



CITY OF ROLLING HILLS

DRAFT MITIGATED NEGATIVE DECLARATION FOR THE
CITY OF ROLLING HILLS
2021-2029 HOUSING ELEMENT UPDATE

Prepared for:

CITY OF ROLLING HILLS
No. 2 Portuguese Bend Road
Rolling Hills, CA 90274
Contact: John F. Signo, AICP
(310) 377-1521

Prepared by:

CHAMBERS GROUP, INC.
600 West Broadway, Suite 250
Glendale, CA 91204
(213) 623-1859

August 2022

TABLE OF CONTENTS

	<u>Page</u>
SECTION 1.0 – PROJECT OVERVIEW	1
SECTION 2.0 – PROJECT DESCRIPTION AND SETTING	2
2.1 INTRODUCTION.....	2
2.2 BACKGROUND.....	2
2.3 HOUSING ELEMENT OVERVIEW.....	4
2.4 REGIONAL HOUSING NEEDS ALLOCATION (RHNA).....	4
2.5 HOUSING OPPORTUNITIES AND RESOURCES.....	5
2.5.1 Approved or Pending Development	5
2.5.2 Vacant Residential Lots	5
2.5.3 Rancho Del Mar Site.....	6
2.5.4 Accessory Dwelling Units	8
2.5.5 Summary of Ability to Meet RHNA	8
2.6 2021-2029 GOALS AND POLICIES AND CEQA ANALYSIS.....	8
SECTION 3.0 – ENVIRONMENTAL DETERMINATION	10
3.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:	10
3.2 DETERMINATION	10
SECTION 4.0 – EVALUATION OF ENVIRONMENTAL IMPACTS	11
SECTION 5.0 – CHECKLIST OF ENVIRONMENTAL ISSUES.....	1
5.1 AESTHETICS.....	1
5.1.1 Impact Analysis	1
5.2 AGRICULTURE & FORESTRY RESOURCES	3
5.2.1 Impact Analysis	3
5.3 AIR QUALITY.....	4
5.3.1 Impact Analysis	4
5.4 BIOLOGICAL RESOURCES	6
5.4.1 Impact Analysis	7
5.5 CULTURAL RESOURCES.....	14
5.5.1 Impact Analysis	15
5.6 ENERGY.....	17
5.6.1 Impact Analysis	17
5.7 GEOLOGY AND SOILS	19
5.7.1 Impact Analysis	19
5.8 GREENHOUSE GAS EMISSIONS	25
5.8.1 Impact Analysis	25
5.9 HAZARDS AND HAZARDOUS MATERIALS	27
5.9.1 Impact Analysis	27

5.10	HYDROLOGY AND WATER QUALITY.....	30
5.10.1	Impact Analysis	31
5.11	LAND USE AND PLANNING	32
5.11.1	Impact Analysis	32
5.12	MINERAL RESOURCES	33
5.12.1	Impact Analysis	33
5.13	NOISE	34
5.13.1	Impact Analysis	34
5.14	POPULATION AND HOUSING	36
5.14.1	Impact Analysis	36
5.15	PUBLIC SERVICES.....	37
5.15.1	Impact Analysis	37
5.16	RECREATION	39
5.16.1	Impact Analysis	39
5.17	TRANSPORTATION	40
5.17.1	Impact Analysis	40
5.18	TRIBAL CULTURAL RESOURCES.....	41
5.18.1	Impact Analysis	41
5.19	UTILITIES AND SERVICE SYSTEMS	44
5.19.1	Impact Analysis	44
5.20	WILDFIRE	47
5.20.1	Impact Analysis	47
5.21	MANDATORY FINDINGS OF SIGNIFICANCE.....	49
5.21.1	Impact Analysis	49
SECTION 6.0 – REFERENCES		51

LIST OF APPENDICES

APPENDIX A – Biological Resources Reconnaissance Assessment

APPENDIX B –Tribal Consultation Responses

LIST OF TABLES

	<u>Page</u>
Table 2.5-1: Vacant Residential Lots and Realistic Yield	5
Table 2.5-2: Summary of Ability to Meet RHNA	8

LIST OF FIGURES

	<u>Page</u>
Figure 2.1-1: Project Location.....	3
Figure 2.5-1: Vacant Residentially Zoned Sites.....	7

SECTION 1.0 – PROJECT OVERVIEW

Project Title: City of Rolling Hills 2021-2029 Housing Element Update

Project Location: Citywide. Rolling Hills is located in Los Angeles County, on the Palos Verdes Peninsula (See Figure 2.1-1: Project Location.)

Lead agency name and address:

City of Rolling Hills
No. 2 Portuguese Bend Road
Rolling Hills, CA 90274

Contact person and phone number:

John F. Signo, AICP, Director of Planning and Community Services
phone: (310) 377-1521
email: jsigno@cityofrh.net

Project sponsor's name and address:

City of Rolling Hills
No. 2 Portuguese Bend Road
Rolling Hills, CA 90274

General Plan Description: Citywide

Zoning: Citywide; No proposed zoning changes

Approvals Required: Pursuant to State law, the California Department of Housing and Community Development (HCD) is empowered to review the housing element of each community to ensure its compliance with the provisions of the Government Code related to facilitating the improvement and development of housing in order to make adequate provisions for the housing needs of all economic segments of the community. HCD is a responsible agency for the Housing Element Update.

The City Council will need to adopt the Mitigated Negative Declaration for the Housing Element-Update. No other approvals will be required.

Project Description Summary: The Project is the Sixth Cycle, 2021-2029 Housing Element Update of the City of Rolling Hills General Plan. The Housing Element is a policy update only, and no specific land use changes or development projects are proposed. See further discussion under Section 2.0, "Project Description and Setting."

SECTION 2.0 – PROJECT DESCRIPTION AND SETTING

2.1 INTRODUCTION

The City of Rolling Hills (City) is a rural, equestrian residential community, consisting entirely of large lot residential parcels of one acre or more. The community encompasses 2.99 square miles of land (approximately 1,910 acres) on the Palos Verdes Peninsula in the County of Los Angeles (Figure 2.1-1: Project Location). The City's General Plan was drafted and adopted in 1990. The City is proposing an update to the Housing Element of the General Plan.

The 2020 Census indicates a citywide population of 1,739 residents, making the City the fifth smallest of the 88 cities in Los Angeles County. The City is proposing to adopt the Housing Element for the Sixth Cycle planning period from 2021 to 2029. The proposed 2021-2029 Housing Element Update (HEU or 2021-2029 HEU) is available on the City's website. The Housing Element, which is part of the City's General Plan, is a policy document designed to provide the City a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing within the community. California Government Code Section 65580 states the following regarding the importance of creating housing elements:

The availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of the highest order.

Per State law, the housing element has two main purposes:

1. To provide an assessment of both current and future housing needs and constraints in meeting these needs; and
2. To provide a strategy that establishes housing goals, policies, and programs.

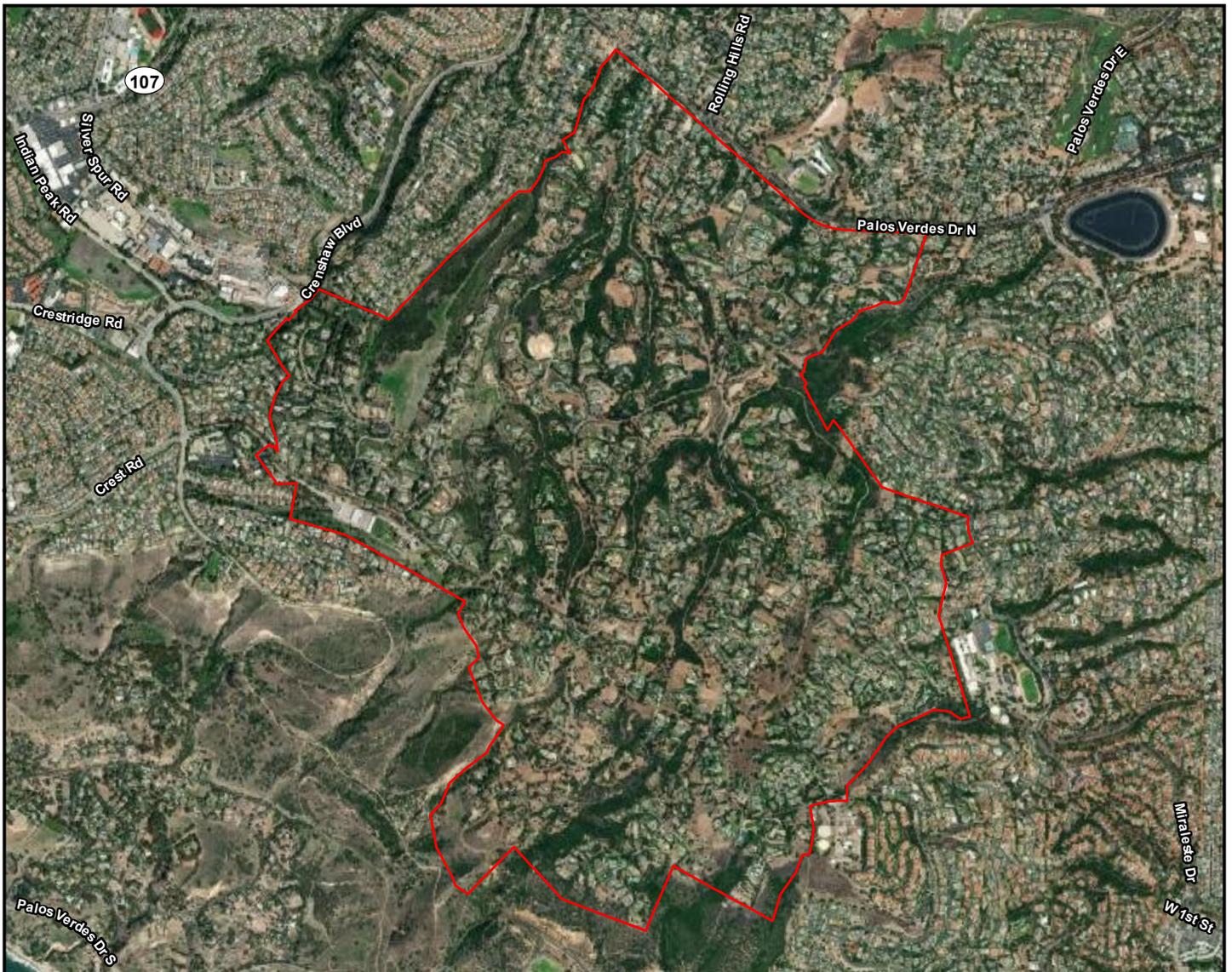
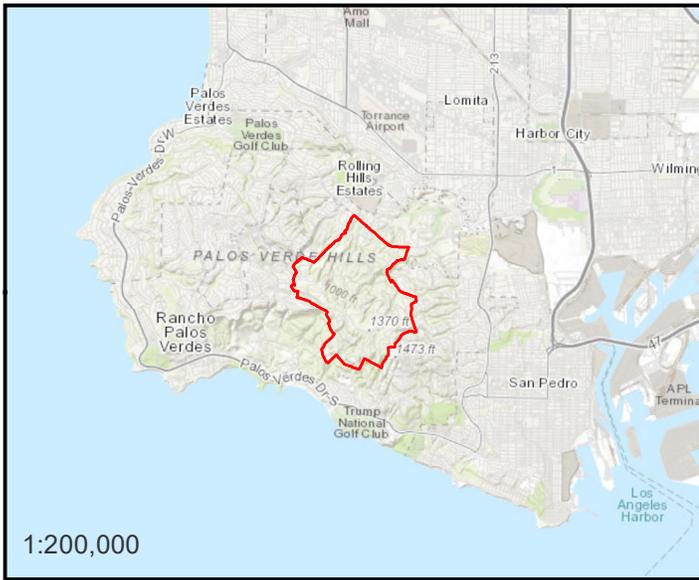
A detailed description of the update is provided below.

2.2 BACKGROUND

The City's Housing Element serves as an integrated part of the General Plan and is subject to detailed statutory requirements, including a requirement to be updated every eight years and mandatory review by the California Department of Housing and Community Development (HCD). This action includes the adoption of the HEU, which is a policy document; no actual development or rezoning of parcels is included as part of the HEU. The proposed HEU is an eight-year plan for the 2021-2029 period.

Pursuant to Government Code Section 65583, a housing element is required to consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. Specifically, a housing element is required to contain the following:

- An assessment of housing needs and an inventory of resources and constraints relevant to meeting those needs (Government Code Section 65583[a])



 Project Location

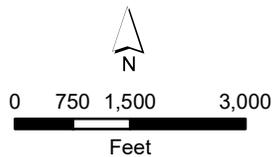


Figure 1
City of Rolling Hills
Housing Element Update
Project Location

- A statement of the community’s goals, quantified objectives, and policies relative to the maintenance, preservation, improvement, and development of housing (Government Code Section 65583[a])
- A program that sets forth a schedule of actions during the planning period, each with a timeline for implementation of the policies and to achieve the goals and objectives of the housing element (Government Code Section 65583[c])

Southern California Association of Governments (SCAG) began the Regional Housing Needs Allocation (RHNA) process for the Sixth Cycle in Fall 2019, exploring different methodologies for allocating the regional need to individual cities and counties. As other cities began work on their Sixth Cycle Elements, the City was required to first amend its Fifth Cycle Element to accommodate both the current (Fifth) cycle and the prior (Fourth) cycle RHNA allocations due to its noncompliant status. The combined RHNA for the two cycles was 28 units. Accommodating this need meant that City was also required to amend its General Plan and zoning to create additional housing capacity.

The Fifth Cycle Housing Element was adopted by the City Council on June 14, 2021 and certified by HCD on July 7, 2021. As a result of the compliance determination, the City does not have to carry over its prior allocation and may plan only for the 45 units identified in the Sixth Cycle RHNA.

2.3 HOUSING ELEMENT OVERVIEW

The City’s HEU consists of the following major components:

- A review of the prior housing element and goals that were accomplished (Section 2, Evaluation of Prior Housing Element)
- An assessment of housing needs in the City including profile and analysis of the City’s demographics, housing characteristics, and existing and future housing needs (Section 3, Housing Needs Assessment)
- An assessment of resources available to meet the City’s objectives regarding housing production and preservation. Resources include land available for new construction and redevelopment, as well as financial and administrative resources available (Section 4, Housing Sites)
- A review of the constraints to housing production and preservation. Constraints include potential market, governmental policy, and environmental limitations to meeting the City’s identified housing needs (Section 5, Constraints to Housing Production)
- A statement of the housing plan to address the City’s identified housing needs, including housing goals, policies, and programs (Section 6, Housing Goals, Policies, Objectives, and Programs)

2.4 REGIONAL HOUSING NEEDS ALLOCATION (RHNA)

State housing element law requires housing elements to be updated regularly to reflect a community’s changing housing needs, including preparation of a RHNA plan [Government Code Section 65584(a)]. A critical measure of compliance is the ability of a jurisdiction to accommodate its share of the RHNA prepared by HCD for each Council of Governments in the state that identifies projected housing units

needed for all economic segments based on Department of Finance population estimates. SCAG is responsible for allocating this total to each of the six counties and 191 cities in the SCAG area. This process is known as the RHNA and occurs every eight years.

SCAG calculates each city and county’s “fair share” of the regional need using a computer model that weighs factors such as existing population and employment, growth potential, proximity to transit, and social equity. For each jurisdiction, SCAG distributes the RHNA among four different income groups. This ensures that each city or county is planning for housing that meet the needs of all economic segments of the community, including lower income households.

For the City, the RHNA for 2021-2029 is 45 units (SCAG 2020). This includes 20 very low income units, 9 low income units, 11 moderate income units, and 5 above moderate income units. The 2021-2029 Housing Element demonstrates that the City has the capacity to accommodate this assignment.

2.5 HOUSING OPPORTUNITIES AND RESOURCES

The below sections include a discussion of the inventory of potential housing sites in the City and the City’s availability to meet RHNA numbers.

2.5.1 Approved or Pending Development

There are 12 housing units in the City that are approved or pending and not yet constructed. All of these units are expected to become available for occupancy during the 2021-2029 period and, therefore, count toward meeting the RHNA. These units include three market-rate single family homes and nine ADUs.

2.5.2 Vacant Residential Lots

There are 34 vacant, residentially zoned, privately owned parcels located throughout the City, totaling 124.8 acres as shown in Figure 2.5-1: Vacant Residentially Zoned Sites. Of the 34 sites, 20 are estimated to be developable and 14 are severely constrained and presumed undevelopable for the 2021-2029 planning period. The constrained parcels include five lots that are landlocked with no street frontage and nine that are in the Flying Triangle Landslide Hazard Overlay area. Several of the lots in the landslide area had homes that were destroyed by earth movement in the 1980s and early 1990s.

For the 20 remaining vacant lots, Table 2.5-1 below indicates the “realistic” potential for 20 single family homes. Note that there is a potential for additional units to be provided, however, to take a conservative approach, the realistic yield was utilized. The site locations in the table below, correspond with the locations in Figure 2.5-1.

Table 2.5-1: Vacant Residential Lots and Realistic Yield

Site	APN	Zoning	General Plan	Acres*	Realistic Yield, excluding ADUs
1	7567-006-001	RAS-1	LDR	2.27	1
2	7567-006-014	RAS-1	LDR	1.22	0
3	7567-009-007	RAS-1	LDR	1.61	1
4	7567-010-013	RAS-1	LDR	1.24	1
5	7567-010-015	RAS-1	LDR	1.49	0

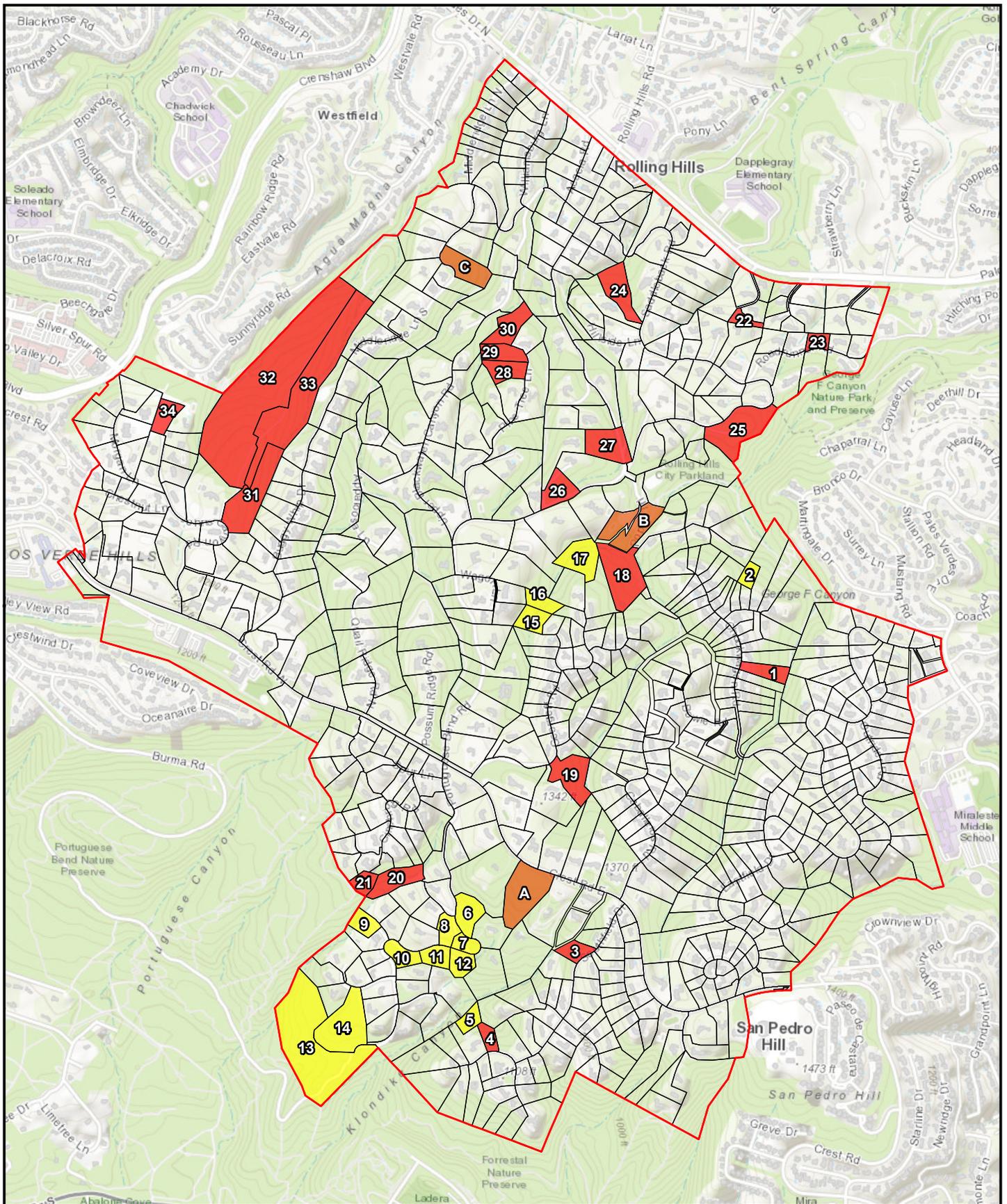
Site	APN	Zoning	General Plan	Acres*	Realistic Yield, excluding ADUs
6	7567-011-017	RAS-2	VLDR	2.67	0
7	7567-012-019	RAS-2	VLDR	0.96	0
8	7567-012-020	RAS-2	VLDR	1.46	0
9	7567-012-026	RAS-2	VLDR	1.82	0
10	7567-012-035	RAS-2	VLDR	1.64	0
11	7567-012-036	RAS-2	VLDR	1.71	0
12	7567-012-038	RAS-2	VLDR	1.84	0
13	7567-013-005	RAS-2	VLDR	19.81	0
14	7567-013-007	RAS-2	VLDR	7.09	0
15	7567-014-005	RAS-1	LDR	2.12	0
16	7567-014-011	RAS-1	LDR	1.66	0
17	7567-014-013	RAS-2	VLDR	3.79	0
18	7567-014-031	RAS-2	VLDR	6.85	1
19	7567-015-036	RAS-2	VLDR	4.56	1
20	7567-017-017	RAS-2	VLDR	3.52	1
21	7567-017-045	RAS-1	VLDR	1.52	1
22	7569-001-020	RAS-1	LDR	1.03	1
23	7569-001-036	RAS-1	LDR	1.00	1
24	7569-004-026	RAS-1	LDR	3.39	1
25	7569-005-008	RAS-1	LDR	6.52	1
26	7569-012-022	RAS-2	VLDR	2.30	1
27	7569-012-025	RAS-2	VLDR	3.51	1
28	7569-013-017	RAS-2	VLDR	2.41	1
29	7569-013-018	RAS-2	VLDR	2.20	1
30	7569-013-020	RAS-2	VLDR	2.13	1
31	7570-024-019	RAS-2	VLDR	6.04	1
32	7570-024-020	RAS-2	VLDR	11.64	1
33	7570-024-021	RAS-2	VLDR	10.10	1
34	7570-025-022	RAS-2	VLDR	1.68	1
Total				124.8	20

Notes: *Acreages generally exclude unbuildable easements

2.5.3 Rancho Del Mar Site

In March 2021, the City adopted an Affordable Housing Overlay Zone on the 31-acre Palos Verdes Peninsula Unified School District (PVPUSD) property located at 38 Crest Road (Rancho Del Mar site). Although the site is technically non-vacant, roughly three-quarters of the property (approximately 23 acres) is open space. The remaining areas are underutilized and could be repurposed.

The entire Rancho Del Mar site has a General Plan designation of Very Low Density Residential and an underlying zoning designation of RAS-2. The designation permits 16 units on the site, based on the site area of 31 acres and the density of one unit per two acres ($31/2 = 15.5$, rounded up to 16). However, the General Plan (as amended in 2021) requires that the allowable density for this site be transferred to a single location on the property where a density standard of 20-24 units per acre applies. This is reinforced



- Project Location
- Zoning**
- Vacant lots with approved single family homes
- Vacant lots with constraints
- Vacant lots (counted as one SF home each)

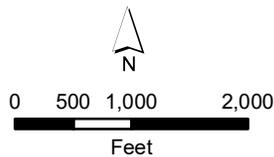


Figure 2
 City of Rolling Hills
 Housing Element Update
 Vacant Residentially Zoned Sites

and codified by the Rancho Del Mar Overlay Zone (RDMO). The RDMO effectively takes the 16 units of housing and transfers it to a single location on the west side of the parcel. The RDMO further mandates that any housing built on the site be 100% affordable to very low and/or low income households. Such development is permitted by right, provided that the development complies with the objective development and design standards contained in the RDMO. Consistent with the General Plan and Zoning amendments completed in 2021, the site is viable for 16 units of low/very low income housing.

2.5.4 Accessory Dwelling Units

The City of Rolling Hills has estimated the potential for 40 ADUs and Junior Accessory Dwelling Units (JADUs) over the eight-year planning period, or approximately five (5) ADUs per year. This projection is based on the permitting of nine ADUs in 2021 alone, and the implementation of Housing Element program that encourage ADUs in the coming years.

2.5.5 Summary of Ability to Meet RHNA

As shown in Table 2.5-2 below, the combination of recently approved housing units (expected to be occupied in 2022), future affordable units on the Rancho Del Mar site, and new ADUs can accommodate the RHNA allocation in all income categories. The table illustrates a surplus capacity of seven lower income units based on projected ADU production over the planning period.

Table 2.5-2: Summary of Ability to Meet RHNA

	Income Category				Total
	Extremely Low/ Very Low	Low	Moderate	Above Moderate	
Approved Development	–	2	3	7*	12
Vacant Residential Lots	–	–	–	20	20
Rancho Del Mar Site	8	8	–	–	16
Accessory Dwelling Units	12	6	8	14	40
TOTALS	20	16	11	41	88
RHNA	20	9	11	5	45
Surplus/Deficit	0	+7	0	+36	+43
Adequate Sites?	YES	YES	YES	YES	YES

Notes:

* Includes 3 new homes and 4 ADUs

2.6 2021-2029 GOALS AND POLICIES AND CEQA ANALYSIS

The housing goals, policies, objectives, and programs which can be found in Chapter 6 of the HEU reflect the City's continued commitment to actively support residential development and plan for the City's fair share of regional housing needs. As previously mentioned, and as discussed in the HEU, RHNA allocation in all income categories can be met with approved development, the future Rancho Del Mar Site, and new ADUs; therefore, the 2021-2029 HEU focuses on the addition of the 20 vacant residential lots.

