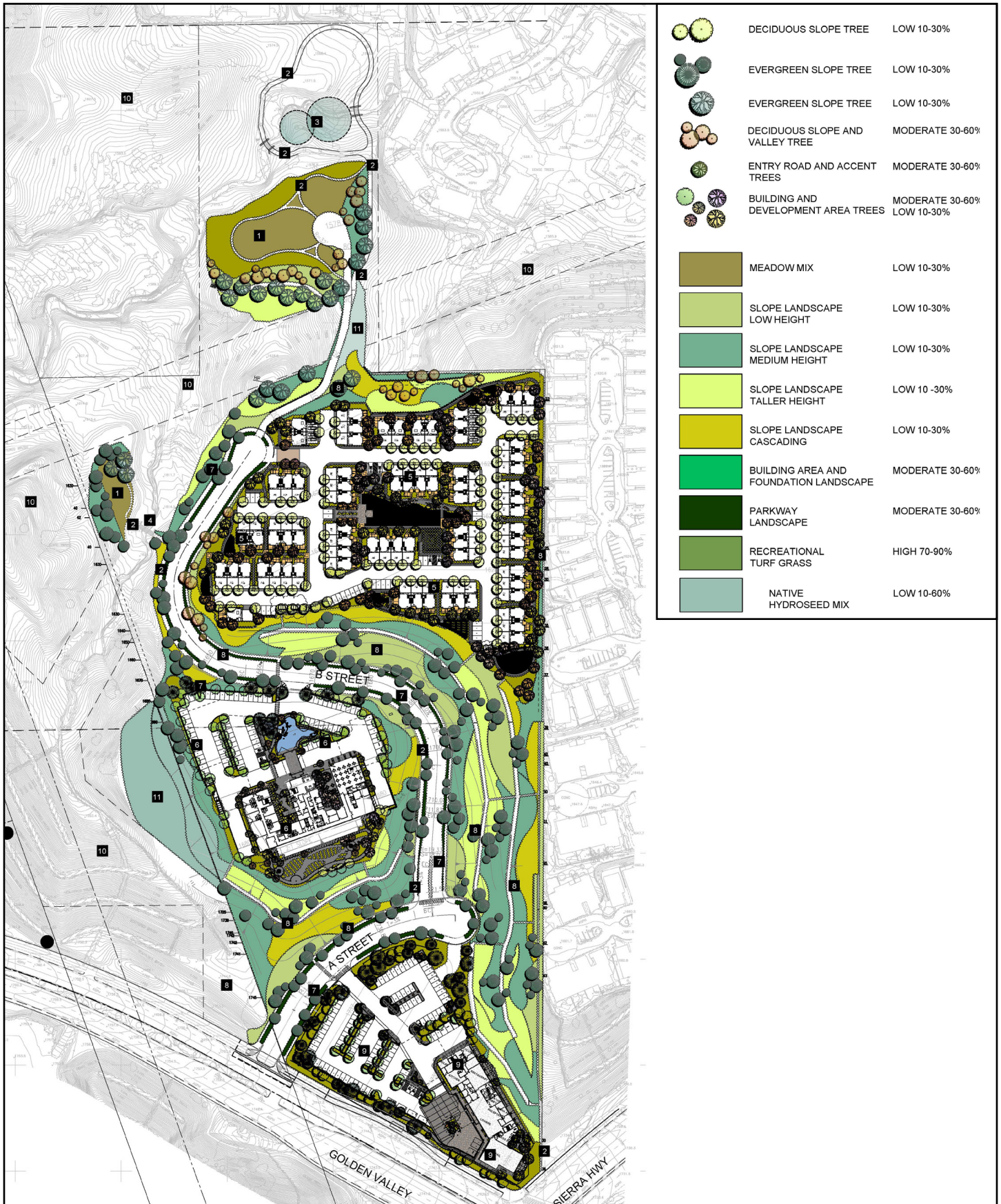
Construction activities are anticipated to begin in 2026 with the demolition of the house, and the project is expected to be operational by 2028. Soil excavation of between two to twenty feet, depending on the context, will be necessary wherever earthwork occurs. Removed material may be used for fill and the total amount of cut and fill is estimated at 360,000 cubic yards. No import or export of soil is proposed as it is anticipated that all excavated soils will be balanced onsite.

REQUIRED ENTITLEMENTS

The project seeks the following approvals from the City under Master Case 21-036:

- Tentative Map (TM): A Tentative Map is required for the subdivision of the project site.
- Conditional Use Permit (CUP): A CUP is required for the development within the Planned Development Overlay, and for the residential care facility in the zone.

- Minor Use Permit (MUP): A MUP is required for the hotel use in the zone, and for residential density and commercial floor area less than the minimum required by the zone.
- Hillside Development Review (HDR): A HDR is required for development on the property with average cross slopes greater than ten percent.
- Development Review Permit (DR): A DR is required to review the proposed development and site plan.
- Architectural Design Review Permit (ADR): An ADR is required to review the proposed architecture of a new building.



Source: TTM 068203 landscape plan, Fong Hart Schneider Partners, September 24, 2021

Date - 12/26/25

GOLDEN VALLEY ROAD MIXED-USE PROJECT

Proposed Landscaping

FEET 0 175 250



FIGURE 3-4

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Front Elevation



Rear Elevation

Source: Golden Valley Road, Feng Xiao Architect, Inc. Planning Submission, August 11, 2022

Date - 12/22/25



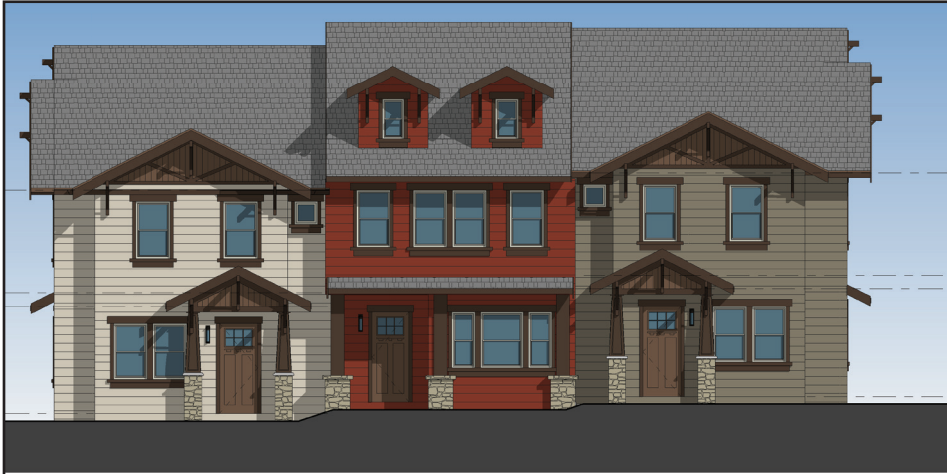
Front Elevation



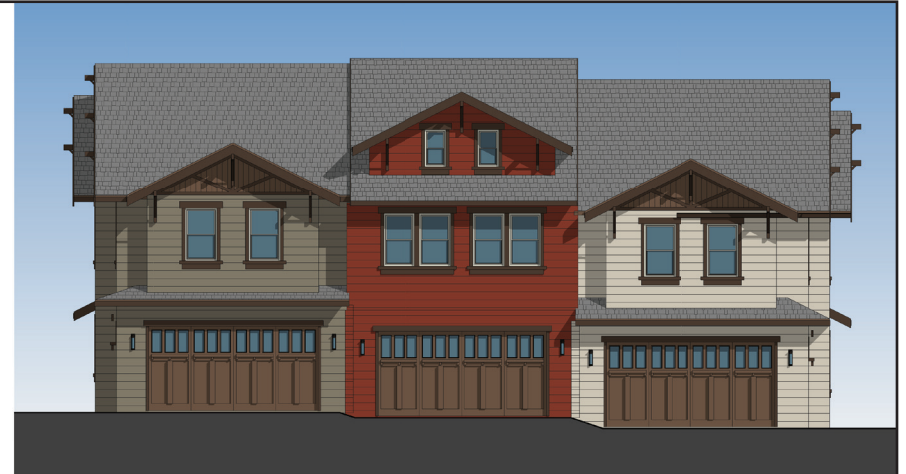
Rear Elevation

Source: Golden Valley Road, Feng Xiao Architect, Inc. Planning Submission, August 11, 2022

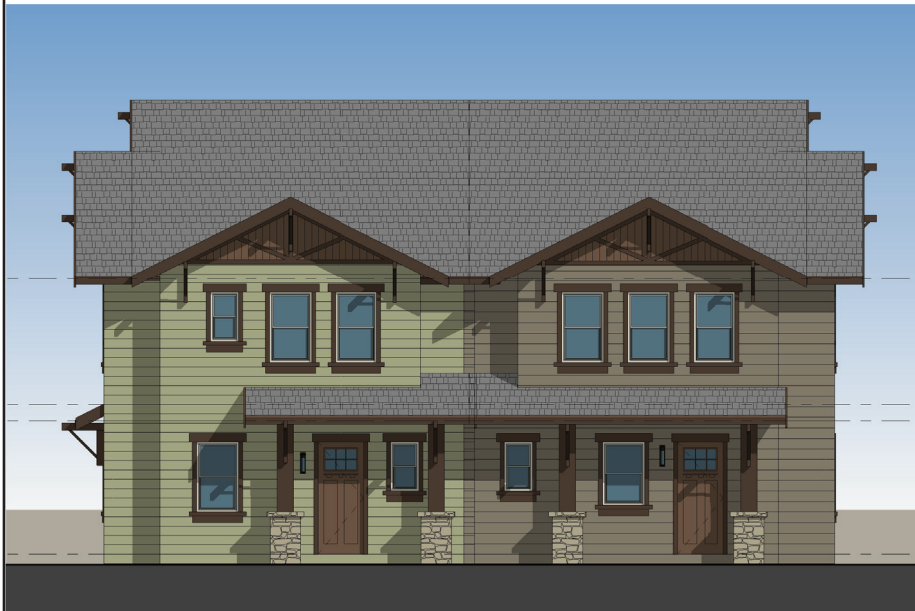
Date - 12/22/25



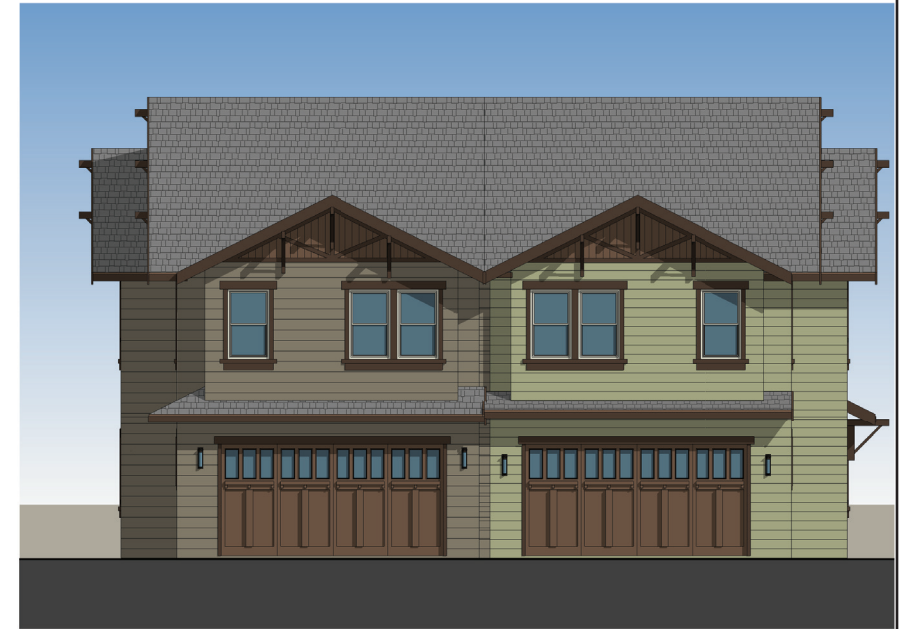
Triplex, Front Elevation



Triplex, Rear Elevation



Duplex, Front Elevation



Duplex, Rear Elevation

Source: Golden Valley Road, Feng Xiao Architect, Inc. Planning Submission, August 11, 2022

Date - 12/22/25

4.0 INITIAL STUDY/NEGATIVE DECLARATION

CALIFORNIA ENVIRONMENTAL QUALITY ACT INITIAL STUDY AND CHECKLIST

1. **Project title:**
Golden Valley Road Mixed Use Project (Master Case 21-036)
2. **Lead agency name and address:**
City of Santa Clarita
Community Development Department
23920 W. Valencia Blvd. Suite 302
Santa Clarita, CA 91355
3. **Contact person and phone number:**
Ms. Erika Iverson, Senior Planner
Email: eiverson@santa-clarita.com
Tel: (661) 255-4330
4. **Project location:**
The project is located at 20101 Golden Valley Road (Assessor's Parcel Numbers 2836-013-106, 2836-013-107, 2836-013-111, 2836-013-128, 2836-013-141, 2836-013-175, 2836-020-058, 2836-020-078, 2836-020-086, and 2836-020-087)
5. **Project sponsor's name and address:**
Veluzat Productions
24715 Oak Creek
Newhall, CA 91321
6. **General Plan Land Use designation:**
Mixed Use – Neighborhood (MX-N)
7. **Zoning designation:**
Mixed Use Neighborhood (MXN)
8. **Project Description:**
The project would consolidate 10 parcels on an approximately 28.13-acre site into four lots for the purpose of constructing a hotel, a senior assisted-living facility, and residential condominiums. Lot 1 will be 3.76 acres in size and developed with a hotel with 60 rooms. Lot 2 will be 5.43 acres in size and developed with a senior assisted housing facility with 151 units. Lot 3 will be 13.09 acres in size and developed with 73 townhouses. Lot 4 will be 5.11 acres and reserved as open space.
9. **Surrounding land uses and setting:**
Adjacent to the east of the site are residential subdivisions, adjacent to the west is a strip of land 330 feet wide owned by the City of Los Angeles Department of Water and Power, occupied by high-voltage transmission lines, which is then bordered by residential subdivisions and the Golden Valley High School. Adjacent to the north is vacant land and residential subdivisions, and to the south, on the other side of Golden Valley Road, is vacant land and an oil extraction field.
10. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):**
CDFW, Streambed Alteration Agreement
CalGEM, permit for well abandonment (potential)

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| ☐ Aesthetics | ☐ Agriculture and Forestry Resources | ☐ Air Quality |
| ☒ Biological Resources | ☒ Cultural Resources | ☐ Energy |
| ☒ Geology /Soils | ☐ Greenhouse Gas Emissions | ☐ Hazards & Hazardous Materials |
| ☐ Hydrology/Water Quality | ☐ Land Use/Planning | ☐ Mineral Resources |
| ☐ Noise | ☐ Population/Housing | ☐ Public Services |
| ☐ Recreation | ☐ Transportation | ☒ Tribal Cultural Resources |
| ☐ Utilities/Service Systems | ☐ Wildfire | ☐ Mandatory Findings of Significance |

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project. Therefore, an EIR Addendum will be prepared.

Name: Erika Iverson

Title: Senior Planner, Planning Division, City of Santa Clarita

Signature: Erika Iverson

Date: April 7, 2026

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
I. AESTHETICS.				
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?	☐	☐	☐	☒
c. 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 points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Impact Analysis

a. Less than Significant Impact. Would the project have a substantial adverse effect on a scenic vista?

The City does not have a specific definition of scenic vista, but the Aesthetics chapter from the City's One Valley One Vision General Plan EIR describes scenic vistas as including sweeping views of a valued landscape or simply just unobstructed views of attractive natural features. Scenic vistas in the context of CEQA would only include views from publicly accessible vantagepoints as private views would not be considerable. The project site can generally only be seen from Golden Valley Road and from a portion of Sierra Highway, and in order to have a significant impact upon a scenic vista the project would need to be within the view of a scenic vista.

The front of the project site, the southern end, abuts Golden Valley Road and is at a higher elevation than the rear of the project site (the north end). Under current conditions, looking north from Golden Valley Road where adjacent to the project site there are essentially no views of the valley or the hills to the north. This is because there is a tall berm and then a block wall at the southern border of the site which obscures any view. The only exception is a small area near the intersection with Sierra Highway where the block wall ends. From here one can see across the valley to the north with the mountains in the distance. This view could not reasonably be considered a scenic vista for passing motorists as it would only be visible for a brief moment. However, pedestrians would be able to see the view for an extended period if they chose to, and because the vantagepoint provides a view of a portion of the valley and the mountains it is reasonable to describe the view as a vista.

The project will place the hotel at this corner of the property and those views from Golden Valley Road will be blocked. This would not result in a significant impact, however, because although there is a long-range view available it would not be considered an important public resource or a scenic vista within the context of the criteria question. The existing view is only seen from adjacent to a busy intersection, and this location is not reasonably recognized nor valued for the views available from it. The view is somewhat constrained by Sierra Highway to the right, the topography to the left, and a powerline in the foreground, and it is not a particularly unique or exceptional view by any reasonable standard.

The project site can also be seen when looking west from the pedestrian overpass on Sierra Highway north of the intersection with Golden Valley Road, and from Sierra Highway for a short section north of the pedestrian overpass. From here one can see portions of the property between the subdivisions on either side of it. Post-construction rather than seeing a portion of vacant property between the subdivision the roof of the assisted living facility will be visible from the roadway and more visible from the overpass. The views to the west that include the project site within the field of vision would not be considered scenic vistas and the construction of the project would merely modify the character of the view.

The Conservation and Open Space Element of the General Plan defines particular mountains, canyons, water bodies, and woodlands as scenic resources, and obscuring or otherwise degrading the view of one of these features could result in an impact. The project does not interrupt any views of these resources except the view at the easternmost corner from Golden Valley Road as the Sierra Pelona mountains can be seen in the distance, but as discussed above this would not constitute a significant impact.

As the project will not interrupt, degrade, or otherwise obscure a scenic vista the project will have a less than significant impact to scenic vistas.

Mitigation Measures: No mitigation measures are required.

b. No Impact. Would the project Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?

The project site is not located along a designated scenic highway or visible from a designated scenic highway, and therefore development of the site will not damage any scenic resources within a scenic highway. The nearest known scenic highway the portion of Interstate 5 west of the City, which is eligible for state designation, and is approximately 4 miles from the site at its nearest point.¹ Therefore, the project would result in no impact to scenic resources within a state-designated scenic highway.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact. 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 publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

As described in I.a above the project site is not readily visible except from Golden Valley Road and a portion of Sierra Highway, plus the pedestrian overpass on Sierra Highway south of the intersection. The existing character of the project site where it can be viewed from these areas is that of a vacant lot, and the

¹ CalTrans California State Scenic Highway System Map, Accessed March 9, 2026 at: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>

site itself would not be considered a visual resource. The character of the site will be changed but adherence to design guidelines would in some respects improve the existing character of the project site.

The City has Community Character and Design Guidelines published in 2009 which guides the creation of new development in the City. The Guidelines include provisions for multi-family development, commercial development, and mixed-use development, as well as more information regarding design philosophy. The project is a mixed-use development as there are three different uses proposed for the project site, but the uses are not integrated and therefore the commercial and multi-family design guidelines are more appropriate. In general terms the design guidelines strive to create people-oriented spaces wherever possible, with buildings placed toward public streets in an effort to create welcoming public spaces. Automobile and service oriented areas should be the least prominent spaces in new development, and softened with landscaping and pedestrian amenities whenever appropriate.

The hotel is oriented toward the intersection of Golden Valley Road and Sierra Highway which is the desired orientation according to the commercial guidelines. The retail suite and its courtyard are nearest to the intersection providing the most active component of the development at the most visible location. The hotel entryway is also readily visible from the street and further serves to activate that location. Per the commercial guidelines the auto-oriented portions of the hotel, namely the parking lot and driveway, are the most obscured components of the hotel. From the street the modern-rustic character of the hotel and its most active components will be showcased to the public street, providing a maximum amount of street activation in an area that is otherwise dominated by the large arterial roads. The character of the view will change

The assisted-living facility and residential condominiums would not be readily visible from any public vantagepoint, save for the pedestrian overpass and nominally from a short section of Sierra Highway north of the overpass. Nonetheless the assisted-living facility exhibits 360 degree architecture and provides large outdoor pedestrian spaces on the front and rear of the building, with the spaces in the front of the building integrated into the building itself, providing a welcoming, people-oriented design to visitors and residents. The residences are oriented toward common spaces including a large, central green in the middle of the development. This provides robust pedestrian-oriented circulation within the development, and east connection between the units. The garages of the units are oriented toward the street, however, the buildings still exhibit 360-degree design, and as this is a self-contained village the relationship between the units is more important for community-building than the relationship of the units to the street.

In each use the buildings present a modern building typology with traditional design elements that meet the goals of the Guidelines General Design Principles²:

- Richness of material surface and texture.
- Muted earth tone colors (such as off-whites, ochres, siennas, umbers, beiges, tans, browns, or other similar subdued colors) for primary building surfaces, with more intense colors limited to accents.
- Significant wall articulation (insets, canopies, wing walls, trellis features, arcades, colonnades).
- Full-sloped roofs, multi-planed roofs (combination of pitched and flat roofs).
- Roof overhangs, articulated eaves, parapets.
- Window configurations compatible with the design of the building.
- Articulated building mass and form.
- Landscape elements, which includes plantings and hardscape, that complement the style of architecture, enhance building and site design, and are integrated into the surrounding context.

² Santa Clarita Community Character and Design Guidelines, Chapter 2: Design Trends and Urban Form, General Design Principles, March 24, 2009

As the project's architectural design is in character with the City, and exhibits the qualities expressed in the Guidelines, impacts related to incompatible visual elements would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact. Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

The project does not feature large expanses of reflective glass that would create substantial glare during the daytime, and project lighting is minimal and commensurate with the various uses. There are no large floodlights oriented toward streets or other properties, and the most visible lights from a public roadway would be coming from the interior of the hotel's retail suite, which would not be exceptionally bright. Therefore, impacts related to light or glare would be less than significant.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES.				
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Impact Analysis

a-c. No Impact. The subject property is located in an area identified as “other land” on the Los Angeles County Important Farmland 2020 map prepared by the California Department of Conservation³ for the Farmland Mapping and Monitoring Program (FMMP). It is not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The site is not used for agricultural purposes, has no agricultural zoning, and is not in conflict with a Williamson Act contract. The subject property is also not located within any private timberlands or public forestlands as identified by the CDFW.⁴ As such, the project would have no impact on agricultural or forestry resources.

Mitigation Measures: No mitigation measures are required.

³ California Department of Conservation, Division of Land Resource Protection, Los Angeles County Important Farmland 2020, Sheet 1 of 2, Accessed on March 9, 2026 at <https://www.conservation.ca.gov/dlrp/fmmp/Pages/LosAngeles.aspx>

⁴ CA Department of Fish and Wildlife, California Forests and Timberlands in California Department of Fish and Wildlife Regions map, September, 28, 2015.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
III. AIR QUALITY.				
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Impact Analysis

The following analysis is based upon the technical analysis found in the Air Quality and Greenhouse Gas Emissions Technical Report (AQ/GHG Report) prepared by Impact Sciences, dated July 2024, and attached as **Appendix A**.

Certain air pollutants have been recognized to cause notable health problems and damage to the environment either directly or in reaction with other pollutants and are regulated at the national and state levels. The Clean Air Act (CAA) is the federal law that regulates air emissions in order to protect public health. Implementation and enforcement of the CAA is the purview of the US Environmental Protection Agency (USEPA). To accomplish this the USEPA has established the National Ambient Air Quality Standards (NAAQS) which sets pollutant concentration levels considered safe, with an adequate margin of safety, to protect the public health and welfare of "sensitive receptors," which include the elderly, young children, the acutely and chronically ill (e.g., those with cardio-respiratory disease, including asthma), and persons engaged in strenuous work or exercise. The USEPA identifies areas in the country as either in attainment, nonattainment, or maintenance of the standards. States with areas in nonattainment, meaning they do not meet the NAAQS, must create a State Implementation Plan (SIP) for each criteria pollutant in nonattainment. The SIP includes pollution control measures that demonstrate how the standards for those pollutants will be met within a certain time period. California has its own California Clean Air Act and air quality standards (CAAQS), some of which are more stringent than the NAAQS.

California is divided geographically into 15 air basins that have similar meteorological and geographic conditions for the purpose of managing air resources on a regional basis. The state is also divided into 35 administrative air districts for the purpose of implementing the SIP. Each district represents a local air quality regulatory agency responsible regional air quality planning, monitoring, and stationary source and facility permitting. The City is located within the South Coast Air Basin (air basin) and the local air quality agency is the South Coast Air Quality Management District (SCAQMD). The air basin is bounded by the Pacific Ocean to the west, the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east, and San Diego County to the south. The SCAQMD regulates the South Coast Air Basin and parts of two neighboring basins to the east. The six principal pollutants for which national and state standards have been promulgated, the "criteria pollutants," are ozone (O₃), respirable and fine particulate matter (PM₁₀

and PM_{2.5}, respectively), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead (Pb). The air basin is in nonattainment for O₃ and PM-2.5, and Los Angeles County (outside of the Antelope Valley) is considered in nonattainment for lead, though this is specifically only related to point sources located in Vernon and the City of Industry. The SCAQMD's Air Quality Management Plan (AQMP) is the air quality regulatory document designed to bring the district into NAAQS and CAAQS attainment and fulfill the obligations of the SIP. The AQMP is developed in collaboration with the Southern California Association of Governments (SCAG) which is responsible for preparing the portion of the SIP that addresses transportation control measures, land use, and growth projections within nonattainment areas. The AQMP is based upon the demographic, population, and motor vehicle emission projections SCAG produces for their Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

a. Less than Significant Impact. Would the project conflict with or obstruct implementation of the applicable air quality plan?

