



Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead



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Regional Planning

Entrada South and Valencia Commerce Center Project

Entrada South:
Vesting Tentative Tract Map No. 083582

Valencia Commerce Center:
Vesting Tentative Parcel Map No. 18108

INITIAL STUDY

Project No. TBD (New Project No. Forthcoming)¹
State Clearinghouse No. 2000011025

Prepared by:

County of Los Angeles
Department of Regional Planning, Subdivisions
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October 7, 2021

¹ The current VCC Project No. is 87-150-(5); a new Project No. for Entrada South is pending.

Environmental Checklist Form (Initial Study)

County of Los Angeles, Department of Regional Planning



Project title: Entrada South and Valencia Commerce Center (VCC) Project

Lead agency name and address: Los Angeles County, 320 West Temple Street, Los Angeles, CA 90012

Contact Person and phone number: Mr. Jodie Sackett, Department of Regional Planning, Subdivisions, (213) 974-6433

Project sponsor's name and address: The Newhall Land and Farming Company, a California Limited Partnership, an indirect subsidiary of Five Point Holdings, LLC, 25124 Springfield Court, Suite 300 Valencia, CA 91355. Jennifer Bohlen, (949) 349-1000, Jennifer.bohlen@fivepoint.com; Alex Herrell, (661) 255-4449, alex.herrell@fivepoint.com

Project location:

Entrada Planning Area: West of I-5 and The Old Road, on the north and south sides of Magic Mountain Parkway, south of Six Flags Magic Mountain theme park in the Santa Clarita Valley

VCC Planning Area: West of I-5 and The Old Road, north of SR-126, and east of Commerce Center Drive and the Chiquita Canyon landfill in the Santa Clarita Valley

APN:

Entrada Planning Area: 2826-008-039, 2826-008-044, and 2826-009-106

VCC Planning Area: 2866-001-001, 2866-002-045, 2866-002-052, 2866-002-061, 2866-002-063, 3271-001-038 (partial)¹

USGS Quad:

Entrada Planning Area: Newhall

VCC Planning Area: Newhall/Val Verde

The Project Site is located within the northwest portion of Los Angeles County (County), west of I-5 and the City of Santa Clarita, as shown on **Figure 1**, Regional Location Map, on page 2. As shown in **Figure 2.1**, Project Vicinity Map, on page 3, the Project Site is located in an unincorporated area of the County, within the Santa Clarita Valley Planning Area (Valley Planning Area). The Project Site's location relative to the local roadway network is depicted in **Figure 2.2**, Local Location and Roadway Network Map, on page 4.

The Project Site is within the planning boundary of the State-approved Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan (RMDP/SCP), which was the subject of a State-certified Environmental Impact Report (EIR) (SCH No. 2000011025; hereafter referred to

¹ The assessor parcel numbers (APNs) listed reflect what is accurate at the time of preparation of this Initial Study. However, the APNs are subject to change over time.

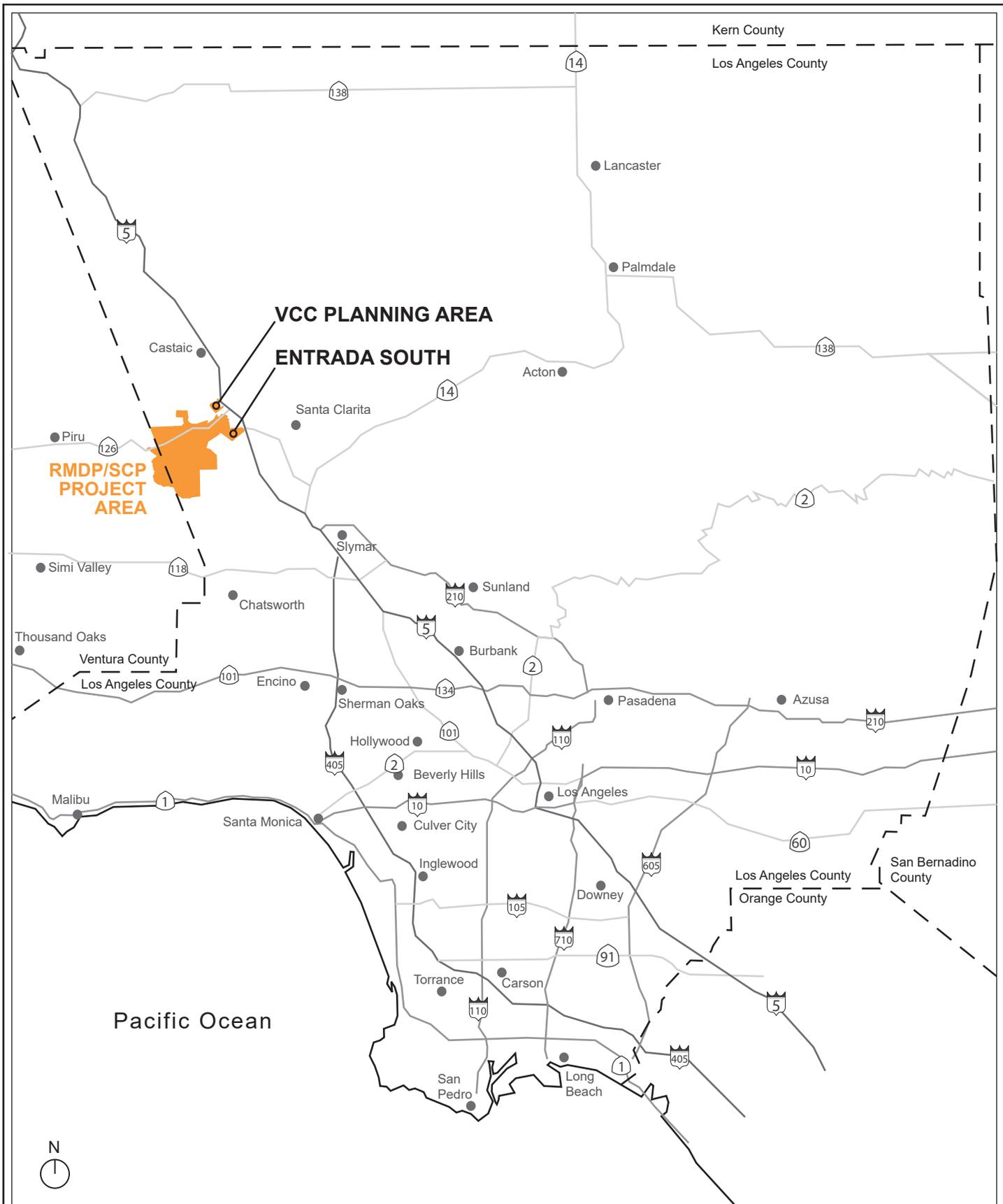


Figure 1
Regional Location Map

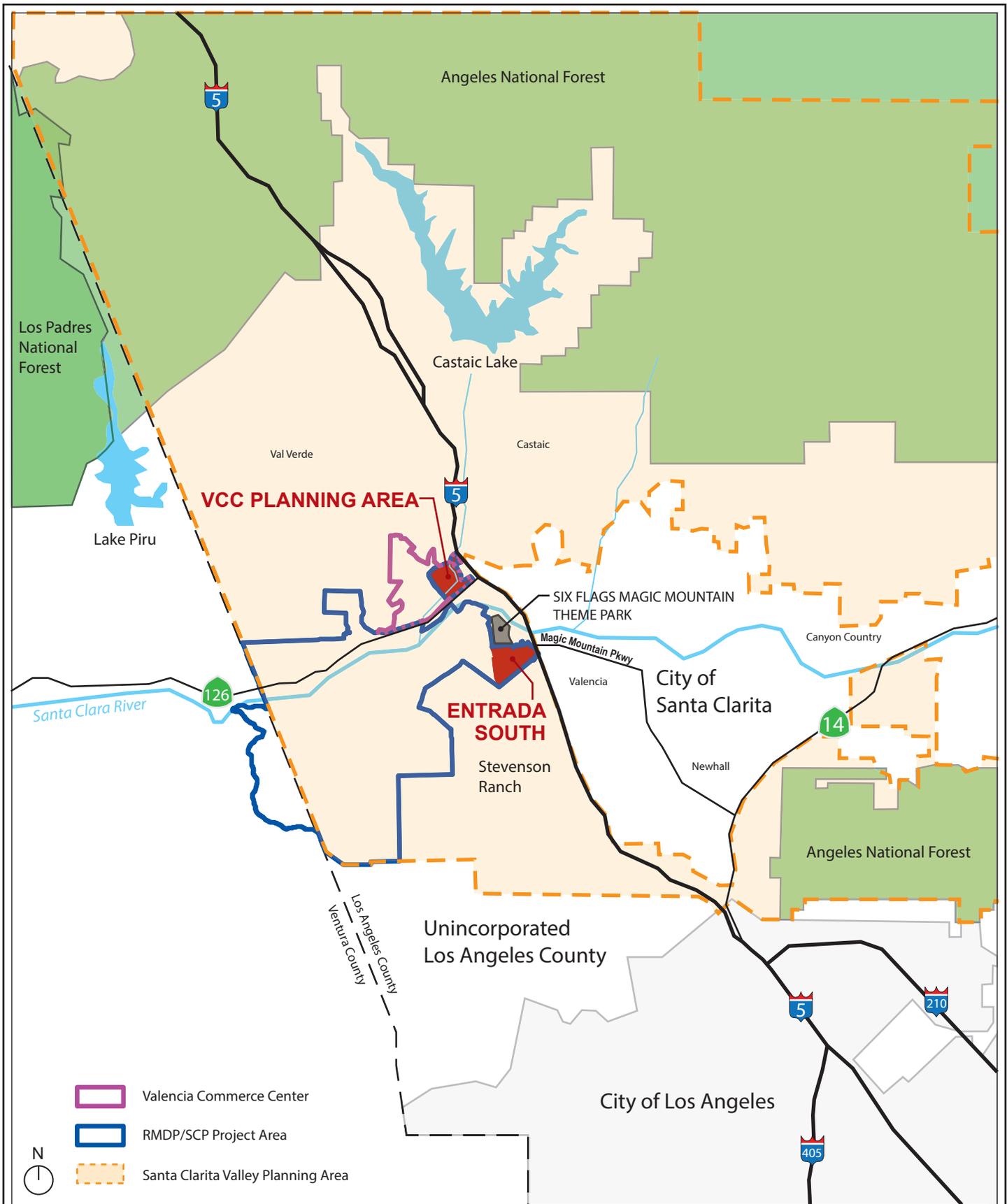
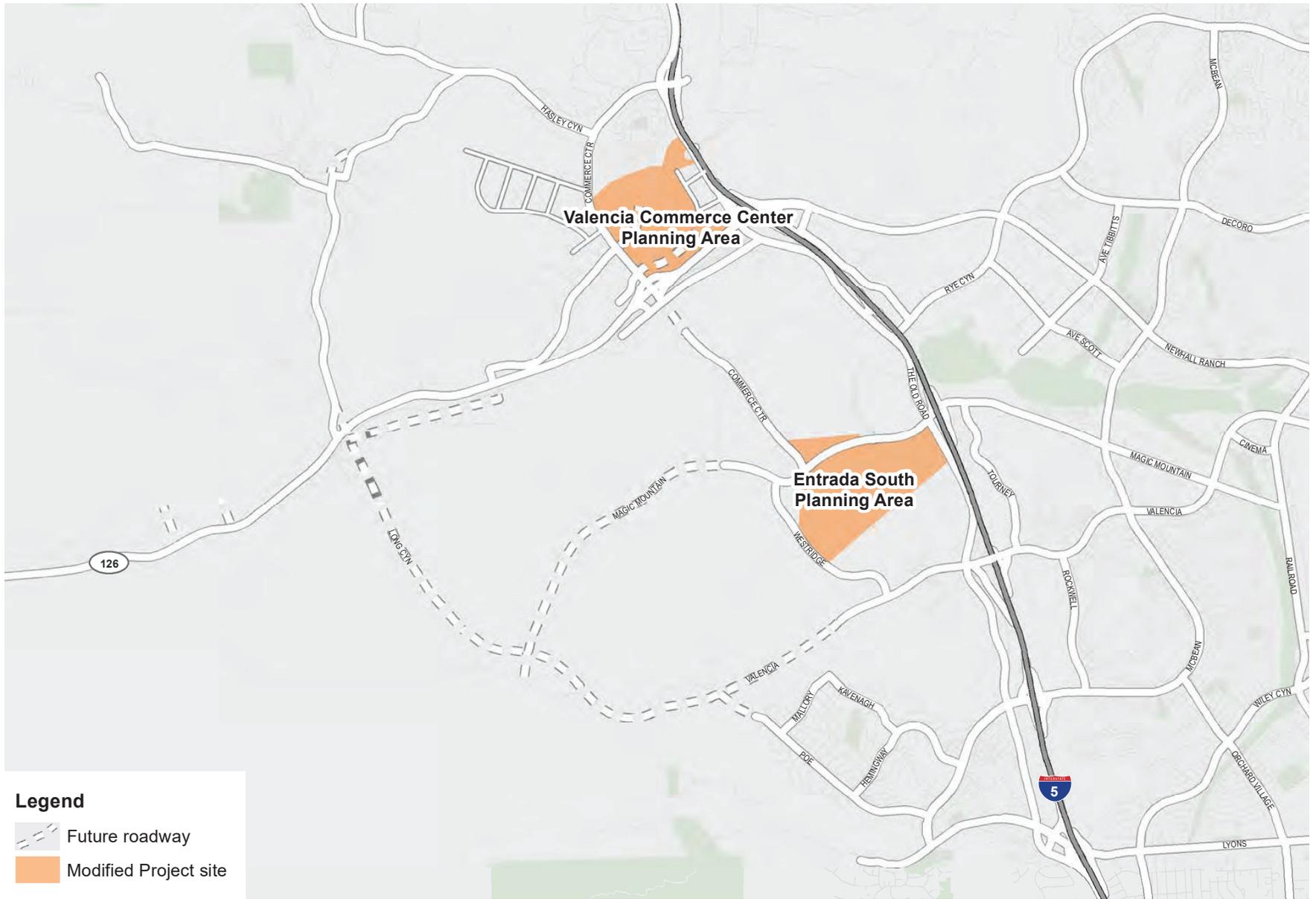


Figure 2.1
Project Vicinity Map



Legend

-  Future roadway
-  Modified Project site

Figure 2.2
Local Location and Roadway Network Map



as the State-certified EIR). In the State-certified EIR for the RMDP/SCP, the Project Site is identified as the “Entrada Planning Area” and the “VCC Planning Area.” The Entrada Planning Area is also sometimes referred to as Entrada South or the Entrada South Planning Area. The Project Site is adjacent to but not located within the Newhall Ranch Specific Plan area.

Entrada Planning Area: The Entrada Planning Area consists of approximately 382 acres located west of I-5 and The Old Road and predominantly south of Six Flags Magic Mountain theme park (Six Flags Magic Mountain).²

VCC Planning Area: The VCC Planning Area consists of approximately 321 acres in an undeveloped portion of the partially completed VCC industrial/business park center located west of I-5 and north of Henry Mayo Drive (SR-126).

Gross Acreage:

<u>Gross Acreage by Planning Area</u>	
<u>Planning Area</u>	<u>Gross Acreage</u>
<u>Entrada South</u>	<u>382 acres</u>
<u>VCC</u>	<u>321 acres</u>
<u>Total Gross</u>	<u>703 acres</u>

General Plan Designation:

Per the Santa Clarita Valley Area Plan: One Valley One Vision 2012 (OVOV Area Plan): H5—Residential 5, south of Magic Mountain Parkway; CM—Major Commercial, north of Magic Mountain Parkway; OS-PR—Parks and Recreation, south of the Southern California Edison electric transmission lines; and IO—Industrial Office. See **Figure 3.1**, OVOV Land Use Designations—Entrada South, on page 6 and **Figure 4.1**, OVOV Land Use Designations—VCC Planning Area, on page 7.

The OVOV Area Plan is a component of the Los Angeles County General Plan intended to provide focused goals, policies, and maps to guide the regulation and development of unincorporated portions of the Santa Clarita Valley. Finalized in 2012, the OVOV Area Plan included extensive public input and resulted from a cooperative effort between the County and the City of Santa Clarita to create a unified plan for the buildout of the Santa Clarita Valley.

The OVOV Area Plan was the subject of a Programmatic EIR (SCH No. 2008071119) (OVOV EIR), which included projections for the number of dwelling units, non-residential square footage, population, and employment in the OVOV Area Plan.³ The OVOV EIR analyzed potential environmental impacts associated with buildout of the OVOV Area Plan based on the identified land use designations.

Community/Area Plan Designation: See OVOV Area Plan designations listed above.

Zoning: R-1—Single-Family Residence, south of Magic Mountain Parkway; C-3—General Commercial, north of Magic Mountain Parkway; C-R—Commercial Recreation, south of the Southern California Edison electric transmission lines; and M-1.5-DP—Restricted Heavy Manufacturing/Development Program. See **Figure 3.2**, OVOV Zoning Designations—Entrada South, on page 8 and **Figure 4.2**, OVOV Zoning Designations—VCC Planning Area, on page 9.

² As studied in the State-certified EIR and approved by CDFW in 2017, Entrada South was represented by the Entrada Planning Area (316 acres), as well as the extension of Magic Mountain Parkway (approximately 66 acres) through the anticipated tract map boundary.

³ OVOV EIR, 2.0-4.

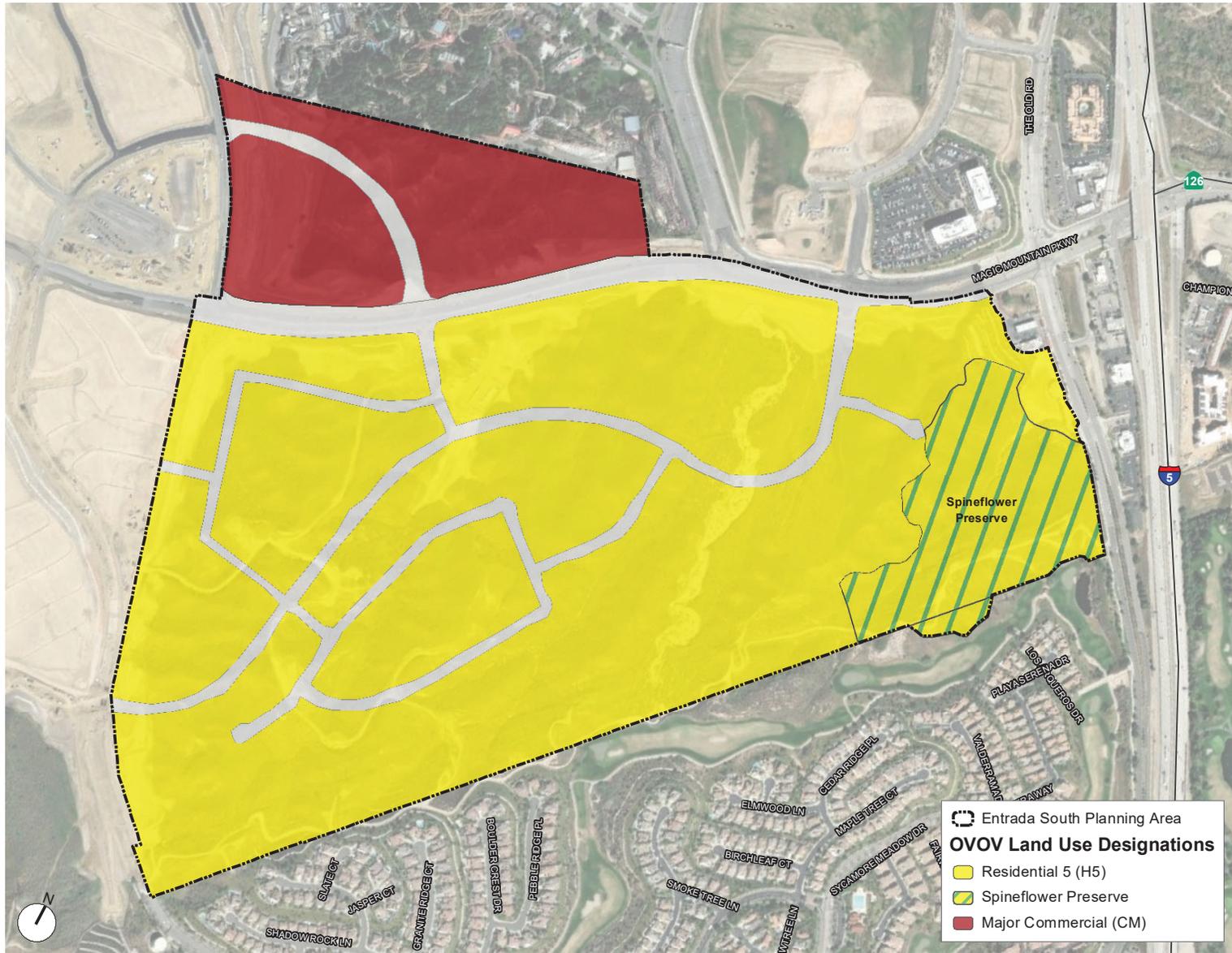


Figure 3.1
OVOV Land Use Designations – Entrada South



Figure 4.1
OVOV Land Use Designations – VCC Planning Area

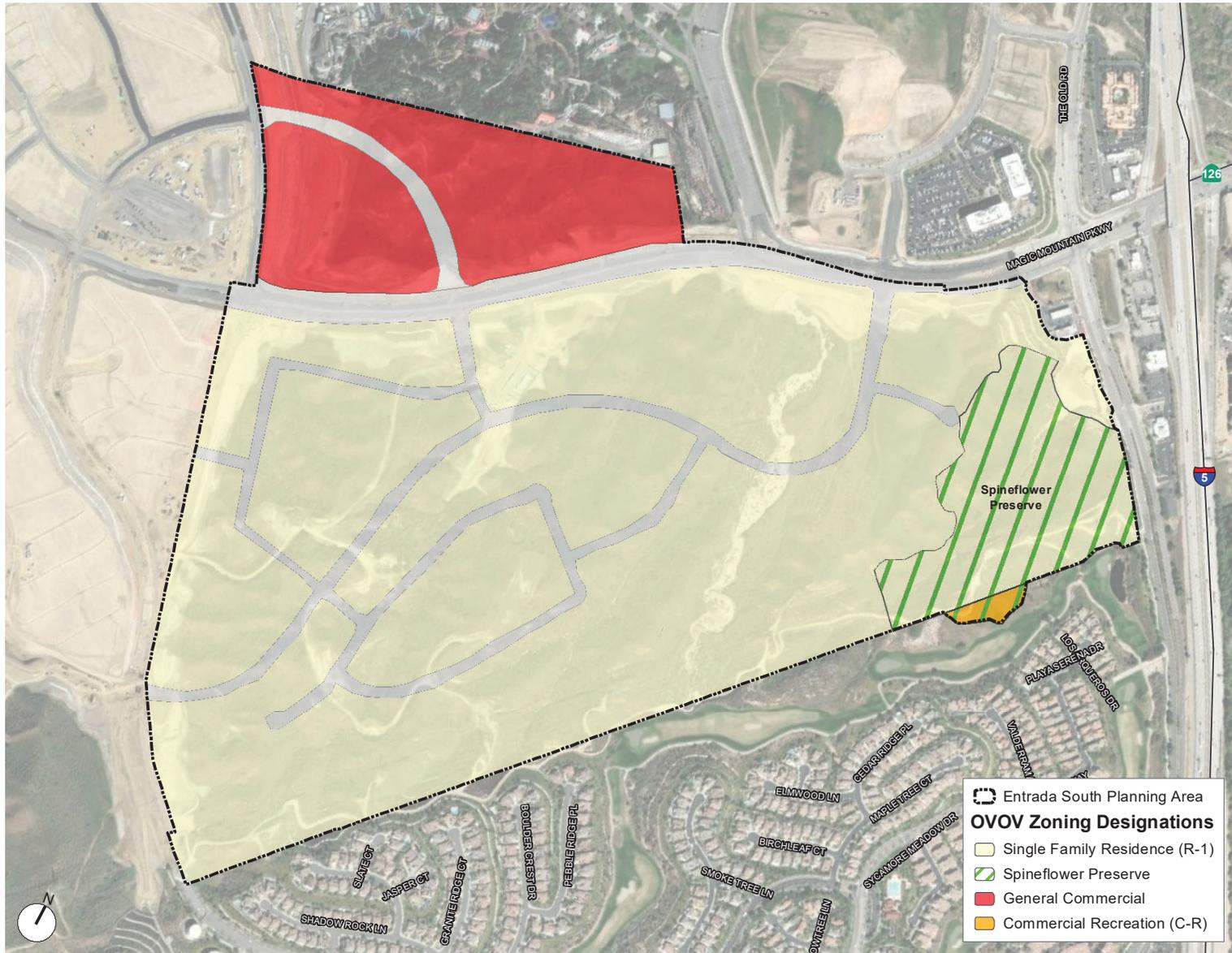


Figure 3.2
OVOV Zoning Designations – Entrada South

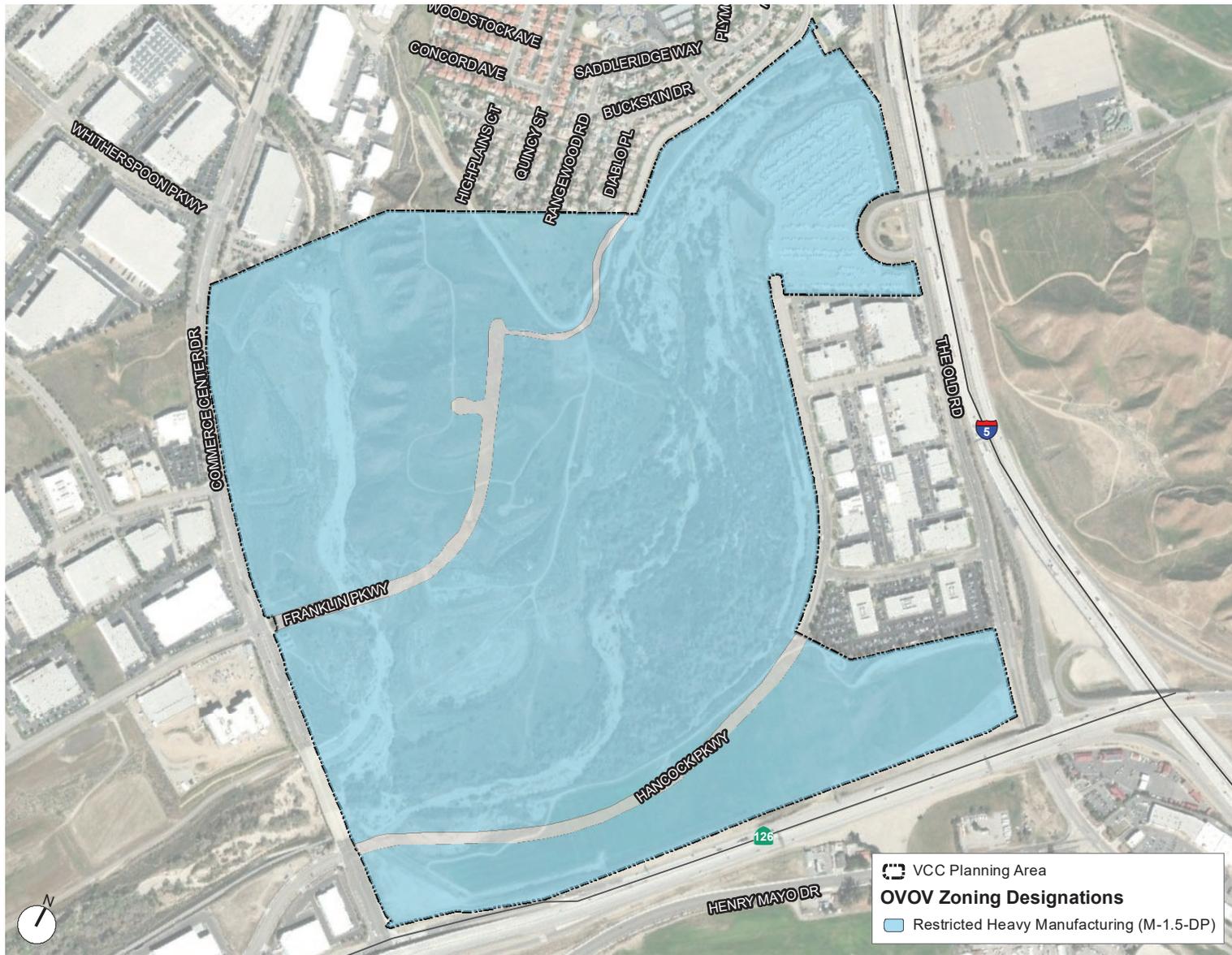


Figure 4.2
OVOV Zoning Designations – VCC Planning Area

The spineflower preserve within the Entrada Planning Area has been permanently dedicated on-site. The Entrada South and VCC Project does not propose any changes to the spineflower preserve.