Thus, this CEQA document evaluates the potential impacts of development on the 20 vacant sites that could offer 20 single family units. Nonetheless, as previously mentioned, based on the City's ability to meet RHNA allocation as described above, the HEU is a policy document; no actual development nor rezoning of parcels is included as part of the approval. Further, the HEU, in and of itself, does not propose specific projects but puts forth goals and policies that regulate various aspects of new housing development in the City. However, the HEU focuses on development of 20 vacant parcels with 20 single family homes and impacts associated with that potential future development are analyzed here, to the extent possible based on available information.

SECTION 3.0 – ENVIRONMENTAL DETERMINATION

3.1 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

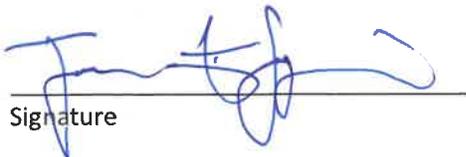
The environmental factors checked below would potentially be affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklists on the following pages. For each of the potentially affected factors, mitigation measures are recommended that would reduce the impacts to less than significant levels.

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

3.2 DETERMINATION

On the basis of this initial evaluation:

1. I find that the project **could not** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
2. 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.
3. I find the proposed project **may have a significant effect** on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
4. 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.
5. 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.



 Signature

John F. Signo, AICP

 Name

8-4-22

 Date

Director of Planning and Community Services

 Title

SECTION 4.0 – 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 a lead agency cites. 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 offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency 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 substantial evidence exists that an effect may be significant. If one or more “Potentially Significant Impact” entries are marked 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 earlier analyses may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other California Environmental Quality Act (CEQA) process, an effect has been adequately analyzed in an earlier Environmental Impact Report (EIR) or negative declaration. Section 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. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. The explanation of each issue should identify:
 - a. the significance criteria or threshold, if any, used to evaluate each question; and
 - b. the mitigation measure identified, if any, to reduce the impact to less than significant.

SECTION 5.0 – CHECKLIST OF ENVIRONMENTAL ISSUES

5.1 AESTHETICS

1.	AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

5.1.1 Impact Analysis

a) *Would the project have a substantial adverse effect on a scenic vista?*

Less than Significant. The 2021-2029 HEU is a policy document and does not include any changes to land use designations, zoning, building heights and intensities, or residential densities. Further, the Housing Element includes policies intended to continue to make the City a safe and desirable place to work and live.

As noted in Section 2.6 above, the City’s HEU focuses on the addition of the 20 vacant residentially zoned, privately owned parcels located throughout the City. These 20 vacant lots have the potential to be developed during the 2021-2029 planning period, although no projects are currently proposed or would be approved with approval of the proposed Project.

If development of the 20 vacant lots occurs, it is assumed that development would adhere to the City’s zoning and the Rolling Hills Municipal Code (RHMC) requirements for development standards. If any development standards stray from the requirements in the zoning and the RHMC, it is assumed a variance would be required and further environmental evaluation would be required. With adherence to the zoning and the RHMC, if development of the 20 vacant lots were to occur, it is assumed impacts would be less than significant.

b) *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

No Impact. No officially designated State scenic highway is located within the City. The nearest eligible scenic highway, Route 5 (South of San Juan Capistrano)/Route 19 (Near Long Beach), is located more

than 10 miles to the east of the City and the City is therefore outside of the scenic highway's viewshed (Caltrans 2021). The Project would result in no impacts to scenic vistas or scenic resources within a State scenic highway.

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

Less than Significant. As previously mentioned, the Project would implement policies intended to continue to make the City a safe and desirable place to work and live. The City's current Zoning Code contains standards intended to preserve the natural beauty of the City and to maintain visual orderliness, including provisions related to building standards (height, setbacks, intensities), screening of utilities in development, and outdoor improvements. All future development in the City, which may include the 20 vacant residential lots, would be required to comply with the provisions of the City's Zoning Code and undergo project-specific environmental evaluation in order to determine any potential impacts. Furthermore, future development of the 20 vacant residential lots would occur in urbanized areas within the City, would comply with applicable zoning and other regulations governing scenic quality, and would be consistent with the visual character of the surrounding residential areas. If any development standards stray from the requirements in the zoning and the RHMC, it is assumed a variance would be required and further environmental evaluation would be required. With adherence to the zoning and the RHMC, if development of the 20 vacant lots were to occur, it is assumed impacts would be less than significant.

- d) *Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

Less than Significant. Sources of light present throughout the City include residential uses of both interior and exterior lighting and vehicular traffic, while sources of glare include highly finished building materials such as glass, and roadway traffic. The Project consists of a policy document and would not directly enable construction or development. Nevertheless, all future residential development enabled by the City's General Plan, including the 20 vacant residentially zoned sites in the City's HEU, are anticipated to introduce light and glare sources typical of development; and all future development in the City would be subject to the zoning requirements pertaining to lighting and glare and the RHMC (Section 17.16.190E Outdoor Lighting). The Zoning Code contains lighting requirements intended to maintain public health, safety, and welfare from noxious or offensive illumination, glare, or similar effects.

All future development in the City, including the 20 vacant residential lots, would be required to comply with the provisions of the City's Zoning Code. If any development standards specific to lighting and glare stray from the requirements in the zoning code, it is assumed a variance would be required and further environmental evaluation would be required. With adherence to the code, if development of the 20 vacant lots were to occur, it is assumed impacts in regards to the creation of light or glare that would adversely affect views, would be less than significant.

5.2 AGRICULTURE & FORESTRY RESOURCES

2.	AGRICULTURE & FOREST RESOURCES. (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. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d)	Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(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 the conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

5.2.1 Impact Analysis

- a) *Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*
- b) *Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*
- c) *Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?*
- d) *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

- e) *Would the project 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 the conversion of forest land to non-forest use?*

No Impact. The City does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2021a). Additionally, no land within the City is under a Williamson Act contract (DOC 2017). The Project involves an update to the City’s Housing Element, with no proposed changes to land use designations or zoning of parcels within the City. The City is a residential community, and no provisions contained in the Housing Element Update would convert Prime Farmland or any farmland of unique or Statewide importance. Further, no development is proposed on forestland or timber property zoned Timberland Production. Any future development proposals, including future development of the previously mentioned 20 vacant, residential lots, would not conflict with an existing Williamson Act contract and would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to nonagricultural use or result in conversion or loss of forest land. Nonetheless, any future development on properties, including the 20 vacant lots identified in Section 2.6, would be analyzed in a future site-specific environmental document and any potentially significant impacts identified would be addressed through mitigation measures specific to the impact. Therefore, no impacts to agricultural or forestry resources would occur.

5.3 AIR QUALITY

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. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

5.3.1 Impact Analysis

- a) *Would the project conflict with or obstruct implementation of the applicable air quality plan?*
 b) *Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*

Less than Significant. The City is located within the South Coast Air Basin (Air Basin), which includes all of Orange County and the non-desert regions of Los Angeles County, Riverside County, and San Bernardino County. The Air Basin is under the jurisdiction of the SCAQMD. As the local air quality management agency, SCAQMD is required to monitor air pollutant levels to ensure that state and federal air quality standards are met and, if they are not met, to develop strategies to meet the

standards. Depending on whether the standards are met or exceeded, the Air Basin is classified as being in “attainment” or “nonattainment.” Under State law, air districts are required to prepare a plan for air quality improvement for pollutants for which the district is in non-attainment. SCAQMD is in nonattainment for the State and federal ozone standards, the State and federal PM2.5 (particulate matter up to 2.5 microns in size) standards, and the State PM10 (particulate matter up to 10 microns in size) standards, and the federal lead standards. It must, therefore, prepare a plan for improvement (SCAQMD 2016). The South Coast Air Quality Management District (SCAQMD) prepared an air quality management plan (AQMP) for both pollutants in 2016 and is currently working on the 2022 AQMP (SCAQMD 2021).

The federal and State Clean Air Acts (CAA) mandate the control and reduction of certain air pollutants. Under these laws, the U.S. Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) have established the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for “criteria pollutants” and other pollutants. Some pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory) into the atmosphere, including carbon monoxide, volatile organic compounds (VOC)/reactive organic gases (ROG), nitrogen oxides (NOX), PM10 and PM2.5, sulfur dioxide, and lead.¹ Other pollutants are created indirectly through chemical reactions in the atmosphere, such as ozone, which is created by atmospheric chemical and photochemical reactions primarily between ROG and NOX. Secondary pollutants include oxidants, ozone, and sulfate and nitrate particulates (smog).

Short-term air quality impacts resulting from construction activities, such as dust generated by clearing and grading activities, exhaust emissions from gas- and diesel-powered construction equipment, and vehicular emissions associated with the commuting of construction workers, will be subject to SCAQMD air quality management plans identified above and all other relevant SCAQMD rules and regulations. Long term impacts associated with single family residential uses in small quantities doesn’t typically result in significant air quality emissions.

The Project would not directly result in construction or development activity, nor would it enable development beyond that which is currently provided for in the City’s General Plan. The number of residential units that could be developed under the HEU, including the 20 vacant residential lots, is consistent with the City’s current General Plan and zoning designations. Additionally, the 20 vacant lots, if developed, may result in 20 single family homes, which are not expected to generate a significant air quality impact.

Thus, the Project would result in less than significant impacts related to implementation of any applicable air quality plan and there will be no cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or State ambient air quality standard.

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

c) *Would the project expose sensitive receptors to substantial pollutant concentrations?*

Less than Significant. As mentioned, the HEU is a policy document and does not include any changes to land use designations or zoning. Future development of the previously mentioned 20 vacant residential lots has the potential to generate toxic air contaminants (TACs); however, residential development projects are unlikely to exceed local NOx, CO, PM10, or PM2.5 thresholds or expose sensitive receptors to substantial pollutant concentrations. Additionally, the City’s General Plan and the RHMC contain policies and measures related to maintaining air quality in residential neighborhoods, including protecting neighborhoods from air pollution-generating activities through appropriate development buffers. Thus, the Project would result in less than significant impacts related to the exposure of sensitive receptors to substantial pollutant concentrations.

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

No Impact. Impacts would be considered potentially significant if the Project were to result in the creation of objectionable odors with the potential to affect substantial numbers of people, or if construction or operation of the Project would result in the creation of nuisance odors that would be noxious to a substantial number of people. The City’s General Plan and the RHMC contain policies and measures related to maintaining air quality in residential neighborhoods, including protecting neighborhoods from odor-generating activities through site-specific environmental review and appropriate development buffers.

The Project would not directly enable construction or development activities upon implementation. However, if future development of the 20 vacant residential lots were to occur, temporary and minor emissions generated by construction equipment and vehicles would occur; however, residential developments, such as that described in the HEU, are not a land use typically associated with odor complaints or noxious emissions. The Project would therefore not result in impacts related to emissions adversely affecting a substantial number of people.

5.4 BIOLOGICAL RESOURCES

4.	BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4.	BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

5.4.1 Impact Analysis

Chambers Group conducted a literature review and biological reconnaissance level survey of the City’s 20 vacant parcels (Survey Area) on June 9 and 10, 2022 to identify vegetation communities, the potential for occurrence of special status species, and/or habitats that could support special status wildlife species. The full report is provided in Appendix A: Biological Resources Reconnaissance Assessment. The following is a summary of results from the report:

Hydrology

The Project site is located within the Alamitos Bay-San Pedro Bay and Frontal Santa Monica Bay-San Pedro Bay watersheds within the Federal Emergency Management Agency (FEMA) 100-year flood zone. Several National Wetland Inventory (NWI) mapped bluelines occur within the Survey Area. The Survey Area is not within Federal Emergency Management Agency (FEMA) Flood Hazard zones. Site 21 is immediately west of an Area of Undetermined Flood Hazard. No other sites are within or adjacent to Flood Hazard Zones.

Site 28 had an erosional feature (non-jurisdictional), originating from the residential home just south of site 28, that was dry during the field survey. The erosional feature (non-jurisdictional) appears to flow northwest along the western boundary end of site 28 and ultimately terminating outside the property boundary. All sites except for 21, 25, 28, and 34 contain ephemeral drainages within the property boundaries. The features within sites 3, 4, and 20 flow southwest through the property; and ultimately terminating in the Pacific Ocean. The features within sites 1, 18, 19, 22, 23, 24, 26, 27, 29, 30, 31, 32, and 33 flow northeast through the property; however, they do not appear to connect to any tributaries and appear to terminate right outside the property boundary. Water features were observed at all the sites except for 21, 25, 28, and 34.

Special Status Plant Species

Following the literature review and after the assessment of the various habitat types in the Survey Area, it was determined that 24 special status plant species are known to historically occur within the Survey Area. Due to a lack of suitable soils and habitats, 20 of these species were considered absent within the Survey Area. Four species were found to have a moderate to high potential to occur within one or more of the Survey Areas. Lewis' evening-primrose, Catalina crossosoma, and Lyon's pentachaeta have potential to occur in Survey Areas 1, 3, 4, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, and 33. Southern tarplant has potential to occur in Survey Areas 18 and 19. No special status species were found during the biological reconnaissance survey.

Special Status Wildlife Species

Following the literature review and the assessment of the various habitat types in the Survey Area, it was determined that of the 29 special status wildlife species known to occur within the Project area, 19 species are considered absent from the Survey Area, seven species (cactus wren (*Campylorhynchus brunneicapillus*), western yellow-billed cuckoo (*Coccyzus americanus occidentalis*), western mastiff batt (*Eumops perotis californicus*), El Segundo blue butterfly (*Euphilotes battoides allyni*), Palos Verdes blue butterfly (*Glaucopsyche lygdamus palosverdesensis*), coast horned lizard (*Phrynosoma blainvillii*), Riverside fairy shrimp (*Streptocephalus woottoni*)) are considered to have a low potential to occur, one species (southern California legless lizard (*Anniella stebbinsi*)) is considered to have a moderate potential to occur, and two species (coastal California gnatcatcher (*Polioptila californica californica*), and least Bell's vireo (*Vireo bellii pusillus*)) are considered to have a high potential to occur.

The three wildlife species with a moderate or high potential to occur are federally or state listed threatened or endangered species. Although, these species were not detected during the biological reconnaissance survey.

While there is no specific time for accuracy of the prepared biological reconnaissance level survey and report, it is assumed that regarding special status plants and species, that the report would be valid for any construction occurring over the next two years from certification of this document.

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

Less than Significant with Mitigation Incorporated. As noted in Section 2.6 above, the City's HEU focuses on the addition of the 20 vacant residentially zoned, privately owned parcels located throughout the City. These 20 vacant lots have the potential to be developed during the 2021-2029 planning period, although no projects are currently proposed or would be approved with approval of the proposed Project. A biological reconnaissance level survey and report was prepared for the 20 vacant sites (Survey Area).

While no special status plant or wildlife species were found on site during the survey, if future development of the 20 vacant lots occurs during the HEU period, a potential to impact special status plant or wildlife species may exist. Implementation of **MM BIO-1** would require future development projects complete a biological resources assessment and **MM BIO-2** would require that if any species

are listed under CESA and/or ESA and impacted by future development, that proper take authorization is obtained.

Additionally, the potential for rare plant species or a Sensitive Natural Community, may exist on any of the sites if they are developed. Implementation of **MM BIO-3** would require that rare plant species or a Sensitive Natural Community be avoided during development, and if they cannot be feasibly avoided, that appropriate compensatory mitigation is provided.

The coastal California gnatcatcher also has the potential to occur within the City. If future development were to occur, impacts may exist. With implementation of **MM BIO-4**, which requires that coastal California gnatcatcher surveys be conducted by a qualified biologist, and **MM BIO-5** which requires compensatory mitigation for any impacts for the coastal California gnatcatcher, impacts to the coastal California gnatcatcher would be less than significant.

Additionally, if development of the 20 vacant sites occurs during the nesting bird season, there is a potential to impact nesting birds protected under the MBTA. Implementation of **MM BIO-6** would ensure that construction occurs outside the nesting season or avoids nesting birds. If any nesting bird habitat is impacted by future development **MM BIO-7** would require that the habitat is appropriately replaced. With implementation of these two measures, impacts to any nesting birds and nesting bird habitat would remain less than significant.

Vegetation found in all 20 developable sites could provide suitable roosting habitat for bats. Some of these sites may contain riparian and oak woodland habitats. Construction would create elevated levels of noise, human activity, dust, ground vibrations, and vegetation disturbance. Where a development project would occur within or adjacent to suitable habitat, the Project could impact bats and roosts. Implementation of **MM BIO-8** would require that future development projects in areas with suitable habitat for roosting and foraging, conduct surveys by a qualified biologist. **MM BIO-9** would require that if trees on site need to be removed, that appropriate measures are taken to allow the bats to escape. **MM BIO-10** requires that if bat roosts are found, a qualified biologist shall help to establish a species-specific no-disturbance buffer that is maintained throughout construction. Additionally, **MM BIO-11** would require that if any maternity roosts are found, that construction occur outside of the maternity roosting season and if not, that trees are left in place with a buffer until maternity season ends and that construction not occur during certain times of the day to allow for bat activities to continue. With implementation of these measures, impacts to bats would remain less than significant.

BIO – 1: Biological Resources Assessment

Applicants of future development projects should be required to prepare a Biological Resources Assessment (BRA). The BRA should be prepared by a qualified biologist. A qualified biologist should conduct field surveys of the project site and focused plant and wildlife surveys. Focused species-specific surveys should be required if suitable habitat is present and performed according to established Survey and Monitoring Protocols and Guidelines (CDFW 2021c). The BRA should characterize the biological resources on site, analyze project-specific impacts to biological resources, and propose appropriate mitigation measures to offset those impacts. The BRA should provide the following information:

- 1) A complete, recent, assessment of rare, threatened, and endangered species, regionally and locally unique species, and sensitive habitats at the project site and within the area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of land around the project site should also be addressed. A nine-quadrangle search of CDFW's California Natural Diversity Database (CNDDDB) should be conducted to obtain current information on any previously reported sensitive species and habitat (CDFW 2022d);
- 2) A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018). Adjoining habitat areas should be included where project construction and activities could lead to direct or indirect impacts off site;
- 3) Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the project site and within the area of potential effect. The Manual of California Vegetation (MCV), second edition, should be used to inform this mapping and assessment (Sawyer et al. 2009);
- 4) A rare plant assessment using online databases for rare, threatened, and endangered plants, including the California Native Plant Society (CNPS) Online Inventory of Rare and Endangered Plants of California (CNPS 2022b) as well as the Calflora's Information on Wild California Plants database (Calflora 2022);
- 5) A discussion regarding project-related indirect impacts on biological resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands [e.g., preserve lands associated with a Natural Community Conservation Plan (Fish & G. Code, § 2800 et. seq.)];
- 6) Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in areas adjacent to the project site.

BIO – 2: Take of Species

Development projects that would impact species listed under CESA and/or ESA should be required to obtain appropriate take authorization from CDFW and/or USFWS prior to the City's issuance of a grading permit.

BIO – 3: Rare Plant Species or Sensitive Natural Community

If a rare plant species or a Sensitive Natural Community is detected, the project applicant should fully avoid impacts. The project applicant should retain a qualified biologist to develop an avoidance plan. An avoidance plan should be submitted to the City prior to any grading or vegetation removal.

If the project cannot feasibly avoid impacts to rare plants and habitat, or sensitive natural communities, either during project activities or over the life of the project, the project applicant should provide compensatory mitigation for the loss of individual plants and habitat acres, which should include impacts due to fuel modification and landslide remediation. Impacts on vegetation due hazard mitigation should also be mitigated as these impacts would result in permanent loss and perpetual impacts on habitat function and quality. The project applicant should provide compensatory so that there is no net loss of rare plants and habitat, or sensitive natural communities. Compensatory mitigation should be appropriate for the extent of permanently disturbed habitat. Compensatory mitigation should be higher for impacts on CRPR 1 species, S1 or S2 Sensitive Natural Community, and Sensitive Natural Community with an additional rank of 0.1 or 0.2. Compensatory mitigation should be implemented by a qualified restoration ecologist. A Restoration Plan, at a minimum, should include success criteria and performance standards for measuring the establishment of rare plants and habitat, responsible parties, maintenance techniques and schedule, 5-year monitoring and reporting schedule, adaptive management strategies, and contingencies. A Restoration Plan should be submitted to the City prior to any grading or vegetation removal.

BIO – 4: Coastal California Gnatcatcher Surveys

Where a project site and areas adjacent to the project has suitable habitat for coastal California gnatcatcher, applicants of future development projects should be required to retain a qualified permitted biologist to survey for coastal California gnatcatcher and prepare an impact assessment. The qualified biologist should survey the project site and adjacent areas to determine presence/absence of coastal California gnatcatcher. The qualified biologist should conduct surveys according to USFWS Coastal California Gnatcatcher (*Poliptila californica californica*) Presence/Absence Survey Guidelines (USFWS 1997). The protocol should be followed for all surveys unless otherwise authorized by the USFWS in writing (USFWS 1997). Survey results should be provided to USFWS per protocol guidance. Survey results, including negative findings, and an impact assessment should be conducted prior to the City's issuance of a grading permits.

BIO – 5: Coastal California Gnatcatcher Compensatory Mitigation

Applicants of future development projects should be required to provide compensatory mitigation for impacts to coastal California gnatcatcher habitat in addition to mitigation required by USFWS to prevent temporal or permanent habitat loss.

BIO – 6: Nesting Birds

Future development projects requiring vegetation disturbance and/or removal, and/or are adjacent to suitable nesting habitat should be required to avoid impacts on nesting birds by conducting all project-related activities between September 1 through January 31, outside of the nesting bird season. If construction must occur during the bird nesting season, project applicants should be required to retain a qualified biologist to survey suitable nesting habitat for nesting birds on the project site and within 100 feet from the project site to the extent allowable and accessible. A qualified biologist should conduct a nesting bird survey no more than 7 days prior to any ground and vegetation disturbing activities. If project activities are delayed or suspended for more than 7 days during the nesting bird season, a qualified biologist should repeat nesting bird surveys before the project can recommence. No-disturbance buffers should be established to

minimize impacts on any nests and nestlings. No-disturbance buffers should be maintained until the breeding season has ended or until a qualified biologist determines that the birds have fledged and are no longer reliant upon the nest or parental care for survival.

BIO – 7: Nesting Bird Habitat

Future development projects removing habitat for nesting birds should be required to restore or replace habitat in-kind and on site if feasible to prevent temporal or permanent habitat loss. Projects should provide replacement habitat for both individual trees and habitat acres.

BIO – 8: Bat Surveys

Future development projects in areas with suitable roosting and foraging habitat for bats should be required to retain a qualified bat biologist to conduct a survey for within the project site and within 100 feet from the project site to the extent allowable and accessible. A qualified bat specialist should identify potential daytime, nighttime, wintering, and hibernation roost sites. Surveys should be conducted prior to any ground-disturbing activities and vegetation removal.

BIO – 9: Tree Removal – Bat Impacts

If a project requires tree removal and a qualified bat biologist determines that roosting bats may be present at any time of year and could roost in trees that need to be removed, during tree removal, trees should be pushed down using heavy machinery rather than felling with a chainsaw. To ensure the optimum warning for any roosting bats that may still be present, trees should be pushed lightly two or three times, with a pause of approximately 30 seconds between each nudge to allow bats to become active. The tree should then be pushed to the ground slowly and remain in place until it is inspected by a qualified bat biologist. Trees that are known to be bat roosts or could support roosting bats should not be bucked or mulched immediately. A period of at least 24 hours, and preferable 48 hours, should elapse prior to such operations to allow bats to escape.

BIO – 10: Roosting Bats

If bats roosts are found within the project impact area, the qualified bat biologist should identify the bats to the species level, evaluate the colony to determine its size and significance, and establish a species-specific no-disturbance buffer that should be maintained throughout the duration of the project's construction.

BIO – 11: Maternity Bat Roosts

If maternity roosts are found, project-related construction and activities should be scheduled between October 1 and February 28, outside of the maternity roosting season when young bats are present but are yet ready to fly out of the roost (March 1 to September 30). If maternity roosts are found and the project must take place during the maternity roosting season, trees/structures determined to be maternity roosts should be left in place until the end of the maternity season. Project-related construction and activities should not occur within 100 feet of or directly under or adjacent to an active maternity roost. A qualified bat biologist should establish a no-disturbance buffer that should be maintained throughout the duration of the project's construction or until a qualified bat biologist determines that the roost is no longer active. Project-related construction

and activities should also not occur between 30 minutes before sunset and 30 minutes after sunrise.

Implementation of **MM BIO – 1** through **BIO – 11** would reduce potential impacts to special status species to a less-than-significant level.

- b) *Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*
- c) *Would the project have a substantial adverse effect on state or federally protected wetlands (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

Less than Significant with Mitigation Incorporated. As previously mentioned, while the HEU does not directly allow or approve any developments, the HEU focuses on the potential development of 20 vacant parcels. The Survey Area is not within FEMA Flood Hazard zones. Site 21 is immediately west of an Area of Undetermined Flood Hazard. No other sites are within or adjacent to Flood Hazard Zones.

Several aquatic features were observed within the various sites during the biological survey. All sites except for 21, 25, 28, and 34 contain ephemeral drainages within the property boundaries. However, these features all occur in lower lying portions of the sites and do not occur in the proposed impact areas. No work is anticipated to occur within or directly adjacent to these features and all the features can likely be avoided with the use of Best Management Practices including straw wattle and/or silt fencing. Nonetheless, if development of the 20 sites were to occur, a potential impact to jurisdictional waters may occur. With implementation of **MM BIO-12**, any sites that may have the potential to contain jurisdictional features, would require a Jurisdictional Delineation prior to the start of construction.

BIO – 12: Jurisdictional Delineation

Applicants of future development projects that are located adjacent to a river, stream, or lake should be required to prepare a jurisdictional delineation and impact assessment provided along with the project's Biological Resources Assessment. If such features are present and may be impacted by the future development, then the project should be required to avoid impacts by implementing appropriate vegetative buffers and/or setbacks adjoining the stream or wetland feature to reduce impacts of the project on these resources. If avoidance is not feasible, the project applicant should be required to notify CDFW pursuant to Fish and Game Code 1602 and obtain an LSA Agreement from CDFW prior to the City's issuance of a grading permit. The project applicant should comply with the mitigation measures detailed in a LSA Agreement issued by CDFW. The project applicant should also provide compensatory mitigation at no less than 1:1 for the impacted stream and habitat acreage, or at a ratio acceptable to CDFW.