The SCAQMD 2022 AQMP is the applicable air quality plan for the City. A project's consistency with the AQMP is primarily based upon its consistency with air quality significance thresholds established by the SCAQMD, which are discussed in threshold b, below. However, as the pollution control measures of the AQMP are based upon the growth estimates and land use assumptions of the SCAG RTP/SCS, a project that resulted in significant population or job increases beyond the projections of the RTP/SCS, or that significantly deviated from its land use assumptions, could conflict with it and by extension the AQMP.

The new 2024-2050 RTP/SCS was certified in 2025, but growth estimates used to prepare the 2022 AQMP are derived from the 2020-2045 RTP/SCS, so the project is compared to the 2020 version. The 2020-2045 RTP/SCS projects that between the years 2016 and 2045 the City would increase in population by 40,600 people and would add 14,000 new jobs within the same time period.⁵ According to the project VMT Analysis (Appendix I) the project will create 66 new jobs and would house an estimated 308 people (157 people in the condominiums, 151 people in the assisted living facility). Averaged over 29 years SCAG's estimated population growth would amount to 1,400 people a year and the job growth to 483 jobs a year. The project's contribution to growth within the City would be well within the rates projected by SCAG. Therefore, the project does not conflict with the growth assumptions that underlie the AQMP's pollution control measures.

The project also does not conflict with the land use assumptions that underlie the AQMP. The land use assumptions of the 2020-2045 RTP/SCS are based upon existing land use designations plus the identification of Priority Growth Areas (PGAs) as areas within the SCAG region where job and housing growth should be concentrated for the purposes of realizing the plan's goals of reducing travel distances, increasing mobility options, improving access to workplaces, and conserving the region's resource areas. The project site is not within a PGA⁶ which means development on the site within the parameters of the existing land use designation aligns with the land use assumptions of the RTP/SCS. Thus, as the project will not conflict with the growth or land uses assumptions of the 2020-2045 RTP/SCS, it will also not conflict with the AQMP, nor would it obstruct its implementation, and impacts would be less than significant.

b. Less than Significant Impact. 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?

⁵ SCAG, 2020 Connect SoCal, Demographics and Growth Forecast Technical Report, September 3, 2020.

⁶ SCAG, Regional Data Platform, Priority Growth Areas (PGA) - SCAG Region feature layer, updated February 14, 2022, available from: <https://scag.ca.gov/RDP>.

The SCAQMD provides significance thresholds for emissions of criteria pollutants, including: reactive organic gases (ROG), NO_x, carbon monoxide (CO), sulfur oxides (SO_x), and particulate matter (PM-10 and PM-2.5). Projects with daily emissions that exceed any of the following emission thresholds shown in **Table III-1, SCAQMD CEQA Daily Emissions Thresholds**, are recommended by the SCAQMD to be considered significant impacts under CEQA.

Table III-1
SCAQMD CEQA Daily Emissions Thresholds

Pollutant	Construction	Operations
Reactive Organic Gasses (ROG)	75	55
Oxides of Nitrogen (NO _x)	100	55
Carbon Monoxide (CO)	550	550
Particulate Matter (PM-10)	150	150
Particulate Matter (PM-2.5)	55	55
Sulphur Oxides (SO _x)	150	150
Source: SCAQMD CEQA Air Quality Significance Thresholds. Revision March 2023.		

The SCAQMD guidance for evaluation of cumulative impacts under CEQA states that “As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR.”⁷ Further, the SCAQMD guidance states that “Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.” SCAQMD recommends that public agencies perform cumulative impact analyses for air quality in the same manner as SCAQMD. As such, a project that does not exceed the emissions thresholds shown in Table III-1 would not have a cumulatively considerable net increase of any criteria pollutant.

Construction Emissions

The air quality model estimated that the Project would be constructed in approximately 18 months with construction beginning in 2025 and project operations commencing by 2026. Construction will actually begin at a later date, projected as sometime in 2026 or 2027, and will most likely take longer than 18 months. There is no need to update the air quality model, however, as it presents a conservative analysis. Emission factors are estimated to improve each year into the future, so the model’s earlier construction and operational dates would result in slightly more conservative emissions estimates. In addition, a shorter construction period will result in more conservative emission estimates because more work is being accomplished on a per day basis, resulting in more daily emissions.

Demolition and removal of existing debris would occur for approximately one month. This phase would include the demolition of the single-family residence and accessory structures (approximately 8,770 sf) that are located near the southerly portion of the property near Golden Valley Road. Grading activities would occur for approximately 5 months and would involve the cut and fill of land to ensure the proper base and slope for the entire site, including building pads and foundations. The analysis assumes approximately 360,00 cubic yards (cy) of cut and fill to be balanced on site; no soil import or export is anticipated at this time. In total, structural building, finishing, and paving activities are expected to occur for approximately

⁷ SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution Appendix D, August 2003.

12 months. Upon completion of the building shells, finishing (coatings) and paving of parking areas and driveways would follow.

The analysis of regional daily construction emissions was prepared utilizing the CalEEMod computer model recommended by the SCAQMD. During construction, emissions of air pollutants would be generated from the use of heavy equipment on-site, including exhaust from internal combustion engines and dust from earth moving activities. Dust emissions generated during construction are called "fugitive emissions," because such emissions are not amenable to collection and discharge through a controlled source. SCAQMD Rule 403 provides regulatory dust control measures that would apply to the grading related to the project, because of the non-attainment status of the Air Basin for PM-10. The following dust control measures would be implemented during construction as needed to comply with Rule 403 regulations:

- Apply soil stabilizers or moisten inactive areas.
- Prepare a high wind dust control plan.
- Stabilize previously disturbed areas if subsequent construction is delayed.
- Water exposed surfaces as needed to avoid visible dust leaving the construction area (typically three times/day).
- Minimize in-out traffic from construction zone.
- Sweep streets daily if visible soil material is carried out from the construction area.

The project's maximum daily construction emissions as calculated by CalEEMod are shown in **Table III-2, Construction Activity Maximum Daily Emissions**.

Table III-2
Construction Activity Maximum Daily Emissions

	Maximum Construction Emissions					
	ROG	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
2025	3.3	29.8	29.7	0.06	3.9	2.2
2026	45.3	20.0	37.4	0.05	4.1	1.5
SCAQMD Thresholds	75	100	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No
Source: Air Quality and Greenhouse Gas Emissions Technical Report Appendix A. Maximum emissions reported for summer or winter season, whichever is greater. Construction emissions are shown in pounds per day and reflect required compliance with SCAQMD Rule 403 for applying water during grading.						

As shown in Table III-2, the peak daily emissions generated during the construction of the Project would not exceed any of the regional emission thresholds recommended by the SCAQMD. Therefore, Project construction would not result in a cumulatively considerable net increase of any criteria air pollutant for which the Project region is nonattainment under an applicable federal or state ambient air quality standard.

Operational Emissions

Project-generated emissions would be associated with motor vehicle use, energy use, and area sources, such as the use of natural-gas-fired appliances, landscape maintenance equipment, consumer cleaning products, and architectural coatings associated with the operation of the project. The project's maximum daily emissions of criteria pollutants during operations are shown in **Table III-3, Daily Operational Emissions**.

Table III-3
Daily Operational Emissions

Source	Operational Emissions (lbs/day)					
	ROG	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
Area	8.77	0.14	14.8	0.01	0.01	0.01
Energy	0.07	1.24	0.68	0.01	0.10	0.10
Mobile	0.99	2.74	32.2	0.09	8.77	2.27
Total	9.83	4.12	47.68	0.11	8.88	2.38
AQMD Threshold	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No
Source: Air Quality and Greenhouse Gas Emissions Technical Report Appendix A. Maximum emissions are shown in pounds per day and reported for summer or winter season, whichever is greater. Totals may appear not to sum due to rounding.						

As shown in Table III-3, the project's operational emissions would be far below the SCAQMD maximum daily emission thresholds for criteria pollutants. Therefore, the project's potential to result in a cumulatively considerable net increase of any criteria pollutant during operations would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact. Would the project expose sensitive receptors to substantial pollutant concentrations?

The SCAQMD developed analysis parameters to evaluate ambient air quality on a local level in addition to the more regional emissions-based thresholds of significance. These analysis elements are called Localized Significance Thresholds (LSTs). LSTs were developed in response to the SCAQMD Governing Board's Environmental Justice Enhancement Initiative 1-4, and the LST methodology was provisionally adopted in October 2003 and formally approved by SCAQMD's Mobile Source Committee in February 2005. LSTs are only applicable to the following criteria pollutants: NOX, CO, PM-10, and PM-2.5. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and they are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor.

The nearest sensitive receptors to the project site include residences approximately 15 feet to the north and to the east. In the case of this analysis, the project site is located within SRA 13 – Santa Clarita Valley with receptors located within 25 meters. The closest receptor distance in the SCAQMD's mass rate look-up tables is 25 meters. Projects that are located closer than 25 meters to the nearest receptor are directed to use the LSTs for receptors located within 25 meters. The CalEEMod User's Guide states the applicable LST should be based on the equipment list for each construction phase and calculated according to the anticipated maximum number of acres a given piece of equipment can pass over in an 8-hour workday.

Based on the project's construction assumptions approximately 1.0 acres per day would be disturbed during demolition and 4.0 acres per day would be disturbed during the grading phase. The LSTs for a 4.0-acre site in SRA 13 with sensitive receptors located within 25 meters were calculated per SCAQMD Linear Regression Methodology and utilized for the grading phase. With respect to building construction, architectural coatings, and paving activities, the 5.0-acre LST in SRA 13 with sensitive receptors located within 25 meters has been utilized to address the potential localized NOx, CO, PM10, and PM2.5 impacts. The application of a 5.0-acre threshold for building construction activities on a 28-acre site would be conservative as physical building construction emissions would likely be spread out more evenly on the 28-acre site compared to the condensed 5-acre threshold applied in this analysis. **Table III-4, Local**

Significance Thresholds and Peak Daily Onsite Emissions shows that the project would not exceed the applicable LSTs.

Table III-4
Local Significance Thresholds and Peak Daily Onsite Emissions

Santa Clarita Valley 25 meters	Emissions			
	NO _x	CO	PM-10	PM-2.5
Demolition (1 acre)	22.2	19.9	1.2	0.9
LST Threshold	114	590	4	3
Grading (4 acres)	29.7	28.3	3.6	2.1
LST Threshold	216.7	1,385.9	10	5.3
Construction (5 acres)	17.8	24.1	0.7	0.7
LST Threshold	246	1,644	12	6
Significant Impact? Yes/No	No	No	No	No
Source: Air Quality and Greenhouse Gas Emissions Technical Report Appendix A. Maximum emissions are shown in pounds per day and reported for summer or winter season, whichever is greater.				

As the project would not exceed any of the identified localized thresholds of significance during construction the project would not expose sensitive receptors to substantial air pollutant concentrations, and these impacts would be less than significant.

The LST methodology is applicable to operations as well but primarily to projects where emission sources occupy a fixed location such as a heavy industrial use or mining operation, or potentially a use where mobile sources may spend long periods queuing and idling at the site such as at warehouse/transfer facilities. As the Project would not include warehouse or transfer facilities, an operational analysis against the LST methodology is not directly applicable to the project. Nevertheless, **Table III-5, Local Significance Thresholds - Operations** has been included to illustrate potential on-site emissions during project operation.

Table III-5
Local Significance Thresholds - Operations

Santa Clarita Valley 5.0 acres/25 meters	Emissions			
	NO _x	CO	PM-10	PM-2.5
Peak Onsite Daily Emissions ^(a)	1.38	15.48	0.11	0.11
LST Threshold	246	1,644	3	2
Significant Impact? Yes/No	No	No	No	No
Source: Air Quality and Greenhouse Gas Emissions Technical Report Appendix A. Maximum emissions are shown in pounds per day and reported for summer or winter season, whichever is greater				

As shown in Table III-5, the Project would not exceed any of the identified localized thresholds of significance. Therefore, the Project's operation would not expose sensitive receptors to substantial air pollutant concentrations, and these impacts would be less than significant.

TACs

Construction would result in the generation of DPM emissions from the use of off-road diesel equipment required for demolition, grading and excavation, building construction, paving, and other construction activities. The amount to which the receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer.

In 2015, the Office of Environmental Health Hazard Assessment (OEHHA) adopted revised guidelines that update previous guidance by incorporating advances in risk assessment with consideration of infants and children using Age Sensitivity Factors (ASF). The intent of the OEHHA 2015 guidance is to provide HRA procedures for use in the Air Toxics Hot Spots Program or for the permitting of existing, new, or modified stationary sources. As the project is not part of the Air Toxics Hot Spots Program and is considered an urban infill mixed-use development consisting primarily of mobile and area sources (i.e., non-stationary sources), the OEHHA 2015 guidance is not directly applicable. OEHHA 2015 offers limited information on conducting a short-term HRA, but the guidance acknowledges the many inherent uncertainties that may occur, and it does not identify the types of short-term projects or non-stationary projects subject thereto. Further, the SCAQMD has not opined on the application of OEHHA 2015 guidance to development projects such as the project. Nevertheless, in an effort to characterize the project's scope of DPM emissions upon nearby sensitive receptors, a quantified construction HRA was conducted for the project (see Appendix A). As demonstrated therein, under worst-case assumptions, the maximum impact at the nearest sensitive receptor (i.e., residences to the north and to the east of the project site) would be 9.3 per 1 million, or less than the risk threshold of 10.0 in 1 million. Impacts at locations farther than this receptor would be further reduced, and thus impacts would be less than significant.

Potential noncarcinogenic effects of chronic DPM exposures were evaluated using the Hazard Index approach as described in the OEHHA Guidance. A hazard index equal to or greater than 1.0 represents a significant chronic health hazard. As shown in greater detail in the HRA, non-carcinogenic effects at the nearest sensitive receptor (i.e., residences located north and east of the project site) would be 0.02, which is less than the 1.0 health hazard threshold. Impacts at locations farther than this receptor would be further reduced, and thus non-cancer effects would be less than significant.

CO Hotspots

Areas with high vehicle density, such as congested intersections, have the potential to create high concentrations of CO, known as CO hotspots. According to the SCAQMD CEQA Air Quality Handbook, a potential CO hotspot may occur at any location where the background CO concentration already exceeds 9.0 ppm, the CAAQS for 8-hour for CO. Within the most recent three years for which measurements are available, the highest CO concentration at the Santa Clarita-Placerita station was measured at 1.5 ppm in 2020 and thus a CO hotspot would not occur. Based on the analysis above, the project's potential to expose sensitive receptors to substantial pollutant concentrations would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The SCAQMD CEQA Air Quality Handbook (1993) identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The proposed project would not include any of the land uses that have been identified by the SCAQMD as odor sources. Construction activities associated with the proposed project may generate detectable odors from heavy-duty equipment exhaust and architectural coatings. However, the nearest sensitive receptor is 700 feet away and construction-related odors would be short-term in nature and cease upon project completion. The proposed project would be required to comply with the California Code of Regulations, Title 13, sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. This would reduce the detectable odors from heavy-duty equipment exhaust. The proposed project would also be required to comply with the SCAQMD Rule 1113 – Architectural Coating, which would minimize odor impacts from

ROG emissions during architectural coating. Any odor impacts to existing adjacent land uses would be short-term and not substantial. Accordingly, the project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES.				
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
c. 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?	☐	☒	☐	☐
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
f. 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 Analysis

This analysis is based upon the project Biological Resources Assessment prepared in 2025 by South Environmental (Bio Report, **Appendix B-1**), the project Botanical Survey prepared in 2023 by South Environmental (Botanical Survey, **Appendix B-2**), the Jurisdictional Delineation prepared in 2025 by South Environmental (JD Report, **Appendix B-3**), the Oak Tree Report prepared in 2025 by South Environmental (Oak Tree Report, **Appendix B-4**), and the Focused Gnatcatcher Survey prepared in 2023 by Dudek (Gnatcatcher Survey, **Appendix B-5**). Final peer review comments concerning the biological reports prepared by Envicom Corporation are provided in **Appendix B-6** (Peer Review).

a. Potentially Significant Unless Mitigation Incorporated. Would the project have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate,

sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Special-status species are those plants and animals listed, proposed for listing, or candidates for listing as Threatened or Endangered by the USFWS under the Federal Endangered Species Act (FESA); those considered “Species of Concern” by the USFWS; 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 identified as “Species of Special Concern” (SSC) and “Watch List” (WL) by the CDFW, and; CDFW Special Plants, specifically those with California Rare Plant Ranks (CRPR) of 1B and 2 in the CNPS’s Inventory of Rare and Endangered Plants of California (CNPS 2022).

Wildlife

Initial site surveys conducted in 2020 for the Bio Report observed one special-status wildlife species on site, a Cooper’s Hawk (*Accipiter cooperii*). A search of the California Natural Diversity Database (CNDDB) for species that have been observed in the past within a broad study area around and including the project site contained nine special-status wildlife species. The potential for occurrence for each species, based upon the suitability of habitat present and the date and proximity of previous observations, is listed below.

- *Aimophila ruficeps canescens*, southern California rufous-crowned sparrow, medium potential
- *Artemisospiza belli belli*, Bell’s sage sparrow, high potential
- *Plioptila californica californica*, coastal California gnatcatcher, high potential
- *Bombus crotchii*, Crotch’s bumble bee, medium potential
- *Eumops perotis californicus*, western mastiff bat, medium potential
- *Neotoma lepida intermedia*, San Diego desert woodrat, medium potential
- *Helminthoglypta vasquezii*, Vasquez shoulderband snail, medium potential
- *Phrynosoma blainvillii*, coast horned lizard, medium potential
- *Aspidoscelis tigris stejnegeri*, coastal whiptail lizard, high potential

The California gnatcatcher (*Plioptila californica californica*) was observed within 1,000 feet of the project site and as such the Gnatcatcher Survey was prepared, which produced negative results. However, five bird species listed as USFWS Bird of Conservation Concern were observed during the gnatcatcher surveys, including:

- *Calypte costae*, Costa’s hummingbird
- *Chamaea fasciata*, wren
- *Spinus lawrencei*, Lawrence’s goldfinch
- *Toxostoma redivivum*, California thrasher
- *Dryobates nuttallii*, Nuttall’s woodpecker

Plants

No special-status plant species were observed at the time of the Botanical Survey, however, one of the 92 plant species observed has recently been placed on the CNPS CRPR 4 list in September 2025, the horehound/Santa Clarita bush mallow (*Malacothamnus marruboides*).

There are eleven special-status plant species that have been observed near the site in the past according to CNDDDB that could have the potential to occur on site due to the presence of suitable habitat. These species and their potential for occurrence on site are listed below.

- *Calochortus catalinae*, Catalina mariposa lily, medium potential
- *Calochortus clavatus* var. *clavatus*, club-haired mariposa lily, medium potential
- *Calochortus clavatus* var. *gracilis*, slender mariposa lily, high potential
- *Calochortus plummerae*, Plummer's mariposa lily, high potential
- *Calystegia peirsonii*, Peirson's morning-glory, medium potential
- *Delphinium parryi* ssp. *purpureum*, Mt. Pinos larkspur, medium potential
- *Dodecahema leptoceras*, slender-horned spineflower, medium potential
- *Harpagonella palmeri*, Palmer's grapplinghook, high potential
- *Malacothamnus davidsonii*, Davidson's bush-mallow, medium potential
- *Optunia basilaris* var. *brachyclada*, short-joint beavertail, medium potential
- *Phacelia hubbyi*, Hubby's phacelia, medium potential

Impacts

The horehound/Santa Clarita bush mallow present on site was added to the CRPR 4 list. CNPS recommends CRPR 4 plants be evaluated for consideration during preparation of environmental documents where the locality of the plant may be important to its listing such as; populations at the periphery of a species' range; areas where the taxon is especially uncommon; areas where the taxon has sustained heavy losses; or populations exhibiting unusual morphology or occurring on unusual substrates. In this case, horehound bush mallow is relatively secure locally and does not meet the criteria to be considered locally significant. Therefore, project impacts to horehound bush mallow would be less than significant. In regard to the plant species with a potential to occur on site, as the Botanical Survey did not encounter any sign of these species potential impacts are considered less than significant.

Of the special-status wildlife species observed on site or with a potential to occur, the Bio Report considers construction of the project to have the potential to impact Crotch's bumble bee (*Bombus crotchii*), western mastiff bat (*Eumops perotis californicus*), coastal whiptail (*Aspidoscelis tigris stejnegeri*), coast horned lizard (*Phrynosoma blainvillii*), and San Diego desert woodrat (*Neotoma lepida intermedia*). To reduce potential impacts to less than significant the Bio Report recommended various mitigation measures. The Peer Review assessed these measures and determined they were appropriate but required modification. Mitigation measures include mitigation measure (MM) **BIO-1** which requires biological monitoring during construction activities. MM **BIO-2** requires protection measures to be put in place during construction to help minimize potential impacts. MM **BIO-3** requires a nesting bird survey to ensure there are no impacts to nesting birds. MM **BIO-4** requires pre-construction surveys and monitoring for Crotch's bumble bee, and appropriate compensatory mitigation if necessary. MM **BIO-5** requires roosting bat surveys and avoidance measures, and MM **BIO-6** requires pre-construction surveys and a salvage plan/salvage activities for any special-status lizards or mammals present on site.

This combination of surveys, avoidance measures, monitoring, and compensatory mitigation would reduce potential impacts to special-status species to less than significant.

Mitigation Measures:

MM BIO-1: Biological Monitoring

Before the City Engineer issues a grading permit, the Applicant must retain a qualified biologist as the lead biological monitor approved by the Community Development Director, or designee. The lead biological monitor must ensure that impacts to biological resources are avoided or minimized and conduct (or supervise) pre-construction field surveys for species that may be impacted by grading and construction activities as described in Mitigation Measures BIO-3 through BIO-6. The lead biological monitor must ensure that all surveys are conducted by qualified personnel (e.g., avian biologists for bird surveys, herpetologists for reptile surveys) and that they possess all permits and/or memoranda of understanding with the appropriate agencies for the handling of wildlife which are expected to be encountered as described in Mitigation Measures BIO-3 through BIO-6 and determined by the lead monitor. During grading, as well as other ground disturbing and vegetation removal activities, the lead biological monitor must be present to inspect and enforce all project biological mitigation requirements and to relocate any wildlife species that may come into harm's way to an appropriate safe location with similar habitat. In the instance a special-status or listed species is encountered during the pre-construction surveys or during construction monitoring and must be relocated the appropriate trustee agency (CDFW or USFWS) will be consulted and Incidental Take Permit(s) will be obtained for the task, if required. The biological monitor must be onsite daily throughout rough grading and other vegetation removal activities and then conduct periodic site visits as necessary throughout the remainder of project construction. The biological monitor is authorized to stop specific grading or construction activities to implement the mitigation measures, or if violations of any local, state, or federal laws are suspected.

The biological monitor must ensure that daily monitoring reports (e.g., survey results, protective actions, results of protective actions, adaptive measures) are prepared, which must be provided to the Community Development Director, or designee, and CDFW. The final report of monitoring activities must be filed within one month of completion of construction.

MM BIO-2: Protection Measures During Grading and Construction

The Applicant must implement the following measures during grading and construction to avoid and minimize potential impacts to native habitats and associated flora and fauna:

- Before initiating grading and construction activities, the permittee must demarcate the project limits of disturbance with temporary exclusionary fencing to prevent encroachment of project activities into adjacent native habitats and jurisdictional waterways, and to dissuade wildlife from entering the construction area. The fencing must be marked with highly visible flagging. Temporary signs must be posted or placed at regular intervals along the fencing prohibit access beyond the project limits. The temporary fencing must be routinely inspected and maintained in functional condition for the duration of project grading and construction.
- Tree protective fencing that is at least 6-feet tall chain-link fencing should be placed at the Tree Protection Zone of on-site oak trees near the proposed hiking trail. The fencing should be placed at least 5 feet from the dripline of the oaks and should be approved by a certified arborist approved by the Community Development Director, or designee, before start of project activities. The fencing should remain in place throughout project construction and should be monitored

by the certified arborist on at least a monthly basis to ensure its continued effectiveness.

- No construction and maintenance activities may occur during nighttime hours, except in an emergency or if authorized by the Community Development Director, or designee.
- If construction lighting is required, then lighting must be pointed away from native habitats and be pointed downward and shielded to the extent practicable.
- The permittee must implement standard measures to avoid excessive construction noise at the construction site.
- No pets are allowed on the project site.
- Trash must be disposed of in closed-containers, and all food-related trash must be disposed of in closed animal-proof containers. The permittee must provide sufficient containers on-site during construction.
- Standard measures to control fugitive dust must be implemented at the construction site, including sufficient watering of disturbed areas and reduced vehicle speeds below 15 m.p.h.
- All trenches must be filled within the same day or escape ramps for animals shall be constructed if trenches are to be left open overnight.
- All project related equipment and vehicles must be cleaned and decontaminated of weeds and soils before entering the project site to reduce the potential for the spread and introduction of invasive and noxious weeds.
- The project must obtain and implement a Stormwater Pollution Prevention Plan to prevent discharge and runoff of pollutants into streams and riparian habitats as well as the natural habitats adjacent to the construction footprint.

The permittee must implement the required measures throughout grading and construction. The lead biological monitor required by MM BIO-1 must maintain a record of monitoring notes including construction activities and observations related to the requirements of this mitigation measure and submit it to the Community Development Director, or designee, and CDFW. The final monitoring report shall be submitted within one month of completion of construction.

MM BIO-3: Nesting Birds

- If possible, ground disturbing activities and vegetation removal must be timed to occur between September 1 – January 31, which is outside the bird nesting season.
- If ground disturbing activities or vegetation removal (including tree trimming) are scheduled between February 1 – August 31, which is the bird nesting season, two preconstruction surveys for nesting birds must be conducted. One within 7 days before construction activity and the second within 72 hours before construction activities. The surveys must be conducted by a qualified biologist with prior experience conducting nesting bird surveys for construction projects. The survey area must include the area of ground disturbing activities and vegetation removal as well as suitable nesting habitat within a 300-foot buffer, or a buffer size determined by the qualified biologist based on level of proposed disturbance and access. A letter report summarizing the methods and results of the nesting bird surveys must be submitted to the Community Development Director, or designee,

before commencement of project activities. If no active nests are found, no additional measures are required.