Description of Modified Project:

Introduction

The Entrada South and VCC Project implements the development within the Entrada and VCC Planning Areas facilitated by the approved RMDP/SCP and analyzed in the State-certified EIR. The California Department of Fish and Wildlife (CDFW) certified the State-certified EIR in June 2017, at which time it also approved the RMDP/SCP and related State permits. Los Angeles County was a responsible agency for the RMDP/SCP and participated in the State-certified EIR process through the receipt and review of the Draft and Final EIRs as well as the Draft and Final Additional Environmental Analysis and the submittal of comments, which were addressed by CDFW. In addition, the Entrada South and VCC Project is consistent with the OVOV Area Plan’s projected buildout and land use designations, as evaluated in the OVOV EIR and approved by the County.

The proposed Entrada South and VCC Project reflects limited changes and refinements to the development of the Entrada and VCC Planning Areas, as compared to what was evaluated in the State-certified EIR. As such, the Entrada South and VCC Project is referred to herein as the “Modified Project.” A Supplemental EIR will be prepared by the County as the CEQA lead agency for the Modified Project. The Supplemental EIR will allow the County, as the CEQA lead agency, and other agencies as CEQA responsible agencies, to consider additional discretionary entitlements needed to complete development of the Entrada and VCC Planning Areas under the Modified Project.

The Modified Project includes enhanced environmental protections for each planning area, as discussed below. A summary of the Modified Project refinements to the balance of residential and non-residential development is shown in the following table and discussed below for each planning area.

<u>Land Use</u>	<u>2017 Approved Project</u>	<u>Modified Project</u>	<u>Difference</u>
<u>Entrada South</u>			
<u>Residential Units</u>	<u>1,725</u>	<u>1,574 (to comply with OVOV Area Plan)</u>	<u>- 151</u>
<u>Non-Residential</u>	<u>450,000 SF</u>	<u>730,000 SF</u>	<u>+ 280,000 SF</u>
<u>Valencia Planning Area</u>			
<u>Residential Units</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Non-Residential</u>	<u>3,400,000 SF</u>	<u>3,400,000 SF</u>	<u>0</u>

Under CEQA, when evaluating project changes relative to a previously certified EIR, the additional CEQA analysis shall focus solely on the incremental changes in the project, changes in circumstances, or new information since the certification of the prior EIR. (See, e.g., *Friends of the College of San Mateo Gardens v. San Mateo County Community College District* (2016) 1 Cal.4th 937, 949; *Benton v. Board of Supervisors* (1991) 226 Cal.App.3d 1467, 1482.) For purposes of this discussion, the “2017 Approved Project” refers to the resource management activities and development facilitated by the RMDP/SCP as approved by CDFW in 2017 for the Entrada and VCC Planning Areas.⁴

⁴ The Entrada and VCC Planning Areas were analyzed in the State-certified EIR as part of Alternative 2 (the proposed project). The final project approved by CDFW (i.e., the 2017 Approved Project) included additional environmental protections

The Modified Project is aimed at being a sustainable development that achieves net zero greenhouse gas emissions. As such, a part of the Project Description for the Modified Project includes applicable mitigation measures from the State-certified EIR, including 13 mitigation measures related to greenhouse gas impacts that reduce the Project's greenhouse gas emissions to net zero and are identical to those imposed on the 2017 Approved Project in accordance with the State-certified EIR. These mitigation measures went through extensive review and refinement as a part of the State-certified EIR, including review by the California Air Resources Board, the State authority on climate policy. These 13 mitigation measures are as follows:

Building Energy Efficiency

- **2-1:** Prior to the issuance of residential building permits for the project or a portion of the project, the project applicant or its designee shall submit one or more Zero Net Energy Confirmation (ZNE) Reports (ZNE Report) prepared by a qualified building energy efficiency and design consultant to Los Angeles County for review and confirmation that the residential development covered by the ZNE Report achieves the ZNE standard specified in this mitigation measure. Specifically, a ZNE Report shall demonstrate that the residential development within the RMDP/SCP project site subject to application of Title 24, Part 6, of the California Code of Regulations has been designed and shall be constructed to achieve ZNE, as defined by CEC in its 2015 Integrated Energy Policy Report, which requires the value of the net energy produced by project renewable energy resources to equal the value of the energy consumed annually by the project using the CEC's Time Dependent Valuation metric.

A ZNE Report shall provide, at a minimum, the following information:

- Confirmation that the residential development shall comply with Title 24, Part 6 building standards that are operative at the time of building permit application.
- Identification of additional measures or building performance standards that shall be relied upon to achieve the ZNE standard (as defined above), assuming ZNE is not already achieved by meeting the operative Title 24, Part 6 building standards.

In demonstrating that the residential development achieves the ZNE standard, the ZNE Report may:

- Evaluate multiple buildings and/or land use types. For example, a ZNE Report may cover all of the residential and non-residential buildings within a neighborhood/community, or a subset thereof, including an individual building.
- Rely upon aggregated or community-based strategies to support its determination that the subject buildings are designed to achieve ZNE. For example, shortfalls in renewable energy generation for one or more buildings may be offset with excess renewable generation from one or more other buildings. As such, a ZNE Report could determine a building is designed to achieve ZNE based on aggregated or community-based strategies even if the building on its own may not be designed to achieve ZNE.
- Make reasonable assumptions about the estimated electricity and natural gas loads and energy efficiencies of the subject buildings.

compared to Alternative 2 in portions of the project outside of the Entrada and VCC Planning Areas, but the final approval did not change the facilitated development within either of those two planning areas.

- If interconnection of the project’s renewable generation is not sufficient to allow compliance with the ZNE standard for the project, or a portion of the project, then Los Angeles County shall allow the project applicant or its designee to achieve an equivalent level of GHG emissions reductions to mitigate such shortfall by providing 5.1 metric tonnes carbon dioxide equivalents (MTCO₂e) of GHG reductions for every megawatt-hour of renewable energy generation that would have been needed to achieve the ZNE standard for the project, or a portion of the project, as demonstrated in the ZNE Report.
- 2-2: Prior to the issuance of building permits for commercial development and private recreation centers, and prior to the commencement of construction for the public facilities, respectively, for the project or a portion of the project, the project applicant or its designee shall submit one or more Zero Net Energy Confirmation Reports (ZNE Report) prepared by a qualified building energy efficiency and design consultant to Los Angeles County for review and confirmation that the commercial development, private recreation centers, and/or public facilities covered by the ZNE Report achieve the ZNE standard specified in this mitigation measure. Specifically, a ZNE Report shall demonstrate that the commercial development, private recreation centers, and public facilities within the RMDP/SCP project site subject to application of Title 24, Part 6, of the California Code of Regulations have been designed and shall be constructed to achieve ZNE, as defined by CEC in its 2015 Integrated Energy Policy Report, which requires the value of the net energy produced by project renewable energy resources to equal the value of the energy consumed annually by the project using the CEC’s Time Dependent Valuation metric.

A ZNE Report shall provide, at a minimum, the following information:

- Confirmation that the commercial development, private recreation centers, and/or public facilities shall comply with Title 24, Part 6 building standards that are operative at the time of building permit application.
- Identification of additional measures or building performance standards that shall be relied upon to achieve the ZNE standard (as defined above), assuming ZNE is not already achieved by meeting the operative Title 24, Part 6 building standards.

In demonstrating that the commercial development, private recreation centers, and/or public facilities achieves the ZNE standard, the ZNE Report may:

- Evaluate multiple buildings and/or land use types. For example, a ZNE Report may cover all of the residential and non-residential buildings within a neighborhood/community, or a subset thereof, including an individual building.
- Rely upon aggregated or community-based strategies to support its determination that the subject buildings are designed to achieve ZNE. For example, short falls in renewable energy generation for one or more buildings may be offset with excess renewable generation from one or more other buildings. As such, a ZNE Report could determine a building is designed to achieve ZNE based on aggregated or community-based strategies even if the building on its own may not be designed to achieve ZNE.
- Make reasonable assumptions about the estimated electricity and natural gas loads and energy efficiencies of the subject buildings.

- If interconnection of the project’s renewable generation is not sufficient to allow compliance with the ZNE standard for the project, or a portion of the project, then Los Angeles County shall allow the project applicant or its designee to achieve an equivalent level of GHG emissions reductions to mitigate such shortfall by providing 5.1 MTCO₂e of GHG reductions for every megawatt-hour of renewable energy generation that would have been needed to achieve the ZNE standard for the project, or a portion of the project, as demonstrated in the ZNE Report.
- **2-3:** Prior to the issuance of private recreation center building permits, the project applicant or its designee shall submit swimming pool heating design plans to Los Angeles County for review and approval. The design plans shall demonstrate that all swimming pools located at private recreation centers on the RMDP/SCP project site have been designed and shall be constructed to use solar water heating or other technology with an equivalent level of energy efficiency.

Mobile Sources

- **2-4:** Prior to the issuance of residential building permits, the project applicant or its designee shall submit building design plans, to Los Angeles County for review and approval, which demonstrate that each residence within the RMDP/SCP project site subject to application of Title 24, Part 6, of the California Code of Regulations shall be equipped with a minimum of one single-port electric vehicle (EV) charging station. Each charging station shall achieve a similar or better functionality as a Level 2 charging station.

Additionally, prior to the issuance of the first building permit for the RMDP/SCP project site, the project applicant or its designee shall establish and fund a dedicated account for the provision of subsidies for the purchase of zero emission vehicles (ZEVs), as defined by CARB. The project applicant or its designee shall provide proof of the account’s establishment and funding to Los Angeles County.

The dedicated account shall be incrementally funded, for each village-level project, in an amount that equals the provision of a \$1,000 subsidy per residence—on a first come, first-served basis—for 65 percent of the village’s total residences subject to application of Title 24, Part 6, of the California Code of Regulations.

- **2-5:** Prior to the issuance of commercial building permits, the project applicant or its designee shall submit building design plans, to Los Angeles County, which demonstrate that the parking areas for commercial buildings on the RMDP/SCP project site shall be equipped with electric vehicle (EV) charging stations that provide charging opportunities to 7.5 percent of the total number of required parking spaces. (“Commercial buildings” include retail, light industrial, office, hotel, and mixed-use buildings.)

The EV charging stations shall achieve a similar or better functionality as a Level 2 charging station. In the event that the installed charging stations use functionality/technology other than Level 2 charging stations, the parameters of the mitigation obligation (i.e., number of parking spaces served by EV charging stations) shall reflect the comparative equivalency of Level 2 charging stations to the installed charging stations on the basis of average charge rate per hour. For purposes of this equivalency demonstration, Level 2 charging stations shall be assumed to provide charging capabilities of 25 range miles per hour.

- 2-6: The project applicant-submitted Newhall Ranch Transportation Demand Management (TDM) Plan, located in Final AEA Appendix 7, shall be implemented to reduce vehicle miles traveled (VMT) resulting from project build out with oversight from Los Angeles County. The TDM Plan is designed to influence the transportation choices of residents, students, employees, and visitors, and serves to enhance the use of alternative transportation modes both on and off the project site through the provision of incentives and subsidies, expanded transit opportunities, bikeshare and carshare programs, technology-based programs, and other innovative means. Village-level implementation of relevant elements of the TDM Plan shall proceed in accordance with village-level applicability supplements prepared by a qualified transportation engineer that are reviewed and considered by Los Angeles County when approving tentative subdivision maps for land developments that are part of the project.

Accordingly, the TDM Plan identifies key implementation actions that are critical to the effectiveness of the VMT-reducing strategies, as well as timeline and phasing requirements, monitoring standards, and performance metrics and targets tailored to each of the strategies.

In accordance with the TDM Plan, a non-profit Transportation Management Organization (TMO) or equivalent management entity shall be established to provide the services required, as applicable.

- 2-7: Prior to the issuance of traffic signal permits, the project applicant or its designee shall work with Los Angeles County and the California Department of Transportation (Caltrans), as applicable, to facilitate traffic signal coordination along:
 1. State Route 126 from the Los Angeles County line to the Interstate 5 north-bound ramps;
 2. Chiquito Canyon Road, Long Canyon Road, and Valencia Boulevard within the RMDP/SCP Project site;
 3. Magic Mountain Parkway from Long Canyon Road to the Interstate 5 north-bound ramps; and,
 4. Commerce Center Drive from Franklin Parkway to Magic Mountain Parkway.

To effectuate the signal synchronization and specifically the operational and timing adjustments needed at affected traffic signals, the project applicant or its designee shall submit traffic signal plans for review and approval, and/or pay needed fees as determined by Los Angeles County or Caltrans, as applicable.

A majority of the signals that will be synchronized will be new signals constructed/installed by the project. Thus, for these signals, the project will provide the necessary equipment at the signal controller cabinet, as well as within the new roadways themselves, to enable and facilitate synchronization. The project is responsible for paying 100 percent of the applicable fee amount for the signal synchronization work, with assurance that the necessary funding will be available to fully implement this measure.

- 2-8: Consistent with the parameters of the Newhall Ranch TDM Plan, the project applicant or its designee shall provide Los Angeles County with proof that funding has been provided for the purchase, operation and maintenance of zero emission school buses in furtherance of the school bus program identified in the project's TDM Plan. The proof of funding shall be demonstrated

incrementally as the school bus program is paced to village-level occupancy and student enrollment levels.

- **2-9:** Prior to the issuance of the first 2,000th residential building permit within the RMDP/SCP project site and every 2,000th residential building permit thereafter, the project applicant or its designee shall provide Los Angeles County with proof that it has provided a subsidy of \$100,000 per bus for the replacement of up to 10 diesel or compressed natural gas transit buses with zero emission buses to the identified transit provider(s).

Construction Sources

- **2-10:** Prior to issuing grading permits for village-level development within the RMDP/SCP project site, Los Angeles County shall confirm that the project applicant or its designee shall fully mitigate the construction and vegetation change GHG emissions associated with each such grading permit (the “Incremental Construction GHG Emissions”) by relying upon one of the following compliance options, or a combination thereof, in accordance with the project applicant-submitted Newhall Ranch GHG Reduction Plan (GHG Reduction Plan; see Final AEA Appendix 6):
 - Directly undertake or fund activities that reduce or sequester GHG emissions (“Direct Reduction Activities”) and retire the associated “GHG Mitigation Credits” in a quantity equal to the Incremental Construction GHG Emissions. A “GHG Mitigation Credit” shall mean an instrument issued by an Approved Registry that satisfies the performance standards set forth in the GHG Reduction Plan and shall represent the estimated reduction or sequestration of one metric tonne of carbon dioxide equivalent that will be achieved by a Direct Reduction Activity that is not otherwise required (California Environmental Quality Act [CEQA] Guidelines Section 15126.4(c)(3)). An “Approved Registry” is an accredited carbon registry as defined by the GHG Reduction Plan; or
 - Obtain and retire “Carbon Offsets” in a quantity equal to the Incremental Construction GHG Emissions. “Carbon Offset” shall mean an instrument issued by an Approved Registry that satisfies the performance standards set forth in the GHG Reduction Plan and shall represent the past reduction or sequestration of one metric tonne of carbon dioxide equivalent achieved by a Direct Reduction Activity or any other GHG emission reduction project or activity that is not otherwise required (CEQA Guidelines Section 15126.4(c)(3)).

Local and Off-Site Mitigation

- **2-11:** Prior to the issuance of building permits for development within the RMDP/SCP project site, the project applicant or its designee shall undertake or fund Direct Reduction Activities pursuant to the Building Retrofit Program (“Retrofit Program”), as included in Final AEA Appendix 13 to improve the energy efficiency of existing buildings located primarily in disadvantaged communities (as defined in the Retrofit Program). The project applicant or its designee shall retire GHG Mitigation Credits or Carbon Offsets issued by an Approved Registry based on such Direct Reduction Activities in a quantity equal to the sum of the following (together, the “Retrofit Reduction Requirement”) as included in Final AEA Appendix 13:
 - For the residential portion of a building permit application, the product of the planned number of residential units for the village-level project multiplied by 0.0377 MTCO_{2e};

- For the commercial portion of a building permit application, the product of the planned commercial development per thousand commercial square feet multiplied by 0.0215 MTCO₂e. (“Commercial development” includes retail, light industrial, office, hotel and mixed-use buildings.)

Building retrofits covered by the Retrofit Program can include, but are not limited to: cool roofs, solar panels, solar water heaters, smart meters, energy efficient lighting (including, but not limited to, light bulb replacement), energy efficient appliances, energy efficient windows, pool covers, insulation, and water conservation measures.

The Retrofit Program shall be implemented within the geographic area defined to include Los Angeles County and primarily within disadvantaged communities, as defined by the Retrofit Program, or in other areas accepted by the Los Angeles County Planning Director.

- **2-12:** Prior to the issuance of the first building permit for the RMDP/SCP project site, the project applicant or its designee shall provide Los Angeles County with proof of installation of EV charging stations capable of serving 20 off-site parking spaces. Thereafter, the project applicant or its designee shall provide Los Angeles County proof of installation of EV charging stations prior to the issuance of residential and commercial building permits per the following ratios: one (1) off-site parking space shall be served by an electric vehicle charging station for every 30 dwelling units, and one (1) off-site parking space shall be served by an electric vehicle charging station for every 7,000 square feet of commercial development. (“Commercial development” includes retail, light industrial, office, hotel and mixed-use buildings.) Off-site EV charging stations capable of servicing 2,036 parking spaces would be required if the maximum allowable development facilitated by the RMDP/SCP project occurs; fewer EV charging stations would be required if maximum build-out under the RMDP/SCP project does not occur.

The EV charging stations shall achieve a similar or better functionality as a Level 2 charging station and may service one or more parking spaces. In the event that the installed charging stations use functionality/technology other than Level 2 charging stations, the parameters of the mitigation obligation (i.e., number of parking spaces served by EV charging stations) shall reflect the comparative equivalency of Level 2 charging stations to the installed charging stations on the basis of average charge rate per hour. For purposes of this equivalency demonstration, Level 2 charging stations shall be assumed to provide charging capabilities of 25 range miles per hour.

The EV charging stations shall be located within the geographic area defined to include Los Angeles County. The EV charging stations shall be in areas that are generally accessible to the public, such as areas that include, but are not limited to, retail centers, employment centers and office complexes, recreational facilities, schools, and other categories of public facilities.

- **2-13:** In addition to Mitigation Measures 2-1 through 2-12, the project applicant or its designee shall offset GHG emissions to zero by funding or undertaking Direct Reduction Activities or, if necessary, obtaining Carbon Offsets through the Newhall Ranch GHG Reduction Plan. The project applicant-submitted Newhall Ranch GHG Reduction Plan focuses on achieving GHG reductions or sequestration through the Direct Reduction Activities in coordination with an Approved Registry, such as the Climate Action Reserve. If these Direct Reduction Activities do not achieve the necessary amount of GHG reductions, the project applicant or its designee can obtain Carbon Offsets issued by an Approved Registry.

Prior to issuing building permits for development within the RMDP/SCP project site, Los Angeles County shall confirm that the project applicant or its designee shall fully offset the

project's remaining (i.e., post implementation of Mitigation Measures 2-1 through 2-12) operational GHG emissions over the 30-year project life associated with each such building permit (the "Incremental Operational GHG Emissions") by relying upon one of the following compliance options, or a combination thereof, in accordance with the Newhall Ranch GHG Reduction Plan:

- Undertake or fund Direct Reduction Activities that are estimated to result in GHG Mitigation Credits, as described in the GHG Reduction Plan, and retire such GHG Mitigation Credits in a quantity equal to the Incremental Operational GHG Emissions;
- Undertake or fund Direct Reduction Activities and retire the Carbon Offsets in a quantity equal to the Incremental Operational GHG Emissions; or
- If necessary, as determined by the Los Angeles County Planning Director in accordance with the GHG Reduction Plan, to fully offset Incremental Operational GHG Emissions, the project applicant or its designee may purchase and retire Carbon Offsets that have been issued by an Approved Registry in a quantity equal to the Incremental Operational GHG Emissions.

Compliance with Mitigation Measure (MM) 2-13 shall be demonstrated incrementally prior to obtaining building permits.

The incremental Operational GHG Emissions shall be equal to the sum of (1) the number of proposed residential units covered by the applicable building permit multiplied by a "GHG Residential Ratio" and (2) every thousand square feet of proposed commercial development covered by the applicable building permit multiplied by a "GHG Commercial Ratio." ("Commercial development" includes retail, light industrial, office, hotel, and mixed-use buildings.) GHG Residential Ratio and GHG Commercial Ratio shall mean the emissions ratios in MTCO₂e set forth in the applicable CEQA analysis completed by the County of Los Angeles for a specific village-level project to ensure that the related GHG emissions are reduced to zero.

Further discussion of these mitigation measures is included in **Section 8, Greenhouse Gas Emissions**, of this Initial Study, as well as Appendix IS-1 and the GHG and Energy Memo provided in Appendix IS-2.

Entrada Planning Area

The proposed changes and refinements under the Modified Project, as compared to the 2017 Approved Project analyzed in the State-certified EIR, include:

Enhanced Environmental Protections

The Modified Project increases environmental protections to wetlands and related biological resources within the Entrada Planning Area. The Modified Project enhances and restores portions of a drainage channel referred to as Unnamed Canyon 2. With the proposed design refinements, portions of Unnamed Canyon 2—from the storm drain outlet at the southern Entrada boundary to Magic Mountain Parkway—would be enhanced and restored as a natural, open, vegetated drainage channel with grade control structures that would generally retain the look and feel of a natural drainage, thus reducing permanent impacts to biological resources and jurisdictional waters and providing additional open space within the developed portions of the Project Site. This environmentally beneficial modification would result in increased open

space, restored drainage areas, and habitat for species as compared to that evaluated in the State-certified EIR.⁵

Refinements to the Balance of Residential and Non-Residential Development

The State-certified EIR for the 2017 Approved Project evaluated the environmental impacts of 1,725 dwelling units, 450,000 square feet of non-residential development, a public facilities area for a neighborhood park and a potential school site, private recreational amenities, a spineflower preserve, and trails and infrastructure within the Entrada Planning Area. The Modified Project includes 1,574 dwelling units (including affordable housing units consistent with the County’s Inclusionary Housing Ordinance or a potential Development Agreement, discussed below), 730,000 square feet of non-residential development, a neighborhood park and potential school site, a spineflower preserve, and trails and infrastructure within the Entrada Planning Area.⁶ The refinements to the land use plan for Entrada South ensure consistency with the density of residential units allowed under the OVOV Area Plan land use designation for Entrada South. As such, this analysis considers the environmental implications of reducing the number of residences by 151 units and increasing the amount of non-residential development by 280,000 square feet. These refinements do not substantially change the scope of the Entrada South land use plan when comparing the Modified Project to the 2017 Approved Project. Non-residential development could include any allowable uses consistent with the zoning designation, including but not limited to commercial, office, retail, and hotel uses. If a school site is not ultimately needed in Entrada South, that area would become available for residential development provided the overall number of allowable units (1,574 dwelling units) is not exceeded. Potential adjustments to school district boundaries may occur based on estimated student populations and discussions with the relevant school districts. The Conceptual Land Use Plan for the Entrada Planning Area is shown in **Figure 3.3**, Conceptual Land Use Plan—Entrada South, on page 19.