Implementation of **MM BIO – 12** would reduce potential impacts to riparian habitat and wetlands to a less-than-significant level.

- d) *Would the project Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

Less than Significant with Mitigation Incorporated. The City is a heavily landscaped residential community interspersed with undeveloped steep hillsides and canyons (City 1990). The HEU focuses on the addition of the 20 vacant residentially zoned, privately owned parcels located throughout the City. These parcels have the potential to each be developed with a single family home, and are scattered throughout the City, most of which would be considered infill development. Within these undeveloped areas, the potential exists for nesting birds, bats, and other species to occur. However, the Project would implement **MM BIO-6** through **BIO-11** which would require that construction occur outside nesting/roosting seasons or require appropriate avoidance or compensatory mitigation for all nesting birds and bats. Implementation of **MM BIO – 6** through **BIO - 11** would reduce potential impacts to nesting birds and bats to a less than significant level.

- e) *Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*
- f) *Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservancy Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

Less than Significant. The County of Los Angeles’s Significant Ecological Area (SEA) Program was originally established as a part of the 1980 County General Plan, to help conserve the genetic and physical diversity in the County. The SEA Ordinance, which codified the SEA Program, establishes the permitting, design standards and review process for development within SEAs. The City contains portions of the Palos Verdes Peninsula and Coastline SEA; however, only areas within unincorporated Los Angeles County are subject to this ordinance. Additionally, the City’s Open Space and Conservation Element of the General Plan, has a few policies to preserve natural resources within the City including:

Policy 1.1: Encourage the retention of natural habitat for wildlife through the preservation of existing vegetation.

Policy 1.2: Encourage the reintroduction of native wildlife onto the Peninsula.

Policy 1.7: Encourage the preservation of watershed areas in their natural state.

Further, policies and programs of the HEU promote infill housing including ADUs. Any future development, that occurs pursuant to HEU would be required to adhere to these policies. Therefore, the Project would result in less than significant impacts in regards to conflicting with any local policies, ordinances, or plans protecting biological resources.

5.5 CULTURAL RESOURCES

5.	CULTURAL RESOURCES. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
----	--	---------------------------------------	---	-------------------------------------	------------------

(a)	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c)	Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

5.5.1 Impact Analysis

- a) *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*
- b) *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

Less than Significant with Mitigation Incorporated. The Project involves adoption of—a policy document, the HEU, which does not directly propose any ground disturbance. However, the HEU focuses on the possible development of the 20 vacant parcels. If development were to occur, since the sites are vacant, no historical resources are expected to be disturbed. However, the potential for archaeological or pre-historic resources to be discovered during the grading and excavation process exists and is considered potentially significant. If archaeological resources are identified, as defined by Public Resources Code Section 21083.2, a project site would require treatment in accordance with the provisions of that law, as appropriate. This could include stopping work and evaluating the find, preserving the find, and waiting for site release by a qualified archaeologist to resume work. To ensure construction workers are aware of potential impacts and can identify them, **MM CUL-1** would be required for future projects implemented under the 2021-2029 Housing Element that are currently undeveloped or where excavation would be to deeper levels than previous excavation levels, as determined during plan review.

As previously mentioned, while the HEU does not directly allow or approve any developments, the HEU focuses on the potential development of 20 vacant parcels. If development were to occur, ground disturbance would be required on the 20 vacant sites that have not previously been developed, which would have the potential for construction activities to damage or destroy previously unknown historic or prehistoric archaeological resources that may be present on or below the ground surface. Consequently, damage to or destruction of previously unknown sub-surface cultural resources could occur because of development implemented under the 2021-2029 Housing Element. This represents a potentially significant impact. If the site is determined to be sensitive through the archaeological investigation as part of the permitting process, **MM CUL-2** would be required to reduce impacts to less than significant.

CUL-1 Provide Construction Worker Archeological Awareness Training

Prior to the start of construction on sites that are currently undeveloped or where excavation would be to deeper levels than previous excavation levels as determined during plan review, the project archaeologist or their designee shall conduct training for construction personnel regarding the appearance of archeological resources and the procedures for notifying archeological staff should artifacts be discovered by construction staff. The Worker Environmental Awareness Program (WEAP) shall be fulfilled at the time of a pre-construction meeting, which a qualified archaeologist

shall attend. This training will include a printed handout that provides examples of potential cultural resources. The WEAP training will be repeated when construction personnel change and periodically renewed if the project has a long duration (more than 3 months.)

CUL-2 Conduct Archeological Resources Construction Monitoring

Prior to the issuance of a grading permit on sites that are currently undeveloped or where excavation would be to deeper levels than previous excavation levels as determined during plan review, the property owner/developer shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology (National Park Service 1983) to be present during all initial subsurface ground-disturbing construction activities. At the commencement of construction activities, an orientation meeting shall be conducted by the qualified archaeologist, construction manager, general contractor, subcontractor, and construction workers associated with ground-disturbing activities. The orientation meeting shall describe the potential of exposing archaeological resources, the types of resources that may be encountered, and directions on the steps that shall be taken if such a find is encountered.

With implementation of **MM's CUL-1** and **CUL-2**, impacts related to archeological resources would be less than significant with mitigation incorporated.

- c) *Would the project disturb any human remains, including those interred outside of formal cemeteries?*

Less than Significant with Mitigation Incorporated. Human burials outside of formal cemeteries often occur in prehistoric archaeological contexts. Although much of the City is built out, the potential still exists for these resources to be present. Excavation during construction activities in the City would have the potential to disturb these resources, including Native American burials.

Although no development is proposed with implementation of the HEU, if the 20 vacant sites were to be developed, impacts from unanticipated human remains may exist. The 1990 General Plan EIR has no provisions for the preservation of cultural resources, including Native American burials. Nonetheless, the City must comply with State law on this topic. If human remains are unearthed, the State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. and implementation of **MM CUL-3** would be required.

CUL-3 Unanticipated Discovery of Human Remains and Associated Funerary Objects

The term "human remains" encompasses more than human bones. In ancient and historic times, tribal traditions included but were not limited to the burial of associated cultural resources (funerary objects) with the deceased and the ceremonial burning of human remains. These remains are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects. The Native American Graves Protection and Repatriation Act guidance specifically states that the federal agencies will consult with organizations on whose aboriginal lands the remains and cultural items might be discovered, who are reasonably known to have a cultural relationship to the human remains and other cultural items. Therefore, it is appropriate to consult with local Native American groups as recommended by the California NAHC.

Any discoveries of human skeletal material shall be immediately reported to the County Coroner. Work shall be stopped and the construction manager or archaeological monitor, if present, shall immediately divert work at a minimum of 50 feet and place an exclusion zone around the burial. The construction manager or the monitor shall then notify an archaeologist meeting standards of qualification under the guidelines of the Secretary of Interior and the coroner to assess the discovery. Work shall continue to be diverted while the coroner determines if the remains are Native American. The discovery shall be kept confidential and secure to prevent any further disturbance. If the remains are Native American, the coroner will notify the California NAHC as mandated by State law who will then appoint a most likely descendent (MLD). The MLD shall provide recommendations as to the treatment and disposition of the human remains within 48 hours of MLD designation. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains shall be covered with a protective casing to prevent further damage or looting. Each occurrence of human remains and associated funerary objects shall be stored in accordance with methods agreed upon between the MLD and the landowner. If the Coroner determines the remains represent a historic non-Native American burial, the burial shall be reburied in an appropriate setting, as determined by the Coroner. If the Coroner determines the remains to be modern, the Coroner will take custody of the remains.

Implementation of MM CUL-3 would reduce potential impacts to human remains to a less-than-significant level. Potential impacts to tribal cultural resources are also discussed in Section 5.18, Tribal Cultural Resources of this IS MND.

5.6 ENERGY

6.	ENERGY Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

5.6.1 Impact Analysis

- a) *Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

Less than Significant. The HEU is consistent with the City’s General Plan and contains policies to conserve energy resources. The HEU also seeks to conserve energy through public education on the reduction of residential energy use. Any future development, including potential development of the previously identified 20 vacant residential lots, would also be subject to individual review for compliance with federal, State, and local regulatory requirements related to energy efficiency.

If the 20 vacant sites were to be constructed with 20 singles family homes, energy use during construction would be in the form of fuel consumption (e.g., gasoline and diesel fuel) to operate heavy

equipment, light-duty vehicles, machinery, and generators for lighting. Energy use during the construction would be temporary in nature, and equipment used would be typical of construction projects in the region. Construction contractors would be required to demonstrate compliance with applicable CARB regulations that restrict the idling of heavy-duty diesel motor vehicles and govern the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Construction activities would be required to utilize fuel-efficient equipment consistent with State and federal regulations and would comply with State measures to reduce the inefficient, wasteful, or unnecessary consumption of energy. These practices would result in efficient use of energy during construction of future development.

Additionally, if the 20 single family homes were to be built, they would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6 of the California Code of Regulations, California's Energy Efficiency Standards for Residential and Nonresidential Buildings), the California Green Building Standards Code (CALGreen, Title 24, Part 11 of the California Code of Regulations). The California Energy Code provides energy conservation standards for all new and renovated commercial and residential buildings constructed in California. This code applies to the building envelope, space-conditioning systems, and water-heating and lighting systems of buildings and appliances and provides guidance on construction techniques to maximize energy conservation. Minimum efficiency standards are given for a variety of building elements, including appliances; water and space heating and cooling equipment; and insulation for doors, pipes, walls, and ceilings. The code emphasizes saving energy at peak periods and seasons and improving the quality of installation of energy efficiency measures. CALGreen sets targets for energy efficiency, water consumption, dual plumbing systems for potable and recyclable water, diversion of construction waste from landfills, and use of environmentally sensitive materials in construction and design, including ecofriendly flooring, carpeting, paint, coatings, thermal insulation, and acoustical wall and ceiling panels. As a result, operation of 20 single family homes would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy, and impacts would be less than significant.

- b) *Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

Less than Significant. Any future development in the City, including the 20 vacant properties, would be subject to federal, State, and local regulatory requirements related to energy efficiency. Additionally, goals, policies, and programs related to reducing greenhouse gas (GHG) emissions (as discussed in Section 5.8: Greenhouse Gas Emissions) are closely related to reducing energy consumption through the use of alternative forms of energy or sustainable design features.

Proposed projects related to implementation of the HEU would be required to comply with City and State energy-efficiency regulations and standards, including CALGreen building code requirements, and compliance with these requirements would be assessed during the project permitting and review process. This would ensure that individual projects implemented under the HEU would not conflict with renewable energy and energy efficiency plans adopted by the City. As such, reasonably foreseeable development under the HEU would not conflict with or obstruct a plan for renewable energy or energy efficiency and impacts would be less than significant.

5.7 GEOLOGY AND SOILS

7.	GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(f)	Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

5.7.1 Impact Analysis

- a) i) *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*
- ii) *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?*
- iii) *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?*
- iv) *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?*

Less Than Significant. Rolling Hills is in a seismically active region of southern California, with the Whittier fault, Newport-Inglewood fault, Palos Verdes fault, Malibu Coast fault, Cabrillo fault, Santa Monica fault, and Redondo Canyon fault all within 50 miles of the City. The closest active fault to the City is the Palos Verdes Fault, located within the City boundaries. While there are a number of seismically active faults in the City and region, there are no active faults with the potential for ground rupture, defined by the Alquist-Priolo Earthquake Fault Zoning Act. The closest Alquist-Priolo Fault Zone is the Newport-Inglewood Fault approximately nine miles northeast of the City (City 1990).

Potential development projects proposed on the 20 vacant residential lots during implementation of the HEU would be subject to the City's General Plan including the newly adopted Safety Element, goals and policies and the provisions in the RHMC, which adopted the Los Angeles County Building Code (LABC) as of 2020. The 2020 LABC adopts and amends the 2018 International Building Code and the 2019 California Building Code (CBC) requirements to reduce seismic impacts. The Safety Element contains important policies that aim to protect the community from loss of life, injury, property damage, and destruction from earthquakes and geologic hazards.

All potential projects built on the 20 vacant residential lots would be required to comply with the RHMC's building regulations and engineering practices. This, and adherence to the goals and policies in the Safety Element of the General Plan, would reduce impacts due to potential seismic ground shaking to less-than-significant levels.

Landslides can occur because of ground shaking from an earthquake in loosely consolidated, wet soil and/or rocks on steep sloping terrain. The most common earthquake-induced landslides include shallow, disrupted landslides such as rock falls, rockslides, and soil slides. Much of the existing development in Rolling Hills is located on hilly terrain that is highly susceptible to landslide risks, and potential future development of the 20 vacant residential lots would similarly be located on steep terrain. Residential development implemented under the HEU would be required to adhere to the RHMC, which includes provisions in the 2020 LABC that regulate building design and would address risks from landslides. Through compliance with the latest codes and the requirements of the Safety Element, projects developed under the 2021-2029 HEU would have less than significant impacts relative to landslides.

The potential for liquefaction, lateral spreading, and seismically induced dynamic settlement within the City, including the 20 vacant residential lots, is low (City 1990). Liquefaction occurs when seismic waves pass through water-saturated granular soil, causing some of the empty spaces between granules to collapse, resulting in a loss of ground strength and a near-liquid state. Liquefaction causes horizontal movements commonly 10 to 15 feet, but up to 100 feet, soil flows, and loss of bearing strength, all of which could cause structures to settle or tip. Liquefaction can cause severe damage to property. The City does not contain any mapped liquefactions zones (DOC 2022) and, therefore, projects developed under the 2021-2029 HEU would have less than significant impacts relative to liquefaction.

Overall, compliance with the RHMC, LABC and CBC, and the City's General Plan Safety Element goals and policies, as described above, would ensure that impacts related to seismic activity, including shaking, landslide, and liquefaction would be less than significant.

b) *Would the project result in substantial soil erosion or the loss of topsoil?*

Less than Significant. Rolling Hills is a developed city with no commercial agricultural uses and, therefore, has minimal potential for erosion or topsoil loss due to further development. The 20 vacant residential lots identified in the 2021-2029 HEU would comprise new residential development and would not rezone agricultural land where topsoil is a concern. Demolition and construction activities would be required to comply with LABC and the CBC, Appendix Section J110, Erosion Control standards, which ensures appropriate erosion and stormwater pollution control during grading and construction activities.

Construction activities that occur on more than one acre are required to obtain a National Pollutant Discharge Elimination System (NPDES) Construction General Permit. NPDES requires the development of a storm water pollution prevention plan (SWPPP), which includes best management practices (BMP) to reduce erosion and topsoil loss from stormwater runoff. Development projects proposed under the 2021-2029 HEU would adhere to grading and erosion controls listed in RHMC, which includes a requirement for the prevention of sedimentation or damage to off-site properties.

The Project involves adoption of a policy document, the HEU, which does not directly propose any ground disturbance. However, the HEU focuses on the possible development of the 20 vacant parcels. Therefore, project components such as amount of grading, excavation, vegetation removal, necessary for specific future projects is unknown. Nonetheless, projects proposed on any of the 20 vacant residential lots that total 1 acre or more will be required to prepare a SWPPP as part of the NPDES requirements, both of which include BMPs for erosion and sedimentation control. BMP examples generally include an effective combination of erosion and sediment controls, which include barriers such as silt fences, hay bales, drain inlet protection, or gravel bags.

RHMC Section 13.18 requires that a grading plan be submitted as part of the landscape plan, which is required for any applicant proposing landscaping, unless exempted pursuant to Section 13.18.050. The project applicant would be required to submit a grading plan that includes the finished configurations and elevations of the landscape area including height of graded slopes, drainage patterns, pad elevations, finish grade, and stormwater retention improvements, if applicable. In addition, to prevent excessive erosion and runoff, project applicants are encouraged to prepare a grading plan that does the following: grades so that all irrigation and normal rainfall remains within property lines and does not drain on to non-permeable hardscapes; avoids disruption of natural drainage patterns and undisturbed soil; and avoids soil compaction in landscape areas. Development facilitated by implementation of the 2021-2029 HEU would be subject to these conditions and, therefore, impacts to soil erosion or loss of topsoil would be less than significant.

c) *Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*

Less than Significant. As previously discussed, much of the existing development in Rolling Hills is located on hilly terrain; and many of the City's canyons exhibit steep slopes with little vegetation coverage. These areas are highly susceptible to landslide risks. However, the City generally lacks the thick, loose, sandy soils which lead to liquefaction and ground failure hazards. Thus, the potential for liquefaction, lateral spreading, and seismically induced dynamic settlement is low (City 1990). Impacts related to landslides and liquefaction are addressed in detail under Impact Discussion a) above;

therefore, this discussion focuses on impacts related to unstable soils due to lateral spreading, subsidence, or collapse. Lateral spreading occurs because of liquefaction; accordingly, liquefaction-prone areas would also be susceptible to lateral spreading. Subsidence occurs at great depths below the surface when subsurface pressure is reduced by the withdrawal of fluids (e.g., groundwater, natural gas, or oil) resulting in sinking of the ground.

The Project involves adoption of a policy document, the 2021-2029 HEU, which does not directly propose any projects or developments. However, the HEU focuses on the possible development of the 20 vacant residential lots. All of these sites are undeveloped and zoned for residential use, and new development would primarily be new residential development where underlying unstable soils could exist. The General Plan Safety Element includes goals and policies designed to address potential geologic impacts. As discussed under Threshold a), above, conformance with the 2020 LABC which is amended from the 2019 CBC, would also be required. With compliance with the existing codes, the Project would have less than significant impacts related to location 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 offsite landslide, lateral spreading, subsidence, liquefaction, or collapse.

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

Less than Significant. Expansive soils are characterized as fine-grained, such as silts and clays or soils with variable amounts of expansive clay minerals that can change in volume due to changes in water content. According to the General Plan, soil types within the City consist predominantly of fertile clays with some loams and shales (City 1990). The potential for soil to shrink and swell depends on the amount and types of clay in the soil. Highly expansive soils can cause structural damage to foundations and roads without proper structural engineering and are less suitable or desirable for development than non-expansive soils because of the necessity for detailed geologic investigations and costlier grading applications.

The General Plan Safety Element includes goals and policies designed to address potential geologic impacts. As discussed under Threshold a), above, conformance with the 2020 LABC which is amended from the 2019 CBC, would also be required.

The City's HEU focuses on the addition of the 20 vacant residentially zoned, privately owned parcels located throughout the City. These 20 vacant lots have the potential to be developed during the 2021-2029 planning period, although no projects are currently proposed or would be approved with approval of the Proposed Project. When proposed, projects associated with the 20 vacant residential lots would be required to comply with existing codes that would ensure potential impacts from expansive soils such that substantial direct or indirect risks to life or property, would be reduced to less than significant. Therefore, impacts would be less than significant.

- e) *Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?*

Less than Significant. With the exception of the Rancho Del Mar site and 13 residences that have individually or collectively (through the creation of a small sewer district) connected to an adjacent jurisdiction's sewer systems, no sanitary sewer system exists in Rolling Hills. Residences are served by individual septic tanks and seepage pits. These systems are designed to serve single-family residences

and are not conducive to multi-family housing; particularly given the geologic, slope, and soil constraints in Rolling Hills.

As noted in Section 2.6 above, the City's HEU focuses on the addition of the 20 vacant residentially zoned, privately owned parcels located throughout the City. These 20 vacant lots have the potential to be developed during the 2021-2029 planning period, although no projects are currently proposed or would be approved with approval of the proposed Project. If development of the 20 vacant lots occurs, it is assumed that development would adhere to the City's zoning and the RHMC requirements for development standards of sewer interconnections, and septic tank and seepage pit installation. When proposed, projects associated with the 20 vacant residential lots would be required to adhere for the 2020 LABC, the 2019 CBC, and the RHMC for installation of septic systems. Plans would be required to be approved by Building and Safety to ensure that the potential for projects to occur on soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available would be avoided to the greatest extent practicable. The Project would have less than significant impacts related to soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems.

- f) *Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?*

Less than Significant with Mitigation Incorporated. The City of Rolling Hills lies within the Los Angeles Basin, a sedimentary basin formed by the Peninsular Ranges and the Transverse Ranges in Southern California. Much of this area is known to have high potential for fossil-rich sedimentary rocks. As noted in Section 2.6 above, the City's HEU focuses on the addition of the 20 vacant residentially zoned, privately owned parcels located throughout the City. These 20 vacant lots have the potential to be developed during the 2021-2029 planning period, although no projects are currently proposed or would be approved with approval of the proposed Project. The 20 residential lots are undeveloped; therefore, paleontological resources may be present in fossil-bearing sediments and geologic units below the ground surface and could be unearthed during excavation for new development. Ground-disturbing activities in geologic units with high paleontological sensitivity have the potential to damage or destroy paleontological resources that may be present. Therefore, activities resulting from implementation of the 2021-2029 HEU, including development of the 20 vacant lots, could damage or destroy fossils in these geologic units resulting in a significant impact.

Effects on paleontological resources would only become evident once a specific project has been proposed, because the effects greatly depend on the individual project's site conditions (in this case, the geologic setting) and the characteristics and extent of the proposed ground-disturbing activity. However, to ensure development on the 20 vacant residential lots does not have an adverse effect on paleontological resources, each project will need to be assessed as it is proposed in terms of the potential for paleontological resources to be present. Neither the City's General Plan nor the RHMC address the discovery or conservation of paleontological resources. Projects would be required to comply with regulatory standards enumerated under in PRC Section 5097.574, which sets the protocol for proper handling and projects implemented during the 2021-2029 planning period would be subject to **MM GEO-1** described below.

GEO-1 Prepare Paleontological Resources Study and Implement Study Recommendations

For any development in Rolling Hills that occurs within high sensitivity geologic units, whether they are mapped at the surface or hypothesized to occur in the subsurface, the City shall require a site-specific paleontological study and avoidance and/or mitigation for potential impacts to paleontological resources. The City shall require the following specific requirements for projects that could disturb geologic units with high paleontological sensitivity, whether they are mapped at the surface or hypothesized to occur in the subsurface.

1. **Retain a Qualified Paleontologist.** Prior to initial ground disturbance within highly sensitive geologic units, the applicant shall retain a project paleontologist, defined as a paleontologist who meets the Society of Vertebrate Paleontology (SVP) standards for Qualified Professional Paleontologist, to direct all mitigation measures related to paleontological resources (SVP 2010). A qualified paleontologist (Principal Paleontologist) is defined by the SVP standards as an individual with an M.S. or Ph.D. in paleontology or geology who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology of California, and who has worked as a paleontological mitigation project supervisor for a least 1 year.
2. **Paleontological Mitigation and Monitoring Program.** Prior to construction activity, a qualified paleontologist shall prepare a Paleontological Mitigation and Monitoring Program to be implemented during ground disturbance activity for the proposed project. This program shall outline the procedures for construction staff Worker Environmental Awareness Program (WEAP) training, paleontological monitoring extent and duration, salvage and preparation of fossils, the final mitigation and monitoring report, and paleontological staff qualifications.
3. **Paleontological Worker Environmental Awareness Program.** Prior to the start of construction, the project paleontologist or his or her designee, shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff shall fossils be discovered by construction staff. The WEAP shall be fulfilled at the time of a pre-construction meeting at which a qualified paleontologist shall attend. In the event of a fossil discovery by construction personnel, all work in the immediate vicinity of the find shall cease and a qualified paleontologist shall be contacted to evaluate the find before restarting work in the area. If it is determined that the fossil(s) is(are) scientifically significant, the qualified paleontologist shall complete the following conditions to mitigate impacts to significant fossil resources.
4. **Paleontological Monitoring.** Ground disturbing construction activities (including grading, trenching, foundation work and other excavations) at the surface in areas mapped as high paleontological sensitivity and exceeding 5 feet in depth in areas overlying potentially high paleontological sensitivity units shall be monitored on a full-time basis by a qualified paleontological monitor during initial ground disturbance. The Paleontological Mitigation and Monitoring Program shall be supervised by the project paleontologist. Monitoring shall be conducted by a qualified paleontological monitor, who is defined as an individual who has experience with collection and salvage of paleontological resources. The duration and timing of the monitoring will be determined by the project paleontologist. If the project paleontologist determines that full-time monitoring is no longer warranted, he or she may recommend that monitoring be reduced to periodic spot-checking or cease entirely. Monitoring would be reinstated if any new or unforeseen deeper ground disturbances are required, and reduction or suspension would need to be reconsidered by the supervising paleontologist. Ground disturbing activity that does not occur in areas mapped as high sensitivity or that do not exceed 5 feet in depth in areas overlying potentially high sensitivity units would not require paleontological monitoring.

5. **Salvage of Fossils.** If significant fossils are discovered, the project paleontologist or paleontological monitor shall recover them. Typically, fossils can be safely salvaged quickly by a single paleontologist and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. In this case the paleontologist shall have the authority to temporarily direct, divert or halt construction activity to ensure that the fossil(s) can be removed in a safe and timely manner. Work may continue outside of a buffer zone around the fossil, usually 50-100 feet (specific distance may be determined by the project paleontologist).
6. **Preparation and Curation of Recovered Fossils.** Once salvaged, significant fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection (such as the University of California Museum of Paleontology), along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the project paleontologist.
7. **Final Paleontological Mitigation Report.** Upon completion of ground disturbing activity (and curation of fossils if necessary) the qualified paleontologist shall prepare a final mitigation and monitoring report outlining the results of the mitigation and monitoring program. The report shall include discussion of the location, duration and methods of the monitoring, stratigraphic sections, any recovered fossils, and the scientific significance of those fossils, and where fossils were curated.

With implementation of **MM GEO-1**, impacts related to paleontological resources would be less than significant.

5.8 GREENHOUSE GAS EMISSIONS

8.	GREENHOUSE GAS EMISSIONS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

5.8.1 Impact Analysis

- a) *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*
- b) *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Less than Significant. Gases that absorb and re-emit infrared radiation in the atmosphere are referred to as greenhouse gasses (GHG). The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO₂), methane (CH₄), nitrous oxides (N₂O),

fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF6). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation. GHGs are emitted by both natural processes and human activities. Of these gases, CO₂ and CH₄ are emitted in the greatest quantities from human activities. Emissions of CO₂ are largely by-products of fossil fuel combustion, and CH₄ results from off-gassing associated with agricultural practices and landfills. Different types of GHGs have varying global warming potentials (GWP), which are the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO₂) is used to relate the amount of heat absorbed to the amount of the GHG emissions, referred to as carbon dioxide equivalent (CO₂e), and is the amount of a GHG emitted multiplied by its GWP. CO₂ has a 100-year GWP of one. By contrast, CH₄ has a GWP of 28, meaning its global warming effect is 28 times greater than that of CO₂ on a molecule-per-molecule basis (Intergovernmental Panel on Climate Change [IPCC] 2014).