- If active nests are found the biologist will map the location and document the species and nesting stage. A no-work buffer will be established around the active nest as determined by the qualified biologist and based on the species sensitivity to disturbance and the type and duration of the disturbance. No construction activities may occur within the no-work buffer until the biologist has determined the nest is no longer active.

MM BIO-4: Crotch's Bumble Bee

Pre-Project Habitat Assessment and Protocol Surveys

Before the City Engineer issues a grading permit, the permittee must retain a qualified biologist to conduct a habitat assessment to determine if the project site contains suitable habitat for Crotch's bumble bee. If it is determined that the project site contains suitable habitat, the qualified biologist must conduct a protocol survey of the project site for Crotch's bumble bee. The protocol survey must be conducted during the Colony Active Period (April 1 through August 31) and follow CDFW's *Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species* (June 6, 2023), or other survey protocol approved by California Department of Fish and Wildlife (CDFW). The qualified biologist must prepare and submit a report with the methods and results of the survey to the Community Development Director, or designee, and CDFW.

If Crotch's bumble bee(s) are not detected during the pre-project protocol survey, no additional mitigation is required provided the project commences within one year of completion of the survey. If the project does not commence within one year of completion of the survey, an additional protocol survey of the project site must be conducted and the survey results submitted to the Community Development Director, or designee and CDFW.

If a Crotch's bumble bee(s) is found during the protocol survey, the permittee must notify the Community Development Director, or designee, and initiate consultation with CDFW to determine if an Incidental Take Permit (ITP) for Crotch's bumble bee will be required for the project. If required, the permittee must obtain an ITP from CDFW before the City Engineer issues grading permit.

If a Crotch's bumble bee(s) is found at the project site during the protocol surveys, mitigation to avoid and minimize project impacts as well as to compensate for loss of habitat for the species must include the following, or as otherwise determined by CDFW:

Project Timing

To the extent feasible, initial ground-disturbing and vegetation removal activities must be scheduled after Crotch's bumble bee nectar sources have stopped blooming in the fall, as determined by the qualified biologist, and outside of the Queen Flight Season (February 1 through March 30) and the Colony Active Period (April 1 through August 31).

Pre-Construction Surveys

Before initial ground-disturbing or vegetation removal activities that would occur during the Queen Flight Season (February 1 through March 30) and the Colony Active Period (April 1 through August 31) including, without limitation, grading and fuel modification, a qualified biologist must conduct two visual surveys for Crotch's

bumble bee within the development and fuel modification areas, plus 50 feet. Surveys must occur not more than 10 days before commencement of ground-disturbing and vegetation removal activities. The surveys must be at least four days apart, with the second survey completed within two days of starting work. Surveys must be conducted at a minimum effort of one person-hour per three acres of habitat. Survey effort must focus on blooming nectar and pollen resources and potential nesting substrates (burrows, grasses, brush piles, old bird nests, dead trees, hollow logs). If the biologist detects any nesting Crotch's bumble bees during the pre-construction survey, a 50-foot exclusionary buffer in which no activities would be allowed to occur must be established around the nesting bee(s). All project personnel must be notified of the buffer, and the Community Development Director, or designee, and CDFW must be notified within 24 hours of detection of nesting Crotch's bumble bee(s). The exclusionary buffer must be maintained until the Crotch bumble bee(s) are no longer nesting, as determined by the biologist. Within 14 days of completion of the pre-construction surveys, the surveying biologist must prepare and submit a report documenting the methods and results of the pre-construction surveys to the Community Development Director, or designee, and CDFW.

Biological Monitoring

A qualified biologist must monitor initial ground disturbance and vegetation removal activities occurring at any time of year to ensure that the project does not result in take of Crotch's bumble bee. Biological monitoring during the Queen Flight Season (February 1 through March 30) and the Colony Active Period (April 1 through August 31) must include searches for nests, which includes observations of ground animal burrows, bunch grasses, thatched annual grasses, brush piles, old bird nests, dead trees, and hollow logs. Biological monitoring conducted during the Overwintering Season for Crotch's bumble bee (November 1 through January 31) must include searches of potential hibernacula. If the biological monitor detects any nesting or overwintering Crotch's bumble bees during monitoring activities, a 50-foot exclusionary buffer in which no activities would be allowed to occur must be established around the nesting or overwintering bee(s). All project personnel must be notified of the buffer, and the Community Development Director, or designee, and CDFW must be notified within 24 hours of detection of the nesting or overwintering Crotch's bumble bee(s). The exclusionary buffer must be maintained until the Crotch bumble bee(s) are no longer nesting or overwintering, as determined by the biologist. The monitoring biologist must maintain daily field notes, including the locations of nesting and overwintering bees and collect photographs and other appropriate information. Within one month of completion of all biological monitoring activities, the biological monitor must prepare and submit a monitoring report documenting the methods and outcome of monitoring activities to the Community Development Director, or designee, and CDFW. The biological monitor's field notes must be attached to the report.

Compensatory Mitigation for Loss of Habitat

If Crotch's bumble bees are found on the project site during the pre-project protocol surveys, the qualified biologist must identify the extent of suitable habitat for the species and quantify the extent of project impacts. The permittee must mitigate for permanent and temporary impacts to suitable habitat at a 1:1 ratio. Suitable habitats that are temporarily impacted must be restored to pre-project or better conditions and contain locally native nectar sources identified by the qualified biologist appropriate for Crotch's bumble bee. Suitable habitats that are permanently impacted must be

mitigated by restoration and/or enhancement of onsite habitats suitable for Crotch's bumble bee, as well as permanent preservation of the mitigation area(s) in a manner approved by the Community Development Director, or designee. If onsite restoration or enhancement is not feasible, offsite restoration or enhancement at a location acceptable to the Community Development Director, or designee, and CDFW is sufficient. Alternatively, the Applicant may mitigate for permanent impacts to suitable habitat via contribution to an in-lieu fee program or mitigation bank approved by the Community Development Director, or designee, and CDFW. In-lieu fees or mitigation bank credits shall be used for restoration and/or enhancement and permanent protection of suitable habitats for Crotch's bumble bee. A Mitigation and Monitoring Plan prepared for compensation of permanent and temporary impacts to suitable habitats for Crotch's bumble bee must be prepared by a qualified restoration ecologist and include the following:

1. **Plant Palette:** The permittee must compile a plant palette(s) of local native species that is appropriate for the habitats being restored or enhanced. The plant palette(s) must include a diverse assemblage of locally native nectar resources for Crotch's bumble bee that can be expected to be blooming during the Colony Active Period for Crotch's bumble bee. Nectar and pollen-producing plants for Crotch's bumble bee in the plant palette may include, without limitation, the genera *Chaenactis*, *Lupinus*, *Phacelia*, and *Salvia* and other suitable flowering plants in the families Fabaceae, Apocynaceae, Asteraceae, Lamiaceae, Hydrophyllaceae, Plantaginaceae, Onograceae, Papaveraceae, Polygonaceae, and Boraginaceae. Seeding may be utilized as a method of plant establishment given that seed mixes consist of only locally native species. Seeds to be used must be collected locally from the region.
2. **Timing:** The Mitigation and Monitoring Plan must be approved by the Community Development Director, or designee, and CDFW before the City Engineer issues a grading permit. Proper establishment of planted species requires planting activities to occur during or just prior to the rainy season (October to March) or the first expected rain event. The permittee must plan for implementation of restoration and/or enhancement activities to occur within this timeframe.
3. **Performance Standards:** The restoration and/or enhancement area must provide a minimum absolute cover of native plant species by the end of the required monitoring period that is not less than the absolute cover of native species found at high quality reference sites found onsite or in the surrounding area and approved by the Community Development Director, or designee, and CDFW. Species richness, diversity, abundance, and frequency/density within each restoration and enhancement area must be roughly proportionate to that of the reference sites. Non-native species cannot exceed 5% cover of the restoration and/or enhancement area by the end of the required monitoring period.
4. **Monitoring and Maintenance:** The permittee must monitor and maintain restoration and/or enhancement areas for a period of five years or until performance standards are met as determined by the Community Development Director, or designee. The permittee must perform periodic maintenance of the site including weeding, repairing irrigation or other associated components, and replanting or re-seeding dead plants. Monitoring involves qualitative and quantitative methods to document site conditions and success. The monitoring period begins immediately following initial implementation activities

including seeding, weeding, and establishment of appropriate irrigation and other restoration components. Replacement plantings must be monitored with the same survival and growth requirements for three years after planting.

5. Reporting: The permittee must submit annual reports to the Community Development Director, or designee, and CDFW documenting mitigation activities not later than January 31 of each year until performance standards are met as determined by the Community Development Director, or designee.
6. Adaptive Management: The permittee will implement adaptive management/contingency measures as needed throughout the duration of the monitoring period to ensure that performance standards are met, at the direction of the qualified restoration ecologist.

If impacts are mitigated by purchasing credits from a mitigation bank or by contribution to an in-lieu fee program, the permittee must provide written documentation to the Community Development Director, or designee, and CDFW of purchase of mitigation credits or payment of the in-lieu fee before the City Engineer issues a grading permit.

MM BIO-5: Roosting Bat Surveys and Avoidance Measures

- Construction activities including demolition, grading, and vegetation removal must occur outside the bat maternity season, which occurs between April 1 through August 31, as feasible. If the bat maternity season cannot be avoided, a bat habitat assessment survey must be conducted by a qualified biologist no more than 14 days before the start of construction activities. The habitat assessment survey must document the locations of potential bat roosting habitat as well as evidence of bat species that may occur in the proposed project limits through direct observation (e.g., roosting bats) and/or sign (e.g., bat guano).
- No more than five days before the start of construction activities, emergence bat surveys must be conducted during the bat maternity season in areas of suitable bat habitat identified during the habitat assessment survey (e.g., near vacant structures or suitable roosting trees) to document any bat species emerging from these features. Generally, the emergence survey(s) will be conducted approximately one hour before sunset and last a minimum of two hours after sunset. The exact timing, however, will be determined by the qualified biologist. Passive acoustic monitoring equipment will be utilized during the emergence surveys to identify bats to the species level. In the event multiple features were identified in the habitat assessment in which bats may occur, at the discretion of the qualified biologist, either multiple emergence surveys may be necessary or additional acoustic equipment may need to be set up to capture the acoustics of bats as they emerge at dusk.
- Before the permittee commences any project activities, the qualified biologist must prepare and submit a letter report documenting the methods and results of the habitat assessment and emergence surveys to the Community Development Director, or designee, and CDFW.
- If no bats are detected during the habitat assessment or emergence surveys, then construction activities may proceed. If roosting bats are detected during the habitat assessment or emergence surveys, the roost sites and roosting bats must be avoided during the maternity season. The qualified biologist must determine an appropriate buffer around the roost site where construction is prohibited. The buffer typically ranges in size, between 100 to 300 feet around the roost site, depending on potential

for project impacts and surrounding terrain. For example, if a project will result in high noise decibels and the roost site is exposed without surrounding trees or hills, the buffer may be increased to reduce disturbances to the roosting bats during breeding activities. CDFW must be consulted regarding the buffer distances around roosts containing special-status bat species. Features such as trees or structures determined to be active roosts must be left in place throughout the maternity season.

- If an active roost site cannot be avoided by the project, including within or outside of the maternity season, a bat mitigation and management plan must be developed by a qualified biologist for roost relocation. Roost relocation involves eviction by non-invasive means and only in exceptional circumstances should involve the direct capture and transfer of bats to appropriate natural or artificial bat roosting habitat in the surrounding area. Mitigation and management plans requires consultation with and approval from the Community Development Director, or designee, and CDFW.
- If confirmed occupied special-status bat roosting habitat is destroyed, artificial bat roosts of comparable size and quality must be constructed and maintained at a suitable undisturbed area, preferably on the subject property. The design and location of the artificial bat roosts will be determined by the qualified biologist in consultation with CDFW.
- Not more than one month following completion of all bat survey, monitoring, and mitigation activities, the qualified biologist must prepare and submit a summary report of the methods and results of these activities to the Community Development Director, or designee, and CDFW.

MM BIO-6: Pre-Construction Surveys and Salvage of Special-Status Lizards and Mammals

Before the City Engineer issues a grading permit, a salvage plan that includes the details of the methods to be used to capture and relocate special-status wildlife species occurring within the project area, including coastal whiptail, coast horned lizard, and San Diego desert woodrat, must be prepared by a qualified biologist and submitted to the Community Development Director, or designee, and CDFW for review and approval.

Pre-construction surveys for potentially occurring special-status wildlife species must be conducted by a qualified biologist within 48 hours before the permittee commences project activities that would result in ground disturbance or removal of vegetation. If a special-status wildlife species is found, avoidance is the preferred option (i.e., waiting for the animal(s) to leave the impact area). If avoidance is not feasible, the species will be captured (if possible) and released into a predetermined area containing appropriate habitat and at a location where they would not be harmed by project activities, as detailed in the salvage plan. The salvage program must continue throughout initial ground disturbance and vegetation removal activities and will conclude when all suitable habitat within the grading limits is removed. If a federal or state listed species is found, project activities must be delayed until USFWS and/or CDFW, as applicable, are consulted regarding the presence of the listed species. Within 14 days after completion of the pre-construction surveys and monitoring activities, a letter report summarizing the methods and results of the surveys and salvage efforts must be submitted to the Community Development Director, or designee, CDFW, and USFWS, as applicable.

b. Less than Significant Impact. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

According to the Bio Report plant communities present on site and/or within a 200-foot survey buffer include:

- California Sagebrush – Purple Sage Scrub, 16.71 acres
 - Comprised of *Artemisia californica* - *Salvia leucophylla* Association and *Artemisia californica* – *Eriogonum fasciculatum* Association
- Chamise Chaparral, 6.66 acres
- Installed Sage Scrub, 2.5 acres
- Ruderal, 13.44 acres

These plant communities are not considered sensitive and do not require mitigation for losses, and no riparian habitat was identified on site that would be impacted by the project. Therefore, impacts would be less than significant to sensitive plant communities.

Mitigation Measures: No mitigation measures are required.

c. Potentially Significant Unless Mitigation Incorporated. 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?

The JD Report identifies three ephemeral drainages within the survey areas which includes the project site plus a 200-foot buffer that would be under the jurisdiction of the CDFW and the RWQCB, each of which would be subject to potential temporary impacts and/or permanent impacts. No direct impacts to riparian habitat are identified where disturbance is proposed.

Ephemeral drainage No. 1 runs for 1,315 feet through the survey area, with a total area of 14,374.8 square-feet within the area. Less than half of the drainage runs through the project site. Drainage No. 2 runs for 1,015 feet through the survey area with a total area of 10,018.8 square-feet within the area, with approximately half running through the project site. Most of drainage No. 3 is within the 200-foot survey buffer and runs for a total of 350 feet through, with an area of 5,662.8 square-feet.

Potential temporary impacts include construction of three bridges over drainages No.1 and No.2. These bridges are proposed to allow residents to access recreation areas and to create walkable trails on site. The bridges will not result in permanent impacts as the bed and banks of the drainages will not be modified, but construction could potentially result in temporary impacts.

The two permanent impacts would include construction of a storm drain outlet from the detention basin to drainage No. 1 which would require 15 square feet of the stream to be modified (10 linear feet). Overflow water from the detention basin would exit into the stream at this point, though as explained in Section X would not result in increased flows or flow velocity. The second impact would modify 1,175 square-feet of drainage No. 3 (67 linear feet), which is the entire area located within the project site. This area will be modified with a proposed fire access road, rip-rap, and slope control features associated with development of the condominiums.

Although no riparian vegetation is altered the proposed streambed modifications are considered impacts, according to the JD Report, and Streambed Alteration permits from the CDFW must be obtained, and

potentially permits from the Regional Water Quality Control Board (RWQCB). MM **BIO-7** requires all necessary applications submitted and permits acquired before the City Engineer issues a grading permit, and MM **BIO-8** requires preparation of a Habitat Mitigation and Monitoring Program before the City Engineer issues grading permits, which will detail project mitigation for temporary and permanent impacts to jurisdictional waters features. With implementation of mitigation measures BIO-7 and BIO-8, all potential impacts to jurisdictional waters would be reduced to less than significant.

Mitigation Measures:

MM BIO-7: Resource Agency Permitting for Impacts to Jurisdictional Features

Before the City Engineer issues a grading permit, the permittee must obtain required permits, from USACE, RWQCB, and CDFW for any excavation, fill, or other land and vegetation disturbing activities within the streams at the site to ensure compliance with resource agency permitting requirements related to impacts to jurisdictional waters and riparian habitat. The permittee must provide written proof or documentation to the Community Development Director, or designee that the required permits from USACE, RWQCB, and/or CDFW were obtained or written verification from USACE, RWQCB, and CDFW stating a permit is not required.

MM BIO-8: Habitat Mitigation and Monitoring Program

To mitigate for permanent significant impacts to jurisdictional waters and riparian habitat, the project must prepare a Habitat Mitigation and Monitoring Program. The Program must be developed by a qualified restoration ecologist approved by the Community Development Director, or designee, RWQCB, CDFW, and USACE, as applicable. The Habitat Mitigation and Monitoring Program must be submitted and approved before the City Engineer issues a grading permit. The Habitat Mitigation and Monitoring Program must mitigate for permanent impacts to jurisdictional waters and habitats at a 2:1 ratio by the restoration or enhancement of degraded in-kind jurisdictional habitats. The project must also mitigate for temporary significant impacts to jurisdictional waters and habitat at a 1:1 ratio, which constitutes restoration of the habitats that are temporarily disturbed by the project to in-kind habitat. The Program may also mitigate impacts by purchase of mitigation bank credits or by contribution to an in-lieu fee program approved by the Community Development Director, or designee, RWQCB, CDFW, and USACE, as applicable.

To the extent feasible, mitigation must be accomplished on-site. If the mitigation will be performed off-site, to the extent feasible the mitigation sites should be implemented within the Santa Clara River watershed. Off-site mitigation must also be compensated for at a minimum 2:1 replacement ratio, or as recommended by RWQCB, CDFW, and USACE, as applicable. If impacts are mitigated by purchasing credits from a mitigation bank or by contribution to an in-lieu fee program, the Permittee must provide evidence of purchase of mitigation credits or payment of the in-lieu fee before the City Engineer issues a grading permit. To the extent feasible, in-lieu fees must be used for the creation and/or restoration of in-kind jurisdictional habitat within the Santa Clara River watershed.

The Habitat Mitigation and Monitoring Program (at a minimum) must include:

- Description of the project/impact and mitigation sites;
- Specific objectives;
- Success criteria;

- Plant palette;
- Implementation plan;
- Maintenance activities;
- Monitoring plan; and
- Contingency measures

The mitigation project must be implemented over a five-year period. To the extent feasible, the mitigation project must be initiated before development of the project. Success criteria are (at a minimum) evaluated based on appropriate survival rates and percent cover of planted native species, and eradication and control of invasive species within the restoration or enhancement areas. The target species and native plant palette, as well as the specific methods for evaluating whether the project was successful at meeting the above-mentioned success criteria is determined by the qualified restoration ecologist and included in the mitigation program.

Annual reports discussing the implementation, monitoring, and management of the mitigation project must be submitted to the Community Development Director, or designee, RWQCB, CDFW, and USACE, as applicable. The annual monitoring reports and the final monitoring report must be submitted by the month / day the mitigation project was first initiated. Five years after project start, a final report must be submitted to the Community Development Director, or designee, RWQCB, CDFW, and USACE, as applicable, which (at a minimum) discusses the implementation, monitoring and management of the mitigation project over the five-year period and indicate whether the mitigation project was successful based on the success criteria established in the Program. If the success criteria are not met at the end of the five-year period the mitigation project must be extended until the criteria are met, or to the satisfaction of the Community Development Director, or designee, RWQCB, CDFW, and USACE, as applicable.

d. Less than Significant Impact. 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?

Wildlife corridors are physical connections that allow wildlife to move between areas of suitable habitat within fragmented landscapes. These can exist at both the local and regional level. Wildlife corridors are necessary to access essential resources, such as food and water sources or breeding habitat, and also for dispersal and migration, to ensure the mixing of genes between populations which is critical for the long term survival of species. Wildlife corridors are features that are important on a species level, whether locally or regionally, so the mere use of a site by wildlife would not necessarily indicate the site is part of a wildlife corridor. For instance, a suburban back yard would not be considered a wildlife corridor merely because wildlife occasionally travel through it. A wildlife nursery site would be a location that is important to the breeding cycle of an entire species or specific population of a species, for example a seal rookery or a cave used by a large bat colony. There are no such places or features within the vicinity of the project site important for the continuation of a species.

According to the Bio Report the South Coast Missing Linkages project, which identifies important wildlife corridors, does not identify the survey area as within an important habitat linkage or wildlife migration corridor. The project site is approximately 1.5-miles north of the Santa Susana Mountains, which is an important linkage and migration corridor, but Antelope Valley Highway (SR 14), Sierra Highway, and Golden Valley Road south of the survey area sever the connection between the two habitat areas. In

addition, the survey area is surrounded by developments such as the Golden Valley High School to the west, residential neighborhoods to the north and east, and Golden Valley Road to the south which limit wildlife movement and isolate the survey area from open space in the Santa Susana Mountains to the south. For these reasons, the survey area is not considered an important habitat linkage or migration corridor for wildlife. Therefore, the project would not 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, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

e. Potentially Significant Unless Mitigation Incorporated. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The Oak Tree Report states there are two heritage oaks located on the property and eight oaks located offsite. There is no proposed project work that would encroach into the Tree Protected Zones of the oaks but there is a potential for accidental impacts through construction error. Therefore, the Report recommends implementation of MM **BIO-9** which requires temporary fencing to provide visibility to protected oaks and reduce the potential of accidental impacts. The report also recommends the project apply for an oak tree permit but the necessity of such a permit would be determined at the time the permitting for grading as there is no indication at this time there would be encroachment upon any oak that would require a permit. Inclusion of BIO-9 would ensure impacts to protected oak trees remain less than significant.

Mitigation Measures:

MM BIO-9: Oak Tree Safety Fencing

Before the permittee engages in ground disturbance activities near the two protected oak trees on the northern portion of the site, the permittee must establish a perimeter outside of the protected zone of the trees using highly visible safety fencing to avoid any potential disturbance within the zone. The perimeter must be not less than six feet outside of the drip line of the combined canopies of the oaks. Fencing should be erected with as minimal ground disturbance as is necessary to secure the fencing, and no work may be conducted within the perimeter.

f. No Impact. 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?

The site is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan. Accordingly, there would be no impacts.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
V. CULTURAL RESOURCES.				
Would the project:				
a. Cause a substantial adverse change in significance of a historical resource pursuant in CEQA Section 15064.5?	☐	☐	☒	☐
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to CEQA Section 15064.5?	☐	☒	☐	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Impact Analysis

This analysis is based on the Cultural Resources Technical Report (Cultural Report) prepared by South Environmental, dated December 2021 and attached as **Appendix C**.

a. Less than Significant Impact. Would the project cause a substantial adverse change in significance of a historical resource pursuant in CEQA Guidelines Section 15064.5?

The Cultural Report involved a SCCIC record search of the subject property plus a one mile radius (“study area”). The results of the SCCIC record search found no previously identified cultural resources within the boundaries of the subject property, and two previously identified resources eligible for historic designation. These two resources are the Los Angeles Aqueduct and the LA Aqueduct Olive-Power Plant Transmission Line. Both are at the edge of the one mile radius and would not be impacted by the project. The abandoned house is over 50 years old (built 1966) and was therefore its eligibility for listing as an historic resource at the local, state, or national was evaluated. The Cultural Report found that the owner of the house enjoyed a measure of local prominence for a period within the 60s and 70s, but this local notoriety would not amount to an historic status for the house.

The Cultural Report evaluates the property according to the City’s historic resource criteria (Chapter 17.64 of the City Municipal Code) and the criteria for listing in the California Register of Historical Resources (CRHR) and finds the property does not meet either set of criteria. In both cases the owner was not found to meet the local criteria which requires a person to be “significant in the history of the City, State or nation,” or the CRHR criteria which requires association with “the lives of persons important in our past.” The house was also not found eligible according to criteria associated with value as an architectural specimen.

As the property was found not eligible for listing as an historic resource according to either the local or state criteria, project impacts to a historical resource as defined in CEQA Guidelines Section 15064.5 would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Potentially Significant Unless Mitigation Incorporated. Would the project cause a substantial adverse change in significance of an archaeological resource pursuant to CEQA Section 15064.5?

The pedestrian survey of the site on November 29, 2021 was negative for archaeological resources on the ground surface. Visibility, however, was quite low at 0-15% owing to dense ground vegetation. The results of the SCCIC record search found no previously identified cultural resources within the boundaries of the subject property, and as explained above in V.a there is no indication of previous historic development on the site. Results of a sacred lands file search by the NAHC were negative for Native American sites within the project area, as well.

While there are no known prehistoric archaeological resources on or near the project site archeological monitoring of initial excavation activity is recommended given that large areas of the site appear to consist of undisturbed native soils, and as ground visibility was low during the pedestrian survey it cannot be reliably determined there is no evidence of resources on site. Therefore, to ensure there are no significant impacts to archeological resources, Mitigation Measure **CUL-1**, identified below, is added to the project to require archeological monitoring during excavation activities. With addition of the mitigation measure impacts would be less than significant.