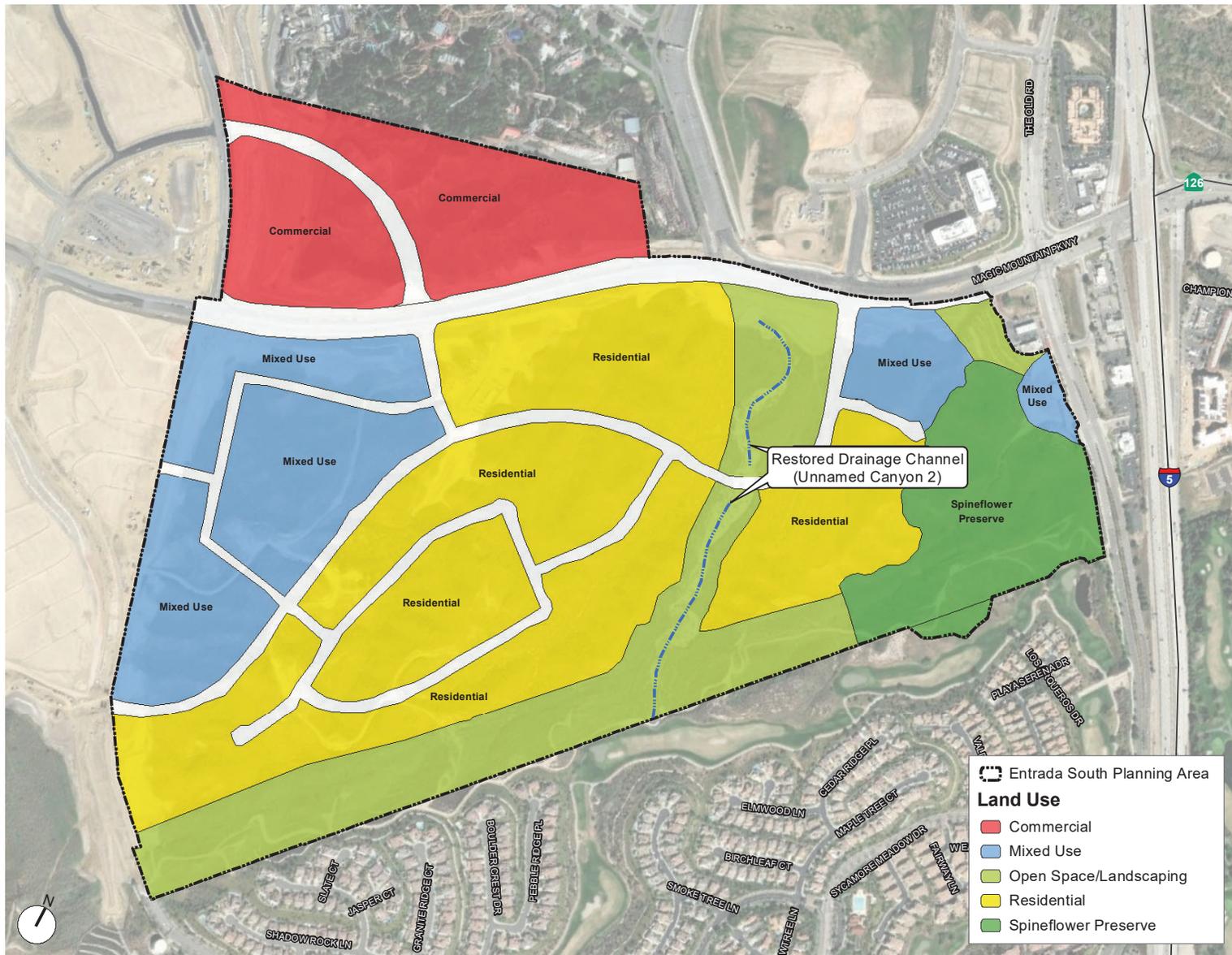
Zone Change

The Modified Project includes a zone change for the portion of the Entrada Planning Area located south of Magic Mountain Parkway from R-1 to MXD, Mixed-Use Development Zone. Consistent with County Code Section 22.26.030, the MXD zone allows for a mixture of residential, commercial, and limited light industrial uses and buildings. The MXD zone integrates a wide range of housing densities with community-serving commercial uses to serve local residents, employees, pedestrians, and consumers.

The County and the applicant may consider a Development Agreement in accordance with Government Code Section 65864 *et seq.* as part of the Modified Project. The Development Agreement would not increase the level of development or the disturbance footprint of the Modified Project. The Development Agreement may establish commitments by the applicant to provide additional environmental benefits, such as an updated affordable housing program. The Supplemental EIR will address the Development Agreement as a discretionary entitlement, if applicable.

⁵ As part of the Modified Project’s environmental enhancements within Entrada South, temporary disturbance of a 0.6-acre previously-disturbed golf course area within The Oaks Club at Valencia golf course, which is located off-site and immediately south of Entrada South within the Westridge community, is required to accommodate a necessary storm drain connection. This previously-disturbed golf course area would experience temporary impacts during a brief construction period and would be revegetated and restored as a portion of the golf course following completion of the storm drain connection associated with Unnamed Canyon 2.

⁶ A density bonus may be available under state law and the County Code based on the provision of affordable housing.



 Entrada South Planning Area
Land Use
 Commercial
 Mixed Use
 Open Space/Landscaping
 Residential
 Spineflower Preserve

Figure 3.3
 Conceptual Land Use Plan – Entrada South



Source: Harris & Associates, 2021.

VCC Planning Area

As relevant background, VCC was approved for development by Los Angeles County through the issuance of various entitlements and certification of an EIR (SCH No. 1987-123005) in 1991 (referred to herein as the County-certified VCC EIR), which is incorporated by reference. The existing VCC entitlement approved by the County allows approximately 12.6 million square feet of industrial/business park space at build-out, of which approximately 9 million square feet has been constructed. The VCC Planning Area evaluated herein as part of the Modified Project is comprised of approximately 3.4 million square feet of industrial/business park space within the County-approved and partially completed VCC industrial/business park center. Following the County-certified VCC EIR, development of the undeveloped portion of the VCC Planning Area was also analyzed in the State-certified EIR, with up to 3.4 million square feet of non-residential development that would be facilitated by the RMDP/SCP. Under the Modified Project and consistent with the State-certified EIR, the VCC Planning Area would be developed consistent with the uses allowed by the County-approved VCC entitlements and existing zoning. Thus, the Modified Project does not propose any new or additional buildout of the VCC Planning Area beyond what was analyzed in the State-certified EIR, and the Modified Project does not result in any buildout of VCC beyond the County-approved existing VCC entitlements, as summarized in the table below.

<u>Valencia Commerce Center (VCC)</u>	<u>Million Square Feet</u>
<u>County's Prior Approval of VCC</u>	<u>12.6</u>
<u>Existing Buildout of VCC (Previously Constructed)</u>	<u>9.0</u>
<u>Remaining Buildout of VCC Not Included in Modified Project</u>	<u>0.2</u>
<u>Remaining Buildout of VCC Planning Area Resulting From the Modified Project (Consistent with the 2017 Approved Project as Analyzed in the State-certified EIR)</u>	<u>3.4</u>
<u>Additional Buildout of the VCC Planning Area Beyond the County's Prior Approval of VCC</u>	<u>0</u>

The Conceptual Land Use Plan for the VCC Planning Area is shown in **Figure 4.3**, Conceptual Land Use Plan—VCC Planning Area, on page 21. As discussed above, the County and the applicant may ultimately enter into a Development Agreement as part of the Modified Project which may establish commitments by the applicant to provide additional environmental benefits. The Supplemental EIR will address the Development Agreement as a discretionary entitlement, if applicable.

The proposed changes and refinements under the Modified Project, as compared to the 2017 Approved Project analyzed in the State-certified EIR, include:

Enhanced Environmental Protections

To provide increased environmental protections to wetlands and related biological resources within the VCC Planning Area, the Modified Project involves a reduction in permanent impacts to Hasley Creek and Castaic Creek (such areas may be temporarily impacted during construction, as analyzed in the State-certified EIR, but would be restored and revegetated after construction based on the Modified Project design) which traverse the VCC Planning Area, including a reduction of permanent impacts to certain vegetation communities and jurisdictional stream habitat. This environmentally beneficial modification would result in increased open space, restored drainage areas, and habitat for species.



Figure 4.3
 Conceptual Land Use Plan – VCC Planning Area



Surrounding Land Uses and Setting:

Entrada Planning Area: Immediately north of the Entrada Planning Area are Six Flags Magic Mountain and the proposed Entrada North community. The existing unincorporated community of Westridge is located to the immediate south. In addition, the City of Santa Clarita is located to the east and is separated from the Entrada Planning Area by The Old Road and I-5. Finally, planned development within the Newhall Ranch Specific Plan area is located to the west. The approved Mission Village community within the Newhall Ranch Specific Plan area, which has been under development since the end of 2017, is located immediately west of the Site. Additionally, the proposed Legacy Village community is located to the southwest.

VCC Planning Area: VCC is surrounded by existing single-family residential and industrial uses to the north. Existing industrial uses, The Old Road and the I-5 Freeway are located to the east. Henry Mayo Drive (SR-126) and the proposed Entrada North community are located to the south. To the west is the Chiquita Canyon Landfill.

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code § 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Yes, tribal consultation will be conducted in accordance with AB 52.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

Other public agencies whose approval may be required (e.g., permits, financing approval, or participation agreement):

Public Agency

Approval Required

Entrada Planning Area:

County of Los Angeles

Zone Change

County of Los Angeles

Vesting Tentative Tract Map

County of Los Angeles

Conditional Use Permit

County of Los Angeles

Affordable Housing Permit

County of Los Angeles

Oak Tree Permit

County of Los Angeles

Parking Permit

County of Los Angeles

Development Agreement

County of Los Angeles

Other approvals, as needed, ministerial or otherwise, which the County has determined are necessary

CDFW

Streambed Alteration Agreement

Los Angeles RWQCB

Section 401 Certification or Waste Discharge Requirements

U.S. Army Corps

Section 404 Permit

Others TBD

Other approvals from responsible agencies

Public Agency

Approval Required

VCC Planning Area:

County of Los Angeles
County of Los Angeles
County of Los Angeles
County of Los Angeles
County of Los Angeles

CDFW
Los Angeles RWQCB
U.S. Army Corps
Others TBD

Tentative Parcel Map
Oak Tree Permit
Parking Permit
Development Agreement
Other approvals, as needed, ministerial or otherwise, which the County has determined are necessary
Streambed Alteration Agreement
Section 401 Certification
Section 404 Permit
Other approvals from responsible agencies

Major projects in the area:

Project/ Case No.

Description and Status

R2013-02833-(5)

Entrada North (VTM 071377)

Homestead North (VTM—Newhall Ranch Specific Plan area)

TR060678-(5)

Homestead South (VTM 060678—Newhall Ranch Specific Plan area)

00-196-(5)

Landmark Village (VTM 53108—Newhall Ranch Specific Plan area)

TR061996-(5)

Legacy Village (VTM 061996—Stevenson Ranch area)

04-181-(5)

Mission Village (VTM 061105—Newhall Ranch Specific Plan area)

R2013-01790-(5)

Potrero Village (VTM 061911—Newhall Ranch Specific Plan area)

TR52584

Los Valles Residential Development Project

R2015-00408-(5)

Northlake Specific Plan Project

TR072126

Tapia Ranch Project

Reviewing Agencies:

Responsible Agencies

- None
- Regional Water Quality Control Board:
 - Los Angeles Region
 - Lahontan Region
- Coastal Commission
- Army Corps of Engineers
- LAFCO

Trustee Agencies

- None
- State Dept. of Fish and Wildlife
- State Dept. of Parks and Recreation
- State Lands Commission
- University of California (Natural Land and Water Reserves System)

Special Reviewing Agencies

- None
- Santa Monica Mountains Conservancy
- National Parks
- National Forest
- Edwards Air Force Base
- Resource Conservation District of Santa Monica Mountains Area
-

County Reviewing Agencies

- DPW
- Fire Department
 - Forestry, Environmental Division
 - Planning Division
 - Land Development Unit
 - Health Hazmat
- Sanitation District
- Public Health/Environmental Health Division: Land Use Program (OWTS), Drinking Water Program (Private Wells), Toxics Epidemiology Program (Noise)
- Sheriff Department
- Parks and Recreation
- Subdivision Committee
-

Regional Significance

- None
- SCAG Criteria
- Air Quality
- Water Resources
- Santa Monica Mtns. Area
-

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially significant impacts affected by this project.

- Aesthetics
- Agriculture/Forestry
- 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/Services
- Wildfire
- Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Department.)

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, nothing further is required.

Jodie D. Snellett
Signature (Prepared by)

September 30, 2021
Date

[Red Signature]
Signature (Approved by)

September 30, 2021
Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources the Lead Department cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the Lead Department has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level. (Mitigation measures from Section XVII, “Earlier Analyses,” may be cross-referenced.)
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA processes, an effect has been adequately analyzed in an earlier EIR or negative declaration. (State CEQA Guidelines § 15063(c)(3)(D).) In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of, and adequately analyzed in, an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 7) The explanation of each issue should identify: the significance threshold, if any, used to evaluate each question, and; mitigation measures identified, if any, to reduce the impact to less than significant. Sources of thresholds include the County General Plan, other County planning documents, and County ordinances. Some thresholds are unique to geographical locations.

Analysis Preface: *The analysis that follows supports the preparation of a Supplemental Environmental Impact Report for the Entrada South and Valencia Commerce Center Project, which supplements the State-certified EIR (SCH No. 2000011025) for the RMDP/SCP, which was approved by the California Department of Fish and Wildlife in 2017. This analysis focuses on the Modified Project, specifically, the changes and refinements to the development proposed within Entrada South and VCC, as compared to the analysis of the Entrada and VCC Planning Areas in the State-certified EIR. The discussion for each environmental topic begins with a summary of the State-certified EIR analysis and follows with a discussion of the potential comparative impacts associated with the Modified Project. The State-certified EIR is available for public review and inspection on the County of Los Angeles Department of Regional Planning website at <https://planning.lacounty.gov/case/view/rmdp> and at the following public libraries: Valencia Library, Castaic Library, Stevenson Ranch Library, Old Town Newhall Library, and Canyon Country Jo Anne Darcy Library. The analysis for each Initial Study checklist question below addresses whether the changes associated with the Modified Project require further analysis of the environmental issue in the Supplemental EIR. For those issues fully addressed herein and scoped out of further analysis in the Supplemental EIR, a list of project design features as well as any applicable mitigation measures, including those previously adopted as part of the State-certified EIR and/or the County-certified VCC EIR, is provided in Appendix IS-1 of this Initial Study.*

1. AESTHETICS

Summary of State-Certified EIR Analysis of Aesthetics

Section 4.15, Visual Resources, of the State-certified EIR analyzed impacts to aesthetics resulting from the development of the Entrada and VCC Planning Areas, as summarized below. The State-certified EIR found that no roadways in the vicinity of either the Entrada or VCC Planning Areas were classified as a state scenic highway.⁷ According to the California Scenic Highway Mapping System of the California Department of Transportation, neither planning area is located on or near a major state-designated scenic highway. SR-126 is the nearest eligible state scenic highway, but it is not officially designated.

Entrada Planning Area

The State-certified EIR determined that development of the Entrada Planning Area would result in an urban-density, mixed-use residential and commercial development in an area with a baseline condition that was predominately undeveloped. Given its location relative to the viewing audience along the I-5 corridor, the Entrada development would be visible from the travel corridor and from other locations throughout the area. The development of new urban uses would result in the conversion of an existing undeveloped area to a developed condition, which would result in substantial change to the existing visual character relative to baseline conditions. New sources of light and glare would be installed on the otherwise vacant site, contributing to an increase in nighttime lighting in the project region. Thus, the State-certified EIR concluded that the Entrada Planning Area development had the potential to result in significant visual impacts. Specifically, impacts with regard to views (scenic vistas), aesthetics (visual character), and light and glare were determined to be significant.⁸

Mitigation Measures RMDP/SCP-VR-1 and RMDP/SCP-VR-2 from the State-certified EIR apply to the Entrada Planning Area. Even with the implementation of mitigation, the State-certified EIR concluded that impacts to views (scenic vistas), aesthetics (visual character), and light and glare would be significant and unavoidable.

VCC Planning Area

The State-certified EIR acknowledged that development of the VCC Planning Area would result in additional commercial uses within portions of the Valencia Commerce Center previously approved for development by the County in 1991. However, build-out of the remainder of VCC would be visually compatible with the previously developed portions of VCC; specifically, buildings similar in size and design would be constructed on the undeveloped portions of VCC. Accordingly, the State-certified EIR determined that buildout of the VCC with implementation of previously adopted Mitigation Measures VCC-VR-1 through VCC-VR-19 would not result in significant impacts.⁹

Project Design Features of the Modified Project (Entrada and VCC Planning Areas)

The Modified Project includes the following project design features relevant to aesthetic resources to provide additional environmental benefits within the Entrada and VCC Planning Areas:

⁷ See State-certified EIR, page 4.15-14.

⁸ See State-certified EIR, page 4.15-54.

⁹ See State-certified EIR, page 4.15-54.

- PDF-VR-1: During construction, temporary green screen construction fencing 6 feet tall shall be placed on-site adjacent to public roadways to screen much of the construction activity from view at street level.
- PDF-VR-2: During construction, all security lighting shall be properly shielded and projected downwards such that light is focused on construction equipment or materials and not on adjacent roadways or off-site areas.
- PDF-VR-3: Prior to issuance of a building permit, the Project Applicant shall submit Design Guidelines to the County of Los Angeles Department of Regional Planning. The Design Guidelines shall address such issues as site planning, architecture, walls and fencing, landscape design, lighting, signage, and general design themes for each of the major land use categories in the community. In particular, the Design Guidelines shall establish the following:
 - Major utility systems, including potable water, recycled water, wastewater, electricity, natural gas, and cable/internet, shall be placed underground.
 - Utility/service areas shall be treated (i.e., through the use of color, landscaping, screening, etc.) to minimize visual impact.
 - Rooftop equipment shall be screened from view from public streets.
 - Outdoor lighting within the Project Site shall be projected downwards to illuminate the intended surface and minimize light spillover and glare generation; and shall consist of low-intensity downlight or be equipped with louvers, shields, hoods, or other screening devices, as appropriate.
 - Only non-reflective or low-reflective building materials, or those treated with a standard non-reflective or low-reflective glazing, shall be used on building exteriors.

Evaluation of Aesthetic Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
Except as provided in Public Resources Code Section 21099, would the project:			
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

A scenic vista, as defined by the California Department of Transportation, is a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. A significant impact would occur if the Modified Project would have a substantial adverse effect on a scenic vista. A focal view includes a notable object, building, setting, or feature of visual interest, as opposed to a panoramic views or vistas which cover a large geographic area for which the view may be wide and extend into the distance. Diminishment of a scenic vista would occur if the bulk or design of a building or overall development blocks, obscures, or contrasts enough with a visually interesting view or view of a visual resource such that the quality of the view is permanently affected.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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Entrada Planning Area

The boundaries of the Entrada Planning Area under the Modified Project fall within the disturbance footprint analyzed in the State-certified EIR, with the exception of the 0.6-acre previously disturbed golf course area on The Oaks Club at Valencia golf course, which will be temporarily disturbed to allow for a storm drain connection and fully restored following construction. The Modified Project would not increase the general scope and intensity of development that was studied in the State-certified EIR and would result in a slight reduction in overall floor area.¹⁰ Moreover, as discussed above under the heading “Enhanced Environmental Protections” for the Entrada Planning Area, the Modified Project would reduce the impacts to aesthetic resources further by preserving additional open space and habitat through the avoidance of permanent impacts to Unnamed Canyon 2.

With respect to development within the Entrada Planning Area, the State-certified EIR determined impacts to scenic vistas would be significant and unavoidable due to the conversion of an existing open area to a developed condition.¹¹ The Modified Project would not increase the general scope and intensity of development that was studied in the State-certified EIR and would result in a slight reduction in overall floor area. Moreover, the Modified Project would reduce the impacts to aesthetic resources further by preserving additional open space and habitat through the avoidance of permanent impacts to Unnamed Canyon 2. The Modified Project is consistent with the 2017 Approved Project in terms of overall development footprint, general land uses, and building scale and design. As a result, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. The mitigation measures set forth in Appendix IS-1 of this Initial Study would continue to apply and will be incorporated into the Mitigation Monitoring and Reporting Program (MMRP) for the Modified Project. As such, no additional analysis in the Supplemental EIR is required.

In addition, the proposed project design measures would provide additional environmental benefits for the Modified Project. Per PDF-VR-3, Design Guidelines would be developed to guide site planning, architecture, walls and fencing, landscape design, lighting, signage, and general design themes to further support a high-quality environment. The Design Guidelines would be consistent with similar design guidelines completed as part of the Mission Village project. Construction-related impacts likewise would be reduced through implementation of PDF-VR-1 and PDF-VR-2, which would require the installation of green screen construction fencing and security lighting that is projected downwards. PDF-VR-1, PDF-VR-2 and PDF-VR-3 are environmentally beneficial and are not relied upon to reach the conclusion that no additional analysis in the Supplemental EIR is required.

VCC Planning Area

The Modified Project development proposed within the VCC Planning Area would be consistent in terms of land use, floor area, and general scope and intensity with that evaluated in the State-certified EIR, and applicable mitigation outlined therein would be implemented. The boundaries of the VCC Planning Area

¹⁰ The 2017 Approved Project includes 1,725 dwelling units (estimated to comprise 3,235,100 square feet) plus 450,000 square feet of non-residential development within the Entrada Planning Area, while the Modified Project includes 1,574 dwelling units (estimated at 2,951,913 square feet) and 730,000 square feet of non-residential development. As such, this analysis considers the environmental implications of reducing the number of residences by 151 units and increasing the amount of non-residential development by 280,000 square feet, for a net reduction of roughly 3,187 square feet compared to the Entrada development evaluated in the State-certified EIR.

¹¹ See State-certified EIR, page 4.15-54.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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under the Modified Project also fall within the disturbance footprint analyzed in the State-certified EIR. Moreover, the Modified Project would reduce impacts to aesthetic resources by preserving additional open space and habitat through the avoidance of permanent impacts to Hasley Creek and Castaic Creek.

Accordingly, development of the Modified Project in the VCC Planning Area would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. As determined in the State-certified EIR, impacts to scenic vistas resulting from VCC development would be less than significant because as compared with existing conditions, build-out of the remainder of the VCC would be visually compatible with the portion of the project already constructed.¹² Nonetheless, Mitigation Measures VCC-VR-1 through VCC-VR-19 previously adopted by the County would be implemented; these measures and related project design features are detailed in Appendix IS-1 of this Initial Study and will be incorporated into the MMRP for the Modified Project. No additional analysis in the Supplemental EIR is required.

In addition, the project design measures would provide environmental benefits for the Modified Project. Per PDF-VR-3, Design Guidelines would be developed to guide site planning, architecture, walls and fencing, landscape design, lighting, signage, and general design themes to further support a high-quality environment. Construction-related impacts likewise would be reduced through implementation of PDF-VR-1 and PDF-VR-2, which would require the installation of green screen construction fencing and security lighting that is projected downwards. PDF-VR-1, PDF-VR-2 and PDF-VR-3 are environmentally beneficial and are not relied upon to reach the conclusion that no additional analysis in the Supplemental EIR is required.

b) Be visible from or obstruct views from a regional riding, hiking, or multi-use trail?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.
As discussed in Response to Question 1.a, the Modified Project would not increase the changes in visual character or quality of public views of the site, including views from nearby regional trails, beyond what was previously analyzed in the State-certified EIR.

Entrada and VCC Planning Areas¹³

Like the 2017 Approved Project, development associated with the Modified Project would be visible from regional trails in the area. Given that development under the Modified Project would be substantially similar to that contemplated as part of the 2017 Approved Project, including in terms of the overall development footprint, general land uses, and building scale and design, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. The project design features and mitigation measures set forth in Appendix IS-1 of this Initial Study would continue to apply and will be incorporated into the MMRP for the Modified Project. As a result, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area.

In addition, the proposed project design measures would provide additional environmental benefits

¹² See State-certified EIR, 4.15-54.

¹³ Where the Modified Project's impacts associated with both planning areas are similar or identical, the discussion of impacts may be combined to reduce redundancy.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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for the Modified Project. Per PDF-VR-3, Design Guidelines would be developed and would address site planning, architecture, walls and fencing, landscape design, lighting, signage, and general design themes to ensure a high-quality environment. Construction-related impacts likewise would be further reduced through implementation of PDF-VR-1 and PDF-VR-2, which would require the installation of green screen construction fencing and security lighting that is projected downwards. PDF-VR-1, PDF-VR-2 and PDF-VR-3 are environmentally beneficial and are not relied upon to reach the conclusion that no additional analysis in the Supplemental EIR is required.

c) **Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.
As discussed above and indicated in the State-certified EIR, no roadway within the project vicinity is classified as a state scenic highway. In addition to SR-126, it is noted that I-5 from I-210 near Tunnel Station to SR-126 is also eligible as a state scenic highway, and both I-5 and SR-126 are designated as First Priority Scenic Routes in the County’s Scenic Highway Element, indicating they are proposed for further study.¹⁴ These roadways offer focused and panoramic views of a variety of visual resources in the area, including the Santa Clara River, Castaic and Hasley Creeks, rolling hillsides, several significant ridgelines, distant mountain backdrops, and scattered stands of oak trees and other native vegetation. However, none of these roadways are officially designated as a state scenic highway.

Entrada Planning Area

The Modified Project would not increase impacts to scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway, as compared to the 2017 Approved Project because there is no roadway within the Modified Project area or its vicinity that is classified as a state scenic highway. The Modified Project would not increase landform modification, nor would it introduce new development and infrastructure as compared to the 2017 Approved Project. Additionally, the Modified Project would not increase grading on undeveloped hillsides and hilltops on-site, would not increase the filling in or channelization of the natural drainage courses on-site, and would not remove more existing native vegetation, including oak trees, than previously evaluated. Since the Modified Project would have a similar overall development footprint as the 2017 Approved Project, any impacts to scenic resources would be the same as disclosed in the State-certified EIR.

As determined in the State-certified EIR, there are no designated state scenic highways in the vicinity of the planning area. Based on the analysis above, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. No additional analysis in the Supplemental EIR is required.

VCC Planning Area

The Modified Project would not increase impacts to scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway, as compared to the 2017 Approved

¹⁴ County of Los Angeles General Plan Scenic Highway Element, Appendix A—Scenic Highway System Map Index, pp. SHA-1 through SHA-2, http://planning.lacounty.gov/assets/upl/project/gp_web80-scenic-highway-element.pdf, accessed May 11, 2021.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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Project because there is no roadway within the Modified Project area or its vicinity that is classified as a state scenic highway. Implementation of the Modified Project would not increase landform modification or new development and infrastructure beyond what was analyzed in the State-certified EIR. Consistent with the 2017 Approved Project, implementation the Modified Project would not increase the grading of undeveloped land. Portions of the natural drainage courses on-site would be modified, and existing native vegetation, including oak trees, would be removed. However, since the Modified Project would have a similar overall development footprint as the 2017 Approved Project, any impacts to scenic resources would be the same as disclosed in the State-certified EIR.

Therefore, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. As determined in the State-certified EIR, impacts would be less than significant. Nonetheless, Mitigation Measures VCC-VR-1 through VCC-VR-19 previously adopted by the County would be implemented (refer to Appendix IS-1 of this Initial Study). Based on the analysis above, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. No additional analysis in the Supplemental EIR is required.

d) Substantially degrade the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or other features and/or conflict with applicable zoning and other regulations governing scenic quality? (Public views are those that are experienced from publicly accessible vantage points).

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.
The Modified Project would not increase the changes in visual character or quality of public views of the site beyond what was previously analyzed in the State-certified EIR.

Entrada Planning Area

As indicated above, Modified Project development in the Entrada Planning Area would fall within the disturbance footprint analyzed in the State-certified EIR. In addition, proposed development under the Modified Project would be consistent in terms of land use, scale, and general location and design with that previously studied in the State-certified EIR. Moreover, the Modified Project would reduce slightly the impacts to aesthetic resources by preserving additional open space and habitat through avoidance of Unnamed Canyon 2.

As previously indicated, the State-certified EIR determined visual quality impacts within the Entrada Planning Area would be significant and unavoidable because the 2017 Approved Project would result in the conversion of an existing open area to a developed condition. However, as stated above, the Modified Project would not increase the general scope and intensity of development that was studied in the State-certified EIR and would result in a slight reduction in overall floor area. Moreover, the Modified Project would reduce the impacts to aesthetic resources further by preserving additional open space and habitat through the avoidance of permanent impacts to Unnamed Canyon 2. The Modified Project is consistent with the Approved Project in overall development footprint, general land uses, and building scale and design. As a result, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. In addition, Mitigation Measures

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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RMDP/SCP-VR-1 and RMDP/SCP-VR-2 from the State-certified EIR, which are set forth in Appendix IS-1 of this Initial Study and will be incorporated into the MMRP for the Modified Project, would be implemented. No additional analysis in the Supplemental EIR is required.