In response to climate change, California implemented AB 32, the “California Global Warming Solutions Act of 2006.” AB 32 requires the reduction of statewide GHG emissions to 1990 emissions levels (essentially a 15 percent reduction below 2005 emission levels) by 2020 and the adoption of rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions. On September 8, 2016, the Governor signed SB 32 into law, extending AB 32 by requiring the State to further reduce GHG emissions to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). On December 14, 2017, the CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program and the Low Carbon Fuel Standard, and implementation of recently adopted policies and legislation, such as SB 1383 (aimed at reducing short-lived climate pollutants including methane, hydrofluorocarbon gases, and anthropogenic black carbon) and SB 100 (discussed further below). The 2017 Scoping Plan also puts an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan Update, the 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends local governments adopt policies and locally appropriate quantitative thresholds consistent with a statewide per capita goal of 6 metric tons (MT) of CO₂e by 2030 and two MT of CO₂e by 2050 (CARB 2017).

The HEU includes objectives for energy conservation and, furthermore, encourages sustainable development and provides energy conservation recommendations, including adoption of the California Green Building Code. Development under the 2021-2029 HEU, including the 20 vacant residential lots, would not conflict with an existing plan, policy, or regulation adopted for the purpose of reducing greenhouse gas emissions. Residential development, such as potential future development of the 20 vacant residential lots, is generally not associated with ongoing or significant GHG emissions; however, construction activities would generate GHG emissions from construction vehicles and equipment; these impacts would be temporary. Projects will be required to comply with the RHMC, LABC, and CBC, including the CALGreen code, which helps reduce GHG emissions through sustainable design and renewable energy considerations. Compliance with these regulations will ensure impacts are less than significant.

5.9 HAZARDS AND HAZARDOUS MATERIALS

9.	HAZARDS AND HAZARDOUS MATERIALS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

5.9.1 Impact Analysis

- a) *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*
- b) *Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

Less than Significant. Quantities of hazardous materials are generated, stored, or transported within Rolling Hills. Hazardous-related transportation incidents from fixed facilities (such as an accidental spill or accident at a manufacturing facility) or from pipelines, and dumping may occur. Additionally, as the entire City is likely to experience ground shaking during an earthquake, all sites in the City may be subject to seismic activity during such an event (California State Water Resources Control Board 2021).

The LAFD is the Certified Unified Program Agency (CUPA) that provides regulatory oversight over hazardous materials and hazardous waste programs in both Los Angeles and Rolling Hills. Additionally, the Safety Element contains goals and policies designed to protect residents and businesses from

hazardous materials and to minimize community exposure to hazardous and potentially hazardous materials.

The HEU is a policy document consistent with the City's General Plan and does not, in and of itself, directly propose physical changes in the environment or enable future development. However, the HEU does focus on development of 20 vacant residential sites. If these 20 sites were to be developed, during construction, construction equipment would require the use of fuel and petroleum-based lubricants and would require regular maintenance of equipment as required by SWRCB and the Los Angeles Regional Water Quality Control Board (LARWQCB). However, construction would be temporary and material would be in relatively small quantities.

During operation, the 20 vacant residential lots, may contain household hazardous materials such as paint, herbicides/pesticides, diesel fuel, and cleaning products that have the potential to spill; however, residential uses typically do not use or store large quantities of hazardous materials. All new development would be required to adhere to federal, State, and local regulations regarding handling hazardous materials and cleanup standards in case of a spill during construction and operation of all projects implemented under the 2021-2029 HEU.

If development of the 20 vacant lots occurs, it is assumed that development would adhere to federal, State, and local regulations and standard protocols during the storage, transportation, and usage of any hazardous materials, as well as compliance with 2021-2029 HEU and Safety Element Policies, which would minimize and avoid the potential for significant upset and accident condition impacts. With adherence to the regulations mentioned above, if development of the 20 vacant lots were to occur, it is assumed impacts would be less than significant.

- c) *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

Less than Significant. One school, Rancho Del Mar High School, is currently in place and operational in the City and is within 0.25 mile of one of the 20 vacant residential lots. The 2021-2029 HEU would facilitate new residential development throughout Rolling Hills on sites that could be located near or adjacent to schools. Residential uses could involve use and transport of very small quantities of hazardous materials in the form of fertilizer or household cleaning products and would, therefore, not emit or handle hazardous materials in such a way that it would impact those outside the home or property. However, construction activities related to the development of residential structures could result in hazardous emissions or the handling of hazardous materials within 0.25 mile of an existing school. Projects proposed under the 2021-2029 HEU, including development of the 20 vacant residential lots, would be subject to State and federal regulations that apply to the use, storage, and transport of hazardous materials with 0.25 mile of a school. With compliance to these regulations, impacts would be less than significant.

- d) *Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

No Impact. No potential hazardous waste sites are under evaluation in Rolling Hills (DTSC 2021; SWRCB 2021). The City and surrounding area do not contain heavy industrial uses that would create a hazardous material risk in the event of a spill, release, or natural disaster. Additionally, the City is

not located near any major transit routes involving transport of a substantial quantity of hazardous material through the City (City 1990).

The Project involves a policy document and does not directly propose physical changes in the environment. Development on the 20 vacant residential lots identified in the 2021-2029 HEU does not have the potential to encounter sites previously developed with uses that could include hazardous materials (e.g., automotive repair facilities, dry cleaners, gas stations) because the lots have not been previously developed.

Furthermore, future development would be subject to all applicable regulatory requirements concerning the proper handling, treatment, and disposal of hazardous materials. The Project would result in no impacts related to location on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

- e) *For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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?*

Less than Significant Impact. The HEU is a policy document that analyzes housing needs in the City. The City is within 2 miles of the Torrance Airport, which is approximately 1.4 miles from the northern boundary of the City. However, the City is not located within the airport or airfield safety hazard zone (ALUC 2003). If development of the 20 vacant lots occurs, it will be subject to State and local regulations regarding the transport, use, and disposal of hazardous materials and to City planning, engineering, and building requirements. Furthermore, residential development is not generally associated with excessive noise or safety hazards. Temporary noise increases would occur during construction; however, these increases would be temporary, intermittent, and typical of residential construction. Less than significant impacts relative to noise hazards are expected to occur as a result of the Project and potential development of the 20 vacant lots.

- f) *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Less than Significant. The City's Community Wildfire Protection Plan (CWPP) identifies the potential evacuation routes listed below, which include options for rapid egress from areas within the City if threatened by a wildfire.

- Main Gate at Rolling Hills Road and Palos Verdes Drive North
- Crest Gate at Crest Road near Crenshaw Boulevard
- Eastfield Gate at Eastfield Drive and Palos Verdes Drive East
- Crest Road East (emergency access only)

Development of the 20 vacant residential lots would involve construction of single family homes scattered throughout the City. Development is expected to occur during the planning years of 2021-2029 and therefore not all development would take place at one time. Additionally, construction of single family homes does not typically require street closure for any reasons. However, if street closures are required, the City would review construction timing and ensure that adequate alternative routes were available throughout the City. Therefore, development facilitated by implementation of

the 2021-2029 HEU would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

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

Less than Significant. As discussed in Section 5.20 Wildfire, the entire City is designated a VHFHSZ by CAL FIRE, and a substantial amount of land in the City is steep hillsides and canyons (CAL FIRE 2011). The City recently adopted their Safety Element Update which includes measures to mitigate the risk of fire hazards. Although the HEU itself does not entitle development, future development in the City, including development of the 20 vacant parcels would be required to adhere to the policies in the Safety Element Update and the CWPP. Implementation of these policies would minimize potential project impacts. Therefore, the Project would result in less than significant impacts associated with wildland fires.

5.10 HYDROLOGY AND WATER QUALITY

10.	HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
	i) Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flood on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

5.10.1 Impact Analysis

- a) *Would the project violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or ground water quality?*
- c) *Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*
 - i) *result in substantial erosion or siltation on- or off-site;*
 - ii) *substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;*
 - iii) *create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources or polluted runoff; or*
 - iv) *impede or redirect flood flows?*

Less than Significant Impact. Rolling Hills is under the jurisdiction of the LARWQCB, which is responsible for the preparation and implementation of the water quality control plan for the region. The RHMC requires owners or developers to implement stormwater pollution control requirements for construction activities. Provisions of the federal and State Clean Water Act require compliance with the NPDES storm water permit during construction for projects developing more than 1 acre. Operators of a construction site would be responsible for preparing and implementing a SWPPP that outlines project-specific BMPs to control erosion, sediment release, and otherwise reduce the potential for discharge of pollutants into the stormwater drainage system. The NPDES also requires post-construction BMPs. Typical BMPs include covering stockpiled soils, installing silt fences and erosion control blankets, and handling and disposing of wastes properly.

RHMC Section 8.32 states that new development and redevelopment projects are required to control pollutants and runoff volume from the project site by minimizing the impervious surface area and controlling runoff through infiltration, bioretention, and/or rainfall harvest and use, in accordance with the standards set forth in the Municipal NPDES Permit.

The 2021-2029 HEU does not propose specific development projects. Therefore, components for specific proposal square footage, paved surfaces, and number of units are unknown. Future development under the 2021-2029 HEU would be required to comply with the LID requirements as outlined in the RHMC and pursuant with NPDES Permit requirements, as described above for projects on 1 acre or more. For projects on smaller parcels, if more than 10 units or up to 10,000 square feet of impermeable surface area would be involved, they would be subject to RHMC Section 8.32 and design would include the runoff control measures described above. With adherence to the RHMC and General Plan goals and policies, impacts would be less than significant.

- b) *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*
- e) *Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Less than Significant Impact. As further discussed in Section 5.19 Utilities and Service Systems, the City is located within the West Basin Municipal Water District (WBMWD) service area. According to the 2020 UWMP, the District's only source of water supply is imported, purchased water from the

WBMWD and groundwater is not being used as a source of supply (CalWater 2021). The WBMWD Draft 2020 UWMP states that it will be able to serve 100 percent of projected demands in normal, single-dry and multiple-dry years. As such, the District expects that, under all hydrologic conditions, purchased water supplies (in combination with the future recycled supplies) will fully serve future potable demands (CalWater 2021). The projected demand for 2025 for the District is 151,521 acre-feet per year (AFY). The water demand associated with development of the 20 vacant lots would be 9.24 AFY, which represents a nominal increase in the projected demand.

Any future development that occurs pursuant to the HEU in the City, including the 20 vacant residential lots, will be subject to State and local regulations regarding water quality, run-off, and hydrology and to City planning, engineering and building requirements. Since the City doesn't utilize groundwater and with compliance to the existing regulations, impacts to groundwater would be less than significant.

d) *Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*

Less than Significant Impact. According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) panels 06037C2026G, 06037C2027G, and 06037C1940F, the City is not located in a flood hazard area and currently has a less than 0.2 percent annual chance to be inundated by flood waters as a result of a storm event (FEMA 2021). Additionally, the City is not located within a tsunami or seiche zone (DOC 2021b; DWR 2021).

If development of the 20 vacant lots occurs, adherence to the 2020 LABC which amends the 2019 CBC, would be required. Compliance with the code would ensure that no development would occur in a flood hazard zone. Therefore, impacts related to flood hazard, tsunami, or seiche zones would be less than significant.

5.11 LAND USE AND PLANNING

11.	LAND USE/PLANNING Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b)	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

5.11.1 Impact Analysis

a) *Would the project physically divide an established community?*

No Impact. The HEU focuses on the addition of the 20 vacant residentially zoned, privately owned parcels located throughout the City. These parcels have the potential to each be developed with a single family home, and are scattered throughout the City, most of which would be considered infill development. Development of these sites with single family homes would not physically divide an established community. Therefore, no impacts would occur.

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

Less than Significant. The City has prepared its HEU in accordance with Section 65580–of the Government Code. The update has also been prepared consistent with the City General Plan and the community’s vision of its housing needs and objectives. Accordingly, the HEU examines the City’s housing needs as they exist today and projects future housing needs based on RHNA allocation. No change to the land use plan or zoning map is proposed as part of the HEU. Additionally, as discussed in Section 5.14 Population and Housing, the additional population associated with potential development of the 20 vacant parcels, would be consistent with SCAG and the City’s RHNA allocation.

All future development in the City, including the 20 vacant sites, would be required to comply with existing land use plans, policies, and regulations. If any developments would conflict with any of these plans, policies, or regulation, further environmental evaluation would be required. With adherence to the City’s zoning and the RHMC, if development of the 20 vacant lots were to occur, it is assumed impacts would be less than significant.

5.12 MINERAL RESOURCES

12.	MINERAL RESOURCES Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

5.12.1 Impact Analysis

- a) *Would the project 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?*
- b) *Would the project 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?*

No Impact. The City is not designated as having any known mineral resources. Although mineral resources exist in the area, they are outside the City limits and outside the boundaries of the General Plan (City 1990). The City’s HEU focuses on the addition of the 20 vacant residentially zoned, privately owned parcels located throughout the City. No land use or zoning changes are proposed. Therefore, the Project would have no impacts on the availability of any known resources or locally important mineral resource recovery sites.

5.13 NOISE

13.	NOISE Would the project result in:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

5.13.1 Impact Analysis

a) *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Less than Significant. Noise is unwanted sound that disturbs human activity. Environmental noise levels typically fluctuate over time, and different types of noise descriptors are used to account for this variability. Noise level measurements include intensity, frequency, and duration, as well as time of occurrence. Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). Noise levels typically attenuate (or drop off) at a rate of 6 dBA per doubling of distance from point sources (such as construction equipment). Noise from lightly traveled roads typically attenuates at a rate of about 4.5 dBA per doubling of distance. Noise from heavily traveled roads typically attenuates at about 3 dBA per doubling of distance, while noise from a point source typically attenuates at about 6 dBA per doubling of distance.

The HEU, in and of itself, does not propose specific projects but puts forth goals and policies that regulate various aspects of new housing development in the City. However as previously mentioned, the HEU focuses on development of 20 vacant parcels with 20 single family homes and impacts associated with that potential future development are analyzed here to the extent possible based on available information.

Development facilitated under the HEU would be required to be consistent with applicable local, State, and federal regulations. Section 15.36.020 of the RHMC requires that no work of improvement or the operation of mechanical equipment used in connection with work of improvement shall occur within the territorial limits of the City except on Monday through Saturday of each week, commencing at the hour of seven a.m. and ending at the hour of six p.m. on each day.

Residential uses are not substantial generators of noise, because noise from the structures themselves is self-contained. Furthermore, residential land uses do not involve manufacturing, processing, or

generation of large amounts of traffic that could produce substantial, temporary, or periodic increases in ambient noise, and infrastructure uses would be subject to established City noise ordinances. Therefore, impacts related to a substantial increase in ambient noise would be less than significant.

- b) *Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

Less than Significant. While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Vibration in buildings, such as from nearby construction activities, may cause windows, items on shelves, and pictures on walls to rattle. Vibration of building components can also take the form of an audible low-frequency rumbling noise, referred to as groundborne noise. Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern from vibration is that it can be intrusive and annoying to building occupants and vibration-sensitive land uses.

Long-term operation of future housing development permitted under the HEU would not result in any groundborne vibration or excessive groundborne noise, although construction activities may result in temporary groundborne vibration and groundborne noise levels. New development implemented under the HEU would not exceed permitted noise levels following existing standards in the 2020 LABC which amends the 2019 CBC. All new development or redevelopment is required to comply with the standards, which would reduce potential impacts. Therefore, implementation of the HEU would not result in generation of excessive groundborne vibration or groundborne noise levels and would have result in less than significant impacts.

- 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. The City is within just over one mile of the Torrance Airport but is not within the airport influence area or airfield safety hazard zone (ALUC 2003). The HEU would not create additional residential opportunities within an airport noise contour. Therefore, no impact would occur.

5.14 POPULATION AND HOUSING

14.	POPULATION AND HOUSING. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

5.14.1 Impact Analysis

a) *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

Less than Significant. As the regional planning agency for the Los Angeles region, SCAG is responsible for preparing jurisdiction-level forecasts for each city and county in the region. The latest forecasts were adopted in September 2020 and describe conditions in a base year (2016) and forecast year (2045). SCAG forecasts indicate that City growth will be flat through 2045, with the latest published forecasts showing 700 households in 2016 and 700 households in 2045. Population in the City over the equivalent period is shown as increasing from 1,900 to 2,000, a growth rate of about 5 percent over 29 years (SCAG 2020).

The 2021-2029 RHNA allocation for the City is 45 units, including 20 very low income units, 9 low income units, 11 moderate income units, and 5 above moderate income units. As previously shown in Table 2.5-2, the combination of recently approved housing units (expected to be occupied in 2022), future affordable units on the Rancho Del Mar site, and new ADUs, which have been made easier to develop under a series of recently passed legislation, can accommodate the RHNA allocation in all income categories. The table illustrates a surplus capacity of seven lower income units based on projected ADU production over the planning period. Any subsequent development accomplished pursuant to the HEU will be consistent with State and regional growth mandates.

As of January 2022, the City had a population of 1,684, a decrease from the previous year of 1,703 persons (DOF 2022a). As of 2021, the City’s average household size was 2.71 persons per household (DOF 2022b). Based on this average household size if all 20 vacant lots were to be constructed, an additional 55 persons would be expected to be added to the City. Based on this additional number of persons, the City’s population would be 1,739, well below the SCAG estimates for 2045.

Based on the population being below the SCAG estimates, and addition of the housing units being consistent with the RHNA allocation, impacts to population and housing would be less than significant.

b) *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

No Impact. As noted in Section 2.6 above, the City’s HEU focuses on the addition of the 20 vacant residentially zoned, privately owned parcels located throughout the City. The Project would not displace any people or housing, rather, would construct housing consistent with the City’s RHNA allocation. Therefore, no impacts would occur.

5.15 PUBLIC SERVICES

15.	PUBLIC SERVICES.	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
	i) Fire Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	ii) Police Protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

5.15.1 Impact Analysis

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

Less than Significant. The Los Angeles County Fire Department (LAFD) provides fire protection services to the City. Fire Station 56, located at 12 Crest Road West, serves the City under Battalion 14. Since the City is within the CAL FIRE VHFHSZ, the City recently adopted their Safety Element Update which includes policies to enforce VHFHSZ-specific standards during development. Compliance with these standards reduces the fire vulnerability of new structures built in the City.

The HEU would not expand the LAFD service area but would facilitate additional structures and population within the existing service area. As described in Section 14, Population and Housing, the HEU has the potential to develop 20 single family, which may result in an increase of 55 residents. The minimal increase in residents is not expected to result in a significant increase for fire protection services.

Additionally, future development associated with the HEU would be required to comply with all applicable federal, State, and local regulations governing the provision of fire protection services, including adequate fire access, fire flows, and number of hydrants, such as the 2019 California Fire Code and the LABC adopted in 2020 which amends the 2019 CBC. The 2019 California Fire Code

contains project-specific requirements such as construction standards in new structures and remodels, road widths and configurations designed to accommodate the passage of fire trucks and engines, and requirements for minimum fire flow rates for water mains. The Building Code requirements for construction, access, water mains, fire flows, and hydrants, and would be subject to review and approval. All development plans are reviewed by the LAFD prior to construction to ensure that adequate fire flows are maintained and that an adequate number of fire hydrants are provided in the appropriate locations in compliance with the California Fire Code. Additionally, any future development would be required to pay application and permit fees that would help offset any required fire protection services. Therefore, HEU impacts related to fire protection services would be less than significant.

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

Less than Significant. The Los Angeles County Sheriff's Department (LASD) is contracted with the City to provide police services and protection. The Lomita Station of the Sheriff's Department is located at 26123 Narbonne Avenue. The City recently adopted their Safety Element Update, which implements policies to promote maintenance of acceptable service ratios, response times, and other performance objectives for police protection.

The HEU would not expand the LASD service area but would facilitate additional structures and population within the existing service area. As described in Section 5.14, Population and Housing, the HEU has the potential to develop 20 single family, which may result in an increase of 55 residents. The minimal increase in residents is not expected to result in a significant increase for police protection services.

Additionally, any future development would be required to pay application and permit fees that would help offset any required police protection services. Therefore, the HEU would not result in significant environmental impacts associated with the need for the provision of new or physically altered police protection facilities. Impacts related to police protection services would be less than significant.

- c) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?*

Less than Significant. The Palos Verdes Peninsula Unified School District (PVPUSD) serves the City. School-related impacts depend upon the location and intensity of a project, students generated per household, and the capacity of facilities in a given attendance area. As described in Section 5.14, Population and Housing, the HEU has the potential to develop 20 single family, which may result in an increase of 55 residents. Of these 55 residents, a conservative estimate of school aged children would be 19, however, the actual number would likely be much lower given the City's general demographic including a median age of 55 (Data USA 2022). The minimal increase in potential students is not expected to result in a significant increase on school facilities. Additionally, any future development would be required to pay application and permit fees, as well as school fees to PVPUSD that would

help offset any school facilities and/or services. Therefore, impacts related to school facilities would be less than significant.

- d) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?*

Less than Significant. There is one public park, numerous trails, open space areas, three tennis courts, and two equestrian facilities located throughout the City. As described in Section 5.14, Population and Housing, the HEU has the potential to develop 20 single family, which may result in an increase of 55 residents. The minimal increase in residents is not expected to result in a significant increase park usage that would result in an increase for additional park facilities. Additionally, any future development would be required to pay development impact fees that would help offset any required need for additional parks or park services. Therefore, impacts related to park services would be less than significant.

- e) *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?*

Less than Significant. The HEU is a policy document and does not authorize future development. As described in Section 5.14, Population and Housing, the HEU has the potential to develop 20 single family, which may result in an increase of 55 residents. The minimal increase in residents is not expected to result in a significant increase in any additional public facilities, including library services, and therefore impacts would be less than significant.

5.16 RECREATION

16.	RECREATION. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

5.16.1 Impact Analysis

- 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?*

Less than Significant. There is one public park, numerous trails, open space areas, three tennis courts, and two equestrian facilities located throughout the City. As mentioned in Section 5.14 Population and Housing, the Project would have a potential to add approximately 55 new residents to the City, resulting in a total population of 1,739 persons which is well below the SCAG estimates for 2045. Additionally, over the last year, the City has seen a decline in population. Additionally, any future development would be required to pay development impact fees that would help offset any required need for additional parks or park services. With the overall minimal increase in population, consistent with the SCAG projections, and payment of the development impact fees, the Project is not expected to result in a substantial increase in the use of recreational facilities. Impacts would therefore be less than significant.

b) *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

No Impact. The Project proposes adoption of the HEU which is a policy document. Although the HEU doesn't include any development, the HEU focuses on housing within the City and would not include any recreational facilities or require construction or expansion of any recreational facilities. Therefore, no impacts would occur.

5.17 TRANSPORTATION

17.	TRANSPORTATION. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(c)	Substantially increase hazards due to a geometric design feature (e. g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(d)	Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

5.17.1 Impact Analysis

- a) *Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?*
- b) *Would the project Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?*

Less than Significant. Rolling Hills has no public roads or streets; thus the City's circulation infrastructure is not conducive to uses generating high trip volumes (City 2014). As mentioned previously, while the HEU does not approve any specific developments, it does focus on the possible development of 20 vacant residentially zoned lots, the development of which may result in an additional 55 residents to the City. With 55 additional residents, this would result in approximately 110 trips per day. The Office of Planning and Research (OPR) has a technical advisory for analyzing VMT impacts, which states that projects that generate fewer than 110 trips per day, generally may be

assumed to cause a less than significant transportation impact. Additionally, any future development would be required to adhere to all programs, ordinances, and policies that address circulation, including those in the General Plan Circulation Element and the RHMC. Thus, circulation-related impacts would be considered less than significant.

- c) *Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?*
- d) *Would the project result in inadequate emergency access?*

Less than Significant. As mentioned previously, while the HEU does not approve any specific developments, it does focus on the possible development of 20 vacant residentially zoned, privately owned parcels located throughout the City. These parcels have the potential to each be developed with a single family home, and are scattered throughout the City, most of which would be considered infill development. If these lots were to be developed, no new streets or roadways would be required, only private driveways. Additionally, all future development would be required to adhere to the 2020 LABC and 2019 CBC. Therefore, impacts associated with hazardous designs or inadequate emergency access would be less than significant.

5.18 TRIBAL CULTURAL RESOURCES

18.	TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b)	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

5.18.1 Impact Analysis

- a) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?*

- b) *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

Less than Significant with Mitigation Incorporated. According to the California PRC Section 21084, a project may have a significant effect on the environment if the project “may cause a substantial adverse change in the significance of an historical resource.” Assembly Bill 52 (AB 52) specifies that a project with the potential for adverse effects on tribal cultural resources may be considered a significant effect on the environment. Additionally, Senate Bill 18 (SB 18) requires a government-to-government consultation process initiated by the local governmental agency prior to adoption or amendment of a General or Specific Plan.

The City, as the Lead Agency pursuant to CEQA and as required by AB 52 and SB 18, has consulted with the local Native American Tribes in the Project Area. Tribes that are located regionally include: Gabrieleno Band of Mission Indians - Kizh Nation, Gabrieleno/Tongva San Gabriel Band of Mission Indians, Gabrielino /Tongva Nation, Gabrielino Tongva Indians of California, Gabrielino-Tongva Tribe, Santa Rosa Band of Cahuilla Indians, and Soboba Band of Luiseño Indians. Letters were sent to these Tribes on December 13, 2021. Tribes were requested to respond to AB 52 by January 12, 2022, and SB 18 by January 27, 2022.

At that time, the Gabrieleño Band of Mission Indians - Kizh Nation responded with two separate letters on December 21, 2021 noting that they had no comments or concerns and no additional information to provide, but requesting consultation for any and all future projects with ground disturbance as shown in Appendix B: Tribal Consultation Response. Additionally, the Gabrielino Tongva Indians of California responded noting that the City is a highly culturally sensitive area and expressed interest in finding out more information regarding the project, however, after review of the project, they submitted a follow up email stating that they have no concerns, but requested notification on future projects.

Since the initial consultation, the City decided to revise the environmental document associated for this Project. The revision itself resulted in no changes in policy perspectives to the HEU and all legislative actions remained the same. The City sent a follow up letter to both tribes making them aware of this change on June 13, 2022. On June 14, 2022, the Gabrieleño Band of Mission Indians - Kizh Nation responded noting that if there is not going to be ground disturbances, there is no need for consultation. On July 18, 2022, Gabrielino Tongva Indians of California responded to keep them involved for further activity.