Mitigation Measures:

MM CUL-1: Archaeological Monitoring

An archaeological monitor that meets the Secretary of Interior qualifications approved by the Community Development Director, or designee, will be hired by the permittee to be on site during grading of the first seven feet of areas of native soil that have not been previously disturbed. This corresponds to the areas labeled Qal (quaternary alluvium) and Tsr (Saugus formation) in the Response to the City of Santa Clarita Review Sheet from LGC Valley Geotechnical Consulting, dated December 14, 2021 and attached as Appendix E-1 to the IS/MND. Areas of 30 percent slope or more are excluded. The archaeological monitor will provide Worker Environmental Awareness Program (WEAP) training to all construction crews engaged in subsurface activity at the project site. Archaeological monitoring will start with full-time monitoring, however, if no resources are encountered during excavation of the first seven feet of soil then monitoring can be reduced as determined appropriate. Each week, the archaeological principal, in consultation with the archaeological monitor and tribal monitor, will recommend whether full time monitoring or spot-check monitoring is the appropriate level of compliance coverage, based on project ground conditions and work schedule at the time. Disputes on coverage will be resolved through communication with the Community Development Director, or designee, who has the final say in compliance task requirements.

1. The archaeological monitor will collect any diagnostic prehistoric or older historical material uncovered through project excavation and can halt construction within 30-feet of a potentially significant cultural resource if necessary. Artifacts collected from a disturbed context or that do not warrant additional assessment can be collected without the need to halt grading. Discovery situations that do not lead to further assessment, survey, evaluation, or data recovery can be described in the monitor's daily monitoring log. However, if prehistoric features or older historical features are encountered, the project "discovery" protocol should be followed (see No. 3). A final Monitoring Report will be produced that discusses all monitoring activities and all artifacts recovered and features identified through monitoring of the project site. Discovery situations that do not lead to further assessment, survey, evaluation, or data recovery can be described in the final Monitoring Report.

2. All artifacts recovered that are determined to have historical information value, with diagnostic or location information that may be important to California history, will be cleaned, analyzed, and described within the Monitoring Report. All materials determined important will be curated at an appropriate depository or returned to the landowner for public display if possible. If important materials are found during monitoring, a Curation Plan may be needed that is reviewed by the City before the publication of the Monitoring Report. The costs of the Monitoring Report, the Curation Plan, and the processing, analysis, and curation of all artifacts will be the responsibility of the permittee.
3. Discovery Protocol: If older historical or prehistoric features, artifact concentrations, or prehistoric material is encountered within an undisturbed context, or in contexts that do not readily allow for expedient site removal, then all work in that area must be halted or diverted away from the discovery to a distance of 30-feet until a qualified senior archaeologist can evaluate the nature and/or significance of the find(s). If a senior archaeologist confirms that the discovery is potentially significant, then the City will be contacted and informed of the discovery immediately.

Construction will not resume in the locality of the discovery until consultation between the senior archaeologist, the owner's representative, the City, and any other concerned parties (such as Native American Tribal Groups), takes place and reaches a conclusion approved by the City. If a significant archaeological resource is discovered during earth-moving, complete avoidance of the find is preferred, per CEQA Guidelines § 15126.4(b)(3)(A). However, if the discovery cannot be avoided, further survey work, evaluation tasks, or data recovery of the significant resource may be required by the City, according to CEQA Guidelines § 15126.4(b)(3). The City may also require changes to monitoring, based on the discovery. If prehistoric cultural resources are identified, Native American monitoring conducted by a monitor with cultural ties to the area must take place along with archaeological monitoring. All costs for the additional monitoring, discovery assessment, discovery evaluation, or data recovery of will be the responsibility of the permittee. All individual reports will be submitted to the SCCIC and/or the Native American monitoring organization at the conclusion of the Project. Curation agreements may also need to be made with appropriate depositories.

c. Less than Significant Impact. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

The results of the SCCIC, and NAHC record searches were negative for cultural resources within the vicinity of the project site. However, there is always a possibility that human remains can be unexpectedly encountered during ground disturbing activities. If human remains are encountered unexpectedly during demolition, grading, and/or construction activities, adherence to Health and Safety Code Section 7050.5 would ensure impacts remain less than significant.

This code section states that in the event human remains are uncovered, no further disturbance shall occur until the County Coroner has made a determination as to the origin and disposition of the remains pursuant to California Public Resources Code Section 5097.98. The Coroner must be notified of the find immediately, together with the City and the property owner.

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 notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials and an appropriate re-internment site. City and a qualified archaeologist shall also establish additional appropriate mitigation measures for further site construction.

Adherence to these regulatory requirements will ensure potential impacts related to the disturbance of unknown human remains would be less than significant.

Mitigation Measures: No mitigation measures are required

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VI. ENERGY.				
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?	☐	☐	☒	☐
b. Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Impact Analysis

The following analysis is based on the CalEEMod output sheets included as an attachment to the AQ/GHG Report provided in Appendix A, and the Fuel Consumption Worksheets provided in **Appendix D**.

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

Construction

During construction, the project would use heavy-duty equipment for demolition, grading, paving, and construction. Construction equipment used on the site would include graders, dozers, scrapers, cranes, forklifts, generators, pavers, and tractors equipped with front end loaders and/or backhoes. Construction also involves trucks for material and supplies delivery, as well as powered hand tools, including concrete saws. The majority of the equipment would likely be diesel-fueled. However, smaller equipment, such as welders and pumps, may be electric-, gasoline-, or natural gas-fueled. For the purposes of this analysis, the majority of construction activities were considered to be diesel-fueled, and activities associated with worker trips were assumed to be gasoline-fueled.

According to the CARB on-road vehicle emissions factor model EMFAC2021(v1.0.2), Emissions Inventory,⁸ the average fuel economy for light duty vehicles operating in Los Angeles (SC) Sub-Area for the year 2025 (construction year) is approximately 24.98 miles per gallon for gasoline-fueled vehicles and approximately 8.64 miles per gallon for all categories of diesel-fueled vehicles except hauling vehicles. The average fuel economy for hauling vehicles is 6.12 miles per gallon. Based on these modeled emissions factors; worker, vendor, and hauling trips; and off-road construction equipment generated by CalEEMod, the project consumption of diesel and gasoline during construction was calculated and is shown in **Table V1-1, Total Fuel Consumption During Construction**.

⁸ California Air Resources Board, EMFAC, Emissions Inventory, Accessed on March 6, 2025 at: <https://arb.ca.gov/emfac/emissions-inventory/31a2aa46de8a1495d39c6a553cc8be9377195ee0>

Table VI-1
Total Fuel Consumption During Construction

Energy Source	Quantity Demanded during Construction per Year
Transportation fuels ^a	
<i>Gasoline</i>	
On-road Worker Trips	37,975 gallons
Gasoline Total	37,975 gallons
<i>Diesel</i>	
On-Road Haul Trucks ^b	900 gallons
On-road Vendor Trucks ^b	13,710 gallons
Off-road Construction Equipment ^c	62,076 gallons
Diesel Total	76,686 gallons
Source: Air Quality and Greenhouse Gas Emissions Technical Report, Appendix A, and Fuel Consumption Worksheets, Appendix D.	
^a On-road mobile source fuel use based on VMT from CalEEMod and fleet-average fuel consumption in gallons per mile from EMFAC2021 web-based data for 2025 (construction year) for Los Angeles (SC) Sub-Area.	
^b Vendor and haul trucks are assumed to be diesel.	
^c All emissions from off-road construction equipment were assumed to be diesel. Off-road mobile source fuel usage based on a fuel usage rate of 0.05 gallons of diesel per horsepower (HP)-hour, based on the South Coast Air Quality Management District (SCAQMD) CEQA Air Quality Handbook, Table A9-3E.	

As shown in Table VI-1, based on the CARB on-road vehicle emissions factor model EMFAC2021(v.1.0.2) and the CalEEMod output, project construction would consume a total of 76,686 gallons of diesel fuel and 37,975 gallons of gasoline. In 2023, 13.6 billion gallons of gasoline and 3.0 billion gallons of diesel, including off-road diesel, was sold in California.⁹ Construction-related fuel use for the project would result in less than 0.01 percent of the fuel consumption in California. In addition, Title 13, Sections 2449 and 2485 of the CCR require drivers of off-road diesel-fueled vehicles and diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds not to idle the vehicle's primary diesel engine longer than five minutes at any location. Compliance with this regulation would prevent unnecessary consumption of energy from use of diesel fuel during construction.

Adherence to CCR Section 2485 and CARB anti-idling regulations for off-road diesel-fueled fleets would reduce the potential for wasteful or inefficient use of energy by construction equipment. Due to the temporary duration of construction and the necessity of fuel consumption inherent in construction, fuel consumption would not be excessive or substantial with respect to fuel supplies. The energy demands associated with fuel consumption during construction is typical for developments of similar size and would not necessitate the construction of additional energy facilities or distribution infrastructure. Therefore, project construction would not result in wasteful, inefficient, or unnecessary consumption of energy resources, and construction impacts would be less than significant.

Operations

During operations, the project would consume energy for vehicle trips, water conveyance, solid waste disposal systems, lighting, landscape maintenance equipment, electronic equipment and devices, and heating, ventilation and air conditioning (HVAC) systems. The project's estimated energy use during operations is summarized in **Table VI-2, Project Operations Energy Use**.

⁹ California Department of Tax and Fee Administration, Fuel Taxes Statistics & Reports, Motor Vehicle Fuel 10 Year Report and Taxable Diesel Gallons 10 Year Report, Excels accessed on March 6, 2025 at: <https://www.cdtfa.ca.gov/taxes-and-fees/spftrpts.htm>

Table VI-2
Project Operations Energy Use

Energy Source	Quantity Demanded during Operations per Year
Electricity (SCE)	1,634,377 kWh
Natural Gas (SoCalGas)	4,812,225 kBtu / 48,122 therms
Transportation Fuels^a	
<i>Gasoline</i>	162,554 gallons
<i>Diesel</i>	29,733 gallons
Source: Air Quality and Greenhouse Gas Emissions Technical Report, Appendix A, and Fuel Consumption Worksheets, Appendix D.	
Notes: kWh = kilowatt-hours kBTU = kilo-British Thermal Units SCE = Southern California Edison SoCalGas = Southern California Gas	
^a Project gasoline and diesel use during operations are calculated based on the vehicle miles traveled (VMT) estimated by CalEEMod Annual Output. It is assumed that light-duty vehicles use gasoline, while heavy-duty (Gross Vehicle Weight Rating > 8,500 pounds) use diesel. CalEEMod estimates that light-duty vehicles account for approximately 94 percent of project VMT. Calculations shown in Fuel Consumption Worksheets, provided as Appendix D. Project gasoline and diesel use are calculated based on vehicle emissions factor model for the calendar year 2027 (operational year) from EMFAC2021(v1.0.2) (25.99 miles per gallon for gasoline-fueled vehicles and 8.87 miles per gallon for diesel-fueled vehicles).	

As estimated by CalEEMod, and shown in Table VI-2, the project's total electricity demand would be approximately 1,634,377 kilowatt-hours per year (kWh/year) and the project's total natural gas demand would be approximately 48,122 therms. Southern California Edison (SCE) and Southern California Gas (SoCalGas) provide electricity and natural gas to the City. In 2022, SCE provided 85,870 millions kWh of electricity¹⁰ and the SoCalGas provided 5,026 millions of therms of natural gas¹¹ throughout their service areas which includes the project site. Therefore, the project would consume approximately 0.001 percent of SCE's recent deliveries and 0.0005 percent SoCalGas's recent deliveries. New buildings would be required to comply with California Energy Code and California Green Building Standards Code (CALGreen Code) which include solar power requirements, so actual electricity use would be less than estimated. As the new buildings will be substantially more efficient than building built according to previous energy codes, and the amount of estimated energy consumption is not excessive in total amount nor as a portion of total deliveries, operational energy impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

The project would be required to comply with the applicable portions of the California Energy Code and the CALGreen Code which establish planning and design standards for sustainable development, energy efficiency, water conservation, and material conservation. The project would be built to the code standards in effect at the time of permit issuance, which generally result in more efficiency with each successive code. As the project would comply with efficiency standards as a matter of regulatory compliance, the project

¹⁰ California Energy Commissions, Electricity Consumption by Entity, Accessed on March 6, 2025 at: <http://www.ecdms.energy.ca.gov/elecbyutil.aspx>

¹¹ California Energy Commissions, Gas Consumption by Entity, March 6, 2025 at: <http://www.ecdms.energy.ca.gov/gasbyutil.aspx>

would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VII. GEOLOGY AND SOILS.				
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☒	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. 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?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geological features?	☐	☒	☐	☐

Impact Analysis

This analysis is based largely on the Geotechnical Report dated November 19, 2020, prepared by LGC Valley, Inc., attached as **Appendix E-1**, and the follow up Response to the City of Santa Clarita Review Sheet (Response) dated December 14, 2021, attached as **Appendix E-2**.

a. i. Less than Significant Impact. 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?

According to the Geotechnical Report the project site is not located within an Alquist-Priolo Earthquake Fault Zones and there are no known active or potentially active faults onsite. Therefore, ground rupture due to faulting is considered unlikely. The nearest fault is the San Gabriel Fault located within 1 mile south of the site. The proximity of this fault may result in ground shaking at the premises but would not result in rupture at the project site. Therefore, impacts related to potential fault rupture are less than significant.

Mitigation Measures: No mitigation measures are required.

a. ii. Less than Significant Impact. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving strong seismic ground shaking?

The Geotechnical Report explains that the site will likely be subject to strong ground shaking in the future, which is a very common hazard in Southern California. The Report classifies the site as Seismic Design Category Class E, based on the 2019 California Building Code (CBC), and thus the project will be subject to the applicable structural regulations in the CBC that address that classification. Seismic Design Categories range from A to F, and the requirements for foundation and structural design will change according to the class in order to compensate for less or more anticipated ground-shaking. The Report explains that soil excavation of between two to twenty feet, depending on the context, will be necessary throughout the site to remove all undocumented fills, alluvium, landslide debris, or any other unsuitable soils. The Report indicated reuse and recompaction of removed soil would be possible and would provide a proper substrate for building foundations if the soil meets certain requirements. This removal and recompaction will allow the use of standard foundations and building techniques to ensure proposed buildings are seismically stable according to CBC requirements. Because it has been determined that conformance with current building codes and engineering practices- including the specific requirements for Class E properties that address ground-shaking hazards- will ensure structural stability, potential impacts from ground shaking are less than significant.

Mitigation Measure: No mitigation measures are required.

a. iii. Less than Significant Impact. 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?

Liquefaction is a process by which sediments below the water table temporarily lose strength and behave as a viscous liquid rather than a solid. The types of sediments most susceptible are clay-free deposits of sand and silts, although liquefaction may occasionally occur in gravel deposits. Liquefaction can occur when seismic waves, primarily shear waves, pass through saturated granular layers and distort the granular structure, causing loosely packed groups of particles to collapse. These collapses increase the pore-water pressure between grains if drainage cannot occur. If the pore-water pressure rises to a level approaching the weight of the overlying soil, the granular layer temporarily behaves as a viscous liquid rather than a solid. The site is partially within a mapped liquefaction hazard zone according to the City's Seismic Hazard Zones map. As the Geotechnical Report explains, bedrock beneath the site is shallow, and there is a lack of shallow groundwater onsite. With removal and replacement of alluvium deposits with compacted fill, the liquefaction hazard potential will be very low to nil. The Report recommendations are CBC standards reiterated by the Report. Therefore, with regulatory compliance to CBC requirements, substantial adverse effects related to liquefaction will be less than significant.

Mitigation Measures: No mitigation measures are required.

a. iv. Less than Significant Impact. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving landslides?

Landslides are a mass wasting phenomenon in mountainous and hillside areas that include a wide range of movements and occur when the stability of the slopes change to an unstable condition resulting from a number of factors including physical and/or chemical weathering of earth materials, unfavorable geologic structures relative to the slope geometry, erosion at the toe of a slope, and precipitation. The Geotechnical Report and Response indicate that there is landslide material north of the existing single-family house and the northeast corner of the site where no structures will be placed. This material will be removed and replaced with compacted fill, which will result in stable soil for the development. Remediation of these areas, and all other areas with alluvium or other unsuitable soils, will ensure stable slopes wherever engineered for the project. Two small areas in the southern portion of the project site are within an earthquake-induced landslide hazard zone according to the City's Seismic Hazard Zones map. However, these zones reflect an historical condition as grading and construction of the Golden Valley Road removed these hazards in 2000, as mentioned in the Report. Because of this, and the removal and remediation of any old landslide material from the site during grading, potential impacts related to landslides would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. Would the project result in substantial soil erosion or the loss of topsoil?

Development of the project has the potential to result in the erosion of exposed soils during site preparation and construction activities as substantial grading and earth movement will occur onsite. However, the project would be required to comply with SCAQMD Rule 403, Fugitive Dust, to minimize wind and water erosion at the site, and the City is a party to the Los Angeles County Municipal Separate Storm Sewer System (MS4) permit requirements, issued by the Los Angeles Regional Water Quality Control Board (LARWQCB) in accordance with the County's National Pollutant Discharge Elimination System (NPDES) permit. These requirements regulate stormwater and non-stormwater discharges, and constitute the water quality standards and discharge requirements the project is subject to during construction and after.

Compliance with MS4 permit requirements includes preparation of a Stormwater Pollution Prevention Plan (SWPPP) demonstrating implementation of Best Management Practices (BMPs) sufficient to minimize erosion and discharge of soil during construction activities. The plan must demonstrate which BMPs are to be employed to retain sediments from areas disturbed by construction; retain construction-related materials, wastes, spills, or residues; contain runoff from equipment and vehicle washing; and control any potential erosion. The project will be required to submit a SWPPP, to demonstrate code compliance to the satisfaction of the City prior to final plan approval, and inspection of the BMPs will be performed during project construction. Compliance with these regulatory measures would ensure potential impacts during construction activities would be less than significant.

Post-construction the project will be required to comply with Los Angeles County Low Impact Development (LID) Standards which require the site to be designed to retain or detain an 85th percentile rainfall event. The result of this will be for most storm events stormwater runoff generated by buildings or roads will be contained within the stormwater system and there will be no opportunity for erosion from those sources. Other areas subject to grading or earthmoving will be landscaped, and slopes will be stabilized with landscaping and temporary or permanent erosion control measures. Therefore, the potential for the project to result in substantial soil erosion or the loss of topsoil during operations is less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact. 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?

Lateral spreading is a term referring to landslides that form on gentle slopes and have a fluid-like flow movement. As discussed above, with removal of all undocumented fills, alluvium, landslide debris, or any other unsuitable soils, and replacement with new compacted fill or recompacted onsite soils, the site will be suitable for development, this includes the potential risk related to lateral spreads which should be less than significant with adherence to building standards. Risks related to liquefaction have already been discussed and are less than significant.

Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. Soils that are particularly subject to subsidence include those with high silt or clay content. No extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the site. The Geotechnical Report determined that onsite soils below recommended grading depths have a low potential for static settlement, and that by following the recommendations of the report the site is not anticipated to be susceptible to seismic-induced settlement. Therefore, potential impacts due to subsidence would be less than significant.

Therefore, by meeting the recommendations of the Report and requirements of the CBC, as will be permitted by the City via the grading permit process, project impacts related to site stability would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Expansive soils contain high amounts of clay particles that swell when wet and shrink when dry. Foundations constructed on these soils are subject to uplifting forces caused by the swelling. The Geotechnical Report states that onsite soils have a high expansion potential. However, with recommended remediation of soils it has been determined the site is suitable for development utilizing mat foundations or a post-tensioned slab-on-grade foundation system. The precise design of the hotel foundation has not yet been determined but the Report indicates there are no substantial impediments to its construction. The Report also specifies if any retaining walls are constructed that they are backfilled with engineered soils to compensate for the onsite expansive soils. With implementation of the recommendations of the Geotechnical Report to be confirmed by the City during plan check, the project would have a less than significant impact regarding expansive soils.

Mitigation Measures: No mitigation measures are required.

e. No Impact. 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?

The project site will be served by the municipal wastewater collection, conveyance, and treatment system. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impact would occur.

Mitigation Measures: No mitigation measures are required.

f. Potentially Significant Unless Mitigation Incorporated. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological features?

Paleontological resources are fossilized remains of organisms preserved in a geologic context. Fossils are not found in all geologic units; usually they will only be found in sedimentary rocks and are not found in igneous or metamorphic rocks. Because of this the geologic units present on a project site will determine if there is the potential to encounter paleontological resources or not. In Envicom Corporation's peer-review of the Cultural Report (Appendix C) it was noted that the site contains geologic units with the potential to contain fossils.¹² These are shown on the project Geotechnical Report as quaternary alluvium and Saugus formation, denoted as Qal and Tsr on the provided geotechnical map. Project grading will occur in areas containing these geologic units, therefore, the project has the potential to destroy unique paleontological resources unless mitigation is applied. The peer review recommended paleontological monitoring during grading and excavation of these units.

To ensure impacts to paleontological resources remain less than significant **MM PAL-1** is applied which requires paleontological monitoring during grading of areas with Qal and Tsr geologic units, or areas where these units may be encountered beneath existing fill. Implementation of MM PAL-1 would ensure that the project's potential paleontological resources impacts would be less than significant.

Mitigation Measures:

MM PAL-1: Paleontological Monitoring

Before the City Engineer issues a grading permit, the applicant must retain a qualified paleontologist that meets the standards of the Society for Vertebrate Paleontology to provide monitoring services. The paleontological monitor will examine the project geotechnical report, the final project plan, and the site schedule to determine what subsurface activities may require paleontological monitoring of project site grading or excavation. Only areas listed in the geotechnical report as containing Qal (Quaternary Alluvium) and Tsr (Saugus Formation) geological units require investigation. However, monitoring may be required elsewhere if intact older alluvial soils or Saugus bedrock will be encountered under areas of fill.

The paleontological monitor will collect any fossil material that is uncovered through grading or excavating that is found within a disturbed or intact context if the fossil can easily be removed from the project site, and the paleontological monitor can halt construction within 30-feet of a potentially significant fossil resource that cannot readily be removed. Fossils collected from a disturbed context or that do not warrant additional assessment can be collected without the need to halt grading. If fossils are not present within the older alluvial or bedrock material, and the project conditions warrant reduced monitoring, then a daily or weekly spot-check system of monitoring can be arranged at the discretion of the paleontological monitor. However, if fossils are encountered that cannot be removed during grading and that the paleontological monitor believes will need further assessment, then project "discovery" protocol will be followed, as described in project mitigation measure CUL-1. Discovery situations that do not lead to further assessment, survey, evaluation, or data recovery can be described in the monitor's daily logs. The City must be informed of any monitoring scheduling changes by the monitoring team.

¹² Envicom Corporation, CEQA Services Golden Valley Project (Envicom Project #2022-105-01): Cultural Resource Technical Report Peer Review, dated September 12, 2022.

All fossils recovered that may be of importance to California paleontology will be cleaned, analyzed, and described within a final project Monitoring Report. All collected materials will be offered to the Natural History Museum of Los Angeles County (NHMLAC) to be curated at the end of the project. If the NHMLAC decides that the recovered fossils are worthy of curation, then a Curation Plan will be prepared by the paleontological monitor that is reviewed by the Lead Agency prior to the publication of the final Monitoring Report and prior to curation of the fossil materials. The costs of the paleontological Monitoring Report, the Curation Plan, and the processing, analysis, and curation of all fossils will be the responsibility of the permittee.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS.				
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Impact Analysis

Greenhouse gases (GHGs) emitted by human activity are implicated in global climate change. These GHGs contribute to an increase in the temperature of the earth's atmosphere by preventing long wavelength heat radiation in some parts of the infrared spectrum from leaving the atmosphere. For purposes of planning and regulation, Section 15364.5 of the California Code of Regulations (CCR) defines GHGs as including CO₂, CO, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Carbon dioxide is the primary GHG emitted in California, accounting for 84 percent of total GHG emissions in 2015. Because the warming potential of the identified GHGs differ, GHG emissions are typically expressed in terms of CO₂ equivalents (CO₂e), providing a common expression for the combined volume and warming potential of the GHGs generated by a particular emitter. The total GHG emissions from individual sources are generally reported in metric tons (MT) and are expressed as MT of CO₂ (MTCO₂e).

Fossil fuel combustion in the transportation sector (on-road motor vehicles, off-highway mobile sources, and aircraft) is the single largest source of GHG emissions, accounting for approximately half of GHG emissions globally. The transportation sector, primarily on-road travel, is the single largest source of CO₂ emissions in California. Additionally, about 50 percent of the industrial source emissions of CO₂ are from the refinery and oil and gas sectors. When the industrial source emissions from the oil and gas sectors are attributed to the transportation sector, the emissions associated with transportation amount to approximately half of statewide GHG emissions.

A number of regulatory steps have been taken by the state in the past two decades. Most relevant to CEQA impact analysis are:

California Assembly Bill 32 (AB32), the California Global Warming Solutions Act of 2006, provided authorization to the California Air Resources Board (CARB) to develop regulations and market mechanisms to reach the GHG emissions goals established in 2005. Subsequently the first Climate Change Scoping Plan produced by CARB was adopted in December 2008. The 2022 Scoping Plan was finalized in December 2022 and is focused on the goal of obtaining carbon neutrality by 2045 or earlier. GHG emission targets set in the Scoping Plan are implemented in part through regional sustainable communities strategies developed by the metropolitan planning organizations.

Senate Bill 375, the Sustainable Communities and Climate Protection Act, passed in 2008, requires CARB to develop and set regional targets for GHG emission reductions from passenger vehicles. Targets are set regionally for each of the 18 metropolitan planning organization (MPO) regions. Each MPO is required to develop a Sustainable Communities Strategy (SCS) that will reduce GHG emissions to achieve the regional

targets. The SCS is a component to the Regional Transportation Plan (RTP), which regulates transportation financing in each region. The RTP and SCS must complement each other and accommodate the Regional Housing Needs Allocation (RHNA). The bill modified the RHNA requirements to align with production of the RTP/SCS. The purpose of this coordination is for each MPO to arrive at a mix of transportation and land use strategies that will direct the region's growth in such a way that emissions from car trips meet the GHG reduction targets.