In addition, the proposed project design measures would provide additional environmental benefits for the Modified Project. Per PDF-VR-3, Design Guidelines would be developed and would address site planning, architecture, walls and fencing, landscape design, lighting, signage, and general design themes to further support a high-quality environment. PDF-VR-3 is environmentally beneficial and is not relied upon to reach the conclusion that no additional analysis in the Supplemental EIR is required.

VCC Planning Area

The Modified Project would not increase impacts to the visual character or the quality of public views of and surrounding the VCC Planning Area compared to the analysis completed in the State-certified EIR. The Modified Project would fall within the disturbance footprint analyzed therein. Additionally, proposed development would be consistent in terms of land use, scale, and general location and design with that studied in the State-certified EIR. Moreover, the Modified Project would reduce slightly the impacts to aesthetic resources by preserving additional open space and habitat through avoidance of impacts to Hasley Creek and Castaic Creek.

As determined in the State-certified EIR, visual character impacts would be less than significant because build-out of the remainder of the VCC would be visually compatible with the portion of the project already constructed. The Modified Project, which consists of development of the same general scope and intensity as the 2017 Approved Project, would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. In addition, Mitigation Measures VCC-VR-1 through VCC-VR-19 previously adopted by the County would be implemented (refer to Appendix IS-1 of this Initial Study). No additional analysis in the Supplemental EIR is required.

In addition, the proposed project design measures would provide additional environmental benefits for the Modified Project. Per PDF-VR-3, Design Guidelines would be developed and would address site planning, architecture, walls and fencing, landscape design, lighting, signage, and general design themes to further support a high-quality environment. PDF-VR-3 is environmentally beneficial and is not relied upon to reach the conclusion that no additional analysis in the Supplemental EIR is required.

e) Create a new source of substantial shadows, light, or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.
The Modified Project would not generate shadows or add new light or glare sources beyond those evaluated in the State-certified EIR.

Entrada Planning Area

As previously discussed, the Modified Project would fall within the same development footprint as the 2017 Approved Project, and proposed development would be consistent in terms of land use, scale, and general location and design with that previously studied in the State-certified EIR.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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As determined in the State-certified EIR, impacts would be significant and unavoidable because new sources of light and glare would be installed on the vacant site, contributing to an increase in nighttime lighting in the Project region. However, as stated above, the Modified Project would not increase the general scope and intensity of development that was studied in the State-certified EIR and would result in a slight reduction in overall floor area. Moreover, the Modified Project would reduce the impacts to aesthetic resources further by preserving additional open space and habitat through the avoidance of permanent impacts to Unnamed Canyon 2. The Modified Project is consistent with the Approved Project in overall development footprint, general land uses, and building scale and design. As a result, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. The project design features and mitigation measures set forth in Appendix IS-1 of this Initial Study would continue to apply and will be incorporated into the MMRP for the Modified Project. No additional analysis in the Supplemental EIR is required.

Moreover, PDF-VR-1 and PDF-VR-2 would further reduce light and glare impacts during construction by requiring the installation of green screen construction fencing and security lighting that is projected downwards. Additionally, under PDF-VR-3, the Project Applicant would develop Design Guidelines that would address screening devices and low-reflective building exteriors. The inclusion of PDF-VR-1, PDF-VR-2 and PDF-VR-3 would provide additional environmental benefits for the Modified Project and are not relied upon to reach the conclusion that no additional analysis in the Supplemental EIR is required.

VCC Planning Area

Modified Project development within the VCC Planning Area would not result in increased shading, light, or glare impacts compared to the 2017 Approved Project, as the development footprint and general scope and intensity of development would be consistent with that previously analyzed in the State-certified EIR.

As determined in the State-certified EIR, impacts would be less than significant. Nonetheless, Mitigation Measures VCC-VR-1 through VCC-VR-19 previously adopted by the County would be implemented (refer to Appendix IS-1 of this Initial Study). Based on the preceding analysis, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. No additional analysis in the Supplemental EIR is required.

Moreover, PDF-VR-1 and PDF-VR-2 would further reduce light and glare impacts during construction by requiring the installation of green screen construction fencing and security lighting that is projected downwards. Additionally, under PDF-VR-3, the Project Applicant would develop Design Guidelines that would address screening devices and low-reflective building exteriors. The inclusion of PDF-VR-1, PDF-VR-2 and PDF-VR-3 would provide additional environmental benefits for the Modified Project and are not relied upon to reach the conclusion that no additional analysis in the Supplemental EIR is required.

2. AGRICULTURE / FOREST

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Summary of State-Certified EIR Analysis of Agricultural Resources

Section 4.12, Agricultural Resources, of the State-certified EIR analyzed impacts to agricultural resources resulting from the development of the Entrada and VCC Planning Areas.

Entrada Planning Area

As discussed in the State-certified EIR, the Entrada Planning Area contains no Important Farmland, and impacts to the planning area's 242.6 acres of grazing land would not be significant.¹⁵ The State-certified EIR determined that, based on the then-current zoning for the Entrada Planning Area, new urban development and establishment of a spineflower preserve would conflict with the site's agricultural zoning and cattle grazing uses, which would be a potentially significant impact. The State-certified EIR concluded that approval of the requested zone change would eliminate this impact; however, if the zone change were not approved, this impact would be significant and unavoidable.¹⁶

Since publication of the State-certified EIR, a zone change has been implemented by the County for the Entrada Planning Area, which now includes land zoned R-1—Single-Family Residence, C-3—Unlimited Commercial, and C-R—Commercial Recreation. In addition, the spineflower preserve within the Entrada Planning Area has since been permanently dedicated on-site.

VCC Planning Area

Per the State-certified EIR, the VCC Planning Area contains 14.8 acres of Prime Farmland, 34.8 acres of Unique Farmland, and 4.1 acres of Farmland of Statewide Importance, all of which would be removed, thus resulting in a significant impact. However, as the VCC Planning Area is zoned for industrial uses, any land use conversion to non-agricultural uses would not conflict with an existing agricultural zoning designation, and this impact would not be significant.¹⁷

Mitigation Measures RMDP/SCP-AG-1 and RMDP/SCP-AG-2 from the State-certified EIR apply to the VCC Planning Area. However, even with such mitigation, the State-certified EIR concluded that impacts to Important Farmland would be significant and unavoidable.

¹⁵ See State-certified EIR, 4.12-19.

¹⁶ See State-certified EIR, 4.12-19.

¹⁷ See State-certified EIR, page 4.12-19.

Evaluation of Agricultural Resources Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.
The Modified Project would not increase the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use as compared to the 2017 Approved Project.

Entrada Planning Area

The Modified Project would not increase the development footprint as analyzed by the State-certified EIR (with the exception of temporary disturbance to the 0.6-acre previously disturbed golf course area on The Oaks Club at Valencia golf course, which will be fully restored following construction) and would not result in the conversion of any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Accordingly, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. As determined in the State-certified EIR, impacts would be less than significant. No additional analysis in the Supplemental EIR is required.

VCC Planning Area

The Modified Project development within the VCC Planning Area would not change the acreage of converted Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as compared to the 2017 Approved Project. Accordingly, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. While Mitigation Measures RMDP/SCP-AG-1 and RMDP/SCP-AG-2 requiring preparation of a phasing map to document the phased discontinuation of existing agricultural activities and the dedication of a permanent agricultural conservation easement for 138 acres of agricultural land on nearby lands would be implemented (refer to Appendix IS-1 of this Initial Study), impacts would remain significant and unavoidable, as determined in the State-certified EIR. No additional analysis in the Supplemental EIR is required.

b) Conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact. The Modified Project would not conflict with any agricultural zoning, and no portion of the Project Site is designated as an Agricultural Resource Area or subject to a Williamson Act contract.

Entrada Planning Area

Since publication of the State-certified EIR, a zone change has been implemented by the County for the Entrada Planning Area which reduces agricultural zoning impacts compared to the State-certified EIR. As discussed above, the Entrada Planning Area is currently zoned R-1—Single-Family Residence south of Magic Mountain Parkway, C-3—Unlimited Commercial north of Magic Mountain Parkway, and C-R—Commercial

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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forest land, timberland, or timberland zoned Timberland Production. As a result, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. Consistent with the analysis in the State-certified EIR, there would be no impact to such lands as a result of the Modified Project, and no mitigation is required. This issue will not be analyzed further in the Supplemental EIR.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

Like the 2017 Approved Project, the Modified Project would not result in impacts to forest land or conversion of forest land to a non-forest use.

Entrada Planning Area

No portion of the Entrada Planning Area is located within designated forest land such as a National Forest, and no portion of the site is used for timber production or other forest uses. As a result, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. Consistent with the analysis in the State-certified EIR, there would be no significant impact from the loss of forest land or the conversion of forest land to non-forest uses, and no mitigation is required. This issue will not be analyzed further in the Supplemental EIR.

VCC Planning Area

No portion of the VCC Planning Area is located within designated forest land such as a National Forest, and no portion of the site is used for timber production or other forest uses. As a result, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. As such, consistent with the analysis in the State-certified EIR, there would be no significant impact from the loss of forest land or the conversion of forest land to non-forest uses, and no mitigation is required. This issue will not be analyzed further in the Supplemental EIR.

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?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not increase any changes in the existing environment that could result in the conversion of designated Farmland to a non-agricultural use or the conversion of forest land to a non-forest use as compared to the 2017 Approved Project.

Entrada Planning Area

The general nature and location of Modified Project development have not changed compared to the 2017 Approved Project. Thus, consistent with the analysis within the State-certified EIR, the Entrada development would not involve changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland to non-agricultural use or the conversion of forest land to

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Preparation of an EIR* *No
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non-forest use. As no impact would result, the Modified Project would not cause any new significant impacts or increase the severity of previously identified impacts related to this topic. No mitigation is required, and no additional analysis in the Supplemental EIR is necessary.

VCC Planning Area

The general nature and location of Modified Project development have not changed compared to the 2017 Approved Project. Thus, consistent with the analysis within the State-certified EIR, the VCC development would not involve changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland to non-agricultural use or the conversion of forest land to non-forest use. As no impact would result, the Modified Project would not cause any new significant impacts or increase the severity of previously identified impacts related to this topic. No mitigation is required, and no additional analysis in the Supplemental EIR is necessary.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Summary of State-Certified EIR Analysis of Air Quality

Section 4.7, Air Quality, of the State-certified EIR analyzed impacts to air quality resulting from the development of the Entrada and VCC Planning Areas.

Entrada and VCC Planning Areas

Construction in the Entrada and VCC Planning Areas would generate emissions of volatile organic compounds (VOC), nitrogen oxides (NO_x), respirable particulate matter (PM₁₀), and fine particulate matter (PM_{2.5}) that exceed the South Coast Air Quality Management District's (SCAQMD) thresholds of significance, and construction-related air quality impacts would be significant. Mitigation Measures RMDP/SCP-AQ-1 through RMDP/SCP-AQ-12 and measure VCC-AQ-1 for VCC construction would reduce construction-related emissions to some extent; however, such impacts would remain significant and unavoidable within each planning area.¹⁸ Cumulative impacts also would be significant and unavoidable.

Operation of the Entrada and VCC uses would generate operational emissions of VOC, NO_x, carbon monoxide (CO), PM₁₀, and PM_{2.5} that exceed the thresholds of significance, and operational air quality impacts would be significant. Mitigation Measures RMDP/SCP-AQ-13 through RMDP/SCP-AQ-16 and measure VCC-AQ-2 for VCC operations would reduce emissions, but operational air quality impacts would remain significant and unavoidable. Impacts related to the exposure of sensitive receptors to substantial pollutant concentrations and cumulative impacts likewise would be significant and unavoidable.¹⁹

As also evaluated in the State-certified EIR, development of the Entrada and VCC Planning Areas would not conflict with or obstruct implementation of the SCAQMD's Air Quality Management Plan (AQMP). In addition, no odor-generating activities would result from construction or operation of the proposed uses, nor from the creation of the spineflower preserve within Entrada. Therefore, such impacts would be less than significant.²⁰

Evaluation of Air Quality Impacts for the Modified Project

As discussed above in the Project Description, buildout of the VCC Planning Area would be consistent with the uses allowed by the County-approved entitlements for VCC and the existing zoning. As also discussed above in the Project Description, the Modified Project would include changes to the land use plan for the Entrada Planning Area. To evaluate air quality impacts, the Supplemental EIR will analyze the changes and refinements associated with the Modified Project, as described in the Project Description above. Additionally, the State-certified EIR utilized an earlier air quality model to estimate emissions—the Urban Emissions (URBEMIS) model. Currently, the SCAQMD and Los Angeles County recommend using the updated California Emissions Estimator Model[®] (CalEEMod) to estimate emissions. Accordingly, the Supplemental EIR will disclose any changes in emissions associated with the Modified Project.

¹⁸ See State-certified EIR, page 4.7-125 and 4.7-128.

¹⁹ See State-certified EIR, page 4.7-126 and 4.7-128.

²⁰ See State-certified EIR, page 4.7-67.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
Would the project:			
a) Conflict with or obstruct implementation of applicable air quality plans of either the South Coast AQMD (SCAQMD) or the Antelope Valley AQMD (AVAQMD)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Supplemental Analysis Required. The potential air quality impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The potential air quality impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The potential air quality impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. Like the 2017 Approved Project, the Modified Project would not cause adverse odors affecting a substantial number of people.

Entrada Planning Area

Odor impacts associated with development of the Modified Project within the Entrada Planning Area would be consistent with the analysis included in the State-certified EIR. Specifically, since the same types of land uses and general intensity of development would occur, the Modified Project would not include new sources of odors compared to the 2017 Approved Project and, thus, would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. not cause any new or more severe significant impacts related to this topic. The State-certified EIR determined impacts would be less than significant, and no mitigation would be necessary. No additional analysis in the Supplemental EIR is required.

VCC Planning Area

Odor impacts associated with development of the Modified Project in the VCC Planning Area would be consistent with the analysis included in the State-certified EIR. Specifically, since the same types of land uses and general intensity of development would occur, the Modified Project would not include new sources of odors compared to the 2017 Approved Project and, thus, would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. The State-certified EIR

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New Information Requiring
Preparation of an EIR* *No
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determined impacts would be less than significant, and no mitigation would be necessary. No additional analysis in the Supplemental EIR is required.

4. BIOLOGICAL RESOURCES

Summary of State-Certified EIR Analysis of Biological Resources

Entrada and VCC Planning Areas

Section 4.5, Biological Resources, of the State-certified EIR analyzed impacts to biological resources resulting from the development of the Entrada and VCC Planning Areas. More specifically, the State-certified EIR evaluated impacts to: (1) vegetation communities and land covers; (2) wildlife movement, including live-in habitat linkages, travel corridors, and wildlife crossings; (3) common plant and wildlife species; and (4) special-status plant and wildlife species. All biological resource impacts were determined to be less than significant or less than significant with mitigation (generally, Mitigation Measures RMDP/SCP-BIO-1 through RMDP/SCP-BIO-89, although not all apply to the Entrada and VCC Planning Areas), with the exception of impacts to three special-status species: southwestern pond turtle, San Emigdio blue butterfly, and San Fernando Valley spineflower, which would be significant and unavoidable. However, as the San Emigdio blue butterfly has not been observed within the Entrada or VCC Planning Areas nor does its habitat occur therein, that impact is not relevant to the Modified Project.²¹

Section 4.6, Jurisdictional Waters and Streams, of the State-certified EIR analyzed both temporary and permanent impacts to protected wetlands, streambeds, and other jurisdictional waters and their functions and services. All impacts were determined to be less than significant or less than significant with mitigation (generally, Mitigation Measures RMDP/SCP-SW-1 through RMDP/SCP-SW-7, although not all apply to the Entrada and VCC Planning Areas). VCC development also would be subject to Mitigation Measures VCC-SW-1 through VCC-SW-4.²²

In addition, **Section 4.14, Land Use**, of the State-certified EIR evaluated impacts relating to consistency with applicable habitat conservation plans and natural community conservation plans. Such impacts were not found to be significant, and no mitigation was required.²³

Evaluation of Biological Resources Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
Would the project:			
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Supplemental Analysis Required. The potential biological impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

²¹ See State-certified EIR, pages 4.5-2031-2049.

²² See State-certified EIR, page 4.6-106-109.

²³ See State-certified EIR, pages 4.14-13 and 4.14-16.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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b) Have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The potential biological impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The potential biological impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

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?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The potential biological impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

e) Convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inch in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua, southern California black walnut, etc.)?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The potential biological impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

f) Conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (L.A. County Code, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (L.A. County Code, Title 22, Ch. 22.174), the Significant Ecological Areas (SEAs) (L.A. County Code, Title 22, Ch. 102), Specific Plans (L.A. County Code, Title 22, Ch. 22.46), Community Standards Districts (L.A. County Code, Title 22, Ch. 22.300 et seq.), and/or Coastal Resource Areas (L.A. County General Plan, Figure 9.3)?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The potential biological impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

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

<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.
The Modified Project would not increase impacts related to this topic as compared to the 2017 Approved Project.

Entrada Planning Area

The State-certified EIR concluded that impacts related to conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional, or local habitat conservation plan in the Entrada planning area would be less than significant. The Entrada Planning Area is not subject to any habitat conservation plan or natural community conservation plan with the exception of the Spineflower Conservation Plan (SCP), which was evaluated within and adopted in conjunction with the State-certified EIR. As part of the SCP, a 27.2-acre spineflower preserve would be established on-site; this area already has been permanently dedicated (see Figure 3.1, above). The Project Applicant is relying upon the SCP to obtain federal and state permits and agreements from the U.S. Fish and Wildlife Service (USFWS) and CDFW to protect and manage a series of spineflower preserves and authorize take (i.e., removal) of spineflower in areas located outside of the designated preserves. The USFWS issued a Candidate Conservation Agreement that commits the Project Applicant to implement conservation, management, and monitoring measures for spineflower, including within the Entrada South Spineflower Preserve as set forth in the SCP. The Entrada development would rely upon the SCP and associated take authorizations. Thus, the SCP facilitates development of the Entrada Planning Area; as proposed, the Modified Project is consistent with the approved SCP.

In summary, Modified Project development within the Entrada Planning Area would be consistent with the analysis provided in the State-certified EIR with respect to applicable provisions of approved local, regional, or state habitat conservation plans. Thus, it would not cause any new or more severe significant impacts related to this topic. Such impacts were not found to be significant in the State-certified EIR. No additional analysis in the Supplemental EIR is required.

VCC Planning Area

The State-certified EIR concluded that impacts related to conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional, or local habitat conservation plan in the VCC Planning Area would be less than significant. The Modified Project would not increase impacts related to this topic as compared to the 2017 Approved Project. Like Entrada, the VCC Planning Area is not subject to any habitat conservation plan or natural community conservation plan with the exception of the SCP. While no spineflower preserve would be established within VCC, spineflower does occur within the planning area. Thus, the VCC development would rely upon the SCP and associated take authorizations described above. As proposed, the Modified Project is consistent with the approved SCP. Accordingly, development of the Modified Project within the VCC Planning Area would be consistent with the analysis in the State-certified EIR with respect to applicable provisions of approved local, regional, or state habitat conservation plans. Thus, it would not cause any new or more severe significant impacts related to this topic. Such impacts were not found to be significant in the State-certified EIR. No additional analysis in the Supplemental EIR is required.

5. CULTURAL RESOURCES

Summary of State-Certified EIR Analysis of Cultural Resources

Section 4.10, Cultural Resources, of the State-certified EIR analyzed impacts to cultural resources, including historic and archaeological resources as well as human remains, resulting from the development of the Entrada and VCC Planning Areas.

Entrada Planning Area

As the Entrada Planning Area is generally undeveloped, historic resources are not present. The State-certified EIR found impacts to historic resources to be less than significant, with no mitigation required.²⁴

The State-certified EIR found that no known archaeological resources are located within the Entrada Planning Area.²⁵ However, ground-disturbing activities conducted within the Entrada Planning Area could uncover previously undetected cultural resources, and disturbance of an unrecorded archaeological site would result in a significant impact. The State-certified EIR concluded such impacts could be reduced to a less than significant level with implementation of Mitigation Measure RMDP/SCP-CR-5, which requires that ground-disturbing activities be halted should cultural resources be encountered until a qualified archaeologist and Native American representative complete an evaluation of the eligibility of the resources pursuant to criteria established by the California Register of Historical Places and National Register of Historical Places.²⁶

In addition, the State-certified EIR determined impacts associated with the disturbance of human remains would be less than significant with implementation of Mitigation Measure RMDP/SCP-CR-6, which sets forth procedures consistent with Public Resources Code Section 5097.98 and CEQA Guidelines Section 15064.5.²⁷

VCC Planning Area

As the remaining portion of the VCC Planning Area is generally undeveloped, historic resources are not present. The State-certified EIR found impacts to historic resources to be less than significant, with no mitigation required.²⁸

The State-certified EIR found that no known archaeological resources are located within the VCC Planning Area.²⁹ However, ground-disturbing activities conducted within the VCC Planning Area could uncover previously undetected cultural resources, and disturbance of an unrecorded archaeological site would result in a significant impact. The State-certified EIR concluded that such impacts could be reduced to a less than significant level within the VCC Planning Area with implementation of Mitigation Measure RMDP/SCP-CR-5, in combination with previously adopted Mitigation Measures VCC-CR-1 and VCC-CR-2.³⁰ The

²⁴ See State-certified EIR, page 4.10-24.

²⁵ See State-certified EIR, page 4.10-24.

²⁶ See State-certified EIR, page 4.10-24.

²⁷ See State-certified EIR, November 2010 Final Addendum, pages 4.10-42-43.

²⁸ See State-certified EIR, page 4.10-24.

²⁹ See State-certified EIR, page 4.10-24.

³⁰ See State-certified EIR, page 4.10-24.

State-certified EIR also included Mitigation Measure RMDP/SCP-CR-6 to reduce impacts to undiscovered human remains within the VCC Planning Area to a less than significant level.³¹

Summary of State-Certified EIR Analysis of Paleontological Resources

Entrada and VCC Planning Areas

Section 4.11, Paleontological Resources, of the State-certified EIR concluded that future development in the Entrada and VCC Planning Areas would have a low to medium potential to result in impacts to paleontological resources and unique geologic features. Such impacts would be reduced to a less than significant level with implementation of Mitigation Measures RMDP/SCP-PR-1 through RMDP/SCP-PR-4, which specify monitoring requirements, planned contingencies in the unlikely event that paleontological resources are discovered, and periodic sampling/screening requirements to be carried out by a qualified paleontologist; and Mitigation Measures RMDP/SCP-PR-5 through RMDP/SCP-PR-7, which require curation and reporting of any paleontological resources found during the course of the Project.³² The County of Los Angeles also adopted Mitigation Measures VCC-PR-1 and VCC-PR-2 to minimize paleontological impacts within the VCC Planning Area.

Evaluation of Cultural Resources Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
Would the project:			
a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines § 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not increase impacts to historical resources as compared to the 2017 Approved Project. Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Generally, a resource is considered “historically significant” if it meets one of the following criteria:

- Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- Is associated with the lives of persons important in our past;
- Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possess high artistic values;
- Has yielded, or may be likely to yield, information important in prehistory or history.

As discussed above, the Entrada and VCC Planning Areas are generally undeveloped, and historic resources are not present. Since Modified Project development would fall within the same disturbance footprints analyzed in the State-certified EIR, impacts would be unchanged from the previously identified less than

³¹ See State-certified EIR, Final Addendum, pages 4.10-42-43.

³² See State-certified EIR, page 4.11-12.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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significant impacts. Accordingly, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. No additional analysis in the Supplemental EIR is required.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5?

Supplemental Analysis Required. The Modified Project’s potential impacts to archaeological resources will be evaluated further in the Supplemental EIR.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. Development proposed within the Entrada and VCC Planning Areas falls within the disturbance footprints analyzed in the State-certified EIR and would be consistent with the general scope and intensity of development that was studied therein. Moreover, the Modified Project would implement Mitigation Measures RMDP/SCP-PR-1 through RMDP/SCP-PR-7, as well as Mitigation Measures VCC-PR-1 and VCC-PR-2, to minimize paleontological impacts within the Entrada and VCC Planning Areas. The State-certified EIR found that implementation of these mitigation measures would reduce potential impacts to a less-than-significant level. Accordingly, as the Modified Project falls within the disturbance footprints analyzed in the State-certified EIR and would be consistent with the general scope and intensity of development that was studied therein, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area. The mitigation measures are included in Appendix IS-1 of this Initial Study and will be incorporated into the MMRP for the Modified Project. No additional analysis in the Supplemental EIR is required.

d) Disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. The Modified Project would not increase potential impacts associated with disturbing human remains as compared to the 2017 Approved Project. The State-certified EIR concluded that implementation of Mitigation Measure RMDP/SCP CR-5 would reduce significant impacts associated with disturbing human remains to a less-than-significant level. None of the past cultural resource surveys of these sites have located any human remains, whether interred inside or outside formal cemeteries. The Modified Project’s development within the Entrada and VCC Planning Areas would fall within the same disturbance footprints analyzed in the State-certified EIR, and thus impacts would remain unchanged. In addition to complying with Mitigation Measures RMDP/SCP-CR-5 and RMDP/SCP-CR-6 in the unanticipated event human remains are discovered on-site, the Project Applicant would be responsible for compliance with California Health and Safety Code Section 7050.5. California Health and Safety Code Section 7050.5 requires that, in the event that human remains are discovered within the project site, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines the remains are not subject to his or her authority, and if the coroner recognizes or has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within

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Impact*

24 hours, the Native American Heritage Commission. Development of the Entrada and VCC Planning Areas would comply with existing law and would follow mitigation outlined in the State-certified EIR. Therefore, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts. No additional analysis in the Supplemental EIR is required.

6. ENERGY

Summary of State-Certified EIR Analysis of Energy Resources

Entrada and VCC Planning Areas

Section 2, Global Climate Change/Greenhouse Gas Emissions, of the Additional Environmental Analysis prepared for the State-certified EIR studied impacts to global climate change and, by necessity (due to the relationship between energy consumption and the release of GHG emissions), considered the energy implications of development within the Entrada and VCC Planning Areas. As discussed in Section 8, Greenhouse Gas Emissions, below, the State-certified EIR included numerous mitigation measures to increase the energy efficiency of Project development. Of relevance to this discussion are Mitigation Measures RMDP/SCP-2-1 and RMDP/SCP-2-2 (requiring Zero Net Energy design for residential and non-residential development areas), RMDP/SCP-2-3 (requiring solar water heating or equivalent technology for swimming pools at private recreation centers), RMDP/SCP-2-4 and RMDP/SCP-2-5 (requiring extensive charging infrastructure for zero emission vehicles throughout on-site residential and non-residential development areas), RMDP/SCP-2-6 through RMDP/SCP-2-9 (requiring transportation-related commitments, such as implementation of a Transportation Demand Management Plan, traffic signal synchronization, and funding to convert bus fleets to zero emissions technology), RMDP/SCP-2-11 (requiring implementation of an off-site building retrofit program), and RMDP/SCP-2-12 (requiring charging infrastructure for zero emission vehicles at off-site locations). As the net zero mitigation framework is designed to minimize energy usage; by increasing energy efficiency, relying on renewable power, and substantially expanding the use of zero emissions vehicles, the 2017 Approved Project would not result in wasteful, inefficiency or unnecessary consumption of energy resources, and any potentially significant energy impacts would be reduced to a less than significant level.