The HEU is a policy document that would not result in direct development or construction. Similar to the Project, future projects including development of the 20 vacant parcels, would be required comply with the CEQA process and if not exempt from CEQA may require tribal consultation through AB 52 and/or SB 18. However, in order to ensure impacts to any potential Tribal Cultural Resources would remain less than significant, all future development associated with the HEU that is not exempt from CEQA, shall at minimum implement **MM TCR-1** and **TCR-2**.

TCR-1 Retain and Utilize a Native American Construction Monitor

If tribal cultural resources are identified during future tribal consultation efforts for future specific development projects or during construction of such projects, the project applicant for that project shall obtain the services of a qualified Native American Monitor(s) during construction-related ground disturbance activities. Ground disturbance is defined as activities that include, but are not limited to, pavement removal, potholing or auguring, grubbing, weed abatement, boring, grading, excavation, drilling, and trenching, within the project area. The monitor(s) shall be present on-site during the construction phases that involve any ground disturbing activities. The Native American Monitor(s) shall complete monitoring logs daily to provide descriptions of the daily activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the construction-related ground disturbance activities are completed, or when the monitor has indicated that the site has a low potential for archeological resources.

TCR-2 Evaluate Unanticipated Discoveries of Tribal Cultural Resources

If tribal cultural resources are identified during future tribal consultation efforts for future specific development projects or during construction of such projects, a qualified archaeologist and Native American Monitor shall be present during construction-related ground disturbance activities to identify any unanticipated discovery of tribal cultural resources. The qualified archaeologist and Native American monitor may be different individuals or the same individual if the City determines that individual qualifies as both a qualified archaeologist and Native American monitor. All archaeological resources unearthed by construction activities shall be evaluated by the qualified archaeologist and Native American Monitor. If the resources are determined to be human remains (see also Mitigation Measure CUL-3) the Coroner shall be notified, and if the human remains are Native American in origin, the Coroner shall notify the NAHC as mandated by State law, who will then appoint an MLD, who shall then coordinate with the landowner regarding treatment and curation of these resources. Typically, the MLD will request reburial or preservation for educational purposes. If a resource is determined by the qualified archaeologist to constitute a “historical resource” pursuant to *CEQA Guidelines* Section 15064.5(a) or a “unique archaeological resource” pursuant to PRC Section 21083.2(g), the qualified archaeologist shall coordinate with the applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with *CEQA Guidelines* Section 15064.5(f) for historical resources and PRC Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school or historical society in the area for educational purposes.

With implementation of **MM’s TCR-1** and **TCR-2**, impacts related to tribal cultural resources would be less than significant with mitigation incorporated.

5.19 UTILITIES AND SERVICE SYSTEMS

19.	UTILITIES/SERVICE SYSTEMS. Would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

5.19.1 Impact Analysis

a) *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or expansion of which could cause significant environmental effects?*

Less than Significant. Reasonably foreseeable development under the 2021-2029 Housing Element would occur in urban areas that are served by existing utilities infrastructure, including water, wastewater, stormwater drainage, electrical power, natural gas, and telecommunications facilities. Water and wastewater are further discussed in Thresholds b and c below. Stormwater is under the jurisdiction of the LARWQCB, electric is provided by Southern California Edison, and natural gas is provided by Southern California Gas Company.

As mentioned previously, while the HEU does not approve any specific developments, it does focus on the possible development of 20 vacant residentially zoned lots, the development of which may result in an additional 55 residents to the City. These lots are scattered throughout the existing development in the City which would allow for easy connections to existing utility lines.

Rolling Hills is under the jurisdiction of the LARWQCB, which is responsible for the preparation and implementation of the water quality control plan for the region. The RHMC requires owners or developers to implement stormwater pollution control requirements for construction activities. The

addition of 20 single family homes would not result in a significant of increase to stormwater generation.

The increase in electricity and natural gas for 20 single family homes, or 55 additional residents, would be considered nominal. Additionally, if the 20 single family homes were to be built, they would be subject to the energy conservation requirements of the California Energy Code (Title 24, Part 6 of the California Code of Regulations, California's Energy Efficiency Standards for Residential and Nonresidential Buildings), the California Green Building Standards Code (CALGreen, Title 24, Part 11 of the California Code of Regulations). The California Energy Code provides energy conservation standards for all new and renovated commercial and residential buildings constructed in California. This code applies to the building envelope, space-conditioning systems, and water-heating and lighting systems of buildings and appliances and provides guidance on construction techniques to maximize energy conservation. Therefore, the Project would have no impacts regarding the construction or expansion of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities.

- b) *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal dry and multiple dry years?*

Less than Significant. The City is located within the West Basin Municipal Water District (WBMWD) service area. As mentioned previously, while the HEU does not approve any specific developments, it does focus on the possible development of 20 vacant residentially zoned lots, the development of which may result in an additional 55 residents to the City. The WBMWD Draft 2020 UWMP states that the 2020 weighted average per capita water use is roughly 150 gallons per capita per day (GPCD) (CalWater 2021). This would equate to a yearly additional water use of 3,011,250 gallons per year or 9.24 AFY.

According to the 2020 UWMP, the District's only source of water supply is imported, purchased water from the WBMWD (CalWater 2021). The WBMWD Draft 2020 UWMP states that it will be able to serve 100 percent of projected demands in normal, single-dry and multiple-dry years. As such, the District expects that, under all hydrologic conditions, purchased water supplies (in combination with the future recycled supplies) will fully serve future potable demands (CalWater 2021). The projected demand for 2025 for the District is 151,521 AFY. The water demand associated with development of the 20 vacant lots represents a nominal increase in the projected demand. Therefore, the Project would result in less than significant impacts related to water supply availability.

- c) *Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

Less than Significant. Wastewater treatment in the City generally occurs through private septic tanks, as only several parcels on the western periphery of the City have access to sanitary sewer. For these several parcels, the Los Angeles County Sanitation Districts (LACSD) owns, operates, and maintains the sewer system consisting of gravity sewers, pumping stations, and force mains to collect wastewater from the Palos Verdes District service area (Sanitation District #5). The LACSD's Joint Water Pollution Control Plant (JWPCP) provides the wastewater service for the District service area. It provides advanced primary and partial secondary treatment for 400 million gallons per day (MGD)

of wastewater and serves a population of approximately 4.8 million people (LACSD 2021). This plant currently processes 260 MGD; thus, the system has adequate capacity for the Project (CalWater 2021).

If the 20 vacant lots were to be developed, it is likely that the 20 single family homes would contain separate septic systems. However, if all systems were to be connected to wastewater, wastewater generation would be approximately 0.006 (MGD)². This amount would represent a nominal increase in wastewater generation for the District. Therefore, the Project would result in less than significant impacts related to wastewater treatment.

- 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?*

Less than Significant. As mentioned previously, while the HEU does not approve any specific developments, it does focus on the possible development of 20 vacant residentially zoned lots, the development of which may result in an additional 55 residents to the City. According to CalRecycle, a conservative estimate for single family waste generation is 12.23 pounds per household per day (CalRecycle 2022a). This would result in 673 total pounds per day or 0.3 tons per day.

The closest landfill to the City is the Savage Canyon Landfill in Whittier, California. This landfill has a remaining capacity of 9,510,833 tons with a max permitted throughput of 3,350 tons per day and is not expected to close until 2055 (CalRecycle 2022b). Development of the 20 vacant sites with 20 single family homes would result in a nominal increase to the max permitted throughput and remaining capacity. Therefore, impacts would be less than significant.

- e) *Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

Less than Significant. A significant impact could occur if the 2021-2029 HEU would conflict with any statutes and regulations governing solid waste. In compliance with State legislation, any development project facilitated by the 2021-2029 HEU would be required to implement a Solid Waste Diversion Program and divert at least 75 percent of the solid waste generated from the applicable landfill site. Reasonably foreseeable development under the 2021-2029 HEU would comply with federal, State, and local statutes and regulations related to solid waste, such as the California Waste Integrated Waste Management Act (AB 939), the Solid Waste Integrated Resources Plan, and the City's recycling program. Since future projects facilitated by the 2021-2029 HEU would comply with applicable federal, State, and local regulations involving solid waste, 2021-2029 HEU impacts related to conflict with statutes and regulations governing solid waste would be less than significant.

² Wastewater generation generally equates to 75 percent of water demand. Water demand is 55 residents * 150 GPCD = 8,250 gallons per day * 0.75 = 6,187.5 gallons per day.

5.20 WILDFIRE

20.	WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

5.20.1 Impact Analysis

a) *Would the project impair an adopted emergency response plan or emergency evacuation plan?*

Less than Significant. The entire City is designated as a VHFHSZ by CAL FIRE (CAL FIRE 2011). As mentioned in Section 5.9, the City’s CWPP identifies the potential evacuation routes described below, which include options for rapid egress from areas within the City if threatened by a wildfire.

- Main Gate at Rolling Hills Road and Palos Verdes Drive North
- Crest Gate at Crest Road near Crenshaw Boulevard
- Eastfield Gate at Eastfield Drive and Palos Verdes Drive East
- Crest Road East (emergency access only)

The City recently adopted their Safety Element Update which addresses the protection of the existing and future population and development from both natural and man-made hazards through a number of goals, policies, implementation programs, principles, and standards. Among these are measures to mitigate the risk from the hazards of fire. The HEU is a policy level document that does not grant entitlements for development that would have the potential to directly cause wildfire. However, future development in the City, including development of the 20 vacant parcels would be required to adhere to the policies in the Safety Element Update and the CWPP. Implementation of these policies would minimize potential project impacts. Therefore, the Project would result in less than significant impacts associated with impairing an adopted emergency response plan or emergency evacuation plan.

- b) *Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

Less than Significant. As mentioned above, the entire City is designated a VHFHSZ by CAL FIRE, and a substantial amount of land in the City is steep hillsides and canyons (CAL FIRE 2011). The City recently adopted their Safety Element Update which includes measures to mitigate the risk of fire hazards. Although the HEU itself does not entitle development, future development in the City, including development of the 20 vacant parcels would be required to adhere to the policies in the Safety Element Update and the CWPP. Implementation of these policies would minimize potential project impacts. Therefore, the Project would result in less than significant impacts associated with exacerbating wildfire risks.

- c) *Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

Less than Significant. Principal site improvements required upon development of a vacant property in the City are the undergrounding of electrical lines to the structure, installation of a septic system, and conformance to the City's outdoor lighting standards. The entire City is designated a VHFHSZ by CAL FIRE; however, the City recently adopted their Safety Element Update which includes measures to mitigate the risk of fire hazards. Although the HEU itself does not entitle development, future development in the City, including development of the 20 vacant parcels would be required to adhere to the policies in the Safety Element Update and the CWPP. Implementation of these policies would minimize potential project impacts. Therefore, the Project would result in less than significant impacts associated with installation of associated infrastructure.

- d) *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability or drainage changes?*

Less than Significant. As mentioned above, the entire City is designated a VHFHSZ by CAL FIRE, and a substantial amount of land in the City is steep hillsides and canyons highly susceptible to landslide risks (CAL FIRE 2011). The City recently adopted their Safety Element Update which includes measures to mitigate the risk of fire hazards. Although the HEU itself does not entitle development, future development in the City, including development of the 20 vacant parcels would be required to adhere to the policies in the Safety Element Update and the CWPP. Implementation of these policies would minimize potential project impacts. Therefore, the Project would result in less than significant impacts associated with exposure of people or structures to the risk of downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability or drainage changes.

5.21 MANDATORY FINDINGS OF SIGNIFICANCE

21.	MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

5.21.1 Impact Analysis

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?*

Less than Significant with Mitigation Incorporated. The intent of the 2021-2029 HEU is to update the Housing Element to meet the 6th Cycle RHNA, and ensure that a safe, decent supply of housing is provided for current and future Rolling Hills residents. The 2021-2029 HEU would not facilitate development that would eliminate or threaten wildlife habitats or eliminate important examples of the major periods of California history or prehistory. Furthermore, this IS MND proposes mitigation that will address nesting birds, jurisdictional features, and pre-construction surveys, cultural resources, and tribal cultural resources. Therefore, as discussed in more detail in Sections 5.4, *Biological Resources*, 5.5, *Cultural Resources*, and 5.18, *Tribal Cultural Resources*, the 2021-2029 HEU would result in a less-than-significant impact related to biological and cultural resources.

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?)*

Less than Significant with Mitigation Incorporated. Implementation of the 2021-2029 HEU would result in beneficial housing cumulative impacts across the City. Mitigation included in this IS MND

would ensure that impacts to Biological Resources, Cultural Resources, Geology and Soils, and Tribal Cultural Resources would be reduced to less than significant. Furthermore, implementation of the 2021-2029 HEU would be consistent with General Plan policies aimed at improving housing in the City for current and future residents. Therefore, the 2021-2029 HEU would result in an overall less than significant cumulative impact related to all CEQA topics addressed within this document.

- c) *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

Less than Significant with Mitigation Incorporated. As demonstrated throughout this document, the Project would have less than significant impacts to Aesthetics, Agricultural Resources, Air Quality, Energy, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Utilities and Service Systems, and Wildfires. Furthermore, mitigation measures included in this IS MND would ensure impacts to Biological Resources, Cultural Resources, Geology and Soils, and Tribal Cultural Resources would remain less than significant. The 2021-2029 HEU would not result in adverse effects on human beings. Rather, as discussed throughout this document, the 2021-2029 HEU would serve as a pathway to improve housing and ensure that a safe, decent supply of housing is provided for current and future Rolling Hills residents. Therefore, the Project would have no impacts or cumulatively considerable impacts on the environment or human beings.

SECTION 6.0 – REFERENCES

Airport Land Use Commission (ALUC)

- 2003 Torrance Airport, Airport Influence Area adopted May 13, 2003. Available online at: https://planning.lacounty.gov/assets/upl/project/aluc_airport-torrance.pdf.

California Air Resources Board (CARB)

- 2017 California’s 2017 Climate Change Scoping Plan. Available online at: https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf

California Department of Conservation (DOC)

- 2017 State of California Williamson Act Contract Land. Available online at: [https://planning.lacity.org/eir/HollywoodCenter/Deir/ELDP/\(E\)%20Initial%20Study/Initial%20Study/Attachment%20B%20References/California%20Department%20of%20Conservation%20Williamson%20Map%202016.pdf](https://planning.lacity.org/eir/HollywoodCenter/Deir/ELDP/(E)%20Initial%20Study/Initial%20Study/Attachment%20B%20References/California%20Department%20of%20Conservation%20Williamson%20Map%202016.pdf).

- 2021a California Important Farmland Finder. Accessed December 2021. Available online at: <https://maps.conservation.ca.gov/dlrp/ciff/>.

- 2021b Tsunami Hazard Area Map. Accessed December 2021. Available online at: https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/?extent=-13249590.3641%2C3986280.7635%2C-13132183.0887%2C4038410.8168%2C102100&utm_source=cgs+active&utm_content=osangeles.

- 2022 Regulatory Maps Geo Application. Available online at: <https://maps.conservation.ca.gov/cgs/EQZApp/app/>

California Department of Finance (DOF)

- 2022a E-1 Population Estimates for Cities, Counties, and the State with Annual Percent Change - January 1, 2021 to 2022. Accessed online at: <https://dof.ca.gov/forecasting/demographics/estimates-e1/>

- 2022b E-5 Population and Housing Estimates for Cities, Counties, and the State, 2020-2022. Accessed online at: <https://dof.ca.gov/forecasting/demographics/estimates/e-5-population-and-housing-estimates-for-cities-counties-and-the-state-2020-2022/>

California Department of Forestry and Fire Protection (CAL FIRE)

- 2011 Very High Fire Hazard Severity Zones in LRA: Rolling Hills. Available online at: https://osfm.fire.ca.gov/media/5840/rolling_hills.pdf.

California Department of Resources Recycling and Recovery (CalRecycle)

- 2022a Estimated Solid Waste Generation Rates. Accessed July 2022. Available online at: <https://www2.calrecycle.ca.gov/wastecharacterization/general/rates>.

- 2022b SWIS Facility/Site Activity Details: Savage Canyon Landfill (19-AH-0001). Accessed July 2022. Available online at: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3494?siteID=1399>.
- California Department of Toxic Substances Control (DTSC)
2021 EnviroStor. Accessed December 2021. Available online at: <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=rolling+hills%2C+CA>.
- California Department of Transportation (Caltrans)
2021 California State Scenic Highway System Map. Accessed December 2021. Available online at: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>.
- California Department of Water Resources (DWR)
2021 California Dam Breach Inundation Map Web Publisher. Accessed December 2021. Available online at: https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2.
- California Water Service (CalWater)
2021 2020 Urban Water Management Plan: Palos Verdes District. Available online at: https://www.calwater.com/docs/uwmp2020/PV_2020_UWMP_FINAL.pdf. June.
- City of Rolling Hills (City)
1990 City of Rolling Hills General Plan. Available online at: https://www.rolling-hills.org/government/planning_and_community_services/index.php.
2014 2014-2021 Update of the Housing Element of the General Plan. Available online at: <https://cms5.revize.com/revize/rollinghillsca/Government/Planning%20And%20Community%20Services/Housing%20Element%202014%20201402111636398968.pdf>.
- Data USA
2022 Rolling Hills, CA Data. Available online at: <https://datausa.io/profile/geo/rolling-hills-ca>.
- Federal Emergency Management Agency (FEMA)
2021 National Flood Hazard Layer Viewer. Accessed December 2021. Available online at: <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd>.
- Intergovernmental Panel on Climate Change (IPCC)
2014 The Synthesis Report of the IPCC Fifth Assessment Report. Available online at: <https://www.ipcc.ch/report/ar5/syr/>
- Los Angeles County Airport Land Use Commission (ALUC)
2003 Torrance Airport. Available online at: https://planning.lacounty.gov/assets/upl/project/aluc_airport-torrance.pdf.

Los Angeles County Sanitation District (LACSD)

- 2021 Wastewater Treatment Process at JWPCP. Accessed on December 23, 2021, at: <https://www.lacsd.org/services/wastewater-sewage/facilities/joint-water-pollution-control-plant/wastewater-treatment-process-at-jwpcp>.

South Coast Air Quality Management District (SCAQMD)

- 1999 Map of Jurisdiction. Available online at: <http://www.aqmd.gov/docs/default-source/default-document-library/map-of-jurisdiction.pdf>.
- 2016 National and California Ambient Air Quality Standards Attainment Status for South Coast Air Basin. Available online at: <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-qualitymanagement-plans/naaqs-caaqs-feb2016.pdf?sfvrsn=14>.
- 2021 2022 AQMP. Accessed December 2021. Available online at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan#>.

Southern California Association of Governments (SCAG)

- 2020 The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association Of Governments: Connect SoCal. Available online at: https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176.

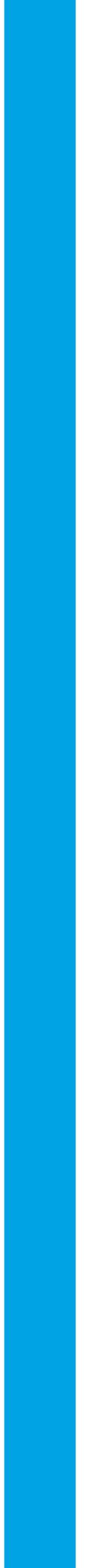
State Water Resources Control Board (SWRCB)

- 2021 GeoTracker. Accessed December 2021. Available online at: <https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=rolling+hills%2C+CA>.

United States Fish and Wildlife Service (USFWS)

- 2021 National Wetlands Inventory. Accessed December 2021. Available online at: <https://www.fws.gov/wetlands/data/Mapper.html>.

APPENDIX A – BIOLOGICAL RESOURCES RECONNAISSANCE ASSESSMENT



July 19, 2022
5 Hutton Centre Drive, Suite 750
Santa Ana, CA 92707

City of Rolling Hills
No. 2 Portuguese Bend Road
Rolling Hills, CA 90274

Subject: Biological Resources Reconnaissance Assessment for the City of Rolling Hills 2021-2029 Housing Element Update and Safety Element Update Project

Chambers Group, Inc. (Chambers Group) was retained by the City of Rolling Hills to conduct a literature review and biological reconnaissance-level survey for the City of Rolling Hills 2021-2029 Housing Element Update and Safety Element Update (HEU) Project (Project). The City's HEU includes a total of 34 vacant sites within the City, but focuses on only 20 vacant residentially zoned lots that have the ability to be developed. The purpose of this survey was to document existing vegetation communities, identify special status species with a potential for occurrence, and map habitats that could support special status plant and wildlife species as well as evaluate potential impacts to these resources, for the 20 vacant sites, as part of the Project.

Project Site Location and Description

The Project sites evaluated as part of the Project consist of 20 vacant undeveloped sites of one acre or more, totaling approximately 113.4 acres (Survey Area) and is located in the City of Rolling Hills, within the U.S. Geological Survey (USGS) *San Pedro* and *Torrance*, California 7.5-minute topographic quadrangles. The 20 vacant sites are numbered and are located within an equestrian residential community on the Palos Verdes Peninsula in Los Angeles County (Attachment 1: Figure 2 Survey Area). Palos Verde Drive North borders the northern portion of the site, Crenshaw Boulevard borders the western portion, Palos Verde Drive East borders the eastern boundary, and Palos Verde Drive South borders the southern portion of the site. The vacant lots within the Project site are surrounded by open space vegetated hillsides, residential roads, and residential homes. A map of the Project Location and Project Vicinity is provided in Attachment 1: Figure 1.

Methods

The Survey Area encompasses the 113.4-acre Project site which includes the entirety of 20 vacant lots, variously numbered as shown in Attachment 1: Figure 2 – Survey Area.

Literature Review

Prior to performing the biological reconnaissance survey, Chambers Group staff conducted a literature review for soils, jurisdictional water features that contribute to hydrology, and special status species known to occur within the vicinity (approximately 5 miles) of the Survey Area.

Soils

Prior to performing the biological reconnaissance survey, soil maps for the Survey Area were referenced in accordance with categories set forth by the U.S. Department of Agriculture (USDA) Soil Conservation Service and the USDA Natural Resources Conservation Service (NRCS) Web Soil Survey (USDA 2022).



Hydrology

A general assessment of waters potentially regulated by the U.S. Army Corps of Engineers (USACE), California Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW) was conducted for the Survey Area. Pursuant to Section 404 of the Clean Water Act, USACE regulates the discharge of dredged and/or fill material into waters of the United States. The State of California (State) regulates discharge of material into waters of the State pursuant to Section 401 of the Clean Water Act and the California Porter-Cologne Water Quality Control Act (California Water Code, Division 7, §13000 et seq.). Pursuant to Division 2, Chapter 6, Sections 1600-1602 of the California Fish and Wildlife (CDFW) Code, CDFW regulates all diversions, obstructions, or changes to the natural flow or bed, channel, or bank of any river, stream, or lake, which supports fish or wildlife. A desktop assessment was conducted of available data prior to the biological reconnaissance survey in the field.

Special Status Habitats and Species

The most recent records of the California Natural Diversity Database (CNDDDB) managed by CDFW (2022) and the California Native Plant Society's Electronic Inventory (CNPSEI) of Rare and Endangered Vascular Plants of California (CNPS 2022) were reviewed for the following quadrangles containing and surrounding the Project: *San Pedro, Torrance, Redondo Beach, Venice, Inglewood, South Gate, and Long Beach*, California U.S. Geological Survey (USGS) 7.5-minute quadrangles. These databases contain records of reported occurrences of federally or State-listed endangered or threatened species, California Species of Concern (SSC), or otherwise special status species or habitats that may occur within or in the immediate vicinity of the Survey Area (Attachment 1: Figure 3 – CNDDDB Occurrences Map).

Biological Reconnaissance Survey

The biological reconnaissance survey was conducted on foot within the Survey Area. During the survey, the biologists identified and mapped all vegetation communities found within the Survey Area onto aerial photographs (Attachment 2: Vegetation Communities Map). Plant communities were determined in accordance with the *Manual of California Vegetation, Second Edition* (Sawyer et al. 2009). Plant nomenclature follows that of *The Jepson Manual, Vascular Plants of California, Second Edition* (Baldwin et al. 2012). Plant and wildlife species observed or detected within the Survey Area were recorded (Attachments 3: Plants Species Observed and 4: Wildlife Species Observed/Detected, respectively). In addition, site photographs were taken depicting current site conditions (Attachment 5: Site Photographs).

Results

Chambers Group biologists Mauricio Gomez and Jessica Calvillo conducted the biological reconnaissance survey within the Survey Area to identify vegetation communities, the potential for occurrence of special status species, and/or habitats that could support special status wildlife species. The survey was conducted on foot between 0630 and 1730 hours on June 9 and 10, 2022. Weather conditions included temperatures from 61 to 80 degrees Fahrenheit (°F), wind speeds from 0 to 4 miles per hour, cloud cover of 0 to 100 percent throughout the day, and no precipitation throughout the survey.

Biological Site Conditions

Soils

According to the results from the USDA NRCS Web Soil Survey (USDA 2022), the Project site is located in the Los Angeles County (CA696) southeastern part of the soil map. Three soil types are known to occur within and/or adjacent to the Project site (Attachment 1: Figure 5 – USDA Soils Map). These soil types are described below.

Dapplegray-Urban Land-Lunada complex, 20 to 55 percent slopes. This soil type occurs on hillslopes and canyons at elevations of 290 to 1,370 feet. This soil exhibits very high runoff and has a low to high water supply availability. Parent



material is human-transported material consisting of mostly colluvium from calcareous shale (USDA 2022). This soil type occurs at all 20 Survey Areas.

Lunada-Zaca complex, 30 to 75 percent slopes. This soil type occurs on hillslopes and canyons at elevations of 80 to 1,400 feet. These soils exhibit very high runoff and have a low to moderate water supply availability. Parent material is colluvium derived from calcareous shale (USDA 2022). This soil type occurs at the following Survey Areas within the Project area: 1, 18, 19, 25, 31, 32, and 33.

Haploxerepts, 10 to 35 percent slopes. This soil type occurs on hillslopes and landslides at elevations of 0 to 1,210 feet. These soils exhibit high runoff and have a moderate water supply availability. Parent material is composed of mixed slide deposits derived mostly from calcareous shale (USDA 2022). This soil type occurs at Survey Area 21.