SCAG is the MPO for the County of Los Angeles (along with the Counties of Imperial, San Bernardino, Riverside, Orange, and Ventura). The 2024-2050 RTP/SCS (aka 2024 Connect SoCal) is the current regional plan for integrating the transportation network and related strategies with an overall land use pattern to accommodate projected growth, housing needs, and transportation demands. On August 6, 2025 CARB announced they had determined the 2024 SCS, the component which fulfills SB 375's mandate, would, if implemented, achieve the 2035 GHG emission reduction target of 19 percent below 2005 per capita emissions.¹³ This target, which was set by CARB in 2018, will remain in place until 2026, and therefore is shared by both the 2020-2045 and 2024-2050 RTP/SCS documents. The City produced a Climate Action Plan in 2012, however, it was only certified through to the year 2020.

a. Less than Significant Impact. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Because individual projects do not generate sufficient GHG emissions that would substantially affect climate change; the issue of climate change typically involves an analysis of whether a project's contribution toward an impact is cumulatively considerable. As defined by the CEQA Guidelines Section 15355, "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects.

The CEQA Guidelines Section 15064.4(a) states that a lead agency shall have discretion to determine, in the context of a particular project, whether to:

- 1) Quantify greenhouse gas emissions resulting from a project; and/or
- 2) Rely on a qualitative analysis or performance based standards.

Additionally, the Section 15064.4(b) states that "In determining the significance of a project's greenhouse gas emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change," and that the following factors should be considered:

- 1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.
- 2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- 3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions (see, e.g., section 15183.5(b)).

CEQA Guidelines Section 15064.4 does not establish a threshold of significance for GHG emissions. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public

¹³ CARB, Evaluation of SCAG 2024 SCS, Executed August 6, 2025.

agencies or suggested by other experts (see CEQA Guidelines Section 15064.7(c)). Pursuant to CEQA Guidelines Section 15064.7(b), “Thresholds of significance to be adopted for general use as part of the lead agency’s environmental review process must be adopted by ordinance, resolution, rule, or regulation, and developed through a public review process and be supported by substantial evidence.” Neither the City nor the SCAQMD have adopted a numeric threshold for the analysis of GHG impacts. In the absence of any applicable adopted numeric threshold, the significance of the Project’s GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(3) by considering the “extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions (see, e.g., section 15183.5(b)).” Section 15183.5(b) lists what elements a plan must contain in order to be used for the purposes of cumulative impacts analysis. Currently there is no state, regional, or local plan applicable to the project that meets all of the criteria. However, of the various policy and regulatory documents available, SCAG’s 2024-2050 RTP/SCS most closely fulfills the necessary criteria.

Project GHG Emissions

Although there is no bright-line numeric threshold for determining the potential significance of GHG emissions that would be applicable to the proposed project, pursuant to CEQA Guidelines Section 15064.4(a), which states that “A lead agency shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of GHG emissions resulting from a project,” the project’s estimated annual GHG emissions were calculated using the same CalEEMod model used to determine the project’s criteria air pollutant emissions and are found in the AQ/GHG Report attached as Appendix A. Consistent with SCAQMD recommendations, construction emissions were amortized over a thirty-year period and added to the annual operational emissions to determine the proposed project’s annual GHG emissions.

Construction

Construction GHG emissions would come from off-road equipment usage, hauling vehicles, delivery, and worker trips to and from the site. The total GHG construction emissions during 2025 and 2026 calculated by CalEEMod would be 1,097 metric tons of carbon dioxide equivalent (MT CO₂e). As GHG emissions impact from construction activities would occur over a relatively short time span, it would contribute a relatively small portion of the lifetime GHG emission impact of the project. The total construction GHG emissions were divided by 30 years to determine an annual construction emission rate to be amortized over the project’s first 30 years of operations, consistent with SCAQMD recommendations. Amortized over a 30-year period, the project is anticipated to emit approximately 36.6 metric tons of carbon dioxide per year (MT CO₂e/year).

Operations

The project would incorporate several design features to reduce GHG emissions and be consistent with local and regional regulations and policies that would reduce GHG emissions during operation of the project. The project’s primary GHG reduction measures and design features include, but are not limited to, the following:

- **Low-Flow Water Fixtures:** The project will include low-flow and/or high efficiency water fixtures such as low-flow toilets, urinals, faucets, and high-efficiency dishwashers;
- **Vegetation & Landscape Irrigation Systems:** The project will include drought-tolerant landscaping and will implement efficient landscape irrigation techniques, such as “smart” irrigation technology, to reduce water use and its associated GHG emissions. “Smart” irrigation systems rely on weather, climate and soil moisture information to adjust watering frequency, hence maintaining the vegetation is adequately moist while conserving water;

- **Energy Reduction:** The project will include energy efficient appliances, high-efficiency lighting, and solar panels. The project will be built to meet and exceed the State's Green Building Standards (CALGreen Code); and,
- **Alternative Fuel Vehicles:** The project would provide on-site electric vehicle (EV) parking spaces, supporting and promoting the use of electric vehicles.

The operations of the Project would generate GHG emissions from the usage of on-road motor vehicles, electricity, natural gas, water, and generation of solid waste and wastewater. The total operational emissions plus the annualized construction emissions from the project as estimated by CalEEMod are shown in **Table VIII-1, Operational Greenhouse Gas Emissions**.

Table VIII-1
Operational Greenhouse Gas Emissions

Source	MTCO ₂ e
Amortized Construction	36.6
Area Sources	4.84
Energy Utilization	652
Mobile Source	1,532
Solid Waste Generation	65.7
Water Consumption	34.2
Water Consumption	12.8
Total	2,338.14
Source: AQ/GHG Report, Appendix A	

As shown in Table VIII-1, with the addition of amortized construction emissions, the project's total annual GHG emissions were estimated to be approximately 2,338.14 MTCO₂e. Because there are no established thresholds to compare the project to, this quantified illustration of the project's scope of GHG emissions is provided for informational purposes and the project's potential impacts will primarily be evaluated qualitatively in Section VIII.b below based on CEQA Guidelines Section 15064.4(b)(3).

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Consistency with the 2024-2050 RTP/SCS

As explained previously, SCAG is the MPO for Los Angeles County, and the SCAG RTP/SCS is the document that outlines the land use and transportation strategies necessary for the SCAG region to meet GHG emission reduction targets set by CARB in the 2022 Scoping Plan. Consistency with the RTP/SCS, in particular the SCS component, would therefore demonstrate consistency with the Scoping Plan and thus a lack of significant impacts.

The land use strategies of the 2024-2050 RTP/SCS consists essentially of identifying Priority Development Areas as places where an increase in population density, job density, or public transportation, or a combination thereof, would serve to reduce VMT and thus reduce GHG emissions. Areas not within a PDA are assumed by the plan to be developed according to their existing land use designation. Therefore, for a development project outside of a PDA conformance amounts to simply aligning with the land use designation in place at the time the SCS was drafted.

The project is not within a PDA¹⁴ and is therefore assumed within the SCS to be developed (in terms of intensity of use) according to its current land use designation. Therefore, because the proposed intensity of use is not greater than what is assumed by the 2024-2050 RTP/SCS, the project does not conflict with it, nor by extension with the CARB Scoping Plan, and potential GHG emissions-related impacts that might arise from conflict with such plans, policies, or regulations would be less than significant.

The AQ/GHG Report also provides a broader project consistency discussion regarding the enumerated actions and strategies of the 2020-2045 RTP/SCS, which can be found in Table 12 of Appendix A.

Consistency with the 2022 Scoping Plan

According to the AQ/GHG Report the project would be consistent with Appendix D (Local Actions) of the 2022 Scoping Plan which encourages local governments to adopt a CEQA-qualified CAP addressing three priority areas, transportation electrification, VMT reduction, and building decarbonization. As the project VMT Analysis (Appendix I) concludes project VMT impacts would be less than significant, the project will provide on-site EV parking spaces, and the project will be built to meet CalGreen Code standards, the project is generally consistent with the three priority areas identified in the Scoping Plan.

Mitigation Measures: No mitigation measures are required.

¹⁴ SCAG, 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy, Map 3.4; and SCAG Regional Data Platform, Growth Prioritization Scale at TAZ-level -SCAG Region Feature Layer, Updated November 12, 2024.

IX. HAZARDS AND HAZARDOUS MATERIALS.

Would the project:

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. 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?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site that 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?	☐	☐	☐	☒
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

Impact Analysis

a. Less than Significant Impact. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

The proposed uses are not of the type that would routinely transport, use, or dispose of hazardous materials. During operations standard cleansers and the like used for housekeeping and maintenance purposes will be used by staff, tenants, and residents. Some of these products in very large quantities may be considered hazardous on a technical basis (for example, chlorine bleach), but their use and storage will be commensurate with the need, and dangerous quantities will not be necessary for operation of any of the project components. Therefore, operation of the project components would not create a significant hazard

to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

During construction, equipment will use diesel fuel and potentially machine lubricants or oil, however, use and care of all diesel worksite equipment is regulated by provisions within Title 8 of the California Code of Regulations, known as the Cal/OSHA Title 8 regulations. Compliance with these regulations will ensure proper use of worksite fuels and chemicals, which will only be in use during the construction period. If a worksite accident should occur, involving the release of hazardous materials, the project would be required to report it to the Los Angeles County Fire Department Health Hazardous Materials division, which would determine the proper response. In addition, prior to construction the project must prepare a stormwater pollution prevention plan that demonstrates which BMPs or series of BMPs will be used during construction to prevent construction-related discharges from leaving the project site. These would ensure if there was any accidental spill of hazardous materials they would be contained on site for proper collection and removal. As such, construction of the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. 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?

As explained above operation of the project would not involve the use of large quantities of hazardous materials that could potentially be released into the environment. During construction hazardous materials such as diesel fuel would be present but adherence to regulatory handling requirements would ensure potential impacts from upset or accident conditions would be less than significant. The only other manner significant amounts of hazardous materials could be released into the environment from project upset or accident conditions is if there were hazardous materials on site encountered during construction activities.

California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized release from underground storage tanks, contaminated drinking water wells, and solid waste facilities, and submit such information to the Secretary for Environmental Protection on at least an annual basis, and the project site has been compared to these lists. The search of the California Environmental Protection Agency's Cortese List Data Resources databases show that the project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.¹⁵

The search involved the following records:

- List of Hazardous Waste and Substances sites from Department of Toxic Substances Control (DTSC) EnviroStor database.
- List of Leaking Underground Storage Tank Sites from the State Water Board's GeoTracker database.
- List of solid waste disposal sites identified by Water Board with waste constituents above hazardous waste levels outside the waste management unit.
- List of "active" CDO and CAO from Water Board.
- List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by DTSC.

¹⁵ California Environmental Protection Agency, Cortese List Data Resources, available at: <https://calepa.ca.gov/sitecleanup/corteselist/>.

The project site is not included on any list compiled pursuant to Government Code Section 65962.5, and is not within 1,000 feet of any such site. Because the site was only previously developed with a single family house it would be unlikely for there to be any significant unknown hazards associated with that previous development. The house was constructed in 1966 according to assessor records, so there is the possibility that hazardous materials could have been used in its construction, such as asbestos. This potential is addressed by SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities), which requires an asbestos survey prior to demolition. The investigation must be performed by a Certified Asbestos Consultant (CAC). If the CAC finds that asbestos-containing material is present a cleanup plan must be prepared by the CAC and a registered asbestos abatement contractor must be hired to clean up the material. These procedures must be performed to the satisfaction of the Building Official and submitted to the AQMD electronically using the Rule 1403 Notification Web Application.¹⁶

Lead paint could also be present and this potential is addressed by Cal/OSHA workplace safety standards. The Lead in Construction Standard (SB 460) requires employers to protect workers at job sites from lead exposure, which avoids environmental exposure, and because of the age of the building it would be presumed to contain lead-based paint. Therefore, provisions in Title 17 of the California Code of Regulations, Division 1, Chapter 8, Accreditation, Certification, and Work Practices for Lead-Based Paint and Lead Hazards apply, including Section 36050, Lead-Safe Work Practices, which requires containment of lead during activities. These requirements which protect workers from exposure also ensures there is no release of lead paint into the environment.

The project site also has an abandoned oil well located within its boundaries (API: 0403713340, Stabler Well #4), which appears to be owned by the Mobil Oil Corporation. The California Department of Conservation's Geological Energy Management Division (CalGEM) mapping application states the well is a "Dry Hole".¹⁷ Historic records from CalGEM indicate the well was drilled between 1919 and 1920 as an exploratory wildcat well to a depth of 3,514 feet.¹⁸ Signs of oil and gas were encountered but no "commercial showing of oil or gas," meaning there were no signs of hydrocarbons in enough quantity to allow for extraction. Specifically, showings of oil and gas were encountered in places between 735 and 3,497 feet but were so slight as to be "negligible."¹⁹ According to records the well was plugged by removing the casing and placing cement plugs at six different intervals within the hole.

The closure of an oil well is referred to as an abandonment, and the procedures and requirements for proper abandonment of an oil well are detailed in the CCR, Title 14, Section 1723, Plugging and Abandonment - General Requirements.²⁰ Modern abandonment requirements differ from the requirements in place at the time the Stabler Well was plugged, but that does not necessarily mean the historic plugging and abandonment is inadequate. Section 117.5 of the Santa Clarita Municipal Code requires development to investigate the status of an abandoned oil well and prepare a report to be reviewed by the Building Official prior to development within 200 feet of an abandoned oil well. This investigation may determine that the well requires re-abandonment according to current standards, or it may require merely adjusting the height of the existing well plug as state law requires the top of an abandoned well plug to be located between five and ten feet below ground, and the existing grade of the site will be modified by the project. In either case, well abandonment is a heavily regulated, routine procedure that is undertaken through permitting procedures established at the local and state level, overseen by CalGEM regional offices. Abandonment of a well is a project subject to CEQA review but is usually categorically exempt except when activities related

¹⁶ SCAQMD Advisory Notice, Important Notice to all Facility Owners and Contractors Performing Renovations or Demolitions Re: Asbestos, March 27, 2019

¹⁷ California Department of Conservation, Well Finder CalGEM GIS; accessed on December 20, 2025 at: <https://maps.conservation.ca.gov/doggr/wellfinder/>

¹⁸ CalGEM Well Record: 03713340_DATA_11-14-07. Available from: <https://filerequest.conservation.ca.gov/WellRecord>

¹⁹ Ibid. Page 13 of the PDF, Report on Proposed Operations, dated September 7, 1920.

²⁰ Cal. Code Regs, Title 14, Division 2, Chapter 4, Subchapter 1, Article 3, Section 1723- 1723.9.

with the work may result in impacts, such as grading within native vegetation or culturally sensitive areas in order to reach the well.²¹ For example, the City recently found the abandonment of six idle wells located within the Needham Ranch Open Space to be categorically exempt under the Class 1 and Class 4 exemptions.²²

This IS/MND analyzes all of the grading that will take place on site, including in the location of the well, and mitigates impacts where necessary. Therefore, should a permit for well abandonment be necessary all impacts related to grading will already have been analyzed in this document which should allow, subject to review at the time of permitting, for the permit to be found categorically exempt or to “tier” off the analysis of this IS/MND. However, because a permit for well closure may be required for the project the process of abandonment is discussed fully here.

As detailed in CCR Title 14, section 1723, a well is plugged by placing cement in the wellbore or casing at certain intervals to isolate the hydrocarbon-bearing rock from water sources. Plugging and abandonment of a well requires permitting, review, and inspection by CalGEM to ensure standards are met. The specifics necessary for proper abandonment of the well, if required, would be detailed during the standard CalGEM permitting process; there is no need to produce those future plans for the purposes of this CEQA review. CalGEM is the regulatory authority for technical compliance of the work, and permits will not be granted, and abandonment not accepted, without full compliance of the law. The general process of well plug and abandonment consists of:²³

1. The well site is inspected and prepared for plugging. Inspections may include, but are not limited to, assessments to ensure safe site conditions, verification of soil stability, testing for methane emissions, and identification and repair of well integrity issues. If the wells cannot be reached by existing roads, access roads must be graded to provide access for equipment.
2. Obstructions such as old tubes or other debris are removed from the well bore, and if there is a casing (the pipe inserted into the hole) it may be removed as well, if deemed appropriate. Residual pressure present in the well would be cleared prior to the work to ensure no material was ejected.
3. Cement plugs will be placed depending on the character of the bore hole or casing, if present, in order to isolate oil and/or water zones. To place the plug, cement is pumped into the wellbore at the required depth intervals. For example, in an uncased hole, cement would be placed to extend from the bottom of the hole to at least 100 feet above the top of each zone. CalGEM would witness the placement of the plug and sign off on acceptance of it.
4. A minimum of 25 feet of cement would be left in the top of the well. A gas test would be conducted and a steel plate welded on the top of the casing.

Because the well was considered “dry” there is a low likelihood of substantial amounts of oil present, but should oil or other fluids be present they would be collected by a vacuum truck and removed from the site. OSHA regulations, in particular Title 8, Section 5192, Hazardous Waste Operations and Emergency Response, will require a site-specific Health and Safety Plan to ensure the safety of the procedures. This includes a hazards assessment prior to commencing the work, preparation of a project-specific emergency response plan and spill containment plan, conducting emergency response and safety training prior to implementation, and notification to the appropriate agencies in case of a spill. This would include the LACoFD in their capacity as the Certified Unified Program Agency.

²¹ Example NOEs available at <https://ceqanet.lci.ca.gov>, SCH Nos. 2018098455, 2018108047, 2024120428, 2024120301, 2025060084, 2025110270.

²² Santa Clarita NOE, Needham Ranch Open Space Oil Wells Plugging and Abandonment Project, October 28, 2025

²³ Adapted from US EPA Well Plugging: <https://www.epa.gov/natural-gas-star-program/well-plugging>, and; US Department of the Interior, Orphaned Oil and Gas Wells 101: <https://storymaps.arcgis.com/stories/92cf4a914be240bb9d72b2351b8d9960>, Accessed December 6, 2024

Adherence to the strict regulatory requirements regarding the closure of oil wells, the proper handling and disposal of asbestos and lead paint, and other regulatory measures concerning workplace safety and the handling of hazardous materials during construction would ensure the potential for the project to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions would be minimal, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact. 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?

Golden Valley High School is less than one-quarter mile west of the project site. As explained in IX.a-b above the project will not employ the use, storage, or transport of any substantial quantities of hazardous materials, as the proposed uses- hotel, assisted-living facility, and residential condominiums- do not utilize such materials in their operation. Construction activities would involve the use of hazardous materials such as fuel and paints, but emissions associated with these activities would be temporary and not in the concentrations or quantities necessary to constitute hazardous emissions. Emissions related to construction, including TACs, are discussed in Section III, and the project would not exceed any relevant thresholds. Therefore, impacts associated with emitting hazardous emissions or substances within one-quarter mile of an existing or proposed school would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. No Impact. Would the project be located on a site that 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?

As explained in IX.b the site is not associated with nor within 1,000 feet of a site listed in the Cortese database resources. Therefore, the project would not result in the creation of a significant hazard to the public or the environment as a result of previous uses being included in lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5. No impact would occur.

Mitigation Measures: No mitigation measures are required.

e. No Impact. 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?

The nearest airport to the project site is Whiteman Airport in the community of Pacoima located approximately 10.5 linear miles southeast, and the project site is not located within the Airport Influence Area of Whiteman Airport.²⁴ Therefore, there would be no impacts in regard to airport proximity.

Mitigation Measures: No mitigation measures are required.

f. Less than Significant Impact. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

²⁴ County of Los Angeles, Airport Land Use Commission, Airports and Airport Influence Areas, August 18, 2018.

The City does not have an adopted emergency evacuation plan but does have various documents that concern emergency response including the 2022 General Plan Safety Element, the 2021 Local Hazard Mitigation Plan, the 2018 Inclement Weather Preparedness Plan, and the Emergency Operations Plan (EOP). The 2023 LA County Operational Area Emergency Operations Plan (OAEOP) would also be relevant as the City contracts with the LA County Fire Department (LACoFD) and Sheriff's Department (LASD) for fire protection and police services. Of these documents the EOP and QAEOP would be considered the adopted emergency response plans.

The Safety Element describes hazards that may affect existing and future residents and provides guidelines for protecting public health and safety. The Element details certain policies and programs in place that concern public safety, such as development standards which require sufficient peak water supply, road widths, structure clearance, and seismic design codes as conditions of development; the City's relationship with the LACoFD and LASD; fire prevention activities headed by the County Fire Marshall, including the preparation of codes, ordinances, and standards, plan checking for fire safety, sprinkler systems and fire alarms, fire inspections of structures, brush clearance compliance programs, etc.; hazardous material risks and response framework. Goals, Objectives, and Policies in Part 2 of the Safety Element are directives for the City itself to take and are not directly applicable to a development project. The proposed project would not interfere with any of the goals, objectives, or policies as each represents standards the City applies to development and as a matter of regulatory compliance the project is required to meet every safety standard promulgated by the City primarily through the municipal code.

The Hazard Plan outlines mitigation goals and actions to facilitate emergency evacuation proceedings, focusing on coordination with the LACoFD and LASD to enhance outreach activities and information dissemination, and to maximize the utility of the Public Alert and Warning Notification System, incorporating texting and social media into notification procedures. The goals and policies of the Hazard Plan are directed at City departments and are not directly applicable at the project level, and the project would not interfere with implementation of any of the plan's action items.

The Inclement Weather Preparedness Plan was prepared to review the City's inclement and emergency weather procedures and list proactive preparation methods to reduce potential impacts throughout the City. Particular areas of the City are identified as vulnerable locations where flooding or debris flows may be an ongoing concern. The project site is not within a vulnerable area.²⁵ The Plan lists Standard Practices and Procedures the City undertakes to maintain stormwater control and erosion, protect open space, maintain City landscaping to avoid hazards, ensure construction sites are secured during weather events, and other standard practices that address in part maintaining safety during excessive weather. The Plan also details the emergency protocols for possible flooding and mud/debris flow events. The Plan is a coordination effort that consolidates City practices, procedures, and standards concerned with stormwater hazards and is not directly applicable to a development project. The standards and practices that concern the construction and operation of development are all established with the municipal code and as a matter of regulatory compliance the project would be required to abide by all applicable measures. As such the project would not interfere with the Plan.

The City's EOP was prepared to ensure the effective allocation of resources for the protection of the population in an emergency.²⁶ The EOP was developed in accordance with the state's Standardized Emergency Management System (SEMS) and the federal National Incident Management System (NIMS). SEMS and NIMS are based on the Incident Command System and the Multiple Agency Coordination System, both of which are used by first responders and emergency managers throughout the state and the nation at-large. The City OEP therefore is designed to coordinate with the 2023 LA County OAEOP which

²⁵ City of Santa Clarita, Inclement Weather Preparedness Plan, Page 5 graphic.

²⁶ City of Santa Clarita, Safety Element, Part 1, H. Emergency Preparedness and Response, 2022

is also based upon the SEMS and NIMS systems. The EOP and the OAEOP both clarify each element of the emergency management organization and their responsibilities in the maintenance of appropriate and current Standard Operating Procedures resource lists and checklists that detail how assigned responsibilities are performed to support implementation of the plans to ensure an effective response during a major disaster. Broadly, the plans organize emergency response into four phases, Preparedness, Mitigation, Response, and Recovery, and then delineates the organization, framework, and command hierarchy for the City and County's responses to major disasters. By utilizing the same hierarchical framework and protocols agencies and jurisdictions are able to coordinate effectively with one another during emergency response. The LACoFD and the LASD both maintain their own versions of an EOP, as do all of the agencies with which the County has mutual and automatic aid agreements in place including the Angeles National Forest, Kern County, Ventura County, and Los Angeles City Fire Departments and law enforcement services. Because the OEP and OAEOP are organizational documents that direct operations of resources during an emergency, the proposed project would not impair implementation of the plan and have no impact upon it.

Basic evacuation routes are identified in the Safety Element as Interstate 5, State Route 14, and State Route 126 going west. The County identifies Interstate 5 and State Route 14 as evacuation routes as well.²⁷ No activities occurring on the site, either during construction or operation, would directly impact these routes. During construction the mix of construction vehicles will arrive and depart at different intervals and would not be great enough in numbers to cause substantial impairment of the routes. Evacuations are accommodated on a dynamic basis at the time of an emergency. In the area in and around the project site evacuation proceedings would be directed by either the LACoFD or the LA County Sheriff's Department Emergency Operations Bureau who are tasked with announcing and managing evacuations consistent with the OAEOP and SEMS in coordination with the LACoFD. In whichever case, each entity would operate according to the ICS and SEMS the purposes of which are to provide multi-agency or inter-agency coordination during emergencies. Evacuation warnings and orders may be made in a phased manner according to vulnerability, location, or other factors, which would enable traffic surges on roadways to be minimized over time allowing for a more an orderly flow of vehicles exiting an evacuation area. Once a warning or order is issued, it is important to note that the timely evacuation of residential properties depends upon timely cooperation from the individuals under evacuation orders.

The project site is accessed from Golden Valley Road, which is a large five to nine-lane arterial, and Sierra Highway is a four to six-lane arterial in the vicinity of the project site. These roads would likely be used by residents of the City during evacuation, or for access by emergency vehicles. Both roads are large enough to carry large numbers of vehicles and State Route 14 is approximately .75 miles southeast from the project site connecting from Golden Valley Road, and 1.3 miles south connecting from Sierra Highway. Construction of the project would not interfere with emergency use of these roads as construction traffic will be intermittent, and all construction activity will be contained onsite. During operations the project would place more people onto these roads if evacuation was necessary, however, during the development review process emergency access is evaluated for all projects. The Department of Public Works and the Los Angeles County Fire Department both review projects for adequate road and driveway widths which are required to provide access to fire trucks, along with turnouts and turnaround areas where deemed necessary. Review from the City and relevant County departments would ensure the project does not interfere with emergency response parameters, therefore, neither the project construction nor operations would physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

g. Less than Significant Impact. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

²⁷ Los Angeles County, General Plan 2035, Safety Element, Figure 12.9: Evacuation Routes Map, August 2021.