Evaluation of Energy Resources Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The State-certified EIR studied impacts to global climate change and, due to the relationship between energy consumption and the release of greenhouse gas (GHG) emissions, considered the energy implications of development within the Entrada and VCC Planning Areas. As summarized below in Section 8, Greenhouse Gas Emissions, the State-certified EIR included a comprehensive suite of GHG mitigation measures designed to increase renewable energy usage and improve energy efficiency while expanding the use of zero-emissions vehicles and thereby reduce fossil fuel usage from electricity generation and personal vehicles. As discussed below, the mitigation framework would avoid the wasteful, inefficient or unnecessary consumption of energy resources by reducing energy consumption in the built environment by exceeding code-based standards; relying on renewable energy sources; and incentivizing the use of zero emission vehicles. In fact, the California Air Resources Board's 2017 Climate Change Scoping Plan Update highlighted the 2017 Approved Project as a model "example [...] of sustainable land use development projects in California" based on the mitigation framework in the State-certified EIR to reduce fossil fuel

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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energy usage and achieve net zero GHG emissions.

In the memorandum entitled Entrada South and Valencia Commerce Center Project—Greenhouse Gas and Energy Impacts (GHG and Energy Memo), included as Appendix IS-2 of this Initial Study, Ramboll US Corporation analyzed whether the Modified Project could result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. As part of this analysis, Ramboll considered Appendix F of the CEQA Guidelines, which identifies six categories of potential energy-related environmental impacts:

1. The project’s energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal. If appropriate the energy intensiveness of materials may be discussed.
2. The effects of the project on local and regional energy supplies and on requirements for additional capacity.
3. The effects of the project on peak and base period demands for electricity and other forms of energy.
4. The degree to which the project complies with existing energy standards.
5. The effects of the project on energy resources.
6. The project’s projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Construction—Construction activities consume energy in the form of diesel and gasoline fuel for on-road vehicles and off-road construction equipment, and electricity for construction equipment and water supply; all of these activities generate GHG emissions. Accordingly, fuel use and GHG emissions can be calculated from construction equipment assumptions using standard modeling software (e.g., CalEEMod®). The State-certified EIR disclosed the unmitigated total amounts of on-road and off-road construction equipment and vehicle use for Entrada South and Valencia Commerce Center. As described in more detail in the GHG discussion below, construction emissions for the Modified Project would not increase compared to construction emissions reported in the State-certified EIR because the Modified Project would involve the same types and number of pieces of construction equipment as assumed in the State-certified EIR analysis of the 2017 Approved Project. Likewise, as discussed below, the Modified Project would not increase construction-related energy use as compared to that disclosed in the State-certified EIR.

Project construction would require use of on-road trucks for hauling and vendor deliveries, and off-road equipment such as excavators, cranes, forklifts, and pavers. The Modified Project would comply with State and local requirements designed to minimize idling and associated emissions, which also minimize use of fuel. Specifically, idling of commercial vehicles and off-road equipment would be limited to five minutes in accordance with the Commercial Motor Vehicle Idling Regulation and the Off-Road Regulation, and the trucks used would comply with the requirements of the Tractor-Trailer Greenhouse Gas Regulation. Furthermore, Mitigation Measure AQ-2 in the State-certified EIR prohibits truck idling in excess of five minutes.

For Entrada South, the Modified Project’s footprint for horizontal construction (e.g., site preparation, grading, demolition, and utilities installation) would remain unchanged. Therefore, the construction-related energy use associated with those sub-phases of construction is not anticipated to increase under the Modified

	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
<i>Supplemental Analysis Required</i>		

Project as compared to the 2017 Approved Project. Furthermore, while the Modified Project would result in a change in land use sub-types compared to what was assumed in the State-certified EIR, the overall square footage of development would be approximately the same under the Modified Project. Additionally, the analysis of vertical construction in the State-certified EIR conservatively assumed that the maximum level of off-road equipment would be used in all construction years for each construction phase (whereas in reality, the peak equipment level would be utilized in a single year with other years involving less equipment), as described further below. As a result, the construction-related energy use during vertical construction also is not expected to increase under the Modified Project as compared to the 2017 Approved Project.

For VCC, the Modified Project will not change the Project footprint, proposed land uses, nor the total building square footage compared to what was assumed in the State-certified EIR. Therefore, the construction-related energy use from all aspects of VCC are not anticipated to change.

As discussed in **Section 8, Greenhouse Gas Emissions**, below, the State-certified EIR also included conservative assumptions about the mix of construction equipment that would be used during construction. Actual average construction equipment use is expected to be lower than the peak construction equipment use considered in the State-certified EIR.

Overall, construction-related energy use for the Modified Project is not expected to increase compared to the 2017 Approved Project. Energy use and fuel efficiency for construction typically improves over time as older equipment is replaced and repowered; therefore, fuel and energy efficiency for the Modified Project is expected to be the same or even potentially improved from the efficiencies assumed in the State-certified EIR. Additionally, there are no unusual Modified Project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities, or equipment that would not conform to current emissions standards (and related fuel efficiencies).

Operations—Modified Project operations would require energy in the forms of electricity, natural gas, gasoline, and diesel. The GHG emissions analysis in the State-certified EIR disclosed the unmitigated total amounts of electricity and natural gas use and mobile vehicle use for Entrada South and Valencia Commerce Center. The estimated changes in operational energy consumption associated with Modified Project development within Entrada South are increases of 2,572 megawatt-hours per year (MWh/yr) of electricity, 480 million British thermal units per year (MMBTU/yr) of natural gas, 117 thousand gallons per year (TGAL/yr) of diesel fuel, 571 TGAL/year of gasoline, and 178 MWh/yr for mobile fuel, while VCC would not have any changes in energy use as compared to the 2017 Approved Project (see the GHG and Energy Memo for additional discussion). This level of energy consumption represents an extremely small portion of the total energy use in Los Angeles County and California (see Tables 8 and 9 in the GHG and Energy Memo); accordingly, the Modified Project would not materially impact local or regional energy supplies or require additional capacity to be constructed, nor would the Modified Project have a material effect on local or regional energy resources.

Moreover, the comprehensive suite of GHG mitigation measures described in **Section 8, Greenhouse Gas Emissions**, which are designed to reduce operational energy usage (i.e., reduce non-renewable electricity use and reduce fossil fuel vehicle use), will continue to apply to the Modified Project. The State-certified EIR included an extensive GHG mitigation framework that incorporates renewable energy and energy efficiency measures into building design, equipment use, transportation and other project features. The Modified Project will continue to implement all applicable mitigation measures. Specifically, Mitigation Measures 2-1 and 2-2 designed to achieve Zero Net Energy for all residential and non-residential buildings exceed the

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(e.g., solar panels) and energy efficient buildings designed to Zero Net Energy standards, which would meet or exceed state and local plans for renewable energy resources. The Modified Project would continue to implement the mitigation measures imposed by the State-certified EIR, as described in the GHG and Energy Memo. As such, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area, and impacts under this threshold would be less than significant. This issue will not be further evaluated in the Supplemental EIR.

7. GEOLOGY AND SOILS

Summary of State-Certified EIR Analysis of Geology and Soils

Section 4.13, Geology and Soils, of the State-certified EIR analyzed impacts related to geology and soils resulting from development of the Entrada and VCC Planning Areas. Impacts associated with the Entrada and VCC Planning Areas were evaluated relative to debris flow hazards, ground rupture, seismic shaking, slope stability (including landslides), bedding planes, shear strength, erosion potential, and liquefaction potential.

Entrada Planning Area

The State-certified EIR found impacts related to the following issues to be less than significant with mitigation: expansive and poorly consolidated soils; ground rupture or displacement, ground failure (liquefaction, landslides, etc.), and ground shaking associated with the potentially active Holser Fault; liquefaction and earthquake induced settlement; and soil erosion or loss of topsoil.³³

VCC Planning Area

Similar to Entrada, impacts related to expansive and poorly consolidated soils as well as ground rupture, ground failure, and ground shaking associated with the Holser Fault were determined to be less than significant with mitigation, as were impacts related to and soil erosion or loss of topsoil.³⁴ The Project geologist recommended that habitable structures not be constructed over the Holser Fault. However, as the types of soils at the VCC site are not conducive to liquefaction, liquefaction impacts were concluded to be less than significant. Previously adopted mitigation measures include VCC-GEO-1 through VCC-GEO-5.

Modified Project Mitigation Measures (Entrada and VCC Planning Areas)

The State-certified EIR concluded that the implementation of the previously adopted VCC mitigation measures and additional measures (e.g., measures similar to those previously adopted for the Newhall Ranch Specific Plan) would ensure that geology and geologic hazard impacts would be less than significant for Entrada South and VCC.³⁵ An analysis of the Modified Project's impacts related to geology and soils was prepared by ENGEO Incorporated and is included in a memorandum entitled Entrada South and Valencia Commerce Center—2021 Project Geology and Geologic Hazards Update (Geotech Memo), provided in Appendix IS-3 of this Initial Study. As described in the Geotech Memo, the following mitigation measures would achieve an equivalent level of mitigation as contemplated by the State-certified EIR, and all such measures shall apply to the Entrada and VCC Planning Areas. Refer to Appendix IS-1 of this Initial Study for ES/VCC-GEO-1 through ES/VCC-GEO-4 and other applicable mitigation measures that will be incorporated into the MMRP for the Modified Project.

- ES/VCC-GEO-1: Prior to issuance of building permits, to address potential risks related to seismic shaking, all structures shall be designed using sound engineering judgment and the latest California Building Code requirements, as a minimum, which prescribe minimum lateral forces, applied statically to each habitable structure, combined with the gravity forces of dead and live loads, as determined in a report by a registered geotechnical engineer and submitted to the

³³ See State-certified EIR, pages 4.13-41-42.

³⁴ See State-certified EIR, pages 4.13-40-41.

³⁵ See State-certified EIR, page 4.13-67.

Department of Public Works pursuant to the County of Los Angeles Manual for Preparation of Geotechnical Reports.

- ES/VCC-GEO-2: Prior to issuance of rough grading permits, and in those portions of the Entrada South and VCC planning areas beneath habitable structural improvements where the anticipated seismic differential settlement exceeds the County of Los Angeles' one-inch seismic differential settlement standard, one or more of the following design requirements will be implemented:
 - a. Alluvium removal to reduce liquefaction-induced settlement to less than 1 inch.
 - b. Ground improvements such as rammed aggregate piers (RAPs), deep soil mixing (DSM), or stone columns to reduce liquefaction-induced settlement to less than 1 inch.
 - c. Ground improvements such as deep dynamic compaction (DDC) or compaction grouting to reduce liquefaction-induced settlement to less than 1 inch.
 - d. Sufficiently stiff foundations or deep foundations.
 - e. An approved alternative design requirement capable of reducing liquefaction induced settlement to less than 1 inch.

The above design requirements shall be performed by removing and/or improving enough liquefiable alluvium to achieve a less than 1-inch seismic differential settlement, pursuant to the County of Los Angeles Manual for Preparation of Geotechnical Reports, or by specific foundation design. Geotechnical recommendations and design requirements shall be presented and approved as a conceptual design at the 100-scale grading plan stage and as a detailed design at the 40-scale grading plan stage.

- ES/VCC-GEO-3: Prior to issuance of rough grading permit, in order to address landslides, unstable soil, liquefaction, expansive soil and dry-sand settlement, a Corrective Grading Plan delineating the areas where such geotechnical conditions exist shall be prepared by a registered geotechnical engineer and submitted to the Department of Public Works pursuant to the County of Los Angeles Manual for Preparation of Geotechnical Reports. The Corrective Grading Plan shall address the following:
 - a. Project grading shall include a combination of ground modification and/or structural mitigation in areas subject to liquefaction to reduce the risk to an acceptable level (as defined by CGS in Special Publication 117a, Chapter 2, or as superseded by CGS guidance in effect at the time of implementation of this measure). Ground modification shall consist of the removal of some of the soil material subject to liquefaction. The recommended depth of removal for mitigation of liquefaction ranges from 5 to 30 feet. Structures shall be designed to resist the anticipated static and seismic total and differential settlements.
 - b. Landslides shall be stabilized and/or removed, and/or building setbacks shall be used to protect structural integrity.
 - c. Grading and engineering design requirements shall address the removal of unstable soil, stabilization of potential landslide areas, and compaction of engineered fill to meet County of Los Angeles soil compaction requirements (County of Los Angeles Grading Guidelines, 2017).

d. Areas where expansive soil is encountered shall include grading measures designed to reduce hazard of construction in expansive soil including but not limited to removing expansive soil and replacing with engineered fill, installing drainage systems, using stiffened foundations systems, or conducting engineered preparation of building pads.

- ES/VCC-GEO-4: Prior to the issue of building permits, and after the site has been mass graded, soil corrosion testing shall be completed and appropriate design requirements shall be implemented in accordance with the latest California Building Code (CBC) as a minimum, to reduce the hazard of construction in corrosive soil.

Evaluation of Geology and Soils Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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 active fault trace? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.
An analysis of the Modified Project’s impacts related to geology and soils was prepared by ENGEO Incorporated and is included in the Geotech Memo provided in Appendix IS-3 of this Initial Study. Aside from addressing impacts and mitigation associated with the Modified Project, the Geotech Memo includes an extensive summary of current regulatory requirements related to geotechnical issues.

Entrada Planning Area

The Modified Project would not increase impacts related to fault rupture as compared to the 2017 Approved Project. As indicated in the Geotech Memo, no active or potentially active faults are known to exist within the Entrada Planning Area. Additionally, no portion of the Entrada Planning Area is located within an Alquist-Priolo Earthquake Fault Zone. The State-certified EIR concluded fault rupture impacts would be less than significant with mitigation. The analysis in the Geotech Memo confirms that such hazards would be less than significant due to the absence of any active or potentially active faults within the Entrada Planning Area. Further, Mitigation Measure ES/VCC-GEO-1 addresses potential risks related to seismic shaking. Accordingly, the Modified Project would not cause any new or more severe significant impacts related to this topic. No additional analysis in the Supplemental EIR is required.

VCC Planning Area

The potentially active Holser Fault is mapped within the VCC Planning Area although it is not located within an Alquist-Priolo Earthquake Fault Zone. The State-certified EIR conservatively concluded that fault rupture impacts would be less than significant with mitigation. Although the State-certified EIR referenced Mitigation Measure VCC-GEO-1 from the County-certified VCC EIR, which included building setbacks

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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from the Holser Fault based on known information about the fault at that time, the State-certified EIR also recognized that updated geologic review would be completed by Los Angeles County.³⁶ Subsequent geologic hazard investigations were completed and reviewed by Los Angeles County that were more recent than the data relied upon in the County-certified VCC EIR.³⁷ As discussed in the Geotech Memo, these subsequent geologic hazard investigations of surface fault rupture hazards along the Holser Fault concluded that the risk of surface rupture on the Holser Fault is low and that fault setbacks are not required throughout VCC.³⁸ Based on review of these subsequent studies and the final report submitted to the Los Angeles County Department of Public Works in July 2007, the Geotech Memo concludes that the impact of surface rupture would be less than significant and setbacks would not be necessary. Further, all buildings within the Modified Project must comply with the latest California Building Code requirements and Los Angeles County Code standards to address seismic shaking, as required by Mitigation Measure ES/VCC-GEO-1. Thus, the Modified Project would not cause any new or more severe significant impacts related to this topic. No additional analysis in the Supplemental EIR is required.

ii) Strong seismic ground shaking?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not increase impacts related to seismic ground shaking as compared to the 2017 Approved Project. The State-certified EIR found seismic ground shaking impacts to be less than significant with mitigation. The Modified Project does not include any modifications that would increase risks related to seismic ground shaking. As required by Mitigation Measure ES/VCC-GEO-1 and described in the Geotech Memo, application of current regulatory compliance requirements associated with the current 2019 California Building Code (CBC) would reduce any such impacts related to seismic ground shaking to a less than significant level.

More specifically, Mitigation Measure ES/VCC-GEO-1 requires all buildings within the Modified Project to be constructed in conformance with the latest CBC requirements to address seismic hazards, subject to review and oversight by the Los Angeles County Public Works Department. The 2019 CBC specifically addresses risks associated with seismic ground shaking. Among other regulatory requirements, the 2019 CBC requires that structures must be designed and certified by a registered engineer to be able to: (1) resist minor earthquakes without damage; (2) resist moderate earthquakes without structural damage but with some nonstructural damage; and (3) resist major earthquakes without collapse, but with some structural, as well as nonstructural damage. As concluded in the Geotech Memo, it is reasonable to expect that well-designed and well-constructed structures, as required by Mitigation Measures ES/VCC-GEO-1 and ES/VCC-GEO-2, will not collapse or cause loss of life in a major earthquake.³⁹ Thus, the Modified Project would not cause any new or more severe significant impacts related to this topic. No additional analysis in the Supplemental EIR is required.

³⁶ See State-certified EIR, page 4.13-67.

³⁷ See Geotech Memo at p. 8-9 [citing Geolabs; Geotechnical Investigation and Surface Fault Rupture Hazard Assessment, Tentative Parcel Map 18108, Castaic, California; May 31, 2007; R.T. Frankian & Associates; Response to Los Angeles County Department of Public Works Geotechnical Review No. 2, Vesting Tentative Tract Map No. 53295; January 16, 2008; Job No. 2004-700-22].

³⁸ See Geotech Memo at p. 8-9.

³⁹ See Geotech Memo at p. 9-10.

iii) Seismic-related ground failure, including liquefaction and lateral spreading?

<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not increase impacts related to seismic-related ground failure, including liquefaction and lateral spreading, as compared to the 2017 Approved Project. The State-certified EIR found seismic-related ground failure impacts to be less than significant with mitigation. The Modified Project does not include any modifications from the 2017 Approved Project that would increase risks related to liquefaction and lateral spreading, and the Modified Project requires Mitigation Measures ES/VCC-GEO-2 and ES/VCC-GEO-3 to address risks related to liquefaction and lateral spreading.

According to the Geotech Memo, the Seismic Hazard Zone Report for the Newhall Ranch 7.5-Minute Quadrangle shows portions of both VCC and Entrada South to be potentially susceptible to liquefaction. Further analyses also have concluded that liquefaction mitigation should be incorporated into the proposed VCC and Entrada designs to reduce the impacts of liquefaction and dry-sand settlement to less than significant levels. As portions of the VCC and Entrada Planning Areas may experience seismic differential settlement in excess of one inch, mitigation in the form of alluvium removal will be needed to reduce the hazard to a less than significant level, in compliance with County requirements. Mitigation Measures ES/VCC-GEO-2 and ES/VCC-GEO-3 are proposed to address seismic differential settlement, liquefaction, and related hazards through alluvium removal and implementation of a Corrective Grading Plan. Refer to Appendix IS-1 of this Initial Study for a list of these and other applicable mitigation measures, which will be incorporated into the MMRP for the Modified Project. Because the State-certified EIR concluded seismic-related ground failure impacts to be less than significant with mitigation and the Modified Project will implement such mitigation with ES/VCC-GEO-2 and ES/VCC-GEO-3, the Modified Project would not cause any new or more severe significant impacts related to this topic. No additional analysis in the Supplemental EIR is required.

iv) Landslides?

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not increase impacts related to landslides as compared to the 2017 Approved Project. The State-certified EIR concluded landslide impacts to be less than significant with mitigation. The Modified Project does not include any modifications from the 2017 Approved Project that would increase risks related to landslides and the Modified Project requires Mitigation Measure ES/VCC-GEO-3 to address landslide risks. As discussed in the Geotech Memo, the Seismic Hazard Zone Reports for the Val Verde and Newhall 7.5-Minute Quadrangles map portions of Entrada South and VCC as potentially susceptible to earthquake-induced landslides. Several potential landslide areas have been mapped, including five in the Entrada Planning Area and one in VCC. These potential landslides will require supplemental subsurface investigations to confirm their existence and to meet regulatory compliance standards. If landslides are confirmed, an assessment of their stability must be made to demonstrate they will not adversely affect the proposed development, and a Corrective Grading Plan delineating these areas shall be submitted to the County Department of Public Works as required for regulatory compliance. Landslides identified on the Corrective Grading Plans would be mitigated through stabilization, removal, and/or building setbacks, as determined by the Geotechnical Engineer. Mitigation Measure ES/VCC-GEO-3 is proposed to address landslide hazards and related issues through implementation of a Corrective Grading Plan. Refer to Appendix IS-1 of this Initial Study for this and other applicable mitigation measures, which will be incorporated into the MMRP for the Modified Project. With implementation of these corrective grading

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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measures, impacts related to potential landslides would be reduced to a less than significant level. Because the State-certified EIR concluded landslide impacts to be less than significant with mitigation and the Modified Project will implement such mitigation with Mitigation Measure ES/VCC-GEO-3 to address landslide risks, the Modified Project would not cause any new or more severe significant impacts related to this topic. No additional analysis in the Supplemental EIR is required.

b) Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not increase impacts related to soil erosion or loss of topsoil as compared to the 2017 Approved Project. The State-certified EIR concluded that the effects of substantial soil erosion or loss of topsoil may include the undermining of structures and slopes, alterations of surface drainage patters, steepening of slopes, and loss of setback areas and safety zones would be less than significant with mitigation. The Modified Project does not include any modifications from the 2017 Approved Project that would increase risks related to soil erosion or the loss of topsoil and the Modified Project requires Mitigation Measure ES/VCC-GEO-3 to address soil erosion risks.

As discussed in the Geotech Memo, corrective grading measures required by Mitigation Measure ES/VCC-GEO-3 would be designed to remove unstable soils, stabilize potential landslide areas, and compact engineered fill to meet County grading and soil compaction requirements and reduce impacts to a less than significant level. Specifically, Mitigation Measure ES/VCC-GEO-3 is proposed to address such issues through implementation of a Corrective Grading Plan. Because the State-certified EIR concluded soil erosion and loss of topsoil impacts to be less than significant with mitigation and the Modified Project will implement such mitigation with Mitigation Measure ES/VCC-GEO-3, the Modified Project would not cause any new or more severe significant impacts related to this topic. No additional analysis in the Supplemental EIR is required.

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?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not increase impacts related to soil instability that could potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse as compared to the 2017 Approved Project. The State-certified EIR concluded impacts related to unstable soil conditions, including seismic-related ground failure to be less than significant with mitigation. The Modified Project does not include any modifications from the 2017 Approved Project that would increase risks related to unstable soil conditions, including seismic-related ground failure, and the Modified Project requires Mitigation Measure ES/VCC-GEO-3 to address such risks.

As previously discussed, the Seismic Hazard Zone Reports for the Val Verde and Newhall 7.5-Minute Quadrangles map substantial portions of the Entrada and VCC Planning Areas as potentially susceptible to liquefaction and earthquake-induced landslides. As such, a Corrective Grading Plan delineating these areas would be submitted to the County Department of Public Works as required, and areas subject to these hazards would be mitigated during corrective grading. Specifically, Mitigation Measure ES/VCC-GEO-3 is proposed to address unstable soils, landslides, liquefaction, expansive soils, and dry-sand settlement through implementation of a Corrective Grading Plan. Refer to Appendix IS-1 of this Initial Study for this and other

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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applicable mitigation measures, which will be incorporated into the MMRP for the Modified Project. With implementation of these corrective grading measures, impacts related to unstable soil conditions, including seismic-related ground failure, would be reduced to a less than significant level. Because the State-certified EIR concluded impacts related to unstable soil conditions, including seismic-related ground failure, to be less than significant with mitigation and the Modified Project will implement such mitigation with Mitigation Measure ES/VCC-GEO-3, the Modified Project would not cause any new or more severe significant impacts related to this topic. No additional analysis in the Supplemental EIR is required.

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?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not increase impacts related to expansive soils as compared to the 2017 Approved Project. The State-certified EIR concluded impacts related to expansive soil to be less than significant with mitigation. The Modified Project does not include any modifications from the 2017 Approved Project that would increase risks related to expansive soil and the Modified Project requires Mitigation Measures ES/VCC-GEO-3 and ES/VCC-GEO-4 to address risks related to expansive soil.

As discussed in the State-certified EIR and reiterated in the Geotech Memo, reddish-brown clayey siltstone lenses in the Saugus Formation, which are located in both the Entrada and VCC Planning Areas, are potentially expansive, and alluvial soils are poorly to moderately consolidated. Accordingly, in compliance with regulatory requirements, testing on expansive soil and/or rock would be performed, and geotechnical design measures such as the removal of expansive soil and replacement with engineered fill, installation of drainage systems, use of stiffened foundations systems, or preparation of engineered building pads would be implemented to reduce hazards associated with constructing in expansive soils. Areas subject to expansive soils would be mitigated during corrective grading, as set forth in Mitigation Measure ES/VCC-GEO-3, detailed in Appendix IS-1 of this Initial Study. In addition, previous geotechnical characterizations have identified the presence of corrosive soils. As detailed in Mitigation Measure ES/VCC-GEO-4 included in Appendix IS-1, soil corrosion testing would be conducted and appropriate mitigation would be implemented in accordance with the latest CBC requirements in order to reduce any hazard related to construction in corrosive soils. With implementation of these mitigation measures, impacts related to expansive and corrosive soils would be reduced to a less than significant level. Because the State-certified EIR concluded impacts related to expansive soil to be less than significant with mitigation and the Modified Project will implement such mitigation with Mitigation Measures ES/VCC-GEO-3 and ES/VCC-GEO-4, the Modified Project would not cause any new or more severe significant impacts related to this topic. No additional analysis in the Supplemental EIR is required.

e) Have soils incapable of adequately supporting the use of onsite wastewater treatment systems where sewers are not available for the disposal of wastewater?

No Impact. Consistent with the analysis provided in Section 4.13, Geology and Soils, of the State-certified EIR, Modified Project development within the Entrada and VCC Planning Areas would not involve use of septic tanks or other alternative wastewater disposal systems, and no impact would occur. This issue will not be analyzed further in the Supplemental EIR.

<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

f) Conflict with the Hillside Management Area Ordinance (L.A. County Code, Title 22, Ch.22.104)?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.
The Modified Project would not increase impacts related to hillside conditions and associated regulatory compliance as compared to the 2017 Approved Project.

The County’s Hillside Management Area (HMA) Ordinance (County Code Section 22.56.217) became effective on November 5, 2015. The HMA Ordinance and the accompanying Hillside Design Guidelines are intended to ensure “that hillside development projects use sensitive and creative engineering, architectural, and landscaping site design techniques” to preserve natural features in hillside areas.⁴⁰ Conditional use permits (CUPs) are required for all development located wholly or partly in an HMA other than those specifically listed in the Ordinance. The HMA Ordinance outlines a detailed process for CUP applications and conditions of approval, including open space designations and project design.