Hydrology

The Project site is located within the Alamos Bay-San Pedro Bay and Frontal Santa Monica Bay-San Pedro Bay watersheds within the Federal Emergency Management Agency (FEMA) 100-year flood zone (Hydrologic Unit Codes [HUC10] 1807010607 and 1807010405, respectively) (Attachment 1: Figure 6 – Watersheds). The Alamos Bay-San Pedro Bay watershed is bordered by the San Gabriel River in Seal Beach to the east, and it encompasses a large portion of southern and southeastern cities in Los Angeles County. The Frontal Santa Monica Bay-San Pedro Bay watershed is bordered by the Ballona Creek in Santa Monica to the northwest and the Los Angeles Harbor in San Pedro to the east. Both watersheds primarily facilitate urbanized run-off and nuisance water and ultimately terminate in the Pacific Ocean. Several NWI mapped bluelines occur within the Survey Area.

The Survey Area is not within Federal Emergency Management Agency (FEMA) Flood Hazard zones. Site 21 is immediately west of an Area of Undetermined Flood Hazard (Attachment 1: Figure 7 – FEMA Flood Hazard Zones). No other sites are within or adjacent to Flood Hazard Zones.

Site 28 had an erosional feature (non-jurisdictional), originating from the residential home just south of site 28, that was dry during the field survey. The erosional feature (non-jurisdictional) appears to flow northwest along the western boundary end of site 28 and ultimately terminating outside the property boundary. All sites except for 21, 25, 28, and 34 contain ephemeral drainages within the property boundaries. The features within sites 3, 4, and 20 flow southwest through the property; and ultimately terminating in the Pacific Ocean. The features within sites 1, 18, 19, 22, 23, 24, 26, 27, 29, 30, 31, 32, and 33 flow northeast through the property; however, they do not appear to connect to any tributaries and appear to terminate right outside the property boundary (Attachment 1: Figure 8 – Jurisdictional Waters NWI and NHD).

Water features were observed at all the sites except for 21, 25, 28, and 34 (Attachment 1: Figure 8 – Jurisdictional Waters NWI and NHD). However, all the features occur in the lower portion of each site, outside of the proposed impact areas. Work activities are not anticipated to occur within or directly adjacent to any of the features and no impacts to any features are anticipated to occur as a result of Project activities.

Vegetation Communities and Other Areas

Seven native vegetation communities and six non-native or other land types were mapped within the Survey Area during the biological reconnaissance survey. The communities are described in the following subsections.

Native Vegetation Communities

Arroyo Willow Thickets

Arroyo Willow Thickets are found along stream banks, slope seeps, and drainages (Sawyer et al. 2009). Arroyo willow (*Salix lasiolepis*) is dominant or co-dominant in the tall shrub or low tree canopy with big leaf maple (*Acer*



macrophyllum), coyote brush (*Baccharis pilularis*), mule fat (*Baccharis salicifolia*), western sycamore (*Platanus racemosa*), Fremont cottonwood (*Populus fremontii*), willows (*Salix* spp.) and blue elderberry (*Sambucus mexicana*). As a shrubland, emergent trees may be present at low cover.

Areas with Arroyo Willow Thickets vegetation are present within approximately 0.50 acre of the Project site within Survey Area 18. Native plant species found on the Project site typical of this vegetation community include California blackberry (*Rubus ursinus*), arroyo willow, and black willow (*Salix gooddingii*).

Ashy Buckwheat – California Sagebrush – Purple Sage Scrub

Ashy Buckwheat – California Sagebrush – Purple Sage Scrub is found on steep slopes of variable aspects with alluvial or colluvial derived soils (Sawyer et al. 2009). California sagebrush (*Artemisia californica*), Ashy Buckwheat (*Eriogonum cinereum*) and/or purple sage (*Salvia leucophylla*), are dominant or co-dominant in the shrub canopy with chamise (*Adenostoma fasciculatum*), coyote brush, orange bush monkeyflower (*Diplacus aurantiacus*), California bush sunflower (*Encelia californica*), buckwheat (*Eriogonum* spp.), interior golden bush (*Ericameria linearifolia*), golden yarrow (*Eriophyllum confertiflorum*), coast golden bush (*Isocoma menziesii*), southern honeysuckle (*Lonicera subspicata*), laurel sumac (*Malosma laurina*), coast prickly pear (*Opuntia littoralis*), lemonade berry (*Rhus integrifolia*), sage (*Salvia* spp.), and poison oak (*Toxicodendron diversilobum*). Emergent trees or tall shrubs may be present at low cover, including southern California black walnut (*Juglans californica*), coast live oak (*Quercus agrifolia*), and blue elderberry.

Areas with Ashy Buckwheat – California Sagebrush – Purple Sage Scrub vegetation are present within approximately 1.02 acres of the Project site within Survey Areas 18, 27, 28, 29, 30, and 32. Native plant species found on the Project site typical of this vegetation community include California sagebrush, orange bush monkeyflower, California bush sunflower, ashy buckwheat (*Eriogonum cinereum*), California buckwheat (*Eriogonum fasciculatum*), purple sage (*Salvia leucophylla*), and black sage (*Salvia mellifera*).

Black Sage Scrub

Black Sage Scrub is found along dry slopes and alluvial fans with shallow soils (Sawyer et al. 2009). Black sage is dominant or co-dominant in the shrub canopy with chamise, California sagebrush, coyote brush, orange bush monkeyflower, California bush sunflower, buckwheat (*Eriogonum* spp.) deerweed (*Lotus scoparius*), Chaparral bush mallow (*Malacothamnus fasciculatus*), laurel sumac, prickly pear (*Opuntia* spp.), and lemonade berry. Emergent trees may be present at low cover.

Areas with Black Sage Scrub vegetation are present within approximately 0.82 acre of the Project site within Survey Area 20. Native plant species found on the Project site typical of this vegetation community include California sagebrush, California bush sunflower, California buckwheat, and black sage.

Giant Wild Rye Grassland

Giant Wild Rye Grassland is found on moderately steep slopes at low elevations with loam soils (Sawyer et al. 2009). Giant wild rye (*Elymus condensatus*) is dominant or co-dominant in the herbaceous layer with non-native wild oat (*Avena fatua*), black mustard (*Brassica nigra*), ripgut grass (*Bromus diandrus*), tocalote (*Centaurea melitensis*), field mustard (*Hirschfeldia incana*) and cliff aster (*Malacothrix saxatilis*). Native shrubs include California sagebrush, coyote brush, and purple sage. Emergent trees may be present at low cover, including trees southern California black walnut and coast live oak.

Areas with Giant Wild Rye Grassland vegetation are present within approximately 0.39 acre of the Project site within Survey Area 20. Native plant species found on the Project site typical of this vegetation community include giant wild



rye and coyote brush. Non-native species include black mustard, foxtail chess (*Bromus madritensis* subsp. *madritensis*), and tocalote (*Centaurea melitensis*).

Holly Leaf Cherry – Toyon Chaparral

Holly Leaf Cherry – Toyon Chaparral is found along steep north facing slopes with soils derived from bedrock or colluvium (Sawyer et al. 2009). Holly leaf cherry (*Prunus ilicifolia*) is dominant or co-dominant in the shrub canopy with California sagebrush, Chaparral clematis (*Clematis lasiantha*), orange bush monkeyflower, California buckwheat, California ash (*Fraxinus dipetala*), chaparral beard tongue (*Keckiella* spp.), oak (*Quercus* spp.) and black sage. Emergent trees may be present at low cover, including southern California black walnut and coast live oak.

Areas with Holly Leaf Cherry – Toyon Chaparral vegetation are present within approximately 0.22 acre of the Project site within Survey Areas 23 and 27. Native plant species found on the Project site typical of this vegetation community include toyon (*Heteromeles arbutifolia*), laurel sumac, California man-root (*Marah fabacea*), and holly leaf cherry.

Laurel Sumac Scrub

Laurel Sumac Scrub is found along often steep slopes with soils that are shallow and fine textured (Sawyer et al. 2009). Laurel sumac dominant or co-dominant in the shrub canopy with California sagebrush, orange bush monkey flower, California bush sunflower, buckwheat, toyon, lemonade berry, and poison oak. Emergent trees or tall shrubs may be present at low cover, including southern California black walnut, western sycamore (*Platanus racemosa*), coast live oak, and blue elderberry.

Areas with Laurel Sumac Scrub vegetation are present within approximately 0.05 acre of the Project site within Survey Area 18. Native plant species found on the Project site typical of this vegetation community included laurel sumac and coyote brush.

Lemonade Berry Scrub

Lemonade Berry Scrub is found along gentle to abrupt slopes and coastal bluffs of variable aspects with loam and clay soils (Sawyer et al. 2009). Lemonade berry is dominant or co-dominant in the shrub canopy with chamise, California sagebrush, orange bush monkeyflower, California bush sunflower, ashy buckwheat, California buckwheat, chaparral Yucca (*Hesperoyucca whipplei*), toyon, chaparral bush mallow, laurel sumac, sage (*Salvia* spp.), and blue elderberry. Shrubs are typically less than 16 feet in height. Emergent trees may be present at low cover, including southern California black walnut and coast live oak. Canopy is open to continuous, two tiered with an open herbaceous layer.

Areas with Lemonade Berry Scrub vegetation are present within approximately 59.84 acres of the Project site within Survey Areas 1, 3, 4, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, and 33. Native plant species found on the Project site typical of this vegetation community included California sagebrush, orange bush monkeyflower, toyon, purple sage, and blue elderberry.

Non-Native Vegetation Communities and Other Areas

Himalayan Blackberry Brambles

Himalayan Blackberry Brambles are found in a variety of habitat types including pastures, roadsides, streams, fence lines, and mesic disturbed areas (Sawyer et al. 2009). Himalayan blackberry (*Rubus armeniacus*) is dominant or co-dominant in the shrub canopy. Emergent trees may be present at low cover, including white alder (*Alnus rhombifolia*), Fremont cottonwood, coast live oak and red willow (*Salix laevigata*).

Areas with Himalayan Blackberry Brambles vegetation are present within approximately 0.08 acre of the Project site within Survey Areas 18 and 19. No other plants were observed within this vegetation community.



Ornamental Landscaping

Ornamental Landscaping includes areas where the vegetation is dominated by non-native horticultural plants (Gray and Bramlet 1992). Typically, the species composition consists of introduced trees, shrubs, flowers and turf grass.

Areas with Ornamental Landscaping are present within approximately 12.38 acres of the Project site within Survey Areas 1, 3, 4, 18, 19, 20, 21, 22, 24, 25, 26, 27, 30, 31, and 34. Plant species found on the project site typical of this community include: Aleppo pine (*Pinus halepensis*), Peruvian pepper tree (*Schinus molle*), Brazilian pepper tree (*Schinus terebinthifolius*), oleander (*Nerium oleander*), English ivy (*Hedera helix*), jacaranda (*Jacaranda mimosifolia*), cyclops acacia (*Acacia cyclops*), sweet gum (*Liquidambar styraciflua*), bougainvillea (*Bougainvillea* sp.), Shamel ash (*Fraxinus uhdei*), pomegranate (*Punica granatum*), Chinese elm (*Ulmus parvifolia*), and Mexican fan palm (*Washingtonia robusta*). Native species including lemonade berry, laurel sumac, or toyon were also observed.

Ruderal

Areas classified as Ruderal tend to be dominated by pioneering herbaceous species that readily colonize disturbed ground and that are typically found in temporary, often frequently disturbed habitats (Barbour et al. 1999). The soils in ruderal areas are typically characterized as heavily compacted or frequently disturbed. The vegetation in these areas is adapted to living in compact soils where water does not readily penetrate the soil. Often, Ruderal areas are dominated by species of the *Centaurea*, *Brassica*, *Malva*, *Salsola*, *Eremocarpus*, *Amaranthus*, and *Atriplex* genera.

There were approximately 34.24 acres of Ruderal vegetation present within Survey Areas 1, 3, 4, 18, 19, 20, 21, 23, 24, 25, 27, 28, 29, 30, 31, 32, and 33. Plant species found on the project site include: Italian thistle (*Carduus pycnocephalus* subsp. *pycnocephalus*), tocalote, prickly sow thistle (*Sonchus asper* subsp. *asper*), black mustard, shortpod mustard (*Hirschfeldia incana*), horehound (*Marrubium vulgare*), giant reed (*Arundo donax*), riggut grass, and foxtail chess.

Shamel Ash Grove

Shamel Ash Groves are found within disturbed riparian corridors with alluvial soils. Shamel Ash is the dominant species in the tree canopy. Shamel Ash is native to Mexico and currently listed on the California Invasive Plant Councils Assessment list (Cal-IPC 2022).

Shamel Ash Groves are present within approximately 0.91 acre of the Project site within Survey Areas 26, 32, and 33. No native plant species were observed within this plant community on site.

Barren

Barren areas, as described by (Gray and Bramlet 1992), are devoid or mostly devoid of vegetation due to disking, grading, or other human activities.

Barren areas are present within approximately 1.24 acres of the Project site within Survey Areas 18, 19, 26, 28, and 31.

Developed

Developed areas are areas that have been altered by humans and now display man-made structures such as houses, paved roads, buildings, parks, and other maintained areas.

Developed areas are present within approximately 1.65 acres of the Project site within Survey Areas 3, 4, 18, 23, 25, 26, 27, 28, 29, and 30.

General Plants

A total of 85 plant species were observed within the Survey Area during the biological reconnaissance survey (Attachment 3: Plant Species Observed). Plant species observed during the survey were representative of the existing Survey Area conditions. No special status plant species were observed during the survey.

General Wildlife

A total of 15 wildlife species were observed within the Survey Area during the biological reconnaissance survey. Wildlife species observed or detected during the survey were characteristic of the existing Survey Area conditions. No sensitive wildlife was observed during the survey effort. A complete list of wildlife species observed or detected is provided in Attachment 4: Wildlife Species Observed/Detected List.

Sensitive Species

Special Status Species

The following information is a list of abbreviations used to help determine special status biological resources potentially occurring in the Survey Area.

CNPS California Rare Plant Rank (CRPR)

- 1A = Plants presumed extinct in California.
- 1B = Plants rare and endangered in California and throughout their range.
- 2 = Plants rare, threatened or endangered in California but more common elsewhere in their range.
- 3 = Plants about which we need more information, a review list.
- 4 = Plants of limited distribution; a watch list.

CRPR Extensions

- 0.1 = Seriously endangered in California (greater than 80 percent of occurrences threatened/high degree and immediacy of threat).
- 0.2 = Fairly endangered in California (20 to 80 percent occurrences threatened).
- 0.3 = Not very endangered in California (less than 20 percent of occurrences threatened).

Federal

- FE = Federally listed; Endangered
- FT = Federally listed; Threatened

State

- ST = State listed; Threatened
- SE = State listed; Endangered
- RARE = State listed; Rare (Listed "Rare" animals have been re-designated as Threatened, but Rare plants have retained the Rare designation.)
- SSC = State Species of Special Concern
- WL = CDFW Watch List
- FP = CDFW Fully Protected

The following information was used to determine biological resources potentially occurring within the Survey Area. The location of prior CNDDDB and USFWS records of occurrence were used as additional data, but since the CNDDDB is a positive-sighting database; this data was used only in support of the analysis from the previously identified factors. The PFO was determined through a combination of these databases and habitat quality identified during field survey efforts. The criteria used to evaluate the potential for special status species to occur within the Survey Area are outlined in Table 1.



Table 1: Criteria for Evaluating Special Status Species Potential for Occurrence (PFO)

PFO*	CRITERIA
Absent:	Species is restricted to habitats or environmental conditions that do not occur within the Project site.
Low:	Historical records for this species do not exist within the vicinity (approximately 5 miles) of the Project site, and/or habitats or environmental conditions needed to support the species are of poor quality.
Moderate:	Either a historical record exists of the species within the vicinity of the Project site (approximately 5 miles) and marginal habitat exists on the Survey Area, or the habitat requirements or environmental conditions associated with the species occur within the Survey Area, but no historical records exist within 5 miles of the Project site.
High:	Both a historical record exists of the species within the Survey Area or its immediate vicinity (approximately 1 mile), and the habitat requirements and environmental conditions associated with the species occur within the Survey Area.
Present:	Species was detected within the Survey Area at the time of the survey.

*PFO: Potential for Occurrence

Special Status Plant Species

Database searches (CDFW 2022; CNPS 2022) resulted in a list of 24 federally and/or state-listed threatened, endangered, CRPR 1 through 3, or otherwise special status plant species documented to historically occur within the vicinity of the Survey Area. Of the 24 plant species that resulted from the database search, it was determined that 20 species are considered absent from the Survey Area due to lack of suitable habitat. Four special status plant species have a moderate to high potential to occur on site. No special status plant species were found during the biological reconnaissance survey.

The following 18 plant species are considered **Absent** from the Survey Area due to lack of sandy soils and suitable marsh, alkali scrub, vernal pool, coastal dune, coast bluff scrub habitat:

- aphanisma (*Aphanisma blitoides*) – CRPR 1B.2
- Coulter’s saltbush (*Atriplex coulteri*) – CRPR 1B.2
- south coast saltscale (*Atriplex pacifica*) – CRPR 1B.2
- Parish's brittle scale (*Atriplex parishii*) – CRPR 1B.1
- Davidson’s saltscale (*Atriplex serenana* var. *davidsonii*) – CRPR 1B.2
- smooth tarplant (*Centromadia pungens* subsp. *laevis*) – CRPR 1B.1
- salt marsh bird’s beak (*Chloropyron maritimum* subsp. *maritimum*) – **FE, CE**, CRPR 1B.2
- island green dudleya (*Dudleya virens* subsp. *insularis*) – CRPR 1B.2
- San Diego button-celery (*Eryngium aristulatum* var. *parishii*) – **FE, CE**, CRPR 1B.1



- mesa horkelia (*Horkelia cuneata* var. *puberula*) – CRPR 1B.1
- decumbent goldenbush (*Isocoma menziesii* var. *decumbens*) – CRPR 1B.2
- Coulter’s goldfields (*Lasthenia glabrata* subsp. *coulteri*) – CRPR 1B.1
- Santa Catalina Island desert-thorn (*Lycium brevipes* var. *hassei*) – CRPR 3.1
- mud nama (*Nama stenocarpa*) – CRPR 2B.2
- prostrate vernal pool navarretia (*Navarretia prostrata*) – CRPR 1B.2
- coast woolly-heads (*Nemacaulis denudata* var. *denudata*) – CRPR 1B.2
- Brand’s star phacelia (*Phacelia stellaris*) – CRPR 1B.1
- estuary seablite (*Suaeda esteroa*) – CRPR 1B.2
- salt spring checkerbloom (*Sidalcea neomexicana*) – CRPR 2B.2
- San Bernardino aster (*Symphotrichum defoliatum*) – CRPR 1B.2

The following four special status plant species have a **Moderate to High** potential to occur within one or more of the Survey Areas on site:

- Lewis’ evening-primrose (*Camissoniopsis lewisii*) – CRPR 3
- southern tarplant (*Centromadia parryi* subsp. *australis*) – CRPR 1B.1
- Catalina crossosoma (*Crossosoma californicum*) – CRPR 1B.2
- Lyon’s pentachaeta (*Pentachaeta lyonii*) – **FE, CE**, CRPR 1B.1

Lewis’ evening-primrose (*Camissoniopsis lewisii*) – CRPR 3

Lewis’ evening-primrose is a CRPR 3 species in the Onagraceae family. This annual herb flowers between March and May and has been known to flower as late as June. Habitats include sandy areas or clay soils of coastal bluff scrub, cismontane woodland, coastal dunes, coastal scrub, and valley and foothill grasslands at elevations upwards of 1,000 feet amsl. Known ranges include Los Angeles, Orange, San Diego counties, and Baja California. Although there have not been any historical occurrences of this species found within 5 miles of the Survey Area, there is a moderate potential for this species to be found within one or more of the following habitats onsite: Ashy Buckwheat – California Sagebrush – Purple Sage Scrub, Black Sage Scrub, Lemonade Berry Scrub, and/or Giant Wild Rye Grassland. These habitat types occur within Survey Areas 1, 3, 4, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, and 33.

southern tarplant (*Centromadia parryi* ssp. *australis*) – CRPR 1B.1

Southern tarplant is a CRPR 1B.1 species in the Asteraceae family. This annual herb flowers between May and November in seasonally moist saline soils of marshes and swamps, vernal pools, and valley and foothill grasslands at elevations upwards to 1,575 feet amsl. Known ranges include: Los Angeles, Orange, Santa Barbara, San Diego, Ventura counties, Santa Catalina Island, and Baja California. This species has been known to grow intertwined with slender tarweed (*Deinandra fasciculata*), a common tarweed that can look similar to the untrained eye. Threats to southern tarplant include: urbanization, vehicles, development, and foot traffic. This species has been historically known to occur within 3 miles of the Survey Area and there is a high potential for this species to be found within the understory of the Arroyo Willow Thickets in Survey Area 18 or 19.

Catalina crossosoma (*Crossosoma californicum*) – CRPR 1B.1



Catalina crossosoma is a CRPR 1B.2 species in the Crossosomataceae family. This deciduous shrub flowers between February and May in dry, rocky soils and canyons of chaparral and coastal scrub at elevations upwards to 1,640 feet amsl. Known ranges include: Los Angeles County, San Clemente and Santa Catalina islands, and Isla Guadalupe in Baja California. *Catalina crossosoma* is threatened by development on the mainland, but it is recovering on San Clemente Island. This species has been historically known to occur within 5 miles of the Survey Area and there is a high potential for this species to be found within one or more of the following habitats onsite: Ashy Buckwheat – California Sagebrush – Purple Sage Scrub, Black Sage Scrub, Holly Leaf Cherry – Toyon Chaparral, Laurel Sumac Scrub, and/or Lemonade Berry Scrub. These habitat types occur within Survey Areas 1, 3, 4, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, and 33.

Lyon’s pentachaeta (*Pentachaeta lyonii*) – FE, CE, CRPR 1B.1

Lyon’s pentachaeta is a federal- and state-listed endangered and CRPR 1B.1 species in the Asteraceae family. This annual herb flowers between March and August on dry coastal habitats. Habitat includes chaparral openings, coastal scrub, and valley and foothill grasslands at elevations between 100 to 2,265 feet amsl. The known range of this species exists in Los Angeles and Ventura counties and Santa Catalina Island. This species has been historically known to occur within 5 miles of the Survey Area and there is a high potential for this species to be found within one or more of the following habitats onsite: Ashy Buckwheat – California Sagebrush – Purple Sage Scrub, Black Sage Scrub, Holly Leaf Cherry – Toyon Chaparral, Laurel Sumac Scrub, Lemonade Berry Scrub, and/or Giant Wild Rye Grassland. These habitat types occur within Survey Areas 1, 3, 4, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, and 33.

Special Status Wildlife Species

Database searches (CDFW 2022; USFWS 2022c) resulted in a list of 29 federally and/or state listed endangered or threatened, State Species of Concern, or otherwise special status wildlife species documented to occur within the Survey Area. After a literature review and the assessment of the various habitat types within the Survey Area, it was determined that 19 special status wildlife species are considered absent, seven species are considered to have a low potential to occur, one species is considered to have a moderate potential to occur, and two species are considered to have a high potential to occur.

The following 19 wildlife species are considered **Absent** from the Survey Area due to the absence of suitable habitat present within the site:

- tricolored blackbird (*Agelaius tricolor*) - ST, SSC
- burrowing owl (*Athene cunicularia*) – SSC
- western snowy plover (*Charadrius nivosus nivosus*) - FT, SSC
- yellow rail (*Coturnicops noveboracensis*) - SSC
- southwestern willow flycatcher (*Empidonax traillii extimus*) - FE, SE
- western pond turtle (*Emys marmorata*) - SSC
- American badger (*Taxidea taxus*) - SSC
- California black rail (*Laterallus jamaicensis coturniculus*) - ST, FP
- south coast marsh vole (*Microtus californicus stephensi*) - SSC
- San Diego desert woodrat (*Neotoma lepida intermedia*) - SSC
- pocketed free-tailed bat (*Nyctinomops femorosaccus*) - SSC
- big free-tailed bat (*Nyctinomops macrotis*) - SSC



- Belding's savannah sparrow (*Passerculus sandwichensis beldingi*) - **SE**
- Pacific pocket mouse (*Perognathus longimembris pacificus*) - **FE, SSC**
- bank swallow (*Riparia riparia*) - **ST**
- Mohave tui chub (*Siphateles bicolor mohavensis*) - **FE, SE**
- southern California saltmarsh shrew (*Sorex ornatus salicornicus*) - **SSC**
- western spadefoot (*Spea hammondi*) – **SSC**
- California least tern (*Sternula antillarum browni*) - **FE, SE**

The analysis of the CNDDDB search and field survey resulted in seven species with a **low** potential to occur on the Project site:

- cactus wren (*Campylorhynchus brunneicapillus*)
- western yellow-billed cuckoo (*Coccyzus americanus occidentalis*) - **FT, SE**
- western mastiff batt (*Eumops perotis californicus*) - **SSC**
- El Segundo blue butterfly (*Euphilotes battoides allyni*) – **FE**
- Palos Verdes blue butterfly (*Glaucopsyche lygdamus palosverdesensis*)
- coast horned lizard (*Phrynosoma blainvillii*) - **SSC**
- Riverside fairy shrimp (*Streptocephalus woottoni*) - **FE**

The analysis of the CNDDDB search and field survey resulted in one species with a **moderate** potential to occur on the Project site. The southern California legless lizard (*Anniella stebbinsi*) has a moderate potential to occur and is described below:

The southern California legless lizard is an SSC and can be found in a wide variety of habitats, which include broadleaved upland forest, chaparral, coastal dunes, and coastal scrub. This species can generally be found in moist loose soils, preferring soils with high moisture content (CNDDDB 2022). Moderate suitable habitat is present within the Ashy Buckwheat – California Sagebrush – Purple Sage Scrub, Black Sage Scrub, Holly Leaf Cherry – Toyon Chaparral, Laurel Sumac Scrub, and Lemonade Berry Scrub communities within sites 1, 3, 4, 18, 20, 24, 26, 28, 29, 30, 32 and 33, and historical records show this species within 3 miles of the Project site. Therefore, this species has a moderate potential to occur on the Project site.