The project site is located within a Very High Fire Hazard Severity Zone (VHFHSZ) so there is a risk of wildfire within unmaintained open spaces near the project site. However, the areas developed by the project will be far less susceptible to conflagration than under existing site conditions as structures will be surrounded by irrigated landscaping and hardscape, including access roads, vegetation will be maintained according to wildland fuel modification requirements, and structures will be fire hardened, equipped with fire sprinklers, and designed to provide adequate access for emergency response activities.

Because the project site is within a VHFHSZ buildings will be required to conform to Title 24, Part 7, the California Wildland-Urban Interface Code (CWUIC), which details project site access, water supply, and fire protection plan requirements; minimum standards for the location, design and construction of buildings and structures within a VHFHSZ; and defensible space requirements. The structures specifically will have class-A roof assemblies, which offer the highest resistance to fire, ignition-resistant cladding, non-combustible exterior doors and windows, and ember-proof exterior venting, which create a very fire-resistant exterior shell. The project will also be required to conform to Title 24, Part 9, the California Fire Code (CFC). Chapter 7 of the CFC regulates materials, systems and assemblies used for structural fire resistance and fire-resistant separation of adjacent spaces to safeguard against the spread of fire and smoke within a building, and the spread of fire to or from buildings. The chapter details requirements for structural members, walls, partitions, and horizontal assemblies. Chapter 9 specifies internal fire protection systems for building and occupancy types, and all project structures will be equipped with fire sprinklers. The combination of these requirements will result in structures designed to be very resistant to exterior fire and impervious to the intrusion of wind-borne embers, and designed to contain the spread of, and extinguish, a structural fire.

Surrounding landscaping will be irrigated which will significantly reduce combustibility and provide a buffer from wildfire burning in untended open space. Landscaping will also be required to conform to fuel modification requirements enforced by the Los Angeles County Fire Department (LACoFD) wherein landscaping is limited with the first 30 feet, all landscaping is irrigated within 100 feet, and all vegetation within 100 to 200 feet is maintained for fuel reduction purposes. Fire code standards include access roads which allow all structures to be reached by firefighters and adequate space to maneuver equipment, and fire hydrant, standpipe, and water-pressure standards to ensure adequate water on site for firefighting. During construction the project will observe the requirements of Chapter 33 of the CFC which outlines general fire safety precautions for all construction operations. The requirements seek to maintain required levels of fire protection, limit fire spread, establish the appropriate operation of equipment and promote prompt response to fire emergencies. This combination of requirements, which are expanded upon in Section XX below, which will be reviewed and approved by the LACoFD for adequacy, will substantially reduce the wildfire risk faced by the project, and the project's risk of structural fires resulting from nearby wildfire to the extent that risk of loss, injury or death involving wildland fires is reduced to less than significance.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY.				
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. 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:				
i. Result in substantial on- or offsite erosion or siltation;	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offside;	☐	☐	☒	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. Impede or redirect flood flows?	☐	☐	☒	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Impact Analysis

This analysis is based upon the Hydrology Report for the project dated October 29, 2024, and prepared by Land Design Consultants, Inc., provided in **Appendix F**.

a. Less than Significant Impact. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

As previously mentioned, Santa Clarita is a party to the Los Angeles County MS4 permit requirements issued by the LARWQCB in accordance with the County's NPDES permit, CAS004004. The permit requires control of post-construction related stormwater and non-stormwater discharges.

Prior to construction the project must prepare a SWPPP that demonstrates which BMPs or series of BMPs will be used during construction to prevent construction-related discharges from leaving the project site and minimize sediment transport and erosion. These requirements ensure compliance with the NPDES General Construction Storm Water Permit requirements (WQ 2009-0009-DWQ) which apply throughout the state, as implemented by LARWQCB Order No. 01-182. This serves to address potential discharges or leaks from construction equipment, and erosion and siltation created by earthmoving activities. These requirements are embedded in Chapter 17.90 of the Santa Clarita Municipal Code and the SWPPP will be reviewed and approved by the City prior to approval for any ground disturbance activities permits. Should grading not be completed before November 1st of a given year a Wet Weather Erosion Control Plan (WWECP) will be required which specifically addresses stormwater controls necessary during the rainy season.

Operationally, the project must incorporate low impact development (LID) strategies in its design so that stormwater runoff generated by the project is retained on site per Chapter 17.85 of the Municipal Code. The project must retain the amount of runoff generated during a 0.75 inch 24-hour storm event, or an 85th percentile 24-hour storm event, whichever is greater. Stormwater can be retained through infiltration, evapotranspiration, bioretention and/or rainfall harvest and use. For this project, the Hydrology Report states the site intersects with three major drainage basins and five minor basins. Post development one drainage area, minor basin No. 8, will remain unmodified, the remaining basins will be modified and consolidated into six drainage basins, with major basin No. 1 expanding in size and the rest diminishing in size. All of the basins will drain to existing facilities, though the expansion of basin No. 1 requires construction of a large detention basin. The basic pre- and post-development drainage modifications are delineated in **Table X-1, Project Site Hydrology Modifications**. The table shows the area comprised of the existing drainage basins, the area of the modified basins and the area they drain, and the stormwater facilities for each basin. Minor basins 6 and 7, which currently drain to existing storm drain facilities, will be consolidated completely. All of the new drainage areas will flow to existing inlets, with major basins 1 and 2 existing to the existing natural canyon on site before traveling to an existing stormwater inlet.

Table X-1
Project Site Hydrology Modifications

Drainage Basin	Existing Acres	Post Development Acres/Area	Post Development Stormwater Control
Major Basin 1	16.68 ac	26.32 ac – Assisted living, western condo area, and surrounding slopes	Storm drain system with underground detention facility with outlet to natural canyon and existing offsite inlet.
Major Basin 2	11.10 ac	4.48 ac – Eastern condo area	Storm drain system with outlet to natural canyon and existing offsite inlet.
Major Basin 3	5.35 ac	3.55 ac – Hotel and surrounding slopes	Storm drain system leading to realigned existing inlet.
Minor 4	0.58 ac	0.46 ac – “A” Street cul de sac	Slope drain leading to existing inlet.
Minor 5	0.45 ac	0.19 ac - “A” Street cul de sac	Slope drain leading to existing inlet.
Minor 6	0.42 ac	N/A, part of Major Basin 3	Major Basin 3 controls.
Minor 7	0.44 ac	N/A, part of Major Basin 2	Major Basin 2 controls.
Minor 8	0.63 ac	0.63 ac – Existing canyon	No modification, drains through canyon to existing inlet.
Source: Hydrology Report, Appendix F.			

The Hydrology Report demonstrates that post-development runoff flow rates and flow velocities would not be greater than under existing conditions and therefore would not result in an increase in downstream erosion. Flows directed to the existing canyon do not exceed current flows and the project therefore would not result in an increase in erosion in the remaining natural areas. Compliance with LID requirements,

which are reviewed and approved prior to permitting, will ensure any runoff from development areas will be retained on site as needed, and properly treated prior to existing the site, maintaining the quality of water that flows into the canyon and existing storm drain inlets.

Compliance with construction permitting requirements, adherence to the designs of the Hydrology Report, and compliance with operational LID requirements would reduce potential impacts related to the violation of water quality standards or waste discharge requirements or the degradation of surface or ground water quality to less than significant levels.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. Would the project substantially decrease groundwater supplies or interfere with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

The project site is located within the Santa Clara River Valley East Groundwater Subbasin and water falling on the site would contribute some amount of recharge to the basin. Infiltration on the site will be modified by the addition of impervious surfaces, but the total amount of water allowed to infiltrate within the site boundaries will not be substantially different from current conditions as the project must retain the amount of runoff generated during a 0.75 inch 24-hour storm event, or an 85th percentile 24-hour storm event, whichever is greater, meaning for the majority of rain events all stormwater falling on new impermeable surfaces will remain on site. The proposed detention basin, which captures runoff from over 26 acres of newly developed area, will allow infiltration as well as slowly releasing water to the existing canyon. Existing and new permeable areas (landscaping, “natural” areas) will allow water to infiltrate during rain events, and newly irrigated areas will contribute to onsite infiltration during summer months. Although the project adds large amounts of impermeable surfaces to the project site, infiltration on site would not substantially decrease post-development, and the project would not significantly interfere with groundwater recharge, therefore, project impacts to sustainable groundwater management would be less than significant.

In addition, the project will not directly draw water from the subbasin, and as discussed in Section XIX.b the project falls within the anticipated growth rates of the Santa Clarita Valley Water Agency and within the City’s projected water availability estimates. Because project demand is factored into the City’s water planning, water use of the project would not substantially decrease groundwater supplies or impede sustainable groundwater management, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c.i. Less than Significant Impact. 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 on- or offsite erosion or siltation?

As discussed in Section X.a, the project will add impervious surfaces and alter the existing drainage patterns on site. However, the Hydrology Report demonstrates that post-development runoff flow rates and flow velocities would not be greater than under existing conditions and therefore would not result in an increase in downstream erosion. In addition, flows directed to the existing canyon do not exceed current flows or velocities and the project therefore would not result in an increase in erosion in the remaining natural areas. Therefore, the project would not substantially increase the rate or amount of surface runoff in a manner which would result in substantial on- or offsite erosion or siltation and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c.ii. Less than Significant Impact. 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 offsite?

As discussed, the Hydrology Report demonstrates that post-development runoff flow rates would not be greater than under existing conditions and therefore would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite. Flows would be distributed to existing storm drain facilities or to the canyon (which flows to a storm drain) which are adequate for existing flows. Because the project will not increase these flows, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c.iii. Less than Significant Impact. 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 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?

As discussed, the Hydrology Report demonstrates that post-development runoff flow rates would not be greater than under existing conditions and therefore would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite. Flows would be distributed to existing storm drain facilities or to the canyon (which flows to a storm drain) which are adequate for existing flows. Conformance to LID requirements would ensure that water released into storm drains would not violate the requirements of the County's NPDES permit which ensures that runoff from new development within the MS4 permit area does not contribute to an increase in stormwater pollution within the watershed. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c.iv. Less than Significant Impact. 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?

The project site is located within a Federal Emergency Management Agency (FEMA) flood zone designation of "Zone X, Area of Minimal Flood Hazard".²⁸ This is an area that is determined to be outside of the 0.2-percent-annual-chance floodplain, aka the 500-year flood zone (1 in 500 annual chance of flooding). This is the lowest risk mapped flood area. As the risk of flooding is exceptionally low, and post-development flow rates do not exist existing flow rates, the project would not significantly impede or redirect flood flows and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. No Impact. Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

The project is not within a flood hazard zone, not near a coastline, and is not within a seiche zone, which is an area at risk of inundation if a water containment facility failed in some manner. As such, the project

²⁸ FEMA, National Flood Hazard Layer FIRM panel 06037C0840G, June 2, 2021 effective date.

would have no impact pertaining to the risk of release of pollutants due to location in flood hazard, tsunami, or seiche zones.

Mitigation Measures: No mitigation measures are required.

e. Less than Significant Impact. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The project is required to produce a SWPPP, and these construction BMP requirements are applied to all projects of one acre or more within the jurisdiction of the LARWQCB through the CGP. Abiding to the requirements of the CGP, via permits reviewed and issued by the County, is in effect a determination a project will not conflict nor obstruct implementation of a water quality control plan because the purpose of the CGP is to ensure water quality is not degraded. In other words, the permitting requirements are designed to ensure construction activities throughout the LARWQCB basin do not result in a degradation of water quality.

MS4 permit requirements, implemented by the City for compliance with the NPDES, constitute the implementation of water quality control measures for the project post-development. In the same manner, compliance with these requirements ensures a development will not conflict with or obstruct implementation of a water quality control plan.

The Santa Clara River Valley East Groundwater Subbasin Groundwater Sustainability Plan (GSP) from the Santa Clarita Valley Groundwater Sustainability Agency is the applicable groundwater management plan for the area. The GSP creates quantitative methods for evaluating the sustainability of the basin, the need and efficacy of monitoring networks, and the projects and management actions needed to implement the plan and achieve sustainability. The GSP is a planning document and does not impose specific requirements on individual projects. The project could conflict with or obstruct implementation of the plan if it significantly impeded recharge or water quality of the basin, or if it required significant amounts of water that could not be accounted for in sustainability planning for the basin. As discussed, post-development infiltration will be similar to that of pre-development conditions, and project water use is accounted for in current growth and water availability estimates. Therefore, project conflicts with water quality control plans or sustainable groundwater management plans would be less than significant.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XI. LAND USE AND PLANNING.				
Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. 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?	☐	☐	☒	☐

Impact Analysis**a. No Impact.** Would the project physically divide an established community?

Development of the project would not physically divide an established community as it is not being placed within or between a cohesive, established, or connected neighborhood. The project site is vacant and the residential subdivisions on either side are not connected in any manner through the project site. Therefore, there would be no impact.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. Would the project 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?

Regionally, the project site is located within the planning area of the SCAG, the federally designated metropolitan planning organization. SCAG is responsible for reviewing regionally significant local plans, projects, and programs for consistency with SCAG's adopted regional plans. The project does not meet the criteria for being regionally significant pursuant to the CEQA Guidelines, Section 15206; therefore, there would be no conflict with any SCAG policy adopted for the purpose of avoiding or mitigating an environmental effect, as explained in Section VIII. The project is also located within the planning area of the SCAQMD AQMP. As evaluated in Section III, Air Quality, the project is consistent with applicable regional plans, and no further analysis is required.

City of Santa Clarita General Plan Land Use Element

The General Plan is a comprehensive, long-range declaration of purposes, policies, and programs to guide development of the City. The Land Use Element is the long-term blueprint for development of property to meet the Santa Clarita Valley's future needs for new housing, retail, office, industrial, parks, open space, and other uses.

The General Plan Land Use Map identifies the project's land use designation as Mixed Use – Neighborhood (MXN). As stated in the General Plan, mixed-use development in the MXN zone will be encouraged to create neighborhoods that integrate residential uses with complementary commercial services. Additionally mixed-use neighborhoods should be designed in consideration of surrounding development patterns, proximity to public transit, providing roadway and trail linkages to adjacent development where appropriate. The residential density range in mixed-use neighborhoods shall be a minimum of six (6) to a

maximum of eighteen (18) dwelling units per acre, and maximum floor area ratio (FAR) for the non-residential portion of the development shall be 0.5. Building heights shall not exceed 50 feet.

The project includes age restricted residential condominiums, a 60-room hotel, and 151-room assisted living facility; a mix of uses which are consistent with the land use designation. The project will conform to the 50-foot height limitation and generally conforms to the MXN zone's density and FAR requirements, as discussed further in the zoning code analysis below. Given the project's consistency with the General Plan vision for the MXN zone, the project would not conflict with the City's General Plan, and impacts would be less than significant.

Santa Clarita Zoning Code and Property Development Standards

The project site is approximately 28 acres, with a 33-percent average cross slope, and located in the MXN zone which is intended for mixed-use development. The MXN zone establishes minimum and maximum density for residential units, and establishes minimum and maximum FAR for non-residential uses. The allowable densities and FAR are further informed by the Hillside Development regulations which establish limitation on densities and FAR, based on the average cross slope of the site.

Accounting for the reduction in allowable density and FAR based on the average cross slope of the project site, the project should provide between 90 and 271 residential units, and the non-residential uses should provide between 131,692 square feet and 329,235 square feet of floor area. The floor area for the hotel and the assisted living facility are attributed toward the non-residential FAR requirement. In sum, those uses provide a total of 148,994 square feet, meeting the required floor area in the zone. The 73 age restricted condominiums fall below the minimum density required in the zone, however, the applicant is seeking a MUP which would allow for the project that does not meet the minimum density required by the MXN zone.

The project's uses include age restricted residential condominiums, a 60-room hotel, and 151-room assisted living facility, which are all contemplated in the MXN zone. The age-restricted condominiums are permitted in the zone. The applicant is seeking approval of an MUP to allow the hotel use in the zone, and a CUP to allow the assisted living facility in the zone.

With approval of the requested entitlements, the project would not conflict with the applicable zoning regulations, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XII. MINERAL RESOURCES.				
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Impact Analysis

a-b. Less than Significant Impact. A significant impact may occur if a project resulted in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State.

According to the Mineral Resources exhibit in the City's Conservation and Open Space Element the project site is not within a mineral resource zone, and appears to be outside of the oil and gas field which is active south of the project site on the other side of Golden Valley Road.²⁹ As explained in IX.b the project site has an abandoned oil well located within its boundaries. The well showed no signs of commercial quantities of oil or gas so it is unlikely it would produce useable quantities in the future as hydrocarbons are generally encased in rock. There is no guarantee this would be the case and it will be at the discretion of the City whether or not to allow any structures to be placed on top of the abandoned well, though typically this is not allowed. Because the precise location of the well requires surveying it will be determined at the time of permitting if a structure is proposed on the well, though typically such a condition is avoided and the well would be located in the place of landscaping or hardscape. If the well coincides with a structure only minor adjustments to the site plan would be necessary to avoid it. In either case, State law dictates that the developer, property owner, and/or local jurisdiction will incur the liability necessary to access the well if for some reason it is necessary to attain access in the future. Regardless, it is unlikely that the well would be capable of providing "future value to the region" or the "residents of the State," within the context of the criteria question, as a single dry well would not be expected to provide hydrocarbons in such quantity or quality as to meet this criteria.

According to the California Department of Conservation Special Report 254, the project site is located within a Mineral Resource Zone (MRZ)-3 which is defined as "Areas containing known or inferred PCC aggregate resources of undetermined mineral resource significance."³⁰ The special report is specifically concerned with Portland Cement Concrete Aggregate Resources. Regarding the MRZ-3 classification the report states: "A large portion of the San Fernando Valley P-C Region is classified as MRZ-3. These areas are underlain by Quaternary and Pleistocene alluvial deposits, Tertiary sedimentary and volcanic deposits, and crystalline basement rock. Little is known about the potential of these rock units for use as PCC aggregate, but pending further evaluation, these deposits could be a potential source of PCC aggregate in the future." The project site, therefore, cannot be said to definitively contain PCC aggregate, but rather the

²⁹ City of Santa Clarita General Plan, Conservation and Open Space Element, Exhibit CO-2 Mineral Resources, June 2011.

³⁰ California Department of Conservation, Special Report 254, Update of the Mineral Land Classification for Portland Cement Concrete Aggregate Resources in the San Fernando Valley and Saugus-Newhall Production-Consumption Regions, 2021.

general soil profile suggests there may be PCC aggregate deposits. However, boring logs from the Geotechnical Report (Appendix E-1) show that bedrock on the site is fairly close to the surface and alluvial deposits, which would contain PCC aggregate, are shallow. Therefore, the site would not be expected to have commercial quantities of oil or gas or PCC aggregate material present, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Potentially Significant Less than Significant Impact	No Impact
XIII. NOISE.				
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Impact Analysis

The following discussion assesses the potential noise impacts of the project and provides a brief description of the key terms and concepts used in the analysis of noise impacts. This analysis is primarily based on the Noise and Vibration Technical Report (Noise Report), prepared by Impact Sciences, which is included as **Appendix G**.

Noise is unwanted sound. Sound is mechanical energy that is transmitted by pressure waves through a compressible medium such as air. The sound pressure level, expressed in decibels (dB), has become the most common descriptor used to characterize the loudness of an ambient sound level. A dB is a logarithmic unit of the ratio of sound pressure to a reference sound pressure level, standardized as 20 micropascals, the threshold of human hearing. Sound or noise can vary in intensity by over one million times within the range of human hearing, so a logarithmic loudness scale similar to the Richter Scale is used to keep sound intensity numbers manageable. The human ear is not equally sensitive to all sound frequencies within the entire spectrum, so noise levels at maximum human sensitivity are factored more heavily into sound descriptions in a process called A-weighting written as dB(A) or dBA. Subsequent references to decibels written as dB should be understood as A weighted dB(A).

Because decibels are logarithmic, the noise level of several sounds at once do not add together arithmetically to produce a louder noise. When two sounds of equal pressure come together, the result is a 3 dB increase in the noise level. For example, if traffic is producing 60 dB of noise and a lawnmower produces another 60 dB of noise, the resulting noise level will be 63 dB, not 120 dB. Humans cannot perceive an increase in noise less than 3 dB outside of a controlled laboratory environment. If an ambient background noise of 60 dB increases to 62 dB, there will be no perceptible increase in loudness. A 3 dB increase in noise is just perceptible and would generally not be noticeable in an urban environment. A 5 dB increase is considered readily perceptible, and an increase of 10 dB is perceived as the noise becoming twice as loud.

Time variations in noise exposure are typically expressed in Leq, a steady-state energy level equal to the energy content of the time varying period; essentially the average noise level during a noise measurement. Lmax is the maximum sound level over a particular time period. Because community receptors are more sensitive to unwanted noise intrusion during the evening and at night, state law requires that, for planning purposes, an artificial dB increment be added to quiet time noise levels in a 24-hour noise descriptor called the Community Noise Equivalent Level (CNEL), a weighted average of noise levels over time.

The Noise Report measured existing noise levels at four locations in the vicinity of the project site in order to establish ambient noise levels. Daytime ambient noise levels ranged from 42.5 dB Leq to 56.1 dB Leq and based on the data the calculated CNEL for Location 1 is 45.7 dB. Details of the measurements are found in Appendix G.

Existing roadway noise levels were calculated for locations on Golden Valley Road and Sierra Highway. The roadway segments selected for analysis are those nearest to the project site and would receive the most project-generated trips. Calculation of the existing roadway noise levels was based on the Federal Highway Administration Highway Noise Prediction Model and traffic volumes from the project's traffic analysis. The average vehicle noise rates (energy rates) utilized in the FHWA Model were modified to reflect average vehicle noise rates identified for California by Caltrans and range between 71.0 dB and 73.6 dB CNEL.

a. Less than Significant Impact. 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?

Construction

The City does not have specific limitations on construction noise levels. Rather, Section 11.44.080 of the SCMC limits the hours and days where construction can occur within 300 feet from a residentially zoned property. Specifically, the code states that construction is only allowed between the hours of seven a.m. to seven p.m., Monday through Friday, and eight a.m. to six p.m. on Saturday, and no work may be performed on New Year's Day, Independence Day, Thanksgiving, Christmas, Memorial Day or Labor Day. The project will not engage in construction outside of the allowed hours and thus would not create a noise impact according to City code. However, a noise impact could still occur if expected construction noise levels were considered excessive or harmful. As the City does not have an impact threshold for construction noise the Noise Report uses the Federal Transit Administration (FTA) general construction noise criteria of 90 dB Leq (1-hour) as an impact threshold, which is utilized by several jurisdictions in the state for assessing construction noise impacts.

Construction of the project would require the use of heavy equipment for demolition, grading/site preparation, installation of utilities, building fabrication, and finishing. Construction activities would also involve the use of smaller power tools, generators, and other sources of noise. During each stage of construction, several types of equipment potentially could be operating concurrently and noise levels would vary based on the amount of equipment in operation and the location of the activity. The Federal Highway Administration's (FHWA) Roadway Construction Noise Model has compiled data regarding the noise-generating characteristics of specific types of construction equipment and typical construction activities which are used to forecast construction noise levels in this analysis.

Noise levels would diminish notably with distance from the construction site at a rate of 6 dBA per doubling of distance (noise from stationary or point sources is reduced by about 6 dBA for every doubling of distance at acoustically hard locations). For example, a noise level of 86 dBA Leq measured at 50 feet from the noise source to the receptor would decline to 80 dBA Leq at 100 feet from the source to the receptor and fall by another 6 dBA Leq to 74 dBA Leq at 200 feet from the source to the receptor. These noise attenuation rates

assume a flat and unobstructed distance between the noise generator and the receptor. Intervening structures and vegetation would further attenuate (reduce) the noise. Furthermore, it should be noted that increases in noise levels at sensitive receptors during construction would be intermittent and temporary and would not generate continuously high noise levels. In addition, the construction noise experienced at sensitive receptors during the initial periods of construction (i.e., demolition and grading) typically would be reduced in the later construction periods (i.e., interior building construction). As the structures are built, the noise from interior construction work would be reduced at off-site locations because the proposed structures would break the line-of-sight noise transmission from the interior construction areas to the exterior areas of sensitive receptors.

Sensitive receptors near the project site include adjacent residences to the north, adjacent residences to the east, residences to the southeast (approximately 395 feet), and residences to the west (approximately 700 feet). **Table XIII-1, Outdoor Construction Noise Levels at Sensitive Receptors** shows the modeled worst-case construction noise levels at the three nearest groups of receptors. Figures are estimated for the phase of construction that would produce the most noise for each location.

Table XIII-1
Outdoor Construction Noise Levels at Sensitive Receptors

Receptor	Distance (feet)	Estimated Max Construction Noise Level (dB Leq)	Exceeds 90 dB FTA Threshold
North Residences	25	89.1	No
East Residences	25	89.1	No
Southeast Residences	395	65.9	No
Source: Noise Report, Appendix G.			

As shown, while construction activity would not exceed the FTA's general construction noise criteria of 90 dB Leq at any of the sensitive receptors. The worst-case estimated noise levels shown in Table XIII-1 do not represent noise levels as they would be experienced throughout the construction process. Equipment would operate some distance from other equipment and would only operate in one location for a limited time. Whenever equipment operated further from the receptors than as modeled in the table, which will be for the majority of the construction process, or not concurrently with other equipment, noise levels would be lower. As construction will only occur during allowed hours, and maximum levels would not exceed the FTA threshold, construction noise impacts would be less than significant and no mitigation is required.

Although it is not required for mitigation purposes, the project will voluntarily incorporate the following best practices as a Project Design Feature:

PDF-1: NOISE

1. Noise and groundborne vibration construction activities whose specific location on the project site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest off-site land uses.
2. When possible, construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
3. Flexible sound control curtains shall be placed around all drilling apparatuses, drill rigs, and jackhammers when in use.
4. The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.