Much of the Entrada and VCC Planning Area contain hillside land, defined as mountainous and hilly areas with 25 percent slopes or greater. As prescribed under the Hillside Management Area Ordinance, CUPs for hillside development would be required for each planning area. Specifically, for the VCC Planning Area, all future development must comply with CUP 87-360 and the associated Design Guidelines approved by the County in 1991. In accordance with the Hillside Management Area Ordinance, the geotechnical reports prepared for the Project, including those prepared to support the State-certified EIR, as well as the Geotech Memo included in Appendix IS-2 of this Initial Study, address all relevant issues regarding faults and slope stability. Additionally, the Modified Project would comply with the hillside requirements set forth in the County’s General Plan and Zoning Code. In particular, public safety impacts would be avoided or reduced to the extent possible. As such, impacts related to compliance with Hillside Management Area Ordinance or other hillside design standards would be less than significant. As such, the Modified Project would not cause any new or more severe significant impacts related to this topic. No additional analysis in the Supplemental EIR is required.

⁴⁰ County of Los Angeles, Department of Regional Planning, “Hillside Management Area (HMA) Ordinance,” <http://planning.lacounty.gov/hma>, accessed October 1, 2019.

8. GREENHOUSE GAS EMISSIONS

Summary of State-Certified EIR Analysis of Greenhouse Gas Emissions

Entrada and VCC Planning Areas

Section 2, Global Climate Change/Greenhouse Gas Emissions, of the Additional Environmental Analysis included a comprehensive analysis of the 2017 Approved Project's greenhouse gas (GHG) emissions. The State-certified EIR process culminated with CDFW's adoption of a comprehensive GHG mitigation framework to ensure the 2017 Approved Project would achieve net zero GHG emissions. The mitigation framework includes Mitigation Measures RMDP/SCP-2-1 through RMDP/SCP-2-13, as well as a Project Applicant-Proposed Supplemental Commitment that was incorporated into the MMRP. The mitigation framework includes measures that address major components of the Project's emission profile, including, but not limited to the following:

- Achieving Zero Net Energy standards in residential and commercial development areas, as well as for private recreation centers and public facilities;
- Implementing a TDM Plan to reduce VMT;
- Providing an electric vehicle charging station in every residence and offering zero emission vehicle purchase subsidies;
- Installing electric vehicle charging stations in publicly accessible areas on the Project site, as well as in publicly accessible, off-site locations within the County of Los Angeles;
- Funding a building retrofit program to improve the energy efficiency of existing buildings in disadvantaged communities within the County of Los Angeles; and
- Implementing the Newhall Ranch GHG Reduction Plan to fully mitigate all remaining construction and operational Project-related GHG emissions to carbon neutrality.

The Modified Project would be subject to the same net zero mitigation framework as the 2017 Approved Project, which is detailed in Appendix IS 1 of this Initial Study. This mitigation framework along with the Project Applicant-Proposed Supplemental Commitment will be incorporated into the MMRP for the Modified Project.

The State-certified EIR's analysis of GHG impacts was extensive. The GHG mitigation framework and analytical methodology was reviewed by the California Air Resources Board (ARB), the state authority on climate policy. ARB determined the State-certified EIR "provides an adequate technical basis to determine that the project would not result in any net additional GHG emissions after the mitigation measures are fully implemented." ARB reiterated the same view in a letter to CDFW dated June 7, 2017, indicating the State-certified EIR's GHG analyses provide an adequate "technical basis for CDFW to find, in its lead agency discretion..., that the project as currently proposed will not result in any net additional greenhouse gas emissions after identified mitigation measures are fully implemented." Moreover, as highlighted in ARB's 2017 Climate Change Scoping Plan Update, the 2017 Approved Project evaluated in the State-certified EIR serves as one of "[s]everal recent examples of sustainable land use development projects in California [that] have demonstrated that it is feasible to design projects that achieve zero net additional GHG emissions."

In CDFW's findings to certify the State-certified EIR, CDFW concluded that the 2017 Approved Project would feasibly and reliably achieve net zero GHG emissions (see 2017 Final AEA Tables 2.3-4 and 2.3-5).

CDFW further found that with implementation of the adopted GHG mitigation measures, the 2017 Approved Project would not result in a cumulatively considerable contribution to cumulative GHG emissions. Based on the adopted mitigation measures and the Applicant's supplemental commitment, and with technical support from ARB, CDFW found in its independent judgment as Lead Agency that the 2017 Approved Project's GHG impacts would be less than significant with mitigation under CEQA.⁴¹

In addition, because the 2017 Approved Project would result in no net increase of GHG emissions, it would not conflict with any plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. The State, and by extension regional and local climate policy, is rooted in achieving an emissions level below the reference year of 1990, which is based on levels established by scientific evidence to avoid the most adverse impacts of climate change. Therefore, relevant plans, such as ARB's Scoping Plan, the Southern California Association of Government's (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and Los Angeles County's Community Climate Action Plan, all establish non-zero targets (i.e., some level of positive net emissions above existing conditions for land developments to accommodate planned growth) to achieve future GHG emissions targets. By achieving net zero GHG emissions, the feasibility and reliability of which has been demonstrated in the analysis set forth in the State-certified EIR's GHG analysis, the 2017 Approved Project would not conflict with any relevant plan, policy, or regulation adopted for the purpose of reducing GHG emissions. CDFW determined that impacts related to conflicts with relevant plans, policies or regulations would be less than significant.

Further, CDFW determined that a 30-year project life is the appropriate period to use to evaluate the 2017 Approved Project's GHG emissions inventory and the Applicant's commitment to net zero emissions. The 30-year project life represents the current reasonable limit of scientific and evidentiary data for the 2017 Approved Project, given current modeling tools, the changing regulatory structure, the level of uncertainty beyond 2050 with respect to regulatory programs mandating further reductions in GHG emissions, and other available information.

When certifying the State-certified EIR, CDFW identified a number of GHG benefits **associated** with the 2017 Approved Project, as follows:

- The 2017 Approved Project represents an innovative demonstration of a mixed-use development project providing needed housing and commercial development in a manner consistent with California's GHG reduction goals. Once developed, the 2017 Approved Project will be one of the largest, if not the largest, developments ever in California to achieve net zero GHG emissions. Benefits achieved from the 2017 Approved Project are exemplified by, but are not necessarily limited to, the following:⁴²
- With implementation of Mitigation Measures RMDP/SCP-2-1 through RMDP/SCP-2-13, the 2017 Approved Project would reduce all Project-related construction and operational GHG emissions to net zero over the 30-year project life.
- As highlighted in ARB's 2017 Climate Change Scoping Plan Update, the 2017 Approved Project serves as one of "[s]everal recent examples of sustainable land use development projects in California [that] have demonstrated that it is feasible to design projects that achieve zero net additional GHG emissions."

⁴¹ Final Actions and Supplemental Findings of the California Department of Fish and Wildlife for the Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan, June 2017, p. 14-15.

⁴² Id., pp. 40-41.

- The 2017 Approved Project involves the design and construction of residential development, commercial development, private recreation centers, and public facilities to achieve Zero Net Energy standards, as defined by the California Energy Commission, which advances California policy goals of increasing the energy efficiency of homes and commercial buildings.
- The 2017 Approved Project involves the installation of an electric vehicle charging station at every residence, as well as thousands more electric vehicle charging stations in commercial areas within the Project Site and off-site throughout Los Angeles County. The 2017 Approved Project will also provide subsidies for the purchase of zero emission vehicles to Project residents. This suite of mitigation commitments is expected to make the 2017 Approved Project a model community for electric vehicle ownership and increase the electric vehicle adoption rate within the Santa Clarita area and Los Angeles County, advancing state, regional, and local goals to reduce emissions through an increased use of electric vehicles.
- The 2017 Approved Project includes implementation of a comprehensive Transportation Demand Management Plan to reduce vehicle miles traveled and enhance the use of alternative transportation modes both on- and off-site, thus advancing state, regional and local policy goals.
- The 2017 Approved Project includes subsidies to transit providers for the replacement of up to 10 diesel or compressed natural gas transit buses with zero emission buses.
- The 2017 Approved Project will undertake or fund a building retrofit program to improve the energy efficiency of homes and other buildings within disadvantaged communities in Los Angeles County.
- The 2017 Approved Project will achieve GHG reductions by implementing direct reduction activities in accordance with the Project’s GHG Reduction Plan.

Lastly, there is a shortage of existing housing within California. The legislature specifically found that “[t]he lack of housing... is a critical problem that threatens the economic, environmental, and social quality of life in California.” Gov. Code § 65589.5(a)(1)(A). Because of the immediate need for housing projects, the legislature now even requires consideration of the impacts associated with the denial of housing projects. More specifically, Gov. Code § 65589.5(b) explains that “It is the policy of the state that a local government not reject or make infeasible housing development projects... without a thorough analysis of the economic, social, and environmental effects of the action.”

Due to the net zero GHG requirements for the Modified Project, the Modified Project provides housing that does not result in any net increase in GHG emissions, thereby improving GHG emissions when considering other housing growth that may not meet a net zero GHG requirement.⁴³ California’s need for housing has been well documented and will occur regardless of the Project. The Project’s commitments to net zero GHG emissions helps to ensure that providing housing for California’s population will have a less severe impact on GHG emissions as compared to housing that does not achieve net zero GHG emissions. As stated in *Center for Biological Diversity v. Dept. of Fish & Wildlife* (2015) 62 Cal.4th 204, 220, “the future residents and occupants of development enabled by Project approval would exist and live somewhere else if

⁴³ See *Association of Irrigated Residents v. Kern County Board of Supervisors* (2017) 17 Cal.App.5th 708 [stating that the environmental analysis can consider displaced growth or displaced trips]. The Modified Project’s net-zero GHG program accounts for all the potential GHG emissions associated with the project and conservatively does not take credit for any displaced growth or displaced trips.

this Project is not approved. Whether ‘here or there,’ GHG emissions associated with such population growth will occur.”

Evaluation of Greenhouse Gas Emissions Impacts for the Modified Project

As discussed above in the Project Description, buildout of the VCC Planning Area would be consistent with the uses allowed by the County-approved entitlements for VCC and the existing zoning. As also discussed above in the Project Description, the Modified Project would include changes to the land use plan for the Entrada Planning Area, as discussed further in the analysis below.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
Would the project:			
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

An analysis of the Modified Project’s GHG emissions was prepared by Ramboll US Corporation and is included in the GHG and Energy Memo, provided in Appendix IS-2 of this Initial Study. As detailed therein and discussed below, the Modified Project with mitigation would not increase GHG emissions as compared to the 2017 Approved Project, and the Modified Project would continue to achieve net zero GHG emissions based on the mandatory mitigation framework established by the State-certified EIR. As discussed above, the California Air Resources Board’s 2017 Climate Change Scoping Plan Update highlighted the 2017 Approved Project as a “recent example [...] of sustainable land use development projects in California [that] have demonstrated that it is feasible to design projects that achieve zero net additional GHG emissions.” Based on the mitigation framework, which the Modified Project likewise would implement.

Construction—Construction emissions associated with the Modified Project would be consistent with the emissions reported in the State-certified EIR. For Entrada South, the Project footprint for horizontal construction or earthwork (e.g., site preparation, grading, demolition, and utilities installation) would remain consistent with that analyzed in the State-certified EIR. Therefore, the construction emissions from those sub-phases of construction are not anticipated to increase due to the Modified Project. Furthermore, while the Modified Project will result in a change in land use sub-types compared to what was assumed in the State-certified EIR, the overall square footage of development would be approximately the same under the Modified Project, and the amount of vertical construction evaluated in the State-certified EIR was conservatively represented, as described further below. Thus, the calculated construction emissions for the Modified Project’s vertical construction is not expected to increase.

The State-certified EIR conservatively assumed that construction equipment mixes for all years would be the same as the year with the maximum amount of construction for each sub-phase, even though the non-maximum years would have reduced construction equipment mixes. For example, although the building construction sub-phase would span multiple years with varying amounts of construction activity, the off-road equipment mix for every year was assumed to be the same as the year with the greatest amount of construction activity. Given this conservative assumption, the construction modeling parameters in the non-maximum years assumed more construction activity than was actually expected to occur, and total GHG emissions were overestimated. In addition, the mix of construction equipment is expected to become cleaner over time (i.e., generate fewer emissions on average) as older equipment is replaced or repowered.

*Less Than Significant
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For Entrada South, the land use mix associated with the Modified Project modifications involves an increase in commercial square footage (from 450,000 square feet to 730,000 square feet) and a reduction in residential development (from 1,725 units to 1,574 units, or from 3,235,100 square feet to 2,951,913 square feet).⁴⁴ These Project modifications would result in approximately the same overall floor area ratio as that assumed in the State-certified EIR.⁴⁵ Therefore, the type and number of construction equipment and the related construction intensity would fall within the envelope of construction activity that was previously analyzed, and the Project modifications for Entrada South would not increase construction emissions relative to those disclosed in the State-certified EIR.

For VCC, the Modified Project would not change the Project footprint, proposed land uses, nor the total building square footage compared to what was assumed in the State-certified EIR. Therefore, construction emissions from all aspects of VCC are not anticipated to increase.

In summary, construction GHG emissions from the Modified Project will not result in any new or more severe significant impacts. As described above, neither the horizontal or vertical construction activities are expected to increase construction emissions. Total GHG emissions are estimated at 12,403 million tons of carbon dioxide equivalent (MT CO₂e) for Entrada South and 13,386 MT CO₂e for VCC, as calculated in the State-certified EIR.⁴⁶ Importantly, the mitigation framework from the State-certified EIR will apply to the Modified Project, and, therefore, there will not be any net increase in GHG emissions. Specifically, Mitigation Measure 2-10 from the State-certified EIR requires construction-related GHG emissions to be mitigated to zero. This mitigation measure will continue to apply to the Modified Project, and therefore net GHG emissions during construction will remain zero. Accordingly, construction-related GHG impacts will continue to be less than significant.

Operations—The State-certified EIR disclosed unmitigated operational GHG emissions for Entrada South and Valencia Commerce Center and mitigated operational GHG emissions for the overall RMDP/SCP Project. Operational GHG emissions sources analyzed in the State-certified EIR include the following categories:

- Area Sources: Combustion emissions from landscaping equipment.
- Building Energy Use: Indirect emissions from electricity production and direct emissions from natural gas combustion.
- Water Use: Indirect emissions from electricity need to supply, treat, and distribute water and wastewater; and direct emissions from wastewater.

⁴⁴ The square footage totals for the residential units referenced in the parenthetical are calculated based on an average unit size of 1,875 square feet.

⁴⁵ The 2017 Approved Project included an estimated 3,685,100 SF of development area within the Entrada Planning Area (450,000 square feet of commercial development and 3,235,100 square feet of residential development). The Modified Project would include an estimated 3,681,913 square feet of development area within the Entrada Planning Area (730,000 square feet of commercial development and 2,951,913 square feet of residential development). As such, the Modified Project would result in a net reduction of approximately 3,187 square feet of floor area within the Entrada Planning Area when compared to the 2017 Approved Project.

⁴⁶ See State-certified EIR, Draft Additional Environmental Analysis, Appendix 1: Greenhouse Gas Emissions Technical Report, Tables 2-7 through 2-9 for Stages 5 and 6 Construction, Ramboll, 2016.

<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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- Solid Waste: Direct emissions from solid waste disposal.
- Traffic: Starting, running, and idling emissions from vehicle use.

To evaluate greenhouse gas impacts, this analysis estimates emissions for the changes associated with the Modified Project.

Unmitigated operational GHG emissions from the Modified Project are expected to be approximately 2,179 MT CO₂e/yr higher than those disclosed in the State-certified EIR for Entrada South and 49 MT CO₂e/yr lower than those disclosed in the State-certified EIR for VCC. Emissions from some source categories will decrease due to increasingly stringent statewide regulatory requirements, while emissions from other source categories may increase or decrease as a result of the Modified Project’s refined land use mix. Moreover, the Modified Project’s operational GHG emissions would be fully mitigated to net zero with the mandatory mitigation framework from the State-certified EIR, thus the Modified Project would continue to achieve net zero GHGs. Specifically, with continued implementation of Mitigation Measures 2-1 through 2-13, the Mitigated Modified Project’s net GHG emissions after mitigation would be reduced to zero. Mitigation Measures 2-1 through 2-13 were reviewed and approved by the California Air Resources Board, which confirmed that the evidence supported a conclusion that the mitigation measures would reduce GHG emission to net zero.⁴⁷ In addition, as discussed in the GHG and Energy Memo,⁴⁸ the Supplemental EV Charger Commitment would result in reductions below net zero of 1,499 MTCO₂e/year and 4,166 MTCO₂e/year for Entrada South and Valencia Commerce Center, respectively, which reductions are more than the anticipated unmitigated operational GHG emissions associated with the Modified Project.⁴⁹ As a result, the mitigated Modified Project would have no net increase in GHG emissions as compared to the existing environmental setting and would not have a significant impact on global climate change under this threshold.

Thus, construction and operational GHG emissions from the Modified Project will not cause a net increase in GHG after mitigation and will not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Thus, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area, and no additional analysis in the Supplemental EIR is required.

b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.
With continued implementation of Mitigation Measures 2-1 through 2-13, the Modified Project’s net GHG emissions after mitigation would be reduced to zero. Mitigation Measures 2-1 through 2-13 were reviewed

⁴⁷ See State-certified EIR, Final Additional Environmental Analysis, Appendix 1; Final Actions and Supplemental Findings of the California Department of Fish and Wildlife for the Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan, June 14, 2017, Section II.

⁴⁸ See pages 15-16, Supplemental Commitment, of the GHG and Energy Memo for a full discussion of the Applicant-Proposed supplemental commitment and its application to the Modified Project.

⁴⁹ See State-certified EIR, Final Additional Environmental Analysis, Response to Comment No. 09-27 and Appendix 2: Errata to Mitigation Monitoring and Reporting Plan, June 2017.

<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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and approved by the California Air Resources Board, which confirmed that the evidence supported a conclusion that the mitigation measures would reduce GHG emission to net zero.⁵⁰ As a result, the mitigated Modified Project would have no net increase in GHG emissions as compared to the existing environmental setting and thus would not conflict with any adopted and applicable local or State plans, policies, or regulations to reduce GHG emissions by 2020, 2030, and/or 2050, all of which utilize non-zero targets (and thereby allow for some level of emissions for land use developments to accommodate projected growth) to reduce the State’s cumulative contribution to global climate change.⁵¹ In addition, the Supplemental EV Charger Commitment would result in 1,499 MTCO_{2e}/year and 4,166 MTCO_{2e}/year of reductions beyond net zero for Entrada South and Valencia Commerce Center, respectively. As such, the Modified Project would be consistent with adopted and applicable local and statewide plans, policies, and regulations designed to reduce GHG emissions. In fact, the 2017 Approved Project was recognized as a model community for advancing climate and sustainability goals the 2017 Climate Change Scoping Plan Update, as noted above. Impacts after mitigation would be less than significant under this threshold for both the Entrada and VCC Planning Areas. Refer to Response to Question 8.a, above, for additional discussion. The Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area, and no additional analysis in the Supplemental EIR is required.

⁵⁰ See State-certified EIR, Final Additional Environmental Analysis, Appendix 1; Final Actions and Supplemental Findings of the California Department of Fish and Wildlife for the Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan, June 14, 2017, Section II.

⁵¹ The State-certified EIR concluded that relevant plans for the reduction of greenhouse gases establish non-zero targets (i.e., some level of positive net emissions above existing conditions for land use developments to accommodate planned growth). By achieving net zero emissions, the 2017 Approved Project would not conflict with any relevant plan, policy, or regulation. The Modified Project’s changes and refinements would not affect these conclusions.

9. HAZARDS AND HAZARDOUS MATERIALS

Summary of State-Certified EIR Analysis of Hazards and Hazardous Materials

Section 4.17, Hazards, Hazardous Materials, and Public Safety, of the State-certified EIR analyzed impacts related to hazards and hazardous materials resulting from the development of the Entrada and VCC Planning Areas. Portions of both the Entrada and VCC Planning Areas were formerly used for oil production, and a number of former oil well sites exist on-site. Despite past remediation activities, residual soil contamination may exist in some areas. In addition, asbestos-containing materials, lead-based paint, and polychlorinated biphenyls may be present within the existing structures on-site. Other existing facilities on-site include high voltage electric transmission lines and towers owned by Southern California Edison, a high pressure gas transmission pipeline owned by Southern California Gas and other gas lines, and groundwater monitoring wells or other water wells.

Entrada Planning Area

The State-certified EIR concluded the following impacts would be less than significant with implementation of Mitigation Measures RMDP/SCP-PH-1 through RMDP/SCP-PH-14 for development within the Entrada Planning Area: hazards related to the routine use, transport, and disposal of hazardous materials; reasonably foreseeable upset and accident conditions; hazardous emissions or the handling of hazardous materials within 0.25 mile of a school; and wildland fires. All other hazards impacts were determined to be less than significant.⁵²

VCC Planning Area

The State-certified EIR concluded the following impacts would be less than significant with implementation of Mitigation Measures RMDP/SCP-PH-1 through RMDP/SCP-PH-14 for development in the VCC Planning Area: hazards related to the routine use, transport, and disposal of hazardous materials; reasonably foreseeable upset and accident conditions; hazardous emissions or the handling of hazardous materials within 0.25 mile of a school; and wildland fires.⁵⁷ The County of Los Angeles also adopted Mitigation Measures VCC-PH-1 and VCC-PH-2 to minimize hazards-related impacts within the VCC Planning Area as part of its approval of the VCC project. All other hazards impacts were determined to be less than significant.⁵³

Project Design Features of the Modified Project (Entrada and VCC Planning Areas)

The Modified Project includes Project Design Feature PDF-HM-1, set forth in Section 17, Transportation, of this Initial Study, which calls for preparation and implementation of a Construction Traffic Management Plan to ensure safe traffic operations and emergency access during construction.

⁵² See State-certified EIR, pages 4.17-57-61.

⁵³ See State-certified EIR, pages 4.17-57-61.

Evaluation of Hazards and Hazardous Materials Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
Would the project:			
a) Create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Supplemental Analysis Required. As noted above, despite past remediation activities, residual soil contamination may exist in some areas. Therefore, the potential hazards impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. As noted above, despite past remediation activities, residual soil contamination may exist in some areas. Therefore, the potential hazards impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. As noted above, despite past remediation activities, residual soil contamination may exist in some areas. Therefore, the potential hazards impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. The Modified Project would not increase impacts related to this topic as compared to the 2017 Approved Project. California Government Code Section 65962.5 requires the California Environmental Protection Agency to compile and update annually the Hazardous Waste and Substances Sites List, also known as the Cortese List. The California Department of Toxic Substances Control (DTSC) is responsible for much of the information contained in the Cortese List, supplemented by additional hazardous material release information from other state and local government agencies. The list is maintained via DTSC’s Brownfields and Environmental Restoration Program called EnviroStor. More specifically, EnviroStor is DTSC’s data management system for tracking cleanup, permitting, enforcement, and investigation efforts at hazardous waste facilities and sites with known contamination or sites where there may be reasons to investigate further. The EnviroStor database was reviewed by ENGEO to determine if any listed sites are located within the Project Site, and none were found; neither the Entrada nor the VCC Planning Area is included on the Cortese List. Therefore, the Modified Project would not cause any new or more severe significant impacts related to this topic, as compared to the 2017 Approved Project. This issue will not be further

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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evaluated in the Supplemental EIR.

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?

No Impact. The Project Site is not located within an airport land use plan or within 2 miles of a public or private airport. A private airstrip was previously located on the Airport Mesa portion of the approved Mission Village community planned immediately west of the Entrada Planning Area; however, use of the airstrip has been discontinued.

In addition, Section 4.9, Noise, of the State-certified EIR concluded that there would be no impact relative to airport noise in the Entrada or VCC Planning Areas as neither are located within an airport land use plan. As the Modified Project would remain within the development footprint analyzed in the State-certified EIR, no development would occur within an airport land use plan. Therefore, the Modified Project would not cause any new or more severe significant impacts related to this topic, and no additional analysis in the Supplemental EIR is required.

f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The State-certified EIR found that impacts to public safety related to emergency response were not significant for the Entrada and VCC Planning Areas. The Modified Project does not include any modifications to the 2017 Approved Project that would increase interference with an adopted emergency response plan or emergency evacuation plan. The Modified Project includes the same mix of uses as the 2017 Approved Project, with only changes to the residential and non-residential allocations for Entrada South that do not have the potential to impair an adopted emergency response plan or emergency evacuation plan. Like the 2017 Approved Project, Modified Project development in the Entrada and VCC Planning Areas would address fire and emergency access needs through the implementation of Mitigation Measure RMDP/SCP-PH-7,⁵⁴ which requires compliance with Los Angeles County Code, Title 21, Chapter 21.24 regarding secondary evacuation access. Further, the Modified Project’s circulation system would be designed and constructed in accordance with all applicable Los Angeles County Fire Department (LACFD) requirements. Therefore, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts for this topic area; no additional analysis in the Supplemental EIR is required.

Additionally, PDF-HM-1, set forth in Section 17, Transportation, of this Initial Study, provides additional benefits for the Modified Project. PDF-HM-1 would require the submission of a detailed Construction Traffic Management Plan which would include provisions for adequate emergency access to all residences and businesses during construction activities. PDF-HM-1 is beneficial and is not relied upon to reach the conclusion that no additional analysis in the Supplemental EIR is required.

⁵⁴ See Appendix IS-1 for all applicable mitigation measures.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located:			
i) within a high fire hazard area with inadequate access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Supplemental Analysis Required. The Modified Project's potential impacts regarding fire hazards will be evaluated further in the Wildfire section of the Supplemental EIR.

ii) within an area with inadequate water and pressure to meet fire flow standards?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The Modified Project's potential impacts regarding fire hazards will be evaluated further in the Wildfire section of the Supplemental EIR.

iii) within proximity to land uses that have the potential for dangerous fire hazard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The Modified Project's potential impacts regarding fire hazards will be evaluated further in the Wildfire section of the Supplemental EIR.

h) Does the proposed use constitute a potentially dangerous fire hazard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The Modified Project's potential impacts regarding fire hazards will be evaluated further in the Wildfire section of the Supplemental EIR.

10. HYDROLOGY AND WATER QUALITY

Summary of State-Certified EIR Analysis of Hydrology and Water Quality

Section 4.1, Surface Water Hydrology and Flood Control; **Section 4.2**, Geomorphology and Riparian Resources; **Section 4.3**, Water Resources; and **Section 4.4**, Water Quality, of the State-certified EIR analyzed impacts related to hydrology, water quality, and groundwater resulting from the development of the Entrada and VCC Planning Areas, as summarized below.

Both the Entrada and VCC Planning Areas are located in the Santa Clara River basin. The Entrada Planning Area contains portions of four drainage channels, including Magic Mountain Canyon and three unnamed drainages, all of which flow to the river. Castaic Creek and Hasley Creek, both of which are tributaries to the Santa Clara River, flow through the VCC Planning Area. Neither planning area contains any land that falls within a 100-year floodplain.