The analysis of the CNDDDB search and the field survey resulted in two species with a **high** potential to occur within the Project site. The coastal California gnatcatcher (*Polioptila californica californica*), and least Bell's vireo (*Vireo bellii pusillus*) have a high potential to occur and are described below:

The coastal California gnatcatcher is a FT and SSC species. Its range extends from southern Ventura County, California south to Baja California, Mexico (USFWS 1997). This species is found in scrub dominated plant communities, specially known as a permanent resident in coastal sage scrub communities below 2,500 feet in southern California (CNDDDB 2022). Moderate suitable habitat is present within the coastal sage scrub at sites 4, 18, 19, 20, 21, 25, 31, and 33. In addition, this species has been recorded within one mile of the Project site, with multiple occurrences recorded as close as 0.5 miles of the Project site. Therefore, this species has a high potential to occur on the Project site.

The least Bell's vireo is a FE and SE species. This species winters in southern Mexico and breeds in southern California, beginning to arrive mid-March to early April (USFWS 2001). This species is found in riparian forests, riparian woodlands, and riparian scrub. This species can be found near dry river bottoms and in low riparian areas near water (CNDDDB 2022).



Suitable habitat is present within the riparian habitat occurring at the edges of sites 4, 18, 19, 28, 29, 30, 32, and 33. Although no water was present during the survey, these areas can potentially provide quality habitat during the breeding season. In addition, this species has been recorded within one mile of the Project site. Therefore, this species has a high potential to occur within the Project site.

United States Fish Wildlife Service Critical Habitat

Critical Habitat is defined as areas of land, water, and air space containing the physical and biological features essential for the survival and recovery of endangered and threatened species. Designated Critical Habitat includes sites for breeding and rearing, movement or migration, feeding, roosting, cover, and shelter. Designated Critical Habitats require special management and protection of existing resources, including water quality and quantity, host animals and plants, food availability, pollinators, sunlight, and specific soil types. Designated Critical Habitat delineates all suitable habitat, occupied or not, that is essential to the survival and recovery of the species. According to the USFWS Critical Habitat WebGIS map, the Project site occurs within designated coastal California gnatcatcher Critical Habitat (USFWS 2022b and 2022c). In addition, Critical Habitat for the Palos Verdes blue butterfly is present within 1.4 miles of the Project site to the west and 1.25 miles southeast of the Project site (Attachment 1: Figure 4 – USFWS Critical Habitat Map). Survey Areas 20 and 21 are located along the designated boundaries of the Rancho Palos Verdes Natural Communities Conservation Plan/Habitat Conservation Plan (NCCP/HCP); however, the sites are contained within the City of Rolling Hills and immediately outside of the Rancho Palos Verdes NCCP/HCP boundary.

Conclusions and Recommendations

Hydrology

Several aquatic features were observed within the various sites in the Survey Area. All sites except for 21, 25, 28, and 34 contain ephemeral drainages within the property boundaries. However, these features all occur in lower lying portions of the sites and do not occur in the proposed impact areas. No work is anticipated to occur within or directly adjacent to these features and all the features can be avoided with the use of Best Management Practices including straw wattle and/or silt fencing. If any construction activities associated with the development of this Project could potentially impact any of the features, a Jurisdictional Delineation must be conducted to determine agency jurisdiction, and applications for a USACE 404 permit, State 401 certification, or CDFW State Streambed Alteration Agreement may be required for Project authorization.

Special Status Plant Species

Following the literature review and after the assessment of the various habitat types in the Survey Area, it was determined that 24 special status plant species are known to historically occur within the Survey Area. Due to a lack of suitable soils and habitats, 20 of these species were considered absent within the Survey Area. Four species were found to have a moderate to high potential to occur within one or more of the Survey Areas. Lewis' evening-primrose, Catalina crossosoma, and Lyon's pentachaeta have potential to occur in Survey Areas 1, 3, 4, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, and 33. Southern tarplant has potential to occur in Survey Areas 18 and 19. No special status species were found during the biological reconnaissance survey.

Several of the plant species would have been flowering at the time of the survey; however, only a reconnaissance-level survey was conducted and to confirm presence or absence of these species, protocol-level focused plant surveys may be required. The focused plant surveys within suitable habitats should be conducted during the appropriate blooming period for each of the species with a moderate or high potential to occur. All of these species are protected under the California Environmental Quality Act (CEQA) and one is a federal and state-listed as endangered species. Mitigation is likely required should one or more of these special status plant species be found to occur during focused surveys within



the proposed impact areas: southern tarplant, Catalina crossosoma or Lyon's pentachaeta. Focused plant surveys are also recommended for Lewis' evening-primrose, though not required as the rare plant ranking for this species is a 3, a plant about which more information is needed.

Special Status Wildlife Species

Following the literature review and the assessment of the various habitat types in the Survey Area, it was determined that of the 29 special status wildlife species known to occur within the Project area, 19 species are considered absent from the Survey Area, seven species are considered to have a low potential to occur, one species is considered to have a moderate potential to occur, and two species are considered to have a high potential to occur.

Three of the wildlife species with a moderate or high potential to occur are federally or state listed threatened or endangered species. Although, these species were not detected during the biological reconnaissance survey; presence/absence surveys are recommended for each species.

Although impacts to aquatic features and associated riparian habitat is not anticipated, focused surveys for least Bell's vireo should be completed at the following Survey Areas within the Project site prior to start of construction activities: sites 4, 18, 19, 28, 29, 30, 32, and 33. Focused surveys should be conducted during the breeding season between April 10 to July 31 in accordance with the *Least Bell's Vireo Survey Guidelines* (USFWS 2001).

Although no formal protocol exists for the southern California legless lizard, preconstruction clearance surveys for this species should be conducted at the following Survey Areas prior to the start of construction: sites 1, 3, 4, 18, 20, 24, 26, 28, 29, 30, 32 and 33. This may include full coverage presence/absence surveys within suitable habitat, and raking surveys (i.e., hand raking in areas of sandy, loose and moist soils typically under sparse vegetation) for legless lizards.

Because sites 1, 3, 4, 18-21, 25-28, and 31-34 occur within designated coastal California gnatcatcher Critical Habitat, focused surveys will be required and completed within the Project site prior to the start of construction activities. Focused surveys should be conducted during breeding season (February 15 to August 31) in accordance with the *USFWS Coastal California Gnatcatcher (Poliptila californica californica) Presence/Absence Survey Guidelines* (USFWS 1997).

If California gnatcatcher, least Bell's vireo, and southern California legless lizard are detected during the surveys, coordination with USFWS and/or CDFW will be required prior to the start of construction.

To minimize potential impacts to coastal California gnatcatcher, least Bell's vireo, and nesting birds protected under the Migratory Bird Treaty Act (MBTA), construction activities should take place outside of nesting season (February 15 to September 1), to the greatest extent practicable.

If construction activities occur during nesting season, preconstruction surveys and biological monitoring should be conducted. A qualified biologist should conduct and submit a migratory nesting bird and raptor survey report. The survey should occur no more than seven days prior to initiation of Project activities, and any occupied passerine and/or raptor nests occurring within or adjacent to the impact area should be delineated. Additional follow-up surveys may be required by the resource agencies. To the maximum extent practicable, a minimum buffer zone around occupied nests should be maintained during physical ground-disturbing activities. The buffer zone should be sufficient in size to prevent impacts to the nest. Once nesting has ceased, the buffer may be removed.



Please contact me at (949) 261-5414 ext. 7232 if you have any questions or concerns regarding this memo report.

Sincerely,

CHAMBERS GROUP, INC.



Heather Franklin

Project Biologist

hfranklin@chambersgroupinc.com

(949) 261-5414 ext. 7232

Attachments

Attachment 1: Figure 1 – Project Location and Vicinity Map

Figure 2 – Survey Area Map

Figure 3 – CNDDDB Occurrences Map

Figure 4 – USFWS Critical Habitat Map

Figure 5 – USDA Soils Map

Figure 6 – Watersheds Map

Figure 7 – FEMA Flood Hazard Map

Figure 8 – Jurisdictional Waters Map

Attachment 2: Vegetation Communities

Attachment 3: Plant Species Observed

Attachment 4: Wildlife Species Observed/Detected

Attachment 5: Site Photographs



References

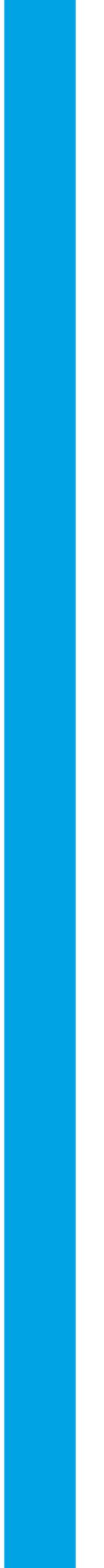
- Baldwin, B.G., D.H. Goldman, D.J. Keil, R. Patterson, and T.J. Rosatti, and D.H. Wilken (editors)
2012 *The Jepson Manual: Vascular Plants of California, Second Edition*. University of California Press, Berkeley, CA.
- Barbour, M.G., J.H. Burk, W.D. Pitts, F.S. Gilliam, and M.W. Schwartz
1999 *Terrestrial Plant Ecology, Third Edition*. Addison Wesley Longman, Inc. Menlo Park, California.
- California Department of Fish and Wildlife (CDFW)
2022 California Natural Diversity Database (CNDDDB). RareFind Version 3.1.0. Database Query for the *San Pedro, Torrance, Redondo Beach, Venice, Inglewood, South Gate, and Long Beach*, California USGS 7.5-minute quadrangles. Wildlife and Habitat Data Analysis Branch.
- California Native Plant Society (CNPS)
2022 Rare Plant Inventory (online edition, v9-01 1.5). Rare Plant Program, California Native Plant Society, Sacramento, California. Accessed July 2021 from <https://www.rareplants.cnps.org> for the *Torrance* and *San Pedro*, California USGS 7.5-minute quadrangles.
- California Invasive Plant Council (Cal-IPC)
2022 *California Invasive Plant Council Inventory*. www.cal-ipc.org. University of California Press. Berkeley, California.
- Gray, J. and D. Bramlet
1992 *Habitat Classification System, Natural Resources, Geographic Information System (GIS) Project*. County of Orange Environmental Management Agency, Santa Ana, CA.
- Sawyer, J.O., T. Keeler-Wolf, and J.M. Evens
2009 *A Manual of California Vegetation Second Edition*. California Native Plant Society, Sacramento, California.
- United States Department of Agriculture (USDA)
2022 Soil Survey Staff, Natural Resources Conservation Service, United States Department of Agriculture. Official Soil Series Descriptions Accessed July 2022 from <https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>.
- United States Fish and Wildlife Service (USFWS)
1997 *Coastal California Gnatcatcher (*Polioptila californica californica*): Presence/Absence Survey Guidelines*. Unpublished Paper. Sacramento, CA.
- 2001 *Least Bell's Vireo Survey Guidelines*. U.S. Fish and Wildlife Service, Carlsbad Fish and Wildlife Office, Carlsbad, CA. 3pp.
- 2022a National Wetland Inventory (NWI). <http://www.fws.gov/wetlands/>. Accessed July 2022.

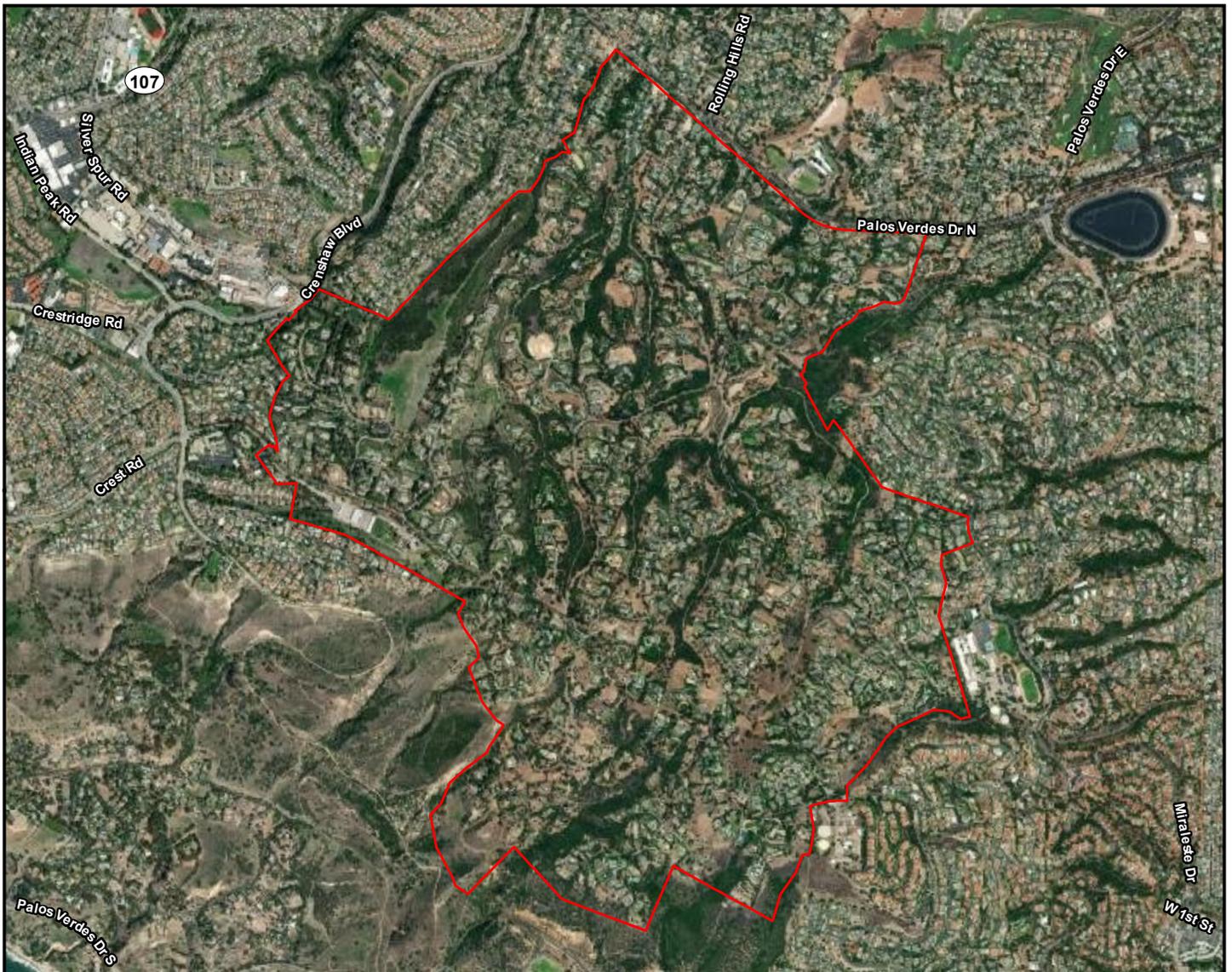
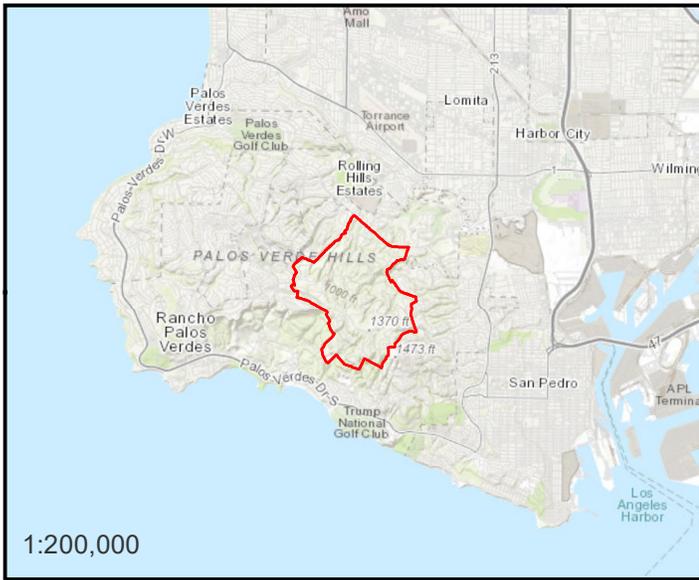


- 2022b Threatened & Endangered Species Active Critical Habitat Report. Accessed online at: https://www.arcgis.com/home/webmap/viewer.html?url=https://services.arcgis.com/QVENGdaPbd4LUkLV/ArcGIS/rest/services/USFWS_Critical_Habitat/FeatureServer&source=sd July 2022.
- 2022c *Information for Planning and Consultation (IPaC) List*. Accessed July 2022 from <https://ecos.fws.gov/ipac/location/ZALE5YY4IFD43LVU6XKDY5CUDI/resources>.



ATTACHMENT 1 – FIGURES





 Project Location

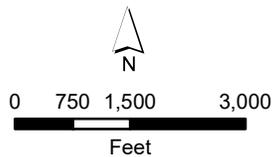
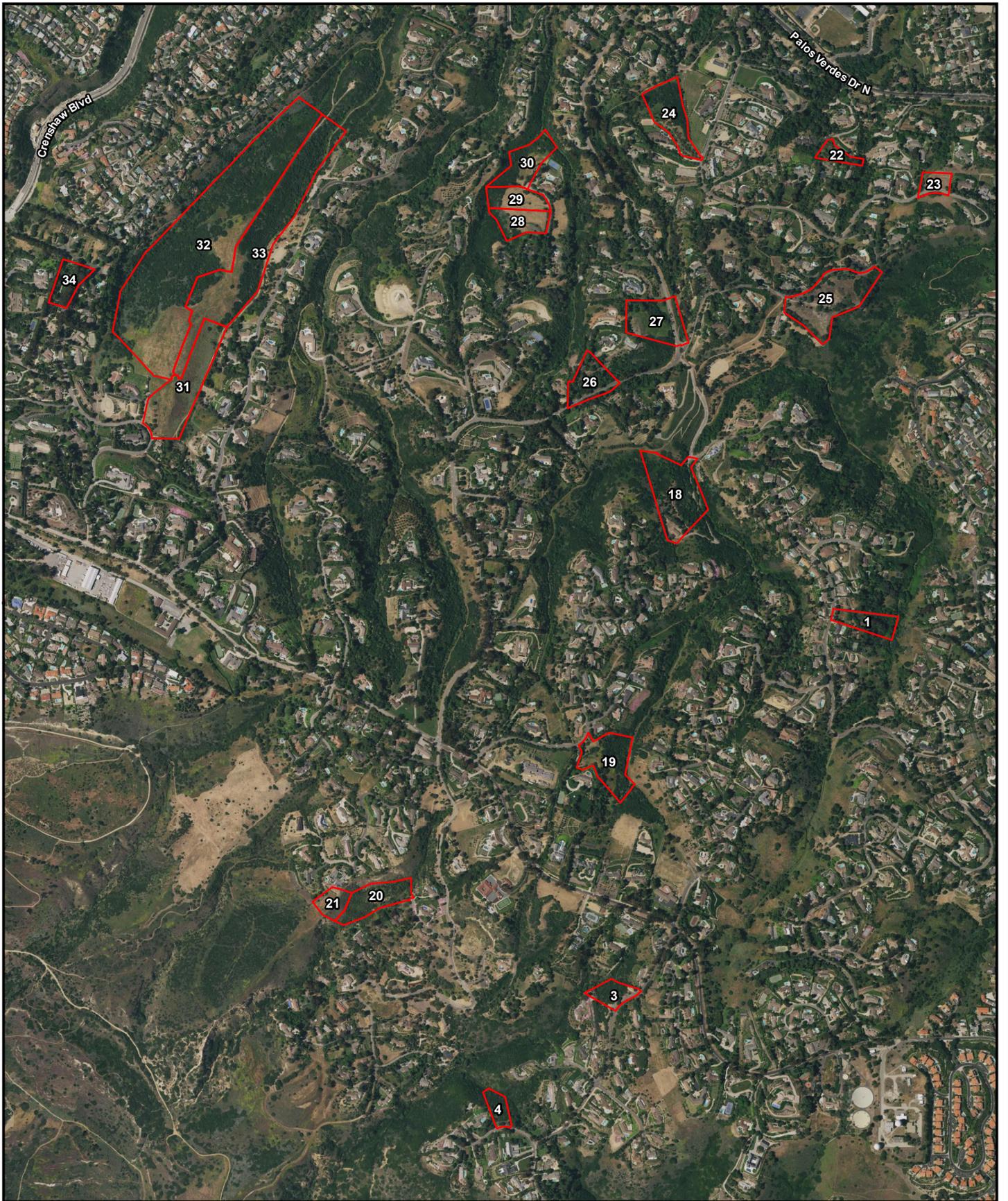


Figure 1
City of Rolling Hills
Housing Element Update
Project Location



 Survey Area

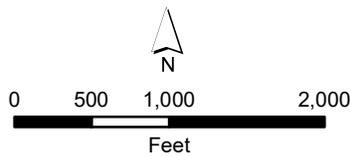
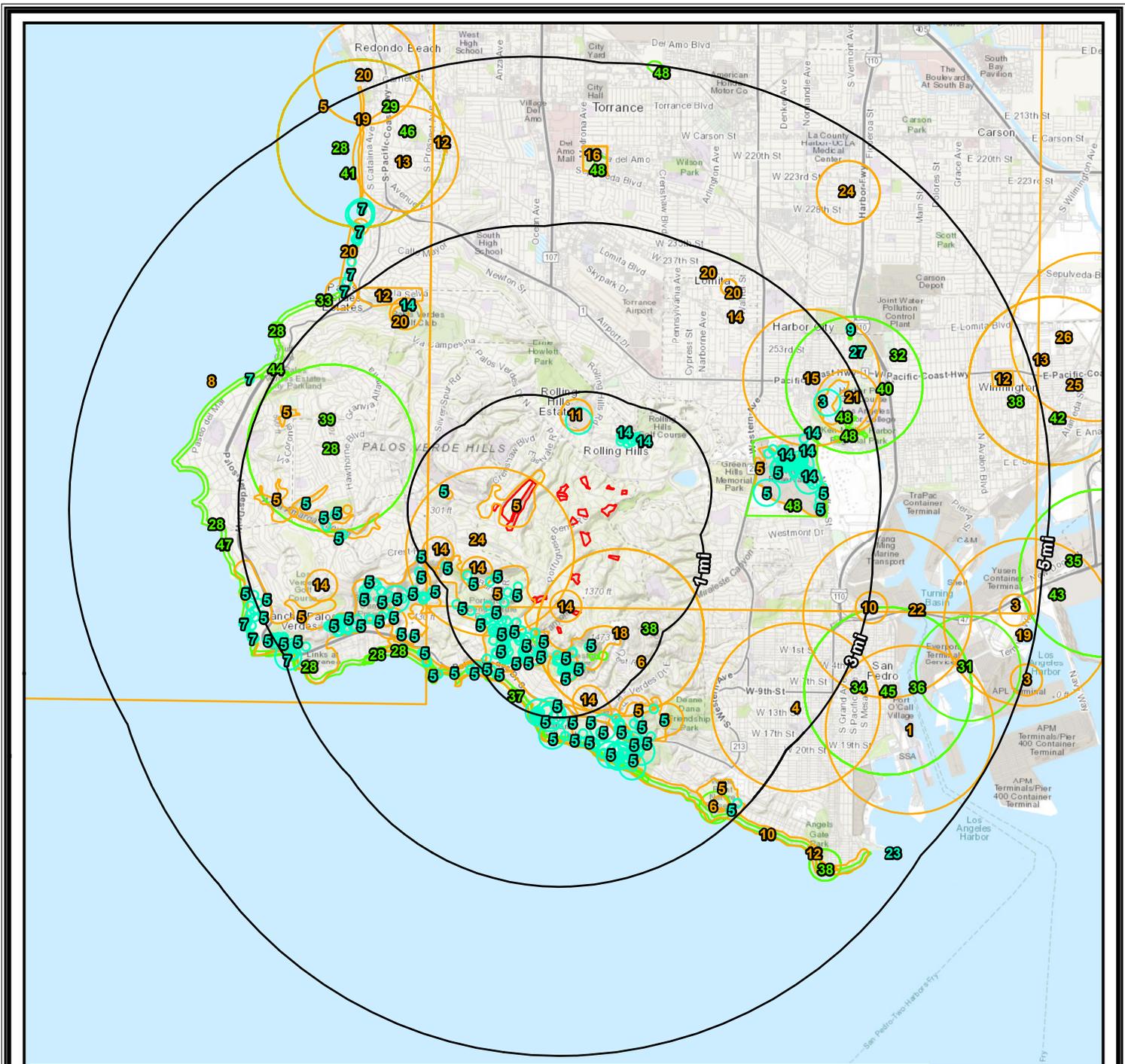


Figure 2
 City of Rolling Hills
 Housing Element Update
 Survey Area



Animals		Plants	
1. bank swallow	13. Pacific pocket mouse	26. western yellow-billed cuckoo	38. Lyon's pentachaeta
2. cactus wren	14. Palos Verdes blue butterfly	27. yellow-billed cuckoo	39. mesa horkelia
3. California least tern	15. pocketed free-tailed bat	28. aphanisma	40. mud nama
4. coast horned lizard	16. Riverside fairy shrimp	29. Brand's star phacelia	41. Parish's brittlescale
5. coastal California gnatcatcher	17. San Diego desert woodrat	30. Catalina crossosoma	42. prostrate vernal pool navaretia
6. Crotch bumble bee	18. San Gabriel chestnut	31. coast woolly-heads	43. salt marsh bird's-beak
7. El Segundo blue butterfly	19. sandy beach tiger beetle	32. Coulter's goldfields	44. Santa Catalina Island desert-thorn
8. El Segundo flower-loving fly	20. Southern California legless lizard	33. Coulter's saltbush	45. smooth tarplant
9. least Bell's vireo	21. tricolored blackbird	34. Davidson's saltscale	46. south coast saltscale
10. mimic tryonia (=California brackishwater snail)	22. western beach tiger beetle	35. decumbent goldenbush	47. Southern Coastal Bluff Scrub
11. Mohave tui chub	23. western snowy plover	36. estuary seablite	48. southern tarplant
12. monarch - California overwintering population	24. western spadefoot	37. island green dudleya	

- ▭ Survey Area
- ▭ USFWS Occurrences
- CNDDB Occurrences**
- ▭ Animals
- ▭ Plants