5. Barriers such as flexible sound control curtains shall be erected around heavy equipment to minimize the amount of noise on the surrounding land uses to the maximum extent feasible during construction.
6. All construction truck traffic shall be restricted to truck routes approved by the City, which shall avoid residential areas and other sensitive receptors to the extent feasible.
7. A construction notice shall be prepared and shall include the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public and approved by the City.

Operational Traffic Noise

The increase in traffic resulting from implementation of the project would increase ambient noise levels at off-site locations in the project vicinity. These concerns were addressed using the FHWA TNM model, which calculates the CNEL noise level for a particular reference set of input conditions, based on site-specific traffic volumes, distances, speeds and/or noise barriers. Based on the traffic analysis prepared for the project in combination with an analysis of the surrounding land uses, roadway noise levels were forecasted to determine if the project's vehicular traffic would result in a significant impact at off-site locations.

Off-site locations in the project vicinity would experience an increase in noise resulting from the additional traffic generated by the project. The project-related increases in noise levels at the primary roadway segments located in proximity to the project site are identified in **Table XIII-2, Project Roadway Noise Levels**.

Table XIII-2
Project Roadway Noise Levels

Roadway	Segment	Existing	Existing + Project	Future w/o Project	Future + Project	Cumulative Increase
Golden Valley	W of Sierra Hwy	73.6	73.7 (+0.1)	73.8	73.9 (+0.1)	0.3
	E of Sierra Hwy	71.0	71.1 (+ 0.1)	71.2	71.4 (+0.2)	0.4
Sierra Hwy	S of Golden Valley	73.0	73.1 (+0.1)	73.2	73.2 (--)	0.2
	N of Golden Valley	71.6	71.6 (--)	71.8	71.9 (+0.1)	0.3
Source: Noise Report, Appendix G. All figures in dB CNEL						

As shown in Table XIII-2, the project would increase local noise levels by a maximum of 0.2 dBA CNEL during project-level buildout scenarios and 0.4 dBA CNEL during cumulative buildout scenarios, which would be less than a 3 dBA increase which is the minimal amount necessary to result in a noticeable increase to traffic noise. As such, the Project's traffic-related noise level increases would be less than significant.

Operational On-Site Noise

As part of the project, new mechanical equipment, HVAC units, and exhaust fans could be installed on the roof or near the proposed new structures. Although the operation of this equipment would generate noise, the design of these on-site HVAC units and exhaust fans would be required to comply with the regulations of the SCMC. Specifically, Section 11.44.070 of the SCMC states any noise level from the use or operation of any machinery, equipment, pump, fan, air conditioning apparatus, refrigerating equipment, motor vehicle, or other mechanical or electrical device, or in repairing or rebuilding any motor vehicle, which

exceeds the noise limits as set forth in Section 11.44.040 at any property line, or, if a condominium or rental units, within any condominium unit or rental unit within the complex, shall be a violation of this chapter. Similarly, Section 11.44.060 of the SCMC states any noise level from the use or operation any radio receiving set, musical instrument, phonograph, television set, or other machine or device for the producing or reproducing of sound at any time in such a manner as to produce noise levels on residential land which would disturb the peace, quiet and comfort of neighboring residents or any reasonable person of normal sensitivity residing in the area shall be unlawful. In addition to these requirements, the project will screen mechanical equipment as feasible and necessary to meet City noise standards. As such, compliance with Section 11.44.070 of the SCMC would ensure noise from stationary sources would be less than significant

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. Would the project result in the generation of excessive groundborne vibration or groundborne noise levels?

The Federal Transit Administration (FTA) provides ground-borne vibration impact criteria with respect to building damage during construction activities, measured in PPV, expressed in inches per second (in/sec). Construction vibration damage criteria are assessed based on structural category (e.g., reinforced-concrete, steel, or timber). FTA guidelines consider 0.5 inch/sec PPV to be the significant impact level for reinforced concrete, steel, or timber buildings.³¹ Vibration can also produce annoyance in humans, which is measured using vibration decibels (VdB). The FTA considers 72 VdB as the threshold for human annoyance at residences.

Vibration at nearby receptors resulting from construction activities was calculated by the Noise Report and the results are presented in **Table XIII-3, Construction Vibration Levels at Receptors**.

Table XIII-3
Construction Vibration Levels at Receptors

Receptor	Distance (feet)	Estimated PPV	PPV Threshold	Estimated VdB	VdB Threshold
North Residences	15	0.191 (in/sec)	0.5 (in/sec)	94	72
East Residences	15	0.191 (in/sec)	0.5 (in/sec)	94	72
Southeast Residences	395	0.001 (in/sec)	0.5 (in/sec)	51	72

Source: Noise Report, Appendix G.

As shown in Table XIII-3 vibration levels at the nearest receptors would not impact structures but could surpass the 72 VdB threshold for human annoyance. However, the estimated 94 VdB is a worst-case estimate where a large bulldozer is operating 15 feet from a receptor. For the majority of the construction process equipment will be operating at greater distances, and while operating close to receptors vibration will be temporary and intermittent. PDF-1 would also serve to reduce construction vibration levels to the maximum extent feasible. Furthermore, the project would be consistent with Section 11.44.080 of the SCMC (Special Noise Sources— Construction and Building), which regulates construction activity in the City. While this section of the SCMC is applicable to construction noise, it would also ensure any annoyance impacts related to construction vibration would not occur during sensitive hours. Therefore, as there would be no noticeable vibration for the majority of the construction process, and annoyance vibration would only occur for a small portion of individual receptors for a brief period of time as equipment passes, and only during allowed days and hours, groundborne vibration impacts would be less than significant.

³¹ Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual. September 2018.

Mitigation Measures: No mitigation measures are required.

c. **No Impact.** If the project is 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?

There are no airports or airstrips within the City. The nearest airstrip is in Agua Dulce some 12 miles away. There would be no impacts.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XIV. POPULATION AND HOUSING.				
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)?	☐	☐	☐	☒
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Impact Analysis

a. No Impact. Would the project 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)?

The SCAG 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) forecasts for population and employment growth from 2016 through 2045 for the City are shown in **Table XIV-1, Population and Employment Growth Forecast**.

Table XIV-1
Population and Employment Growth Forecast

Year	City Population	City Employment
2016	218,200	91,200
2045	258,800	105,200
Net Growth	40,600	14,000
Source: SCAG 2020 RTP/SCS, Current Context: Demographics & Growth Forecast Appendix, Table 14, Jurisdictional-Level Growth Forecast, September 3, 2020.		

As shown in Table XIV-1, SCAG forecasts City population and employment to increase from 2016 to 2045 by 40,600 people and 14,000 jobs. The proposed project includes a 60-room hotel with a restaurant and retail space, a senior assisted-living facility with 151 units, and 73 residential condominium units. The land is zoned Mixed-Use Neighborhood and is intended to host residential units and some amount of commercial development which would create new jobs. According to the project VMT Analysis (Appendix I) the project will create 66 new jobs and would house an estimated 308 people (146 people in the condominiums, 151 people in the assisted living facility). Averaged over 29 years SCAG's estimated population growth would amount to 1,400 people a year and the job growth to 483 jobs a year. The project's contribution to City growth would be well within anticipated trends, even if all employees and all residents of the project moved from outside of the city to work/live on site, which is unlikely. In addition, the City has been allocated 10,031 housing units by the State through the Regional Housing Needs Assessment (RHNA). The RHNA is mandated by State Housing Law as part of the update of local housing elements every 8 years. In March 2020, SCAG adopted their 6th cycle RHNA Allocation plan and the City was allocated a total of 10,031 housing units that the City must prove it has adequate capacity for and substantive plans to

accommodate that many units.³² By adding 73 housing units the project will help the City meet its required housing needs. Although the assisted living units would not be counted toward those requirements, the availability of senior housing is a key part of a City's housing profile and it is widely recognized that there is a nationwide shortage of senior oriented housing.³³ In addition, the project does not extend roads or infrastructure into areas that would otherwise be inaccessible or unbuilding without construction of the project. As such, the project would not result in substantial unplanned population growth and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. No Impact. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

As the project site is vacant land, with the exception of an abandoned single-family house, the project would not displace persons or residential units or necessitate the construction of replacement housing elsewhere. Therefore, the project would have no impact related to displacement.

Mitigation Measures: No mitigation measures are required.

³² City of Santa Clarita, City of Santa Clarita General Plan Draft 2021-2029 Housing Element, May 2022.

³³ Urban Institute, America's Housing Market Is Failing Older Adults, accessed December 15, 2025 at: <https://www.urban.org/urban-wire/americas-housing-market-failing-older-adults>

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
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XV. PUBLIC SERVICES.

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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:

a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

Impact Analysis

a. Less than Significant Impact. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection?

The LACoFD provides fire protection and emergency paramedic services to the project site. The nearest fire station is LACoFD Fire Station No. 150 located approximately 1.4 miles southeast of the project site located at 19190 Golden Valley Road. Two other fire stations are under three driving miles from the project site, Station 104 to the northwest, and Station 107 to the northeast. This distance is close enough for the LACoFD to be within the current standard response time for fire service, which is 8 minutes or less for suburban areas, as stated in Section 5.14.1.1 of the 2014 Los Angeles County General Plan Update Draft EIR.

The construction of Golden Valley Road and Golden Valley High School in 2000 opened up the land on either side of the road to new development that would have not otherwise been possible prior to the road's construction. The project is being built in an area intended for such development, and the expansion of new areas that require service from the LACoFD has been accounted for by the City and the LACoFD.

Because the project site is within a VHFHSZ it will be subject to the provisions of the CWUIC which will require class-A roof assemblies, ignition-resistant cladding, non-combustible exterior doors and windows, and ember-proof exterior venting, which create a fire-resistant exterior shell. The project will also be designed to resist the ignition and spread of structural fires through compliance with Chapters 7 and 9 of the CFC which require fire-rated interior separations and interior fire sprinklers which serve to contain and extinguish fires within the buildings. The site plan will be reviewed and approved by the LACoFD to ensure there is adequate street width and building access, the project will be required to have a fuel modification plan approved by the department, and the site must meet fire-flow availability standards and provide adequate fire hydrants or standpipes. These measures will ensure the project doesn't violate any fire safety

standard that could potentially create a situation where an inordinate increase in fire protection services would be necessary.

Given the close proximity of the existing LACoFD stations, and the regulatory requirements for enhanced fire protection, the project would not require new or physically expanded fire stations and potential impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection?

The City contracts police services from the Los Angeles County Sheriff's Department (LASD). The nearest Santa Clarita Valley Sheriff's station is located at 26201 Golden Valley Road approximately 1.3 driving miles northwest of the project site. Unlike fire protection services, police units are most often in a mobile state; hence, the distance between a headquarters facility and the location of a particular emergency generally does not determine response times. Instead, the number of police officers on the street is more directly related to the realized response time, and calls for police assistance are prioritized based on the nature of the emergency.

The project would introduce new services and households within the existing LASD service area; however pursuant to SCMC Section 17.51.010.B, the project developer would be required to pay a law enforcement facilities fee for providing additional law enforcement personnel and equipment. Therefore, potential impacts related to the expansion of police facilities would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact. Would the project result in substantial adverse physical impacts associated with the construction or expansion of schools?

As explained in XIV above, the project is of a size and scale that is normal and planned for in growth projections. In addition, the project provides age-restricted housing and will not house any school age children. Therefore, potential impacts regarding the demand for new school facilities is less than significant.

Mitigation Measures: No mitigation measures are required.

d-e. Less than Significant Impact. Would the project result in substantial adverse physical impacts associated with the construction of new or physically altered parks or other facilities?

The proposed project adds a hotel, a senior assisted-living facility, and age-restricted residences. The hotel will result in minimal public facility use since hotel visitors are not likely to use parks or other public facilities in large numbers. The assisted living facility is unlikely to have residents that use active public recreational facilities such as soccer or baseball fields and the like, and passive recreational facilities will be provided as part of the project. The residential units will be age restricted for tenants aged 55 or older. These residents will use parks and other public facilities more routinely. The 73 units represent a potential population increase of 146 people, which is not a threshold of growth that would overwhelm public facilities, as use of public facilities is occasional and intermittent for most people. In addition, the project will be required to pay impact fees assessed by the City that address incremental use of public facilities.

What incremental impacts the project may have on public services can be addressed by such fees and would not require the construction of new facilities or the expansion of existing facilities. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVI. RECREATION.				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. 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?	☐	☐	☒	☐

Impact Analysis

- a. Less than Significant Impact.** 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?

The proposed project adds a hotel, a senior assisted-living facility, and age-restricted. The hotel will result in minimal recreational use since hotel residents are not likely to use local or regional recreational facilities in large numbers. The assisted living facility is unlikely to have residents that routinely use park facilities in a manner and extent that would cause substantial deterioration. The residential units will be age restricted for tenants aged 55 or older. Use of local recreational facilities by these tenants is likely to be lower impact compared to families or minors. Therefore, the project would not result in a substantial increase in park usage such that substantial physical deterioration of the facility would occur or be accelerated, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

- b. Less than Significant Impact.** 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?

The proposed project includes two small parks as part of the residential component, and an eight foot wide hiking trail through an undeveloped area. The construction of the park and hiking trail are evaluated as part of the overall project within this document, which has determined that there are no significant environmental impacts. Additionally, the project does not require the construction or physical expansion of existing recreational facilities, and therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVII. TRANSPORTATION.				
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c. Substantially increase hazards to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

Impact Analysis

The following analysis is based on the Santa Clarita Mixed Use Traffic Impact Analysis (Traffic Analysis) dated December 2, 2021, and the Golden Valley Road Mixed-Use Vehicle Miles Traveled Analysis (VMT Analysis) dated November 14, 2023, both prepared by TJW Engineering, and attached as **Appendix H** and **Appendix I**.

a. Less than Significant Impact. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The City's 2011 General Plan Circulation Element contains a Highway Plan and Bikeway Master Plan. The Highway Plan consists of the redesignation of certain roadways, planned modifications to those roadways to meet the designations, and right-of-way standards. The Bikeway Master Plan designates bike paths, bike lanes, and bike routes throughout the City. The project would not conflict with either plan as it will not interfere with the configuration of any existing roadway. The project proposes construction of a short public road extending from Golden Valley Road. The road will intersect with Golden Valley Road but will otherwise not require any modification of it or interfere with any potential improvement.

The Circulation Element also contains goals, objectives, and policies found in Part Two of the document, however, these are directives for City governance and are not applicable to a private development project.

In addition to the Circulation Element the City has the 2019 Transit Development Plan and 2020 Non-Motorized Transportation Plan. The Transit Development Plan outlines operations, performance, maintenance, and upgrades/expansions of the City's transit network. The Non-Motorized Transportation Plan identifies deficiencies in pedestrian and cycling infrastructure and identifies areas for expansion of facilities. The project would not conflict with these plans for the same reason it would not conflict with the Circulation Element; the project does not interfere with the circulation network and does not hinder the City's ability to implement transit or non-motorized facility improvements.

As the project does not conflict with any programs, plans, or policies related to the circulation system, and would be required to comply with any and all municipal code requirements related to circulation as a

condition of entitlement and permitting, the project would not conflict with a program, plan, ordinance or policy addressing the circulation system and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

The Golden Valley Road Mixed-Use Vehicle Miles Traveled Analysis (VMT Analysis) from TJW Engineering dated November 14, 2023 concludes that the project would have a less than significant impact on VMT, which has been confirmed by the City Traffic Engineering department.³⁴

The VMT Analysis projects that the hotel will have 24 employees and the assisted living facility 42. Residents in the condominiums are projected to be 157 persons and the assisted living facility is projected to house 151 residents. According to City guidelines VMT is required to be reported as Home-Based VMT per Capita for residential projects and Home-Based Work VMT per Employee for office projects. Total VMT or VMT per Service Population can be reported for area plans, large-scale retail projects, or other project types, such as special event venues. This VMT Analysis was conducted based on the City's guidelines and direction from the Traffic Engineering department using the SCAG Regional Transportation Plan Model. As the project is mixed-use project each land use was analyzed separately as directed by City staff.

Per the guidelines a project would have a less than significant impact if the VMT per Capita figure was 19.0 or less, 15% lower than the calculated citywide baseline of 22.4, and the VMT per Employee figure was 16.9 or less, 15% lower than the calculated citywide baseline of 19.9. According to the VMT Analysis the project VMT per Capita is 14.3, below the 19.0 threshold, indicating that the project would have a less than significant impact on VMT per Capita.

The VMT Analysis calculates the VMT per Employee figure at 17.1, which is 0.2 above the 16.9 threshold which would indicate an impact. However, as the majority of city residents leave the city for work and the project is projected to create 66 jobs, the project is considered an employment generating use. In this case, as determined by the Traffic Engineering department, the project is evaluated according to whether it affects a net change in work VMT for the city. The baseline home-based work VMT for the city was calculated to be 1,692,308 miles under current (without project) conditions. With inclusion of the project this would decrease to 1,584,617 miles. Reducing citywide home-based work VMT indicates the project would have a less than significant impact on work VMT. In addition the project would decrease overall home-based VMT in the city. Under existing conditions home-based VMT was calculated to be 6,978,984 miles. This would decrease to 6,929,836 miles with inclusion of the project. Therefore, as the VMT per Capita of the project is below the City screening threshold, and the project will result in a net decrease of work VMT for the city, the project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact. Would the project substantially increase hazards to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The project would include one entry driveway from Golden Valley Road and construct a bus stop in front of the hotel. Both elements would be designed and constructed according to City standards without the need

³⁴ Email correspondence, Senior Planner Erika Iverson, January 16, 2024.

for any modification or deviation from the standards. The proposed uses are not incompatible with the area and are appropriate for the location located on a major commercial arterial. Internal driveways and private roads will also be built according to city standards. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact. Would the project result in inadequate emergency access?

The adequacy of emergency access to the project site itself is assessed by the LACoFD ensuring that there is appropriate roadway width, building access, and turnaround points for emergency vehicles. The project is designed according to LACoFD standards and provides adequate emergency access to all proposed uses and buildings. The project does not impact emergency access for other sites or uses as it does not interfere with the operation of Golden Valley Road. The project driveway would conform to City standards and the planned bus stop in front of the hotel is being installed per direction from the City and will design according to City specifications. These features interface with the road but will not impact its use or interfere with emergency access to the site or elsewhere. Therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Potentially Significant Less than Significant Impact	No Impact
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XVIII. TRIBAL CULTURAL RESOURCES.

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code 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 Public Resources Code section 5020.1(k)? | ☐ | ☒ | ☐ | ☐ |
| 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 Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision "c" of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | ☐ | ☒ | ☐ | ☐ |

Impact Analysis

a-b. Potentially Significant Unless Mitigation Incorporated. A significant impact could occur if a project would cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code 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 listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources (PRC 5020.1(k)), or that is determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to the criteria of the National Register of Historic Places criteria (PRC 5024.1(c)).

As discussed above in Section V, Cultural Resources, the Phase I Cultural Resource Assessment of the project site found no record of cultural resources on or adjacent to the site, and the NAHC record search returned no findings, and investigations of the site produced no evidence of habitation. However, large areas of the site appear to consist of undisturbed native soils and ground visibility was low during the pedestrian survey, so it cannot be reliably determined there is no evidence of resources on site.

As specified in AB 52, lead agencies must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the Tribe has submitted a request in writing to be notified of Proposed Projects. The Fernandeano Tataviam Band of Mission Indians responded indicating they wished to provide confidential information to the lead agency. Consultation with the Fernandeano-Tataviam Band of Mission Indians concluded with both parties in agreement to include mitigation measures to avoid or mitigate any potential significant effects to any unknown tribal cultural resources that may be present on the site.

As such, the project's potential to cause substantial adverse changes in the significance of a tribal cultural resource as defined in the PRC, Section 21074 that is listed or eligible for listing in the California Register, or in a local register of historical resources, or determined by the lead agency to be significant pursuant to the criteria of the National Register, would be less than significant.

Mitigation Measures:

MM TCR-1: Tribal Monitoring

The project applicant shall retain two professional tribal monitors procured by the Fernandeano Tataviam Band of Mission Indians to observe the following activities in native soil as described in the following paragraphs: clearing, grubbing, grading/excavating.

There shall be two tribal monitors present during all clearing, grubbing and mass grading activities in native soil, to an excavation depth of 7 feet. If Cultural Resources are encountered at any point, tribal monitors shall observe all remaining ground-disturbing activities, regardless of whether the soil has been previously observed, until all soil disturbing activities are complete. Each week the tribal monitors will consult with the archaeological monitor and/or archaeological principal to determine the appropriate level of compliance coverage per project mitigation measure CUL-1. Disputes on coverage will be resolved through communication with the Community Development Director, or designee, who has the final say in compliance task requirements. Tribal Monitoring shall continue until the permittee provides written confirmation to the Tribe that all scheduled monitoring activities are complete. If tribal monitors must leave the project temporarily and return, the permittee shall provide written confirmation of completion for each set of activities and, if possible, five days' notice prior to the start of each set.

Upon discovery of Cultural Resources, the Tribal Monitor shall have the authority to request that ground-disturbing activities cease within at least 30 feet and up to 60 feet of the discovery. The qualified archaeological monitor attached to the project per project mitigation measure CUL-1 and the Tribal Monitor shall assess the find.

MM TCR-2: Disposition and Treatment of Inadvertent Discoveries

The City and/or permittee shall, in good faith, consult with the FTBMI on the disposition and treatment of any Tribal Cultural Resource encountered during all ground disturbing activities.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS.				
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 wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e. Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Impact Analysis

a. Less than Significant Impact. Would the project 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?

The project does not require the construction or relocation of water, wastewater, storm water drainage, electric power, natural gas, or telecommunications facilities. The project will require new sewer and water connections, and one new water main. The project will install a new water main in Golden Valley Road connecting between existing mains in Sierra Highway to the east and Robert C Lee Parkway to the west. Two other water line connections will be made between the project site and existing water lines located in the Valle di Oro residential development to the east. Sewer connections will be made through three lines connecting to existing lines in the Valle di Oro development. Installation of new sewer and water lines will require underground boring to connect to existing lines. The new water main will be installed within the public right-of-way and may create temporary inconveniences as it is possible a travel lane could be temporarily blocked. These activities will not present any significant impact on the environment as the

installation of new service lines within the public right-of-way is common occurrence and the means by which development connects to existing utility systems and services. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

The Newhall Water Division of the Santa Clarita Valley Water Agency (SCV Water) currently serves as the potable water purveyor to the project vicinity and would provide potable water to the project. SCV Water was created in 2018 through a merger of the Castaic Lake Water Agency, Newhall County Water Districts, and Valencia Water Company. According to its 2020 Urban Water Management Plan (UWMP), SCV Water has sufficient water supplies available for normal year water demands, as well as for dry and multiple dry years through the Year 2050 with existing supply, conjunctive use (coordinated use of surface water and groundwater), water conservation, water transfers, recycled water, and water banking.³⁵ Water supplies for 2050 for multiple dry years are projected by the UWMP to be 128,715 acre-feet per year (AFY) and demand with passive and active conservation is estimated at 102,870 AFY.

The UWMP assumes a population growth of 1.3 percent a year within the SCV Water service area over the 30-year planning period (2050). The population within the service area in 2045 is projected to be 422,100 people. The service area includes areas outside of City limits, which according to the UWMP accounts for approximately 30% of the number. Therefore, the UWMP's projected population in 2045- within City limits- would be 295,470, which is slightly higher than the SCAG 2045 projected City population of 258,800 people, as detailed in Section XIV.a. The combined population of the new assisted-living units and age-restricted condominium units would be in line with both SCAG and SCV Water growth estimates.

Estimates for total daily water demand of the project is detailed below in **Table XIX-1, Project Water Demand**.

Table XIX-1
Project Water Demand

Proposed Use	Units or Size	Demand Rate per Day	Estimated Water Demand per Day
Hotel	60 rooms	144 gal per room ¹	6,768 gal
Restaurant	36 seats	36 gal per seat	1,296 gal
Retail Suite	3,320 sf	30 gal per 1,000 sf	99.6 gal
Banquet Room	1,974 sf	420 gal per 1,000 sf ²	118.1 gal
Assisted Living	151 rooms	84 gal per room ³	12,684 gal
Condominiums	73 units	180 gal per unit ⁴	13,140 gal
Estimated average water demand per day			34,105.7 gallons
*Rates are based upon the City of L.A. Bureau of Engineering's Sewage Generation Factor chart, revised April 2019. Water consumption figured at 120% of sewage generation rate. ¹ Assumes an occupancy rate of 78%, the rounded occupancy average from Santa Clarita Valley Economic Development Corporation (SCVEDC), Q1 2025 Economic Snapshot, page 30, Occupancy Rate Q1 2025. ² Assumes the banquet room is used once a week on average: $1,974 \times 420 = 829.08$ per day. $829.08 \times 52 = 43,112.16$ gallons year / 365 = 118.1 gal day ³ Calculated at Rest Home rate, includes water use of entire facility ⁴ The three-bedroom condos are calculated at a two bedroom rate to account for the fact that 55+ only households would most likely consist of two people maximum.			

³⁵ SCV Water, 2020 Urban Water Management Plan for Santa Clarita Valley Water Agency – Volume 1 Final, June 2021.

The total estimated increase in water demand per day of 34,042.1 gallons amounts to 38.1 acre-feet of water a year. According to the UWMP the City consumed 65,528 acre-feet of potable water in 2020. The 38.1 acre-foot increase in demand then would be a 0.06 percent increase over total water deliveries in 2020, and would be 0.05 percent of the projected 2025 deliveries of 76,400 acre-feet. This increase in water usage is well within the City's projected water availability estimates. Because the increase is factored into the City's water planning, the project's potential to result in a substantial environmental impact due to insufficient water supplies would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact. Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

The project would be served by the Santa Clarita Valley Sanitation District, part of the Los Angeles County Sanitation District, after installing new sewer main lines in Golden Valley Road to connect to existing main lines located at the intersection of Golden Valley Road and Sierra Highway. Wastewater generated from the project site would be conveyed to the Saugus and Valencia Water Reclamation Plants (solids are only processed at Valencia. Combined, the Saugus and Valencia Water Reclamation Plants treat an average of 19.5 million gallons per day (mgd) of wastewater³⁶ and have a combined capacity to treat 28.1 mgd, and therefore currently have an excess capacity of approximately 8.6 mgd.³⁷ **Table XIX-2, Project Wastewater Generation per Day**, illustrates estimated wastewater generation for the project.