Entrada Planning Area

As evaluated in **Section 4.1**, Surface Water Hydrology and Flood Control, of the State-certified EIR, hydrology impacts related to flooding/flood hazards and storm water conveyance within the Entrada Planning Area would be less than significant.⁵⁵ Nonetheless, Mitigation Measures RMDP/SCP-HY-1 through RMDP/SCP-HY-7 (not all of which are applicable to development within Entrada) were adopted to ensure no flood hazards would occur.

Section 4.2, Geomorphology and Riparian Resources, of the State-certified EIR evaluated the hydraulic impacts on sensitive aquatic/riparian resources in the Santa Clara River Corridor and tributaries due to implementation of the 2017 Approved Project. Geomorphic processes include sediment production, transport, and storage through the stream corridor, which have the potential to influence river systems and landforms. Within the Entrada Planning Area, the following impacts were found to be less than significant with Mitigation Measures RMDP/SCP-GRR-1 through RMDP/SCP-GRR-7: construction-related changes to drainage patterns that could result in erosion; long-term erosion and downstream deposition; reductions in geomorphic function (i.e., channel stability); and riverbed and floodplain scouring affecting riparian vegetation. Impacts related to seasonal flows in the “Dry Gap” and reductions in sediment delivered from the Santa Clara River to Ventura County beaches were determined to be less than significant.⁵⁶

Although focused primarily on water supply, **Section 4.3**, Water Resources, of the State-certified EIR also addressed groundwater supply, groundwater recharge, and groundwater quality. As determined therein, adequate water supplies would be available to meet the potable and non-potable water demands of the 2017 Approved Project without resulting in environmental impacts to the Santa Clara River, the local groundwater basins, or downstream users in Ventura County. All related impacts would be less than significant, and no mitigation was required.⁵⁷

As determined in **Section 4.4**, Water Quality, of the State-certified EIR, Entrada impacts with regard to surface water and groundwater quality would be less than significant with implementation of Mitigation Measures RMDP/SCP-WQ-1 and RMDP/SCP-WQ-2.⁵⁸

⁵⁵ See State-certified EIR, pages 4.1-57 and 4.1-123.

⁵⁶ See State-certified EIR, pages 4.2-93-98 and 4.2-266-273.

⁵⁷ See State-certified EIR, pages 4.3-91-92 and 4.3-127.

⁵⁸ See State-certified EIR, pages 4.4-110-123 and page 4.4-181.

VCC Planning Area

Section 4.1, Surface Water Hydrology and Flood Control, of the State-certified EIR determined that hydrology impacts related to flooding/flood hazards and storm water conveyance within the VCC Planning Area would be less than significant.⁵⁹ Nonetheless, Mitigation Measures RMDP/SCP-HY-1 through RMDP/SCP-HY-7 (not all of which are applicable to development within VCC) were adopted to ensure no flood hazards would occur. In addition, Mitigation Measures VCC-HY-1 through VCC-HY-3 were previously adopted by the County and would apply.

As evaluated in **Section 4.2**, Geomorphology and Riparian Resources, of the State-certified EIR, within the VCC Planning Area, the following impacts were found to be less than significant with Mitigation Measures RMDP/SCP-GRR-1 through RMDP/SCP-GRR-7: construction-related changes to drainage patterns that could result in erosion; long-term erosion and downstream deposition; reductions in geomorphic function (i.e., channel stability); and riverbed and floodplain scouring affecting riparian vegetation. Impacts related to seasonal flows in the “Dry Gap” and reductions in sediment delivered from the Santa Clara River to Ventura County beaches were determined to be less than significant.⁶⁰

Section 4.3, Water Resources, of the State-certified EIR found that impacts to groundwater supply, groundwater recharge, and groundwater quality would be less than significant. Although no mitigation was required, the County’s previously adopted Mitigation Measures VCC-WR-1 through VCC-WR-5 would apply.⁶¹

As determined in **Section 4.4**, Water Quality, of the State-certified EIR, VCC impacts with regard to surface water and groundwater quality would be less than significant with implementation of Mitigation Measures RMDP/SCP-WQ-1 and RMDP/SCP-WQ-2.⁶²

Evaluation of Hydrology and Water Quality Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
Would the project:			
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Supplemental Analysis Required. The State-certified EIR addressed potential hydrology and water quality impacts at a programmatic level. Supplemental analysis based on current tract map/parcel map design is required, including review and approval of a Drainage Concept/Hydrology Study and Low Impact Development (LID) Plan by the County Department of Public Works. Therefore, the potential water quality impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

⁵⁹ See State-certified EIR, pages 4.1-57 and 4.1-123.

⁶⁰ See State-certified EIR, pages 4.2-93-98 and 4.2-266-273.

⁶¹ See State-certified EIR, pages 4.3-91-92 and 4.3-127.

⁶² See State-certified EIR, pages 4.4-110-123 and page 4.4-181.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. The State-certified EIR concluded groundwater recharge impacts to be less than significant. The Modified Project does not include any modifications from the 2017 Approved Project that would increase impacts related to groundwater recharge. The Modified Project would not decrease groundwater supplies or interfere substantially with groundwater recharge as compared to the 2017 Approved Project. The Santa Clarita Valley Groundwater Sustainability Agency is responsible for sustainably managing groundwater in the Santa Clara River Valley East Subbasin, within which the Modified Project Site is located. The agency is planning to develop by January 2022 a Groundwater Sustainability Plan to maintain and improve resource management, with the overall goal to achieve sustainable groundwater management within 20 years.⁶³ Locally in the Santa Clarita Valley, about half of the water supply is produced by local groundwater.⁶⁴ The Project Site is not located in an area known to have an inadequate public water supply to meet domestic needs or to have an inadequate groundwater supply. In addition, no municipal groundwater supply wells would be installed as part of the Modified Project.

Like the 2017 Approved Project, the Modified Project Site is primarily undeveloped, and development of the Entrada and VCC Planning Areas would introduce new impervious surfaces. However, several factors would counter the impact of urbanization on groundwater recharge, including an infiltration recharge from LID water quality facilities (e.g., vegetation swales) and irrigation recharge. As the Entrada and VCC Planning Areas fall within the same disturbance footprints analyzed in the State-certified EIR and reflect the same general scope and intensity of development, including land use types, floor area, and associated impervious areas, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts relative to groundwater supplies and groundwater recharge. No additional analysis in the Supplemental EIR is required.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of a Federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would:

- | | | | |
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| (i) Result in substantial erosion or siltation on- or off-site? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
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Supplemental Analysis Required. The State-certified EIR addressed potential hydrology and water quality impacts at a programmatic level. Supplemental analysis based on current tract map/parcel map design is required, including review and approval of a Drainage Concept/Hydrology Study and LID Plan by the County Department of Public Works. Therefore, the potential water quality impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

⁶³ Santa Clarita Valley Groundwater Sustainability Agency, www.scvgsa.org, accessed May 13, 2021.

⁶⁴ *Ibid.*

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
(ii) Substantially increase the rate, amount, or depth of surface runoff in a manner which would result in flooding on- or offsite?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Supplemental Analysis Required. The State-certified EIR addressed potential hydrology and water quality impacts at a programmatic level. Supplemental analysis based on current tract map/parcel map design is required, including review and approval of a Drainage Concept/Hydrology Study and LID Plan by the County Department of Public Works. Therefore, the potential water quality impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

(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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The State-certified EIR addressed potential hydrology and water quality impacts at a programmatic level. Supplemental analysis based on current tract map/parcel map design is required, including review and approval of a Drainage Concept/Hydrology Study and LID Plan by the County Department of Public Works. Therefore, the potential water quality impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

(iv) Impede or redirect flood flows which would expose existing housing or other insurable structures in a Federal 100-year flood hazard area or County Capital Flood floodplain to a significant risk of loss or damage involving flooding?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The State-certified EIR addressed potential hydrology and water quality impacts at a programmatic level. Supplemental analysis based on current tract map/parcel map design is required, including review and approval of a Drainage Concept/Hydrology Study and LID Plan by the County Department of Public Works. Therefore, the potential water quality impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

d) Otherwise place structures in Federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The State-certified EIR addressed potential hydrology and water quality impacts at a programmatic level. Supplemental analysis based on current tract map/parcel map design is required, including review and approval of a Drainage Concept/Hydrology Study and LID Plan by the County Department of Public Works. Therefore, the potential water quality impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

e) Conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84)?

Supplemental Analysis Required. The State-certified EIR addressed potential hydrology and water quality impacts at a programmatic level. Supplemental analysis based on current tract map/parcel map design is required, including review and approval of a Drainage Concept/Hydrology Study and LID Plan by the County Department of Public Works. Therefore, the potential water quality impacts associated with this topic will be evaluated further in the Supplemental EIR for the Modified Project.

f) Use onsite wastewater treatment systems in areas with known geological limitations (e.g., high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No Impact. As previously discussed and consistent with the analysis provided in Section 4.13, Geology and Soils, of the State-certified EIR, Modified Project development within the Entrada and VCC Planning Areas would not involve use of septic tanks or other alternative wastewater disposal systems, and no impact would occur. This issue will not be analyzed further in the Supplemental EIR.

g) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. The State-certified EIR concluded the project area is not located in a tsunami or seiche zone, and development would not occur within the 100-year flood zone.⁶⁵ The Modified Project does not include any modifications from the 2017 Approved Project that would change these conclusions. The Modified Project would not increase the risk of release of pollutants due to inundation as compared to the 2017 Approved Project. Neither the Entrada or VCC Planning Areas contain any land that falls within a 100-year floodplain. The Modified Project Site is not located near any body of water large enough to potentially create seiches during seismic activity, nor is the Pacific Ocean close enough to pose a tsunami risk to the Project Site. As it relates specifically to the VCC Planning Area, Castaic Dam is located on Castaic Lake to the north. In the event of dam failure, inundation waters would flow southerly along Castaic Creek to the north bank of the Santa Clara River. However, under the Modified Project, bank stabilization would be implemented, and development has been pulled back from Castaic Creek as compared to the 2017 Approved Project, which would protect and further stabilize the creek banks and minimize inundation hazards.

Therefore, the potential for the Modified Project to be affected by flooding, tsunami, or seiche would remain negligible. The Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts relative to these issues. This topic will not be evaluated in the Supplemental EIR.

⁶⁵ See State-certified Final EIR, page 4.1-39.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
h) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Water Quality Control Plan: Supplemental Analysis Required. The Modified Project’s potential impacts related to conflicts with or obstruction of a water quality control plan will be evaluated further in the Supplemental EIR. In addition, review and approval of a Drainage Concept/Hydrology Study and LID Plan by the County Department of Public Works will be required.

Sustainable Groundwater Management Plan: Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. Please refer to Response to Question 10.b for discussion of the Santa Clarita Valley Groundwater Sustainability Agency’s forthcoming Groundwater Sustainability Plan. As previously indicated, development within the Entrada and VCC Planning Areas would fall within the same disturbance footprints analyzed in the State-certified EIR and would involve the same general scope and intensity of development, including land use types, floor area, and related types of urban contaminants. The Modified Project would comply with any future applicable groundwater sustainability requirements. Additionally, like the 2017 Approved Project, BMPs would be implemented during both construction and operation of the Modified Project. Also, like the 2017 Approved Project, the Modified Project would be subject to Mitigation Measures RMDP/SCP-WQ-1 and RMDP/SCP-WQ-2, which would reduce water quality and groundwater impacts. As the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts, this topic will not be further evaluated in the Supplemental EIR.

11. LAND USE AND PLANNING

Summary of State-Certified EIR Analysis of Land Use and Planning

Section 4.14, Land Use, of the State-certified EIR analyzed impacts related to land use and planning resulting from the development of the Entrada and VCC Planning Areas.

Entrada Planning Area

The State-certified EIR determined that impacts related to the division of an established community and conflicts with an applicable habitat conservation plan or natural community conservation plan would be less than significant.⁶⁶ However, development of the Entrada Planning Area under the 2017 Approved Project was found to result in a significant and unavoidable impact associated with conflicts with an applicable land use plan, policy, or regulation since establishment of a spineflower preserve would conflict with the site's then-existing agricultural zoning.⁶⁷ This impact was acknowledged to likely be temporary pending the County's approval of a zone change but was nonetheless concluded to be significant and unavoidable as implementation of the zone change was beyond the control of the Applicant. No feasible mitigation was identified.

Since publication of the State-certified EIR, a zone change has been implemented by the County for the Entrada Planning Area, which now includes land zoned R-1—Single-Family Residence, C-3—Unlimited Commercial, and C-R—Commercial Recreation. In addition, the spineflower preserve within the Entrada Planning Area has been permanently dedicated on-site.

VCC Planning Area

The State-certified EIR determined all land use impacts associated with development of the VCC Planning Area would be less than significant, and no mitigation was required.

Evaluation of Land Use and Planning Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
Would the project:			
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No Impact. Like the 2017 Approved Project, the Modified Project would not physically divide an established community.

Entrada Planning Area

The Entrada Planning Area is currently vacant, and the adjacent established Westridge community to the south is distinct and self-contained. Modified Project development would remain within the development footprint analyzed in the State-certified EIR—with the exception of the 0.6-acre previously disturbed golf course area on The Oaks Club at Valencia golf course, which will be temporarily disturbed to allow for a storm drain connection and fully restored following construction—and would not introduce barriers,

⁶⁶ See State-certified EIR, page 4.14-16.

⁶⁷ See State-certified EIR, page 4.14-12.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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roadways, or other infrastructure improvements that would bisect or transect the surrounding existing or planned communities. In fact, the Modified Project would create a more cohesive community and be integrated with the adjacent Mission Village community to the west, which is currently under construction. Connectivity to the proposed Entrada North development to the north also would be provided. Accordingly, the Modified Project would not result in any new or more significant land use impacts related to this issue. This topic will not be further evaluated in the Supplemental EIR.

VCC Planning Area

The VCC Planning Area is surrounded by existing single-family residential and industrial uses to the north, and the previously developed portions of VCC are located to the immediate west. Development within the VCC Planning Area would remain within the development footprint analyzed in the State-certified EIR and would represent a continuation of the non-residential development pattern previously established within VCC. Accordingly, the Modified Project would not physically divide an established community and thus would not result in any new or more significant land use impacts related to this issue. This topic will not be further evaluated in the Supplemental EIR.

b) Cause a significant environmental impact due to a conflict with any County land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.
Like the 2017 Approved Project, the Modified Project would not be inconsistent with the applicable County plans for the Project Site. The OVOV Area Plan designates the Entrada Planning Area as H5—Residential 5 south of Magic Mountain Parkway; CM—Major Commercial north of Magic Mountain Parkway; and OS-PR—Parks and Recreation south of the Southern California Edison electric transmission lines. The VCC Planning Area is designated as IO—Industrial Office. These land use designations allow for development of the proposed uses under the Modified Project. No General Plan or Area Plan amendments are required within either planning area to implement the Modified Project. Therefore, the Modified Project would not result in any new or more significant land use impacts related to this issue, and no further analysis is required.

c) Conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas?

Supplemental Analysis Required. The Modified Project’s potential land use impacts associated with this topic for be evaluated further in the Supplemental EIR.

12. MINERAL RESOURCES

Summary of State-Certified EIR Analysis of Mineral Resources

Entrada and VCC Planning Areas

Section 4.13, Geology and Geologic Hazards, of the State-certified EIR analyzed impacts to mineral resources resulting from development of the Entrada and VCC Planning Areas. The analysis concluded that no impact would occur regarding mineral resources for either planning area.⁶⁸

Evaluation of Mineral Resources Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
Would the project:			
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not increase impacts to mineral resources as compared to the 2017 Approved Project. As discussed above, the State-certified EIR concluded the 2017 Approved Project would have no impact related to the loss of availability of a known mineral resource. The Modified Project does not include any modifications from the 2017 Approved Project that would increase impacts related to the loss of a known mineral resource. The California Geological Survey (CGS) classifies the significance of mineral resources in accordance with the California Surface Mining and Reclamation Act (SMARA) of 1975. More specifically, the State Geologist is responsible for classifying areas within California that are subject to urban expansion or other irreversible land uses. Of the four Mineral Resource Zone (MRZ) categories, lands classified as MRZ-2 are considered to be of regional or statewide significance. Such areas are underlain by significant mineral deposits or exhibit a highly likelihood of their presence. The Entrada Planning Area is located entirely within the MRZ-3 zone, which indicates an area of undetermined mineral resource significance; there are no active mineral extraction areas within the site. In addition, the western portion of the Entrada Planning Area is underlain by an oil and natural gas field known as Castaic Junction Field, but extraction operations were abandoned in the late 1990s. The portions of the VCC Planning Area within the floodplains of Castaic Creek and the Santa Clara River are designated as MRZ-2. Quarrying of sand and gravel in this area in the past created erosion problems, and pursuit of these resources as a marketable product ended approximately 50 years ago.

As previously indicated, development of the Entrada and VCC Planning Areas would remain within the development footprints analyzed in the State-certified EIR, and the County already has made the policy-level decision to preclude mineral resource extraction/removal from the planning areas by designating these sites for urban land uses. As such, like the 2017 Approved Project, the Modified Project would result in no impact relative to the loss of availability of a known mineral resource or a locally important mineral resource recovery site. Moreover, ongoing oil and gas extraction activities within the surrounding area and any potential future extraction from beneath the Entrada site would not be hindered by Modified Project development. Thus, the Modified Project would not result in new or more severe significant impacts relative

⁶⁸ See State-certified EIR, pages 4.13-38 and 40.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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to mineral resources, and no additional analysis in the Supplemental EIR is required.

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?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

Please refer to Response to Question 12.a above. As discussed therein, all past mineral extraction within the Entrada and VCC Planning Areas has ceased, and the County has made the policy-level decision to preclude mineral resource extraction/removal by designating these sites for urban land uses. As such, the Modified Project would not result in new or more severe significant impacts relative to mineral resources, and no additional analysis in the Supplemental EIR is required.

13. NOISE

Summary of State-Certified EIR Analysis of Noise

Section 4.9, Noise, of the State-certified EIR analyzed the noise impacts resulting from development of the Entrada and VCC Planning Areas. A variety of impact types were addressed, including temporary construction-related noise and vibration impacts, long-term noise impacts associated with both on-site operations and off-site sources (i.e., vehicular traffic), as well as impacts affecting both on- and off-site sensitive receptors.

Entrada Planning Area

The State-certified EIR concluded the following impacts would be less than significant with mitigation: exposure of people to noise levels in excess of locally adopted standards; exposure of people to excessive ground-borne noise levels or vibration; a substantial permanent increase in ambient noise levels in the vicinity; a substantial temporary or periodic increase in ambient noise levels in the vicinity; exposure of on- or off-site occupants to Project-related construction noise levels in excess of the Los Angeles County Noise Ordinance standards for construction noise; construction activity, including vibratory and impact pile driving, causing a peak particle velocity (PPV) above 0.01 inch/second (in/sec) at a sensitive receptor and/or between 0.2 and 2.0 in/sec at nearby structures; exposure of on-site exterior frequent use areas at noise-sensitive receptors to noise levels above the normally acceptable levels identified in the State Land Use Compatibility Guidelines or exposure of residences located within mixed use/commercial areas (i.e., residences with no backyards or parks as an exterior frequent use area) to interior noise levels above 45 A-weighted decibels (dBA); exposure of Project occupants to noise levels originating on- or off-site that are above the County Noise Ordinance standards; exposure of off-site sensitive receptors to an increase of 5 dBA or greater in noise level from Project-related activities, even if levels remain within the same land use compatibility classification (e.g., noise levels remain within the normally acceptable range); exposure of off-site sensitive receptors to an increase of 3 dBA or greater in noise level from Project-related activities, which results in a change in land use compatibility classification (e.g., noise levels change from normally acceptable to conditionally acceptable); and exposure of off-site sensitive receptors to an increase in noise levels greater than one dBA where existing noise levels are already considered unacceptable.⁶⁹ Since the Entrada Planning Area is not located within an airport land use plan or within 2 miles of a public or private airport or airstrip, the 2017 Approved Project would not expose people residing or working in the project area to excessive noise levels associated with airport-related uses.⁷⁰

VCC Planning Area

The State-certified EIR concluded the following impacts would be less than significant with mitigation, including measures VCC-NOI-1 through VCC-NOI-4 previously adopted by the County: exposure of people to noise levels in excess of locally adopted standards; a substantial permanent increase in ambient noise levels in the vicinity; a substantial temporary or periodic increase in ambient noise levels in the vicinity; exposure of on-site exterior frequent use areas at noise-sensitive receptors to noise levels above the normally acceptable levels identified in the State Land Use Compatibility Guidelines or exposure of residences located within mixed use/commercial areas (i.e., residences with no backyards or parks as an exterior frequent use area) to interior noise levels above 45 dBA; exposure of Project occupants to noise levels originating on- or off-site that are above the County Noise Ordinance standards; exposure of off-site sensitive receptors to an increase of 5 dBA or greater in noise level from Project-related activities, even if levels remain within the same land use compatibility classification (e.g., noise levels remain within the normally acceptable range);

⁶⁹ See State-certified EIR, pages 4.9-81-84.

⁷⁰ See State-certified EIR, page 4.9-27.

exposure of off-site sensitive receptors to an increase of 3 dBA or greater in noise level from Project-related activities, which results in a change in land use compatibility classification (e.g., noise levels change from normally acceptable to conditionally acceptable); and exposure of off-site sensitive receptors to an increase in noise levels greater than one dBA where existing noise levels are already considered unacceptable. Less than significant impacts were found for the following: exposure of people to excessive ground-borne noise levels or vibration; exposure of on- or off-site occupants to Project-related construction noise levels in excess of the Los Angeles County Noise Ordinance standards for construction noise; and construction activity, including vibratory and impact pile driving, causing a PPV above 0.01 in/sec at a sensitive receptor and/or between 0.2 and 2.0 in/sec at nearby structures.⁷¹ Since the VCC Planning Area is not located within an airport land use plan or within 2 miles of a public or private airport or airstrip, the 2017 Approved Project would not expose people residing or working in the project area to excessive noise levels associated with airport-related uses.⁷²

Evaluation of Noise Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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 County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Supplemental Analysis Required. The Modified Project’s potential noise impacts associated with this topic will be evaluated further in the Supplemental EIR.

b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

Groundborne vibration and noise impacts associated with the 2017 Approved Project were related to the use of pile driving construction.⁷³ As no pile driving would be required to construct the Modified Project, no groundborne vibration or noise would be generated from such activities. While the use of other construction equipment under the Modified Project could generate some level of groundborne vibration and noise, such impacts would be the same or less than those associated with the 2017 Approved Project. Furthermore, groundborne vibration decreases rapidly with distance, and the nearest off-site sensitive (residential) receptors within the Westridge community would be located approximately 350 feet from construction activity within the Entrada Planning Area due to the intervening Southern California Edison electric transmission corridor along the southern boundary of the site. In addition, the nearest future buildings within the Mission Village project to the west would be approximately 40 feet to the closest Project construction area. Although residential uses in the Live Oak community are located directly adjacent to the VCC northern boundary, most of the northern site area is planned as open space (generally associated with

⁷¹ See State-certified EIR, pages 4.9-81-84.

⁷² See State-certified EIR, page 4.9-27.

⁷³ See State-certified EIR, pages 4.9-34-38.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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Castaic Creek and Hasley Creek) and thus little construction work would occur in close proximity to any off-site sensitive receptors. Based on reference vibration levels from typical heavy construction equipment operations that would be used during Modified Project construction, which range from 0.003 inch per second peak particle velocity (PPV) for a small bulldozer to 0.210 inch per second PPV for a vibratory roller at 25 feet from the equipment, the anticipated vibration values would be well below those typically associated with pile driving (0.644 and 1.518 inch per second PPV at 25 feet).^{74,75} Therefore, the Modified Project would not result in new or more severe significant impacts, and no further analysis of this issue is required. Mitigation Measure RMDP/SCP-NOI-1 would not apply, as pile driving would not occur.

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?

No Impact. As previously discussed, the Entrada and VCC Planning Areas are not located within an airport land use plan or within 2 miles of a public or private airport or airstrip or a public use airport. Since Modified Project development within the Entrada and VCC Planning Areas would fall within the same disturbance footprints analyzed in the State-certified EIR, no impacts related to aircraft or airport noise would occur.⁷⁶ The Modified Project would not result in new or more severe significant impacts, and this topic will not be further evaluated in the Supplemental EIR.

⁷⁴ Reference vibration levels excerpted from FTA, Transit Noise and Vibration Impact Assessment, Table 12-2, 2006.

⁷⁵ Pile driving vibration levels from Table 4.9-10 in Section 4.9, Noise, of the State-certified EIR.

⁷⁶ See State-certified EIR, page 4.9-27.

14. POPULATION AND HOUSING

Summary of State-Certified EIR Analysis of Population and Housing

Entrada and VCC Planning Areas

Section 4.19, Socioeconomics and Environmental Justice, of the State-certified EIR analyzed impacts relating to population and housing resulting from the development of the Entrada and VCC Planning Areas. No impacts were found with respect to creating disproportionate, adverse environmental effects on a minority or low-income population; or the displacement of substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere.⁷⁷

In addition, Section 7, Significant Irreversible Changes, Growth Inducing Impacts, and Federal Impact Considerations, discussed the potential growth-inducing effects of the 2017 Approved Project and concluded that development of the Entrada and VCC Planning Areas would not result in growth-inducing impacts.⁷⁸

Evaluation of Population and Housing Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. The Modified Project would not increase residential development or induce population growth beyond that previously projected and analyzed in the State-certified EIR.

Entrada Planning Area

Like the 2017 Approved Project, the Modified Project would not induce substantial unplanned population growth in the Entrada Planning Area. As previously discussed, the Entrada Planning Area is designated in the OVOV Area Plan as H5—Residential 5 south of Magic Mountain Parkway and CM—Major Commercial north of Magic Mountain Parkway, with a small portion designated OS-PR—Parks and Recreation south of the Southern California Edison electric transmission lines. As the Modified Project’s uses are consistent with these designations, such development as well as the associated population have been, generally speaking, anticipated and planned for in the OVOV Area Plan. The construction of new residential units in the Entrada Planning Area would contribute to housing stock in the rapidly growing Santa Clarita Valley and would consequently increase property and sales tax revenue. Further, proposed development within the Entrada Planning Area falls within the disturbance footprint analyzed in the State-certified EIR and would be consistent with the general scope and intensity of development that was studied in the State-certified EIR. More specifically, while the Modified Project represents a reduction of 151 residential units as compared to the 2017 Approved Project, it includes an increase of 280,000 square feet of non-residential development,

⁷⁷ See State-certified EIR, pages 4.19-15-16.

⁷⁸ See State-certified EIR, pages 7.0-6-7.