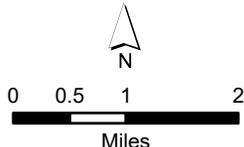
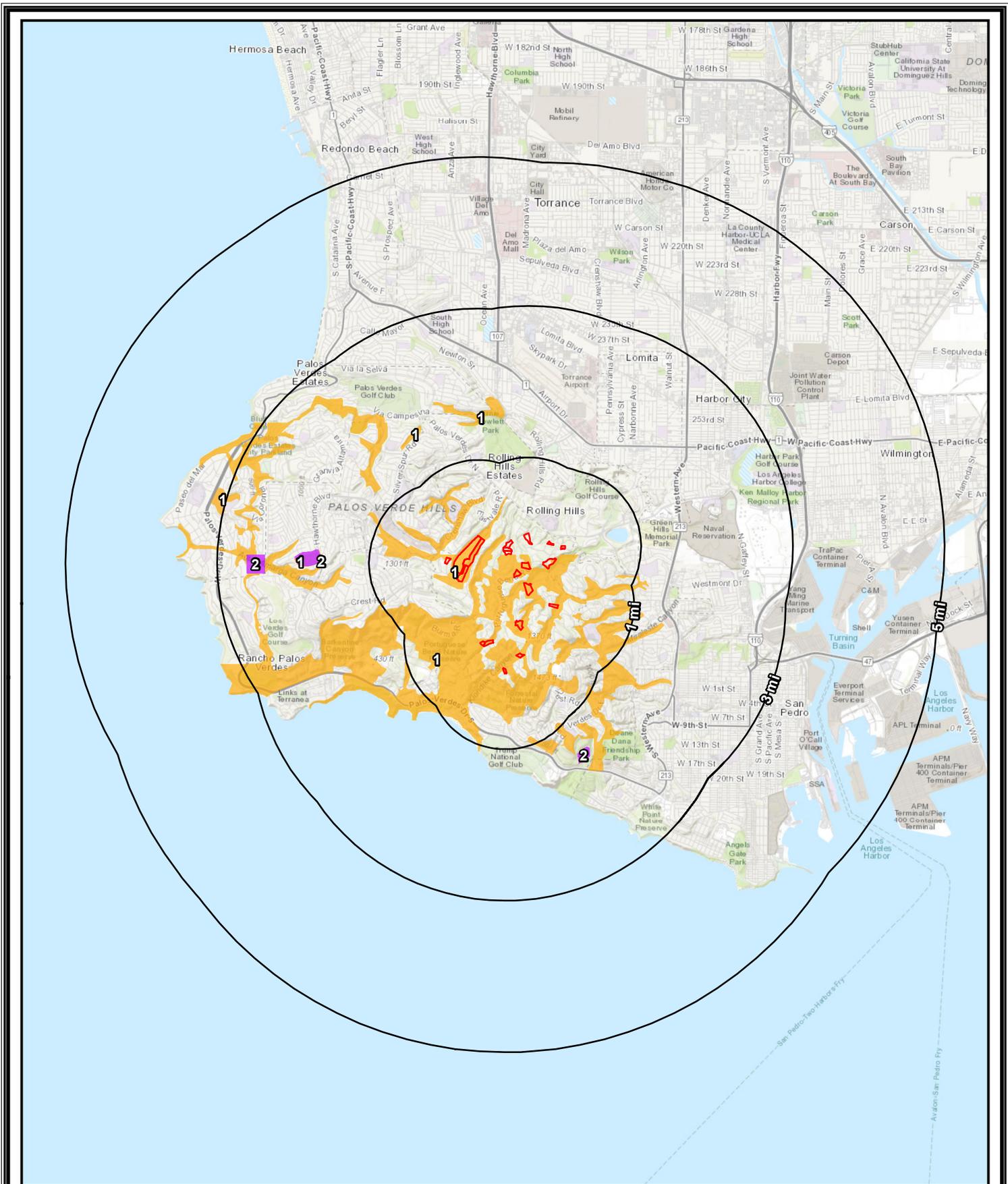


Figure 3
 City of Rolling Hills
 Housing Element Update
 Sensitive Species Occurrences Within 5 Miles





- Survey Area
- USFWS Critical Habitat**
- 1. Coastal California gnatcatcher
- 2. Palos Verdes blue butterfly

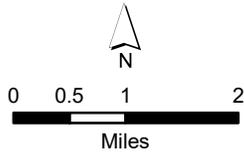
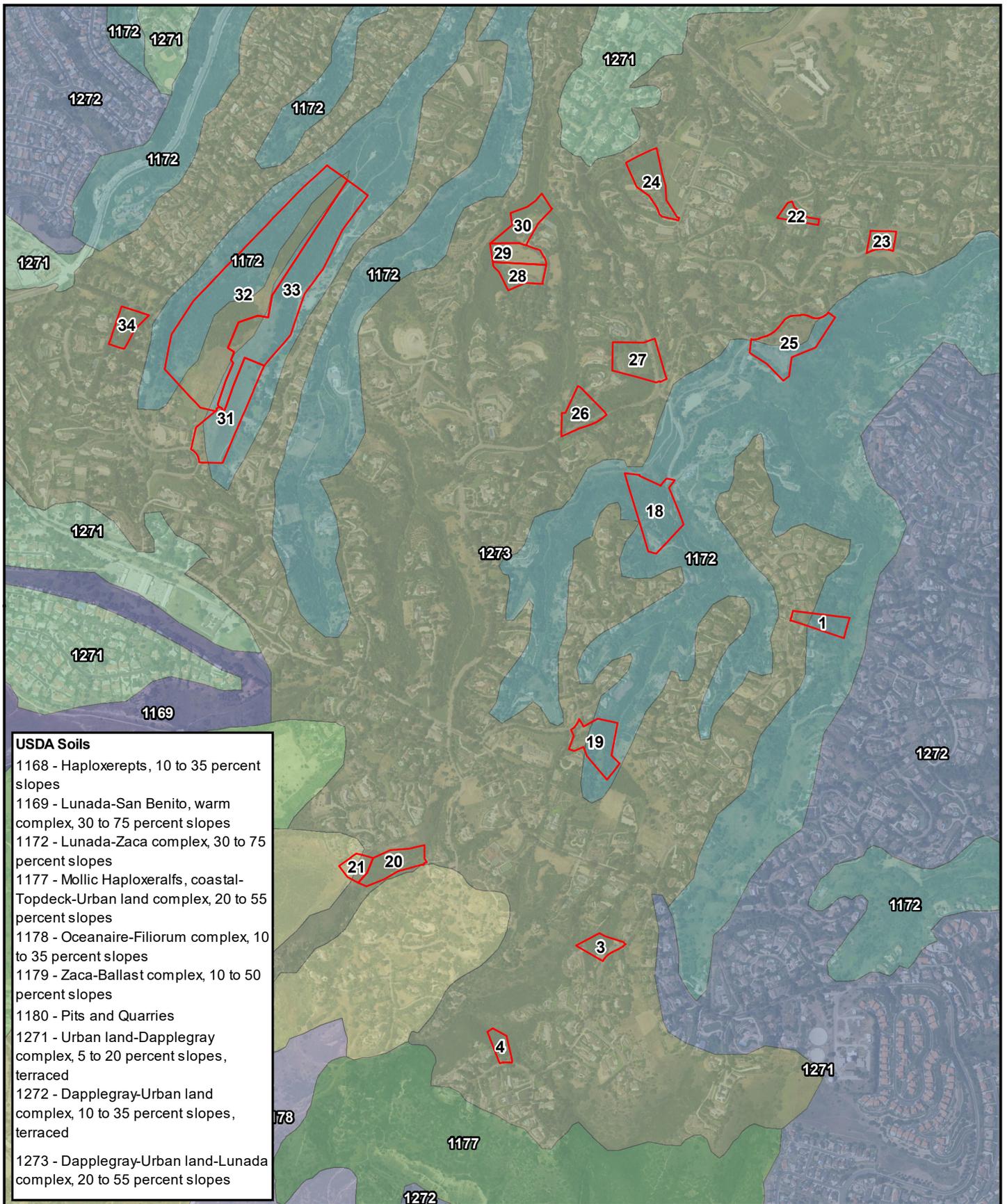


Figure 4
 City of Rolling Hills
 Housing Element Update
 USFWS Critical Habitat



Survey Area

USDA Soils

	1168		1177		1271
	1169		1178		1272
	1172		1179		1273

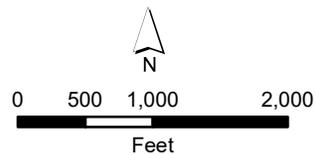
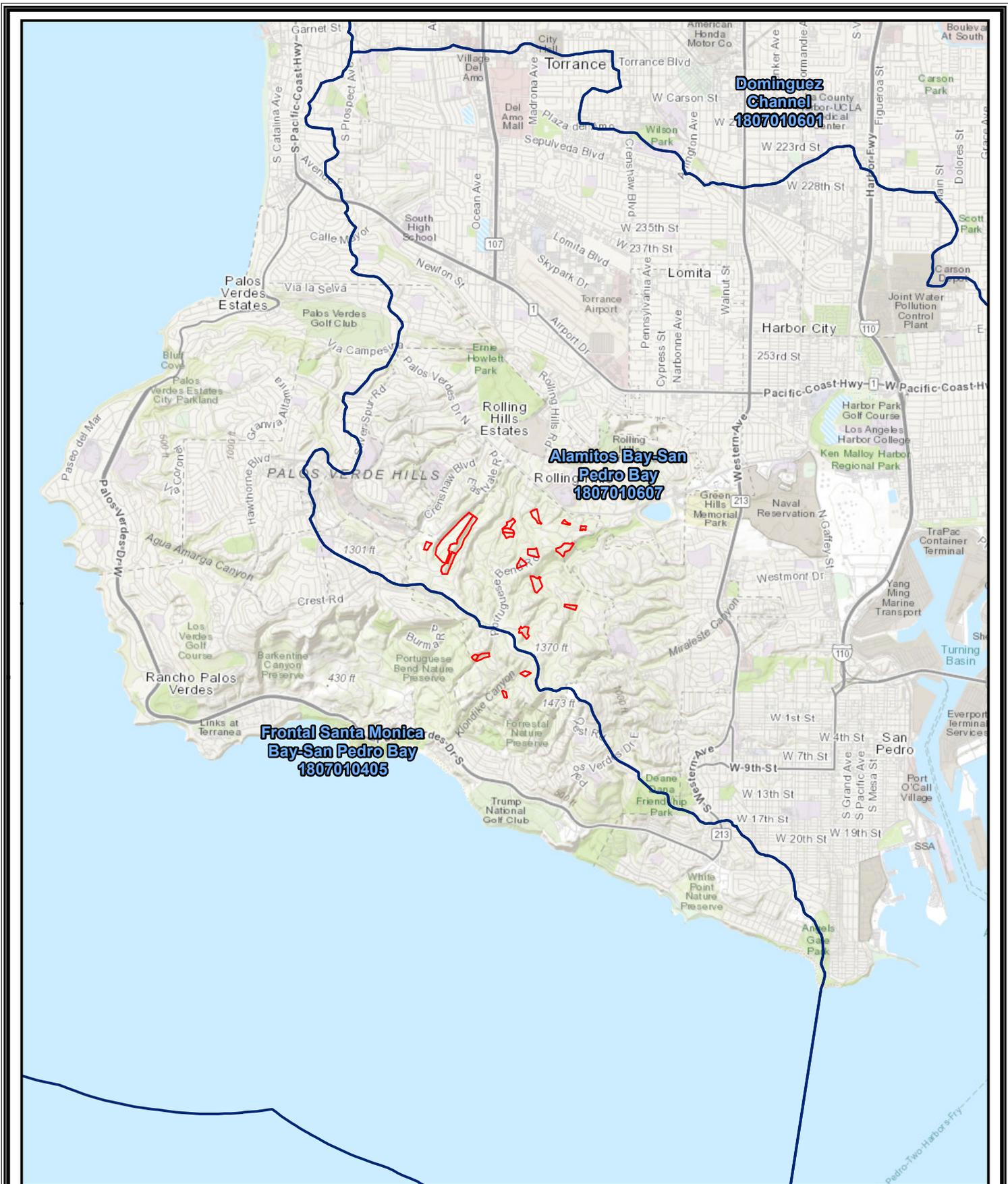


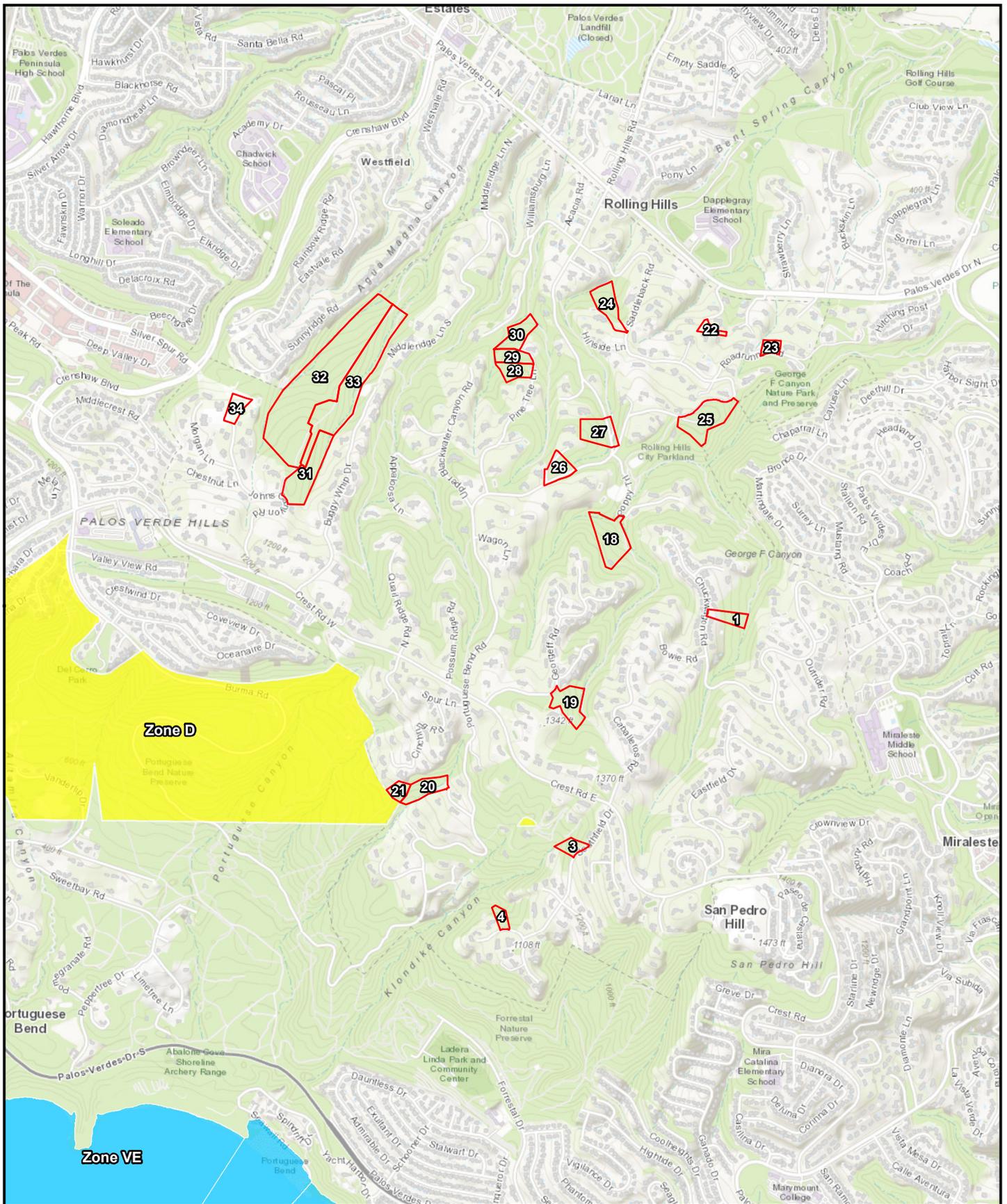
Figure 5
City of Rolling Hills
Housing Element Update
USDA Soils



- ▭ Survey Area
- ▭ Watershed (HUC 10)



Figure 6
City of Rolling Hills
Housing Element Update
Watershed



- Survey Area
- FEMA Flood Hazard Zones**
- Area of Undetermined Flood Hazard
- 1% Annual Chance Flood Hazard

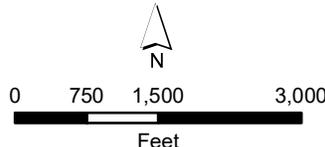
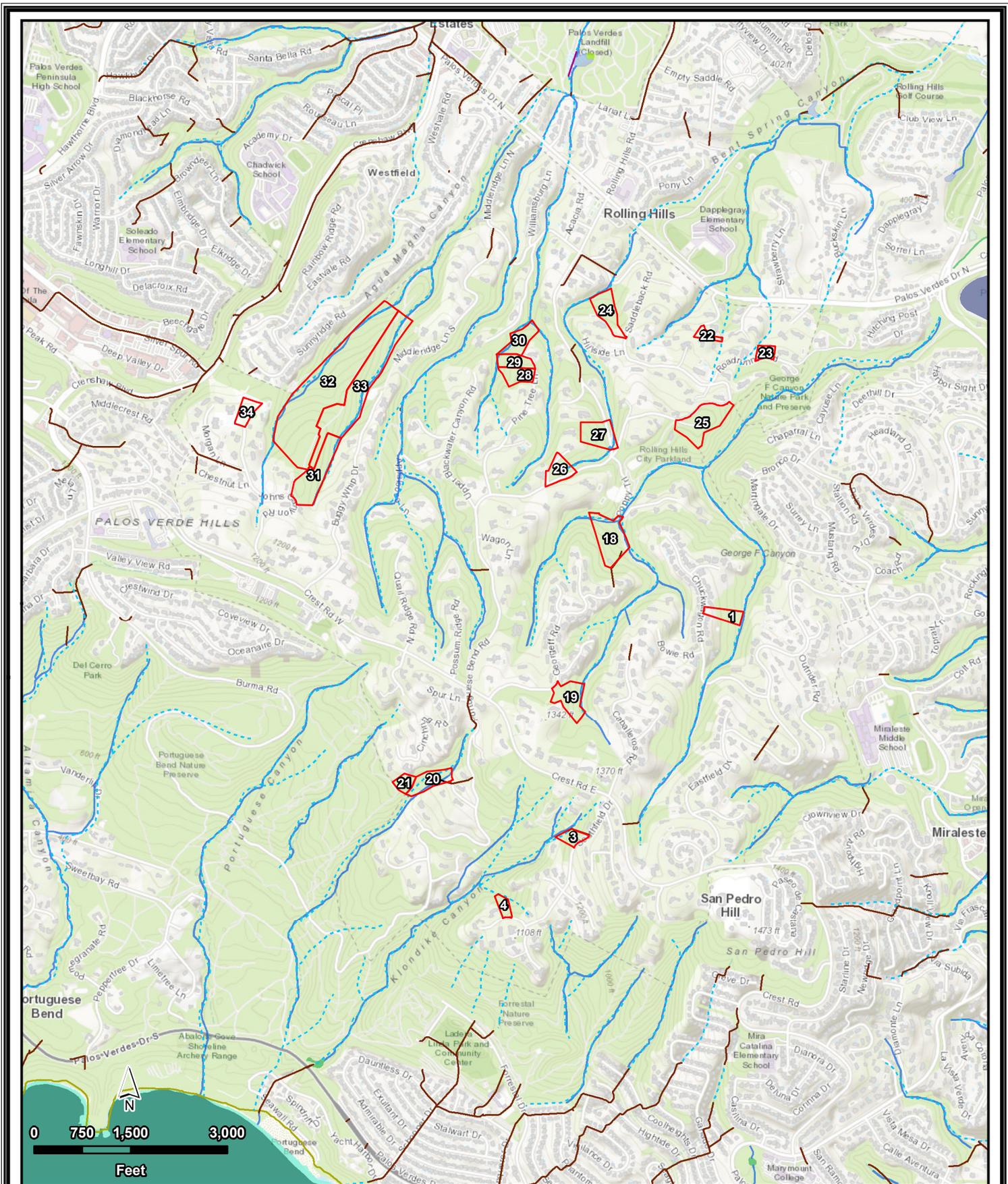


Figure 7
 City of Rolling Hills
 Housing Element Update
 FEMA Flood Hazard Zones





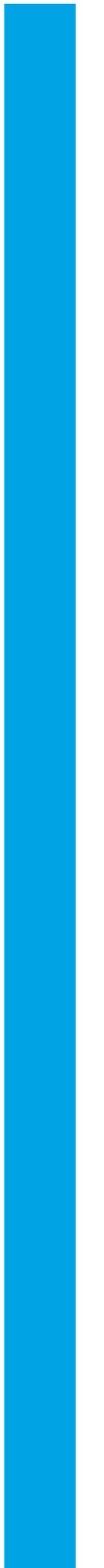
Survey Area

NWI		NHD	
	Estuarine and Marine Deepwater		Freshwater Pond
	Estuarine and Marine Wetland		Lake
	Freshwater Emergent Wetland		Riverine
	Freshwater Forested/Shrub Wetland		Artificial Path
			Coastline
			Connector
			Pipeline
			Stream/River

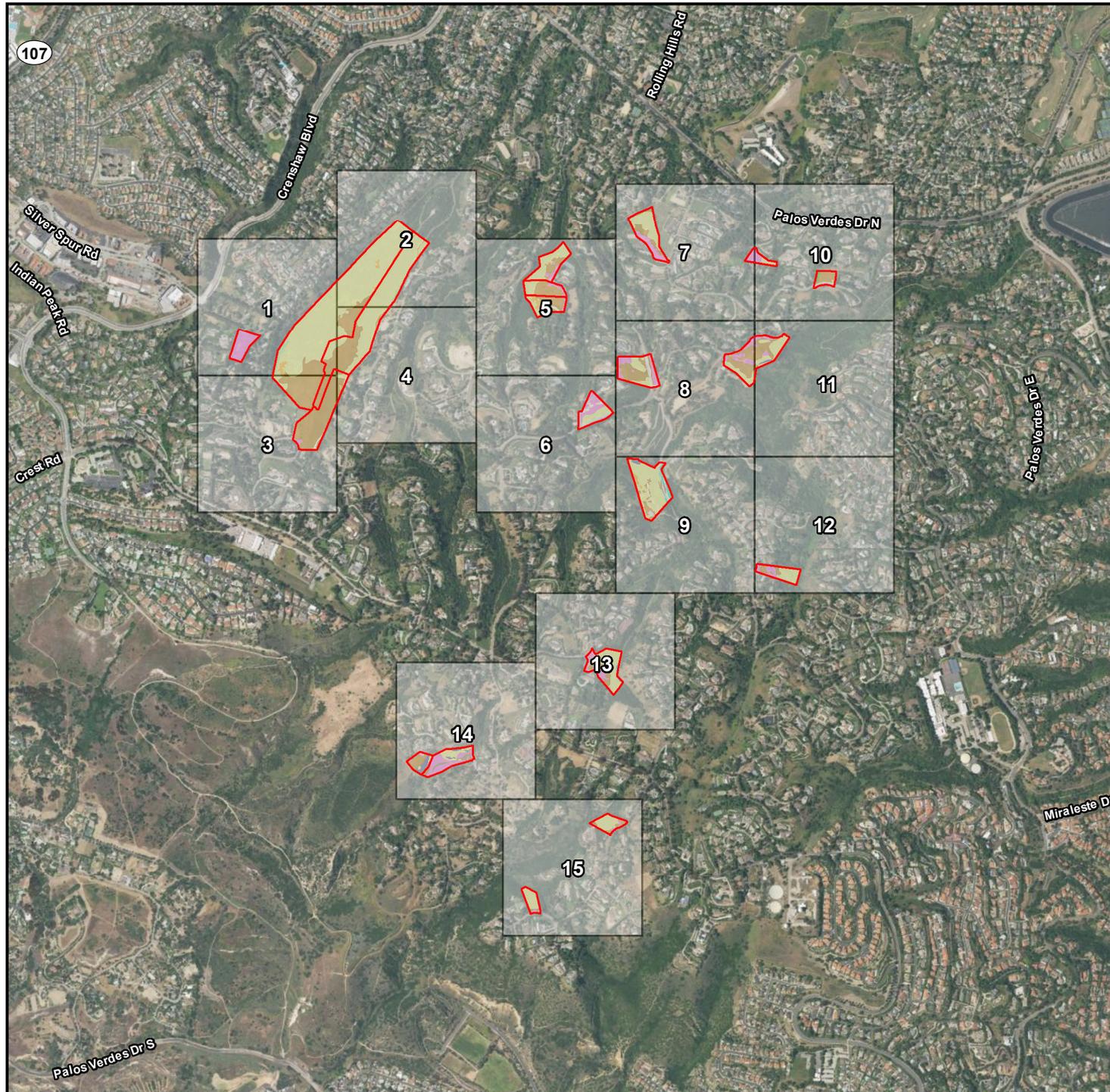
Figure 8
 City of Rolling Hills
 Housing Element Update
 Jurisdictional Waters NWI and NHD



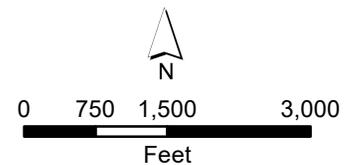
ATTACHMENT 2 – VEGETATION COMMUNITIES MAP



Attachment 2 Housing and Safety Element Updates Vegetation Communities Overview



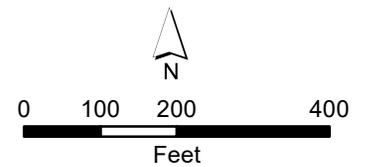
- Survey Area
- Vegetation Communities
- 1. Ruderal
- 2. Barren
- 3. Ornamental Landscaping
- 4. Developed
- 5. Shamel Ash Grove
- 6. Lemonade Berry Scrub
- 7. Holly Leaf Cherry – Toyon Chaparral
- 8. Black Sage Scrub
- 9. Ashy Buckwheat – California Sagebrush – Purple Sage Scrub
- 10. Laurel Sumac Scrub
- 11. Giant Wild Rye Grassland
- 12. Himalayan Black Berry Brambles
- 13. Arroyo Willow Thickets



Attachment 2
Housing and Safety Element Updates
Vegetation Communities
Page 1 of 15



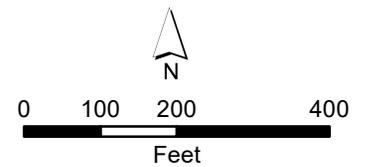
- Survey Area
- Vegetation Communities
 - 1. Ruderal
 - 3. Ornamental Landscaping
 - 5. Shamel Ash Grove
 - 6. Lemonade Berry Scrub
 - 9. Ashy Buckwheat – California Sagebrush – Purple Sage Scrub