Table XIX-2
Project Wastewater Generation per Day

Proposed Use	Units or Size	Demand Rate per Day	Estimated Wastewater Generation per Day
Hotel	60 rooms	120 gal per room ¹	5,640 gal
Restaurant	36 seats	30 gal per seat	1,080 gal
Retail Suite	3,320 sf	25 gal per 1,000 sf	83 gal
Banquet Room	1,974 sf	350 gal per 1,000 sf ²	29.3 gal
Assisted Living	151 rooms	70 gal per room ³	10,570 gal
Condominiums	73 units	150 gal per unit ⁴	10,950 gal
Estimated average wastewater generation per day			28,352.3 gallons
[*] Rates are based upon the City of L.A. Bureau of Engineering's Sewage Generation Factor chart, revised April 2019. ¹ Assumes an occupancy rate of 78%, the rounded occupancy average from Santa Clarita Valley Economic Development Corporation (SCVEDC), Q1 2025 Economic Snapshot, page 30, Occupancy Rate Q1 2025. ² Assumes the banquet room is used once a week on average: $1.974 \times 350 = 690.9$ per day. $690.9 \times 52 = 35,926.8$ gallons year / 365 = 98.4 gal day ³ Calculated at Rest Home rate, includes wastewater generation of entire facility ⁴ The three-bedroom condos are calculated at a two bedroom rate to account for the fact that 55+ only households would most likely consist of two people maximum.			

The total estimated increase in wastewater generation per day of 28,352.3 gallons would be 0.3 percent of the unused daily treatment capacity (8.6 mgd) of the JWPCP. Therefore, there would be adequate treatment capacity for the project and impacts to capacity would be less than significant.

³⁶ Email correspondence LAC Sanitation Districts: Saugus, 5.2 mgd, June 28, 2023, Valencia 14.3 mgd, February 21, 2024.

³⁷ LAC Sanitation Districts, Facilities, Saugus and Valencia profiles accessed February 21, 2024 at: <https://www.app.lacsd.org/facilities/?tab=2>

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact. Would the project 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?

Burrtec Waste Industries provides solid waste management services to the City through a franchise agreement with the City. Solid waste is either diverted for recycling or repurposing, or disposed of at landfills. Prior to 2025 Chiquita Canyon Landfill, located near the City's northwesternmost boundary within unincorporated Los Angeles County, would have served the proposed project site. However, after numerous violations of its governing CUP, the landfill closed January 1, 2025. Burrtec has since entered into three year agreement with the Sun Valley Recycle Park Transfer Station operated by Waste Management to accept deliveries of waste.³⁸ This facility sorts and transfers waste with municipal solid waste from the City transferred to the Simi Valley Landfill.³⁹ Simi Valley Landfill has a remaining capacity of 79,783,835 tons as of February 2020, and is expected to operate until 2063.⁴⁰

Solid waste generated during project operations is subject to certain state requirements for waste diversion and separation. The California Integrated Waste Management Act of 1989 has been followed by a series of assembly bills including AB 341, AB 1826, and AB 876, which results in the project being required to separate recyclables and organic waste, such as food waste, compostable paper, and landscaping waste, so that they will be diverted from landfills and directed to recycling or composting facilities. This is to meet the State requirement to divert 50 percent of solid waste away from landfills. Residents and businesses are provided with trash, recycling, and green waste bins to separate wastes. Wastes may be further sorted at the transfer station. The estimated solid waste generation rates for the project are detailed below in **Table XIX-3, Operational Solid Waste Generation.**

Table XIX-3
Operational Solid Waste Generation

Proposed Use	Units or Size	Generation Rate per Day	Proposed Solid Waste Generation per Day
Hotel			
Rooms	60 rooms	2.9 lbs per room ¹	136.3 lbs
Restaurant	36 seats	1 lb per seat	36 lbs
Retail suite	3,320 sf	2.5 lbs per 1,000 sf	8.3 lbs
Banquet room	1,974 sf	.005 lbs per sf ²	1.4 lbs
Assisted Living			
Units, kitchen, dining, and common areas	151 residents	5 lbs per resident	755 lbs
Onsite clinic	4 patient capacity	16 lbs per patient ³	64 lbs
Administrative offices	990 sf	0.006 lbs per sf	5.9 lbs
Residential Condominiums			
Units	73 units	5.3 lbs per unit	386.9 lbs
Estimated average solid waste generation per day			1,393.8 lbs
Source: Rates used reflect an average or best match of sample rates available from the CalRecycle Estimated Solid Waste Generation Rates, located at: https://www2.calrecycle.ca.gov/wastecharacterization/general/rates			

³⁸ Santa Clarita, January 14, 2025 Agenda Reports, Burrtec Alternative Disposal Facility.

³⁹ Los Angeles County Public Works, December 9, 2025 letter to the Board of Supervisors, Solid Waste Collection Rate Increase Under The Santa Clarita Valley Exclusive Residential Franchise Contract.

⁴⁰ CalRecycle, SWIS Facility/Site Activity Details, Simi Valley Landfill & Recycling Center (56-AA-0007) accessed February 25, 2026 from: <https://www2.calrecycle.ca.gov/SolidWaste/Site/Search>

Proposed Use	Units or Size	Generation Rate per Day	Proposed Solid Waste Generation per Day
¹ Assumes 78% occupancy rate. ² Assumes the space is used once a week. ³ The onsite clinic is presumed to be able to accommodate up to four people at one time. The 16 lbs per patient rate is based on the hospital rate of 16 lbs per bed. Since a hospital provides 24-hour care per bed, the estimate of 16 lbs per patient is better understood to represent the clinic at full capacity (four patients at once) all day.			

The estimated average amount of solid waste generated per day is 1,393.8 pounds. Assuming a 50 percent diversion rate, an average of 696.9 pounds per day or 4,878.3 pounds per week of solid waste would be destined for the Simi Valley Landfill. The current daily excess capacity of the landfill is unknown, however, 4,878.3 pounds per week would be a small increase to the City's overall waste output, and Waste Management would not have accepted a three-year commitment if capacity could not account for minor growth within that time period. Also, although Simi Valley Landfill has been identified as the specific recipient landfill, it is not the only landfill where the transfer station could deliver waste to. In addition, the Los Angeles County Department of Public Works issued a report on the impacts of the closure of Chiquita Canyon Landfill and determined there was sufficient excess capacity in landfills within Los Angeles County to handle the 6,600 tons per day the Chiquita facility was accepting.⁴¹ This assessment only considered landfills within Los Angeles County and not diversion of waste to other areas, such as the Simi Valley Landfill. Therefore, project operations would not substantially impact the capacity of local infrastructure or substantially impair the attainment of solid waste reduction goals, and impacts would be less than significant.

Construction Waste

The project intends to balance all excavated soil onsite, so there will be no need to dispose of soil offsite. Demolition of the abandoned house, its accessory structures and paving, will produce a minimal amount of debris that will be disposed at one or more landfills depending on the nature of the material. Other waste generated during construction would be unusable material from the construction process and vegetative material. Per California Green Building Standards Code (Section 5.408) 65 percent of construction waste must be diverted from landfills. This requirement is repeated in the City's Construction and Demolition Ordinance (05-09). The CalEEMod outputs from the Air Quality and Greenhouse Gas Emissions Technical Report (Appendix A) estimate a total of 101 laden demolition hauling trips, which amounts to 101 trucks carrying up to 20 tons each for a total of 2,020 tons of construction waste.⁴² The total amount going to landfill facilities would be estimated at 707 tons, as 1,313 tons would be diverted. The estimated amount of debris going to landfills on a daily basis would then be 32.1 tons (707/22), though generally waste would not necessarily leave the site every day. Construction waste can only be handled by licensed haulers, and for this purpose the City has a list of approved haulers that must be used. Green waste, soil, contaminated soil, inert debris, and hazardous debris are all separated either at the project site or at transfer stations in order to meet the 65 percent diversion rate. The 35 percent that would reach a municipal landfill may be taken to the nearest facility, which is the Sunshine Canyon Landfill located at the northern edge of Los Angeles. This landfill is expected to operate until 2037 and receives approximately 8,300 tons of municipal solid waste per day and is permitted to receive up to 12,100 tons per day.^{43,44} Therefore, there is sufficient capacity available for disposal of the project's construction waste and impacts would be less than significant.

⁴¹ Los Angeles County Public Works, February 25, 2025, Board Motion of January 7, 2025, Agenda Item 11 Addressing the Closure of Chiquita Canyon Landfill

⁴² CalEEMod section 5.3.1 estimates 4.59 trips per day for a demolition period of 22 days. The default truck size carries 20 tons.

⁴³ CalRecycle, SWIS Facility/Site Activity Details, Sunshine Canyon City/County Landfill (19-AA-2000), accessed February 25, 2026 from: <https://www2.calrecycle.ca.gov/SolidWaste/Site/Search>

⁴⁴ SCAQMD, Sunshine Canyon Landfill news webpage, accessed February 25, 2026 at: <https://www.aqmd.gov/home/news-events/community-investigations/sunshine-canyon-landfill>

Mitigation Measures: No mitigation measures are required.

e. **Less than Significant Impact.** Would the project comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

As mentioned above construction waste can only be handled by approved haulers who must maintain proper licensing and individual manifests for individual projects. Landfills, whether they accept green waste, inert debris, hazardous waste, or municipal solid waste, must maintain licensing from the state, ensure proper handling of waste, submit to inspections, and inspect debris/manifests entering the facility. The waste hauler for operations of the project also must abide by state requirements which govern waste disposal, as does the transfer station waste will be delivered to, and the recipient landfills waste is then transferred to. There are no aspects of the project that could be presumed to result in noncompliance of solid waste regulations as each link in the waste disposal stream must be presumed to abide by the regulations that are in place. The project would generate solid waste typical of construction and then of residential and commercial uses, and the use of authorized, professional disposal services would result in routine compliance with all Federal, State, and local laws, statutes, and ordinances regarding the proper disposal of solid waste. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XX. WILDFIRE.				
If located in or near state responsibility areas or land 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 factor, 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 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Impact Analysis

a. Less than Significant Impact. If located in or near a VHFHSV, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

The project is located within a Very High Fire Hazard Severity Zone (VHFHSZ).⁴⁵ As explained in Section IX.f, the City does not have an adopted emergency evacuation plan but does have an EOP, and because the County provides fire protection and law enforcement services, the LA County OAEOP is also relevant to the project.

The EOP and OAEOP are not plans that are crafted to deal with specific emergencies at specific locations, rather, they organize and facilitate how agencies coordinate during an emergency which may include evacuation proceedings. The command and coordination network and hierarchy of the plans are based upon the SEMS, which itself is based upon the NIMS. It clarifies each element of the emergency management organization and the responsibilities of each party to ensure an organized and effective response during a major disaster, wherein each agency's actions are built upon the same ICS framework and processes for every stage of the response. This system-wide coordination constitutes the emergency response plan for whatever emergency is at hand. The plans are both organizational frameworks that coordinates the operations of public agencies during an emergency system, therefore, the project would not conflict with the EOP or OAEOP in any manner. However, an impact could exist if the project introduced conditions

⁴⁵ CAL FIRE, Fire Hazard Severity Zone Viewer, Accessed March 5, 2025, at: <https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/>

that placed a unique or undue burden on emergency responders which significantly impaired the execution of an emergency response.

The nearest evacuation route to the project site is State Route 14, approximately .75 miles southeast from the project site. No activities occurring on the site, either during construction or operation, would directly impact this route. During construction the mix of construction vehicles will arrive and depart at different intervals and would not be great enough in numbers to cause substantial impairment of the routes, and evacuations are accommodated on a dynamic basis at the time of an emergency. In the area in and around the project site evacuation proceedings would be directed by either the LACoFD or the LA County Sheriff's Department Emergency Operations Bureau who are tasked with announcing and managing evacuations consistent with the OAEOP and SEMS in coordination with the LACoFD. In whichever case, each entity would operate according to the ICS and SEMS, the purposes of which are to provide multi-agency or inter-agency coordination during emergencies. Evacuation warnings and orders may be made in a phased manner according to vulnerability, location, or other factors, which would enable traffic surges on roadways to be minimized over time allowing for a more an orderly flow of vehicles exiting an evacuation area. Once a warning or order is issued, it is important to note that the timely evacuation of residential properties depends upon timely cooperation from the individuals under evacuation orders.

To assist in public awareness and preparation for wildfires the Ready Set Go! (RSG) Program was developed within the state and is now utilized nationwide, managed by the International Association of Fire Chiefs. RSG is an educational and awareness campaign focused on helping residents living in high fire areas, and businesses located there, prepare for the eventuality of living through a wildfire. The LACoFD RSG program consists of outreach and information available from the department, and this information is promoted by the City. The RSG program emphasizes that practical limits on firefighting resources requires individual residents to take responsibility for their response to wildfire. The City maintains the santaclaritaemergency.com website which consolidates emergency updates, and residents can subscribe to the Everbridge Nixle service which allows the City to send text messages to residents besides those that might be sent via the Emergency Alert System. Provided employees, residents and visitors to the project respond to direction from authorities during a wildfire event, operation of the project would not substantially impair emergency response activities.

Because the project site is within a VHFHSZ buildings will be required to conform to Title 24, Part 7, the California Wildland-Urban Interface Code (CWUIC), which details project site access, water supply, and fire protection plan requirements; minimum standards for the location, design and construction of buildings and structures within a VHFHSZ; and defensible space requirements. The structures specifically will have class-A roof assemblies, which offer the highest resistance to fire, ignition-resistant cladding, non-combustible exterior doors and windows, and ember-proof exterior venting, which create a very fire-resistant exterior shell. The project will also be required to conform to Title 24, Part 9, the California Fire Code (CFC). Chapter 7 of the CFC regulates materials, systems and assemblies used for structural fire resistance and fire-resistant separation of adjacent spaces to safeguard against the spread of fire and smoke within a building, and the spread of fire to or from buildings. The chapter details requirements for structural members, walls, partitions, and horizontal assemblies. Chapter 9 of the CFC specifies internal fire protection systems for building and occupancy types, and all project structures will be equipped with fire sprinklers. The combination of these requirements will result in structures designed to be very resistant to exterior fire and impervious to the intrusion of wind-borne embers, and designed to contain the spread of, and extinguish, a structural fire.

Surrounding landscaping will be irrigated which will significantly reduce combustibility and provide a buffer from wildfire burning in untended open space. Landscaping will also be required to conform to fuel modification requirements enforced by the Los Angeles County Fire Department (LACoFD) wherein landscaping is limited with the first 30 feet, all landscaping is irrigated within 100 feet, and all vegetation

within 100 to 200 feet is maintained for fuel reduction purposes. These requirements create buffered spaces that reduce the likelihood of a nearby wildfire affecting structures, and provide adequate space for fire crews to fight encroaching wildfires before they seriously threaten structures. Fire code standards include access roads which allow all structures to be reached by firefighters and adequate space to maneuver equipment. Access roads must allow space for engines or other equipment to pass while another engine is engaged in firefighting on the same road. Fire code standards also mandate adequate fire hydrants and/or standpipes as need so that all structures are within an appropriate distance to provide water to engines, and water-pressure standards to ensure there is adequate flow available for firefighting. During construction the project will observe the requirements of Chapter 33 of the CFC which outlines general fire safety precautions for all construction operations. The requirements seek to maintain required levels of fire protection, limit fire spread, establish the appropriate operation of equipment and promote prompt response to fire emergencies.

Compliant site design provides adequate space for firefighting operations, irrigated landscaping and fuel modification requirements provide vegetative buffers from wildfire events, and fire hardening measures will make structural fires significantly less likely to occur or result in out of control fires within the development. This combination of requirements, which will be reviewed and approved by the LACoFD for adequacy, will substantially reduce the wildfire risk faced by the project, and the project's risk of structural fires resulting from nearby wildfire, to the extent that the project would not create a situation where an inordinate burden would be placed upon fire protection services during wildfire events, and impacts to emergency response or emergency planning would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. If located in or near a VHFHSV, would the project, 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?

A development could exacerbate wildfire risk if the development was placed into a context, or created a context, which exposed its structures or occupants to an inordinate level of potential danger from a wildfire. For example, an increased risk of conflagration of structures due to their placement on or at the top of a naturally vegetated slope or at the mouth of a canyon where prevailing winds are naturally accelerated, or within a topography that creates ideal conditions for the spread of wildfire.

The existing topography of the project site is fairly complex with slopes of various aspects and grades throughout, with an overall rise in elevation from north to south. Most of the site (20.61 acres or 73 percent) averages between 21 and 24 percent grade slopes. The steepest slopes are along the most prominent ridge that runs through the center of the site, beginning behind the existing single-family house and running north until the ridge dips. In this 7.97 acre area slopes average from 30 to 63 percent. Fire moves more rapidly uphill because vegetation higher up a slope will be preheated by the fire below it. Therefore, development on top of the central ridge adjacent to the steepest slopes would exposure structures to significant risk. The proposed project essentially removes this feature by lowering and flattening the ridge and redistributing the soil to create level pads for the component parts of the project. There will be areas of steep slopes (50%) near structures, but in all cases these will be manufactured slopes with irrigated landscaping that conforms to LACoFD fuel modification requirements. The only structure adjacent to a vegetated slope will be the hotel, the rear of which (northeast side) will be near the eastern property line and above a constructed slope. Landscaping on the slope will be irrigated, and all landscaping contiguous to it will be irrigated as well. Adjacent to the east is an offsite irrigated, constructed slope, and all of the contiguous landscaping to the north is irrigated landscaping within the project. None of the other project structures are adjacent to a steep downward slope, and all landscaping that is near structures will be irrigated and as mentioned, compliant with LACoFD fuel modification requirements which requires landscaping to not create fuel ladders.

Therefore, the project would not significantly exacerbate wildfire risk due to the project's relationship to site topography.

The existing topography on site is complex, but the features present are not prominent enough to have a significant influence on wind speed or direction. Wind is generated primarily through differences in atmospheric pressure, which results from differences in temperatures. For example, mountain peaks will be significantly cooler than lower valleys during the evening causing air to descend into valleys creating a mountain wind. During the day air on the peaks is heated more rapidly than air in the valleys causing the valley air to rise, creating a valley breeze. Prevailing winds in the Santa Clarita Valley are generated in this manner, and by offshore winds reaching the valley travelling through and over the surrounding hills.⁴⁶ Large features such as mountain passes can constrict and increase the speed of winds, such as Soledad Pass to the northeast, which is large enough to constrict the flow of winds traveling south from the Great Basin to create the extreme gusts known as the Santa Ana winds in the area.⁴⁷ None of the features on site are large enough to influence wind in such a substantial manner, and the project will generally reduce the complexity of the terrain, so the project would not significantly exacerbate wildfire risk due to the project's relationship to the predominant winds experienced on site.

Santa Ana winds of course create wildfire conditions, and the project will experience these winds likely on a yearly basis. However, the site is not more exposed nor more susceptible to these conditions than elsewhere within the valley. The primary locational factor affecting the project site that could serve to exacerbate wildfire risk is the presence of open space to the northwest and south of the site. The project is placed within the wildland-urban interface (WUI) which creates more exposure to wildfire risk than a project constructed in an already developed area, but it is not an especially extreme case of this type of development, and it is required to conform to regulations designed to reduce risk in such situations. As discussed project buildings will be required to conform to the CWUIC which will require class-A roof assemblies, ignition-resistant cladding, non-combustible exterior doors and windows, and ember-proof exterior venting, which create a fire-resistant exterior shell. The project will also be designed to resist the ignition and spread of structural fires through compliance with Chapters 7 and 9 of the CFC which require fire-rated interior separations and interior fire sprinklers which serve to contain and extinguish fires within the buildings. In addition, because the project would comply with Title 24 Building Energy Efficiency Standards building air filters would be required to have Minimum Efficiency Reporting Value (MERV) 13 or higher air filters installed. MERV 13 filters are the highest rated filters that typical residential HVAC systems can accommodate and would be required for the hotel as well. These filters are recommended by the US EPA for the purposes of cleaning wildfire smoke from the air.⁴⁸ All of these combined measures, along with fire access standards, will result in a defensible development and ignition-resistant structures wherein the project will not significantly exacerbate wildfire risk despite its proximity to open space, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact. If located in or near a VHFHSV, would the project require the installation 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?

⁴⁶ LA County Department of Regional Planning, Santa Clarita Valley Area Plan, One Valley One Vision, 2012, IX. Air Resources

⁴⁷ Cajon Pass and San Geronimo Pass are the predominant features east of the valley accelerating winds for the rest of Southern California during Santa Ana conditions.

⁴⁸ US EPA website epa.gov, "Research on DIY Air Cleaners to Reduce Wildfire Smoke Indoors," and "Preparing for Fire Season," accessed August 14, 2025 at: www.epa.gov/air-research/research-diy-air-cleaners-reduce-wildfire-smoke-indoors and wildfire-smoke-course/preparing-fire-season

The project will construct a new public road leading to the hotel, and private roads leading to the rest of the development, as well as a water detention facility to the north of the residences. The construction of this infrastructure has been accounted for in the analysis of the project's environmental impacts and has been found to not result in significant impacts, and the development will actually serve to overall decrease wildfire risk relative to existing conditions as the irrigated landscaping and fire-hardened structures will be far less likely to spread fire than the existing untended vegetation on site. The construction of this infrastructure will also not exacerbate wildfire risk as the necessary construction activities are no different than the activities that will take place for construction of the rest of the project. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact. If located in or near a VHFHSV, would the project, 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?

If the stability of a development built upon a slope relies upon features that can be damaged or destroyed by wildfire, there may be a potential for a post-fire rain event to result in flooding or landslides which can expose people and other properties to risk. This could result from damage to features which stabilize the land, such as vegetation or retaining walls, or damage to a building's foundation or major structural elements, or stormwater control features, which could weaken a development's ability to withstand a post-fire rain event. Vegetative fires can also create hydrophobic soils which resist absorption of rainfall which can increase erosion and water runoff.

The stability of the development does not rely on features that are especially susceptible to failure from wildfire. The steeper manufactured slopes on the site, though irrigated, could potentially be burned during a wildfire. These slopes will be engineered for stability with or without groundcover, but in a situation where fire was intense enough to create hydrophobic soil, erosion could occur. This is accounted for in the engineering of the site and is addressed in the Hydrology Report (Appendix F). The "burned and bulked" discharge flows of the subbasins on site are analyzed both pre- and post-developed. The burned and bulked flow calculates the flow of a burned vegetated area wherein debris from the burn is increased the volume and velocity of flows and transports sediment and debris. Stormwater facilities must provide Capital Flood protection which is the burned and bulked runoff from a 50-year frequency design storm falling on a saturated watershed. In other words, the site must be designed to handle a 50-year storm event following an idealized vegetation fire that results in a loss of vegetative cover which produces an idealized quantity of debris. According to the Hydrology Report the slopes behind the hotel are not predicted to generate debris flow in such a scenario, whereas under existing conditions they would. In general only areas that retain natural landforms and vegetation would be expected to generate debris flows in such a scenario, but at rates that do not surpass County standards. The site is therefore protected from a Capital Flood scenario and would remain stable if vegetation on site were burned and immediately followed by a large storm event. The drainage terraces and stormwater conveyances provided by the roads and parking lots would adequately control erosion in a Capital Flood scenario such that the project would not significantly contribute to post-wildfire flooding or landslides that could impact the site or other developed areas. Therefore, impacts would be less than significant.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of 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?	☐	☐	☒	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of an individual 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).	☐	☐	☒	☐
c. Does the project have environmental effects that cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Impact Analysis

a. Less than Significant Impact. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of 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?

As explained in Section V there are no known prehistoric archaeological resources on the project site and archeological monitoring is required during initial grading by MM CUL-1 in order to reduce potential impacts to unknown archaeological resources to less than significance. As discussed above in Section IV the project does not have the potential to eliminate a plant or animal community, reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels or restrict the range of any plant or animal. Mitigation measures BIO-1 through BIO-9 are required to reduce all potential impacts to less than significance. The mitigation measures imposed in Sections V and IV are adequate to protect cultural and biological resources and no further impacts beyond those previously identified are anticipated, and there is no need for additional mitigation measures. Impacts would be less than significant.

Mitigation Measures: No additional mitigation measures are required.

b. Less than Significant Impact. Does the project have impacts that are individually limited, but cumulatively considerable?

The definition of a cumulatively considerable impact is provided in Guidelines section 15065(a)(3):

“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.

Areas adjacent to and near the project site are assumed to be developed in the future according to the land uses determined by the General Plan. The project could result in cumulatively considerable impacts if its individual impacts would contribute to a larger or more severe impact that results from successive individual impacts. As concluded in this analysis, the project’s incremental contribution to each evaluated issue would be less than significant, mitigated to less than significant, or would have no impact. Assessment of air quality and greenhouse gas impacts are by nature cumulative analyses, and because the project results in less than significant impacts it would not contribute to any such cumulative impacts. In order to cumulatively contribute to other impacts the project would have to impact resources that would be successively impacted by future projects to the point of a significant effect, and there is no evidence in the record the project would result in impacts to any such resources. The project is developed according to the assumptions of the General Plan and as such would not cumulatively contribute to impacts related to anticipated growth, and the same can be assumed for successive planned development. As such, the project’s contribution to cumulative impacts would be less than significant and no additional mitigation measures are required.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact. Does the project have environmental effects that cause substantial adverse effects on human beings, either directly or indirectly?

As discussed in the preceding analysis, the project would not produce any significant impacts upon the environment that cannot be mitigated. All relevant aspects of the project have been analyzed and there is no substantial evidence that the project would have additional environmental effects that cause substantial adverse effects on human beings, either directly or indirectly, therefore, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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