15. PUBLIC SERVICES

Summary of State-Certified EIR Analysis of Public Services

Entrada and VCC Planning Areas

Section 4.18, Public Services, of the State-certified EIR analyzed impacts to public services, including fire protection, sheriff protection, schools, Emergency Medical Services, and libraries, resulting from the development of the Entrada and VCC Planning Areas. The analysis determined that development of the planning areas would result in an increase in urban-density, mixed-use residential and commercial development in an area with a baseline condition that was predominantly undeveloped and did not require extensive use of or demand for public services. The new urban land uses would result in additional demand for public services. However, the State-certified EIR concluded that development of the Entrada and VCC Planning Areas would have less than significant impacts with implementation of mitigation, including the measures set forth in Appendix IS-1 of this Initial Study; and in the VCC Planning Area, measures VCC-PS-1 through VCC-PS-7, which were previously adopted by the County.⁸⁰

Section 4.16, Parks, Recreation, and Trails, of the State-certified EIR analyzed impacts to parks and recreational facilities resulting from the development of the Entrada and VCC Planning Areas. Impacts were found to be less than significant given that sufficient on-site park and recreational facilities would be provided within the Entrada Planning Area, in addition to facilities proposed throughout the Newhall Ranch Specific Plan area.⁸¹

Project Design Features of the Modified Project (Entrada and VCC Planning Areas)

The Modified Project includes the following project design features relevant to public services to provide additional environmental benefits within the Entrada and VCC Planning Areas:

- PDF-PS-1: Any gated entrances to the Project Site subareas shall incorporate a Knox-Box entry system or equivalent.
- PDF-PS-2: The Project Applicant, its successors or designees shall notify the Los Angeles County Sheriff's Department and California Highway Patrol prior to any Project-related lane closures or other road construction and ensure emergency access remains clear and unobstructed.
- PDF-PS-3: During construction, construction signs shall be posted with a reduced construction zone speed limit per guidance from the California Highway Patrol.
- PDF-PS-4: Upon completion, the Applicant shall provide the Santa Clarita Valley Station Commander with a diagram of each portion of the Project Site, including building entries and access routes.
- PDF-PS-5: Prior to commencement of construction, the Project Applicant shall retain the services of a private security company to patrol the construction site(s), as necessary, to minimize the potential for trespass, theft, and other unlawful activity.

⁸⁰ See State-certified EIR, page 4.18-27.

⁸¹ See State-certified EIR, page 4.16-21.

- PDF-PS-6: The developer of future subdivisions which allow construction shall comply with the terms and conditions of the School Facilities Funding Agreement between The Newhall Land and Farming Company and the Newhall School District.
- PDF-PS-7: The developer of future subdivisions which allow construction shall comply with the terms and conditions of the School Facilities Funding Agreement between The Newhall Land and Farming Company and the William S. Hart Union High School District.
- PDF-PS-8: The developer of future subdivisions which allow construction shall comply with the terms and conditions of the School Facilities Funding Agreement between The Newhall Land & Farming Company and the Castaic Union School District.
- PDF-PS-9: The developer of future subdivisions which allow construction shall comply with the terms and conditions of the School Facilities Funding Agreement between The Newhall Land & Farming Company and the Saugus Union School District.

Evaluation of Public Services Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
a) Would the project create capacity or service level problems, or 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 any of the public services:			

Fire protection?

Supplemental Analysis Required. The Modified Project’s potential impacts related to fire protection will be evaluated further in the Supplemental EIR as part of the wildfire impact analysis.

Sheriff protection?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. The Modified Project would not increase impacts related to the provision of sheriff services as compared to the 2017 Approved Project. As discussed above, the State-certified EIR concluded the 2017 Approved Project would have less than significant impacts with mitigation related to the provision of law enforcement services. The Modified Project does not include any modifications from the 2017 Approved Project that would increase impacts related to the provision of law enforcement services. The Project Site is served by the Santa Clarita Sheriff Station located at 23740 Magic Mountain Parkway within the City of Santa Clarita, as well as the Newhall Area California Highway Patrol (CHP) Station located at 28648 The Old Road. In addition, construction of a new Sheriff Station on the west side of the Santa Clarita Valley is anticipated as development planned in the area progresses.

As discussed above, the Modified Project represents a slight reduction in floor area compared to the Entrada development evaluated in the State-certified EIR, while VCC development remains unchanged. Further, the land uses proposed within the Entrada and VCC Planning Areas would fall within the same development

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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footprints analyzed in the State-certified EIR and would be consistent with the general scope and intensity of development that was studied in the State-certified EIR. As such, with implementation of mitigation from the County-certified EIR, the demand for sheriff protection generated by the Modified Project would be roughly the same or even slightly reduced compared to that of the 2017 Approved Project. Therefore, the Modified Project would not result in new or more severe significant impacts relative to sheriff protection, and this topic will not be further evaluated in the Supplemental EIR.

Additionally, the project design features listed above would serve to reduce demand for sheriff services and thus reduce associated impacts; these measures are detailed in Appendix IS-1 of this Initial Study and will be incorporated into the MMRP for the Modified Project. PDF-PS-1 through PDF-PS-9 are beneficial and are not relied upon to reach the conclusion that no additional analysis in the Supplemental EIR is required.

Schools?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not increase impacts related to the provision of school services as compared to the 2017 Approved Project. As discussed above, the State-certified EIR concluded the 2017 Approved Project would have less than significant impacts related to the provision of school services. The Modified Project does not include any modifications to the 2017 Approved Project that would increase impacts related to the provision of school services. The Project Site is served by the schools of the Castaic Union School District, Newhall School District, William S. Hart Union School District, and Saugus Union School District. The Applicant has entered into School Facilities Funding Agreements with all four school districts, and a potential elementary school site is reserved within the Entrada Planning Area. The Castaic Union School District service area is located north of the Santa Clara River, and thus serves the VCC Planning Area; however, as residential development is not proposed within VCC, any student generation resulting from its development would be negligible.

As discussed above, the Modified Project represents a slight reduction in residential units and total floor area compared to the Entrada development evaluated in the State-certified EIR, while VCC development remains unchanged. Further, the land uses proposed within the Entrada and VCC Planning Areas would be consistent with the general scope and intensity of development that was studied in the State-certified EIR. As such, the demand for schools generated by the Modified Project would be roughly the same or even slightly reduced compared to that of the 2017 Approved Project. As such, the Modified Project would not result in new or more severe significant impacts relative to schools, and this topic will not be further evaluated in the Supplemental EIR.

Additionally, the project design features listed above would be implemented to reduce impacts further; these measures are detailed in Appendix IS-1 of this Initial Study and will be incorporated into the MMRP for the Modified Project. PDF-PS-1 through PDF-PS-9 are beneficial and are not relied upon to reach the conclusion that no additional analysis in the Supplemental EIR is required.

Parks?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not increase impacts related to the provision of parks as compared to the 2017 Approved Project. As discussed above, the State-certified EIR concluded the 2017 Approved Project would have less than significant impacts related to the provision of parks. The Modified Project does not include any modifications to the 2017 Approved Project that would increase impacts related to the provision of

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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parcs. Numerous existing and proposed parks and recreational facilities are located in the vicinity of the Modified Project Site, including facilities maintained by the federal government, the State of California, the County, Ventura County, and the City of Santa Clarita. In addition, there are four private golf courses in the surrounding area, including The Oaks Club at Valencia, located immediately south of the Entrada Planning Area. There is also an extensive public trail system in the area, plus a planned network of trails throughout the Newhall Ranch Specific Plan area immediately west of Entrada and a County-proposed regional trail along the Santa Clara River. It is noted that a neighborhood park and private recreational amenities are proposed within the Entrada Planning Area and a multi-purpose trail is proposed within VCC as part of the Modified Project, in addition to several parks and other facilities that are planned/proposed throughout Newhall Ranch.

As discussed above, the Modified Project represents a slight reduction in residential units and total floor area compared to the Entrada development evaluated in the State-certified EIR, while VCC development remains unchanged. Further, the land uses proposed within the Entrada and VCC Planning Areas would be consistent with the general scope and intensity of development that was studied in the State-certified EIR. As such, the demand for parks generated by the Modified Project would be roughly the same or even slightly reduced compared to that of the 2017 Approved Project. As such, the Modified Project would not result in new or more severe significant impacts relative to parks, and this topic will not be further evaluated in the Supplemental EIR.

Additionally, the project design features listed above would be implemented to reduce impacts; these measures are detailed in Appendix IS-1 of this Initial Study and will be incorporated into the MMRP for the Modified Project. PDF-PS-1 through PDF-PS-9 are beneficial and are not relied upon to reach the conclusion that no additional analysis in the Supplemental EIR is required.

Libraries?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not increase impacts related to the provision of library services as compared to the 2017 Approved Project. As discussed above, the State-certified EIR concluded the 2017 Approved Project would have less than significant impacts related to the provision of libraries. The Modified Project does not include any modifications to the 2017 Approved Project that would increase impacts related to the provision of libraries. The County of Los Angeles Public Library (County Library) provides library services to the Santa Clarita Valley area through three libraries and one bookmobile. The nearby branches include the Stevenson Ranch Library, Castaic Library, and Santa Clarita Valley Bookmobile. In compliance with County Code, the Project Applicant would pay the applicable Library Facilities Mitigation Fee in effect at the time residential building permits are issued for Entrada to offset demand for library services generated by its population. It is also noted that a future public library must be developed within the Newhall Ranch Specific Plan area, located just west of the Modified Project Site.

As discussed above, the Modified Project represents a slight reduction in residential units and total floor area compared to the Entrada development evaluated in the State-certified EIR, while VCC development remains unchanged. Further, the land uses proposed within the Entrada and VCC Planning Areas would be consistent with the general scope and intensity of development that was studied in the State-certified EIR. As such, the demand for libraries generated by the Modified Project would be roughly the same or even slightly reduced compared to that of the 2017 Approved Project. Additionally, the Project Applicant would pay the applicable Library Facilities Mitigation Fee, the purpose of which is “to mitigate any significant

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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adverse impacts of increased residential development upon public library facilities as required by” CEQA.⁸² As such, the Modified Project would not result in new or more severe significant impacts relative to libraries, and this topic will not be further evaluated in the Supplemental EIR.

Other public facilities?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

The Modified Project would not increase impacts related to the provision of other public services as compared to the 2017 Approved Project. As discussed above, the State-certified EIR concluded the 2017 Approved Project would have less than significant impacts related to the provision of other public facilities. The Modified Project does not include any modifications to the 2017 Approved Project that would increase impacts related to the provision of other public facilities. As discussed above, the Modified Project represents a slight reduction in residential units and total floor area compared to the Entrada development evaluated in the State-certified EIR, while VCC development remains unchanged. Further, the land uses proposed within the Entrada and VCC Planning Areas would be consistent with the general scope and intensity of development that was studied in the State-certified EIR. As such, the demand for public services generated by the Modified Project would be roughly the same or even slightly reduced compared to that of the 2017 Approved Project. As such, the Modified Project would not result in new or more severe significant impacts relative to other public services, and this topic will not be further evaluated in the Supplemental EIR.

⁸² Los Angeles County Code Section 22.72.010.

16. RECREATION

Summary of State-Certified EIR Analysis of Recreation

Entrada and VCC Planning Areas

Section 4.16, Parks, Recreation, and Trails, of the State-certified EIR analyzed impacts to parks and recreational facilities resulting from the development of the Entrada and VCC Planning Areas. The analysis determined that development of the planning areas would result in an increase in urban-density, mixed-use residential and commercial development in an area with a baseline condition that was predominantly undeveloped and did not require extensive use of or demand for parks and recreational facilities. The new urban land uses would generate additional demand for parks and recreational facilities; however, the State-certified EIR concluded that development of the Entrada and VCC Planning Areas would have a less than significant impact given that an on-site park and recreational facilities would be provided within the Entrada Planning Area, in addition to facilities proposed throughout the Newhall Ranch Specific Plan area.⁸³

Evaluation of Recreation Impacts for the Modified Project

- | | <i>Supplemental
Analysis
Required</i> | <i>Less Than Significant
Impact/No Changes or
New Information Requiring
Preparation of an EIR</i> | <i>No
Impact</i> |
|--|---|---|--------------------------|
| 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? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. The Modified Project would not increase impacts related to parks or other recreational facilities as compared to the 2017 Approved Project. Please refer to Response to Question 15.d. As discussed therein, a number of existing public and private parks and recreational facilities are located in the general area, in addition to facilities planned and proposed throughout the area. As well, a neighborhood park and private recreational amenities are proposed within the Entrada Planning Area and a multi-purpose trail is proposed within VCC as part of the Modified Project. The Project Applicant would satisfy the County's Parkland Dedication Ordinance via the provision of park space with amenities equal to or greater in value than the established in-lieu park fee. No parkland dedication is required for VCC.

As discussed above, the Modified Project represents a slight reduction in residential units and total floor area compared to the Entrada development evaluated in the State-certified EIR, while VCC development remains unchanged. Further, the land uses proposed within the Entrada and VCC Planning Areas would be consistent with the general scope and intensity of development that was studied in the State-certified EIR. As such, the demand for parks and recreational facilities generated by the Modified Project would be roughly the same or even slightly reduced compared to that of the 2017 Approved Project. As such, the Modified Project would not result in new or more severe significant impacts relative to parks, and this topic will not be further evaluated in the Supplemental EIR.

⁸³ See State-certified EIR, page 4.16-21.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

b) Does the project include neighborhood and regional parks or other recreational facilities or require the construction or expansion of such facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

Please refer to Response to Questions 15.d and 16.a. The Modified Project would not increase impacts related to the construction or expansion of parks or other recreational facilities as compared to the 2017 Approved Project. As discussed therein, a neighborhood park and private recreational amenities are proposed within the Entrada Planning Area and a multi-purpose trail is proposed within VCC as part of the Modified Project. Impacts associated with the development of these facilities are addressed throughout this Initial Study in the context of impacts associated with the Modified Project as a whole. As these facilities are comparable to those assumed in the State-certified EIR, related impacts were previously addressed and would remain unchanged. As such, the Modified Project would not result in new or more severe significant impacts relative to parks, and this topic will not be further evaluated in the Supplemental EIR.

c) Would the project interfere with regional trail connectivity?

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR.

Please refer to Response to Questions 15.d. As discussed, there is an extensive public trail system in the area, plus a planned network of trails throughout the Newhall Ranch Specific Plan area immediately west of Entrada and a County-proposed regional trail along the Santa Clara River. The Modified Project would provide an extensive community trail system throughout the Entrada Planning Area, which would connect to the Newhall Ranch Specific Plan trail system to the west and the existing community of Westridge to the south. This proposed trail system would include community trails, paseos, recreational trails, neighborhood electric vehicle (NEV) trails, and bike lanes. Additionally, a multi-purpose trail is proposed within VCC. As these facilities are comparable to those assumed in the State-certified EIR, related impacts were previously addressed and would remain unchanged. As such, the Modified Project would not result in new or more severe significant impacts relative to trails, and this topic will not be further evaluated in the Supplemental EIR.

17. TRANSPORTATION

Summary of State-Certified EIR Analysis of Transportation

Entrada and VCC Planning Areas

Section 4.8, Traffic, of the State-certified EIR analyzed impacts to traffic resulting from the development of the Entrada and VCC Planning Areas. Specifically, the State-certified EIR evaluated whether the Project would: cause a County roadway segment to go from Level of Service (LOS) A through E to LOS F or a Ventura County roadway segment to go from LOS A through D to LOS E; increase the volume-to-capacity (v/c) ratio at an existing deficient condition location by 0.01 or more; or cause or contribute to a v/c of greater than 1.0 and increase the v/c by 0.020 or more.⁸⁴ All such impacts were determined to be less than significant with mitigation, including Mitigation Measures RMDP/SCP-TR-1 through RMDP/SCP-TR-18; and in Valencia Commerce Center, Mitigation Measures VCC-TR-1 through VCC-TR-17.⁸⁵

Project Design Features of the Modified Project (Entrada and VCC Planning Areas)

The Modified Project includes the following project design feature relevant to transportation, including emergency access:

- PDF-HM-1: Prior to any construction activities and/or issuance of required encroachment permits from the County of Los Angeles, the City of Santa Clarita, and/or Caltrans, a detailed Construction Traffic Management Plan shall be submitted to the relevant agency or agencies for review and approval, consistent with each agency's established codes and procedures. The Construction Traffic Management Plan shall include the following, as required by the applicable agency or agencies:
 - Provisions for traffic control during all phases of construction activities to improve traffic flow on public roadways (e.g., flag persons), as needed;
 - Scheduling construction activities to reduce the effect on traffic flow on arterial streets, including limiting construction worker arrivals immediately prior to opening hours at Six Flags Magic Mountain;
 - Provision of safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers on streets impacted by Project construction;
 - Detour signs, as needed;
 - Provisions to configure construction parking to minimize traffic interference;
 - Provision of adequate emergency access to all residences and businesses adjacent to the roadways impacted by the roadway construction (mitigation) activities during all phases of construction activities;
 - Provisions to maintain emergency access at all times in the event temporary lane closures are necessary for the installation of utilities; and

⁸⁴ See State-certified EIR, pages 4.8-42-52.

⁸⁵ See State-certified EIR, page 4.8-113.

- With the exception of off-site infrastructure improvements, prohibition against parking of construction-related vehicles on streets in predominantly residentially zoned areas.

Evaluation of Transportation Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
Would the project:			
a) Conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Supplemental Analysis Required. The Modified Project’s potential transportation impacts associated with this topic will be evaluated further in the Supplemental EIR, including review of a Traffic Impact Analysis by the County Department of Public Works.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. Pursuant to Senate Bill (SB) 743, the County adopted Transportation Impact Guidelines (Los Angeles County Public Works 2020) to include vehicle miles traveled (VMT) as the new metric to evaluate the significance of transportation impacts. These guidelines and thresholds apply to land use and transportation projects in the County that are subject to CEQA analysis. Therefore, this section uses VMT as the basis for evaluating transportation impacts of the proposed project under CEQA. The Modified Project’s potential transportation impacts associated with this topic will be evaluated further in the Supplemental EIR, including review of a Traffic Impact Analysis by the County Department of Public Works.

c) Substantially increase hazards due to a road design feature (e.g., sharp curves) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. The modifications associated with the Modified Project would not result in changes to the roadway network or incompatible uses as compared to the 2017 Approved Project. As discussed above, the Modified Project’s proposed uses match the 2017 Approved Project except for changes in the allocation of residential and non-residential uses within Entrada South. The proposed residential and non-residential uses would not increase hazards related to roadway use. Additionally, the proposed on-site roadways would not include road design features (e.g., sharp curves) or incompatible uses (e.g., farm equipment) that would substantially increase hazards. All roadway improvements would comply with County standards, including LACFD requirements. In particular, the on-site roadway network would be integrated with the broader roadway network throughout the westside of the Santa Clarita Valley, with connections to a number of existing and proposed arterials listed in the Los Angeles County Highway Plan (formerly known as the Master Plan of Highways) and the Newhall Ranch Specific Plan (Specific Plan). One primary roadway designated on the County Highway Plan is Magic Mountain Parkway, which is currently being extended west through the Entrada Planning Area as part of the planned Mission Village community to the immediate west. In addition, the Project would not result in incompatible uses, as the proposed uses are consistent with the types of residential and commercial land uses already present in the surrounding area. Refer to Response to Question 9.f for related discussion. In summary, the Modified Project would not result in new significant

18. TRIBAL CULTURAL RESOURCES

Summary of State-Certified EIR Analysis of Tribal Cultural Resources

Entrada and VCC Planning Areas

Section 4.10, Cultural Resources, of the State-certified EIR analyzed impacts to cultural resources, including examples of the major periods of California history and interred human remains, resulting from the development of the Entrada and VCC Planning Areas and concluded that no impact would occur.⁸⁶ Nonetheless, the State-certified EIR outlined mitigation measures, including CR-3 through CR-6 which specify avoidance, monitoring, and data recovery requirements to be carried out by a qualified archaeologist and Native Americans, as well as VCC-CR-1 and VCC-CR-2 within the VCC Planning Area.

Evaluation of Tribal Cultural Resources Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
<p>a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §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:</p> <p>i) 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 § 5020.1(k), or</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Supplemental Analysis Required. The Modified Project’s potential impacts to tribal and cultural resources associated with this topic will be evaluated further in the Supplemental EIR.

<p>ii) 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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The Modified Project’s potential impacts to tribal and cultural resources associated with this topic will be evaluated further in the Supplemental EIR.

⁸⁶ See State-certified EIR, page 4.10-24.

19. UTILITIES AND SERVICE SYSTEMS

Summary of State-Certified EIR Analysis of Utilities and Service Systems

Entrada and VCC Planning Areas

Section 4.3, Water Resources, of the State-certified EIR analyzed impacts to water supply resulting from the development of the Entrada and VCC Planning Areas. The analysis determined that the Project's water demands would be satisfied by available, reliable water supplies, and impacts would be less than significant.⁸⁷ Nonetheless, VCC-WR-1 through VCC-WR-5 previously adopted by the County would apply in the VCC Planning Area.

Section 4.20, Solid Waste Services, of the State-certified EIR analyzed solid waste impacts resulting from the development of the Entrada and VCC Planning Areas. Impacts related to landfill capacity were found to be significant and unavoidable, while impacts associated with regulatory compliance would be less than significant with implementation of mitigation, including Mitigation Measure RMDP/SCP-SWS-1 and Mitigation Measure VCC-SWS-1 in the VCC Planning Area.⁸⁸

Evaluation of Utilities and Service Systems Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
Would the project:			
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. The Modified Project would not increase the need to relocate or construct utilities as compared to the 2017 Approved Project. Similar to the 2017 Approved Project, the Modified Project incorporates all necessary utility improvements, including: potable and non-potable (recycled) water infrastructure on-site that would connect to Santa Clarita Valley Water Agency's existing local water distribution and supply system; an on-site network of gravity sewers connecting to the local trunk lines that are maintained by the Santa Clarita Valley Sanitation District and flow to the Valencia Water Reclamation Plant; a comprehensive series of drainage, flood control, and water quality improvements such as storm drains, debris basins, water quality facilities, and inlet and outlet structures designed to protect Project development in compliance with County Department of Public Works requirements and all applicable National Pollutant Discharge Elimination System (NPDES) permits; an on-site electrical system that would include underground electrical lines, conduits, banks, and transformers, as needed, with service provided from Southern California Edison's Saugus Substation; an on-site natural gas distribution system that would connect to the local Southern California Gas Company supply system; and necessary telecommunications facilities capable of serving proposed development. The Modified Project's utility improvements would take into account available capacity within the existing off-site systems and other relevant considerations such as pressure, treatment

⁸⁷ See State-certified EIR, pages 4.3-91-92.

⁸⁸ See State-certified EIR, page 4.20-22.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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capacity, and applicable requirements, while adhering to all necessary design standards.

As part of the Modified Project, the Santa Clarita Valley Sanitation District would need to annex the Entrada Planning Area into the District before sanitary services could be provided. In addition, the Entrada Planning Area would be annexed into the County's Consolidated Sewer Maintenance District, which maintains the local sewer lines in the area. Further, the Modified Project would comply with applicable provisions of the County's Green Building Standards Code (County Code Title 31), which addresses sustainability via appropriate infrastructure planning and design, water and energy conservation, and other related requirements; and the California Green Building Standards Code, commonly referred to as the CALGreen Code (CCR Title 24, Part 11). As also required, all necessary permits, agreements, and approvals would be obtained, and all utility connection fees would be paid as part of the Modified Project.

As previously discussed, the Modified Project would fall within the same development footprint as the 2017 Approved Project, and proposed development would be consistent in terms of land use, scale, and general location and design with that previously studied in the State-certified EIR. Accordingly, the utility improvements included as part of the Modified Project are generally the same as those anticipated under the 2017 Approved Project. In summary, Modified Project development would be consistent with the analysis provided in the State-certified EIR with respect to the provision of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, and telecommunications facilities. Thus, the Modified Project would not cause any new or more severe significant impacts related to this topic, and no additional analysis in the Supplemental EIR is required.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Supplemental Analysis Required. The Modified Project's potential impacts to water supply will be evaluated further in the Supplemental EIR, including review and approval of a Water Supply Assessment by Santa Clarita Valley (SCV) Water.

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?

Supplemental Analysis Required. The Modified Project's potential impacts to wastewater treatment capacity will be evaluated further in the Supplemental EIR.

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?

Supplemental Analysis Required. The Modified Project's potential solid waste impacts will be evaluated further in the Supplemental EIR.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Supplemental Analysis Required. The Modified Project's potential solid waste impacts will be evaluated further in the Supplemental EIR.

20. Wildfire

Summary of State-Certified EIR Analysis of Wildfire

Entrada and VCC Planning Areas

Section 4.17, Hazards, Hazardous Materials, and Public Safety, of the State-certified EIR studied impacts pertaining to wildland fires resulting from the development of the Entrada and VCC Planning Areas. Such impacts were determined to be less than significant with implementation of Mitigation Measure RMDP/SCP-PH-7 regarding emergency access and Mitigation Measure RMDP/SCP-PH-14, which requires development of a Wildfire Fuel Modification Plan.⁸⁹

Evaluation of Wildfire Impacts for the Modified Project

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:			
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR. The Modified Project would not increase impacts related to emergency response or evacuation as compared to the 2017 Approved Project. Please refer to Response to Question 9.f, above. As discussed therein, the Modified Project would not result in new significant impacts or increase the severity of previously identified significant impacts with respect to emergency access. No additional analysis in the Supplemental EIR is required.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The Modified Project's potential wildfire impacts will be evaluated further in the Supplemental EIR. The Supplemental EIR will include a wildfire protection analysis to evaluate wildfire risks, wildfire-related evacuation conditions, and measures designed to address such risks.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The Modified Project's potential impacts related to wildfire protection and infrastructure will be evaluated further in the Supplemental EIR.

⁸⁹ See State-certified EIR, page 4.17-61.

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Supplemental Analysis Required. The Modified Project's potential impacts related to wildfire risks will be evaluated further in the Supplemental EIR.

e) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The Modified Project's potential impacts regarding wildland fires will be evaluated further in the Wildfire section of the Supplemental EIR. As stated above, the Supplemental EIR will include a wildfire protection analysis to evaluate wildfire risks, wildfire-related evacuation conditions, and measures designed to address such risks.

21. MANDATORY FINDINGS OF SIGNIFICANCE

	<i>Supplemental Analysis Required</i>	<i>Less Than Significant Impact/No Changes or New Information Requiring Preparation of an EIR</i>	<i>No Impact</i>
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Supplemental Analysis Required. The Modified Project could result in potentially significant effects relative to the environmental categories identified above. Such effects will be analyzed in the Supplemental EIR.

b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The Modified Project could result in potentially significant cumulative impacts. The Supplemental EIR will analyze the Modified Project’s cumulative impacts in association with other current and reasonably foreseeable future projects for those environmental topics identified herein for further analysis in the Supplemental EIR.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Supplemental Analysis Required. The Modified Project could result in potentially significant direct and indirect adverse effects on humans. Potentially significant impacts related to air quality, biological resources, archaeological resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, transportation/traffic, tribal cultural resources, utilities and service systems, and wildfire will be further analyzed in the Supplemental EIR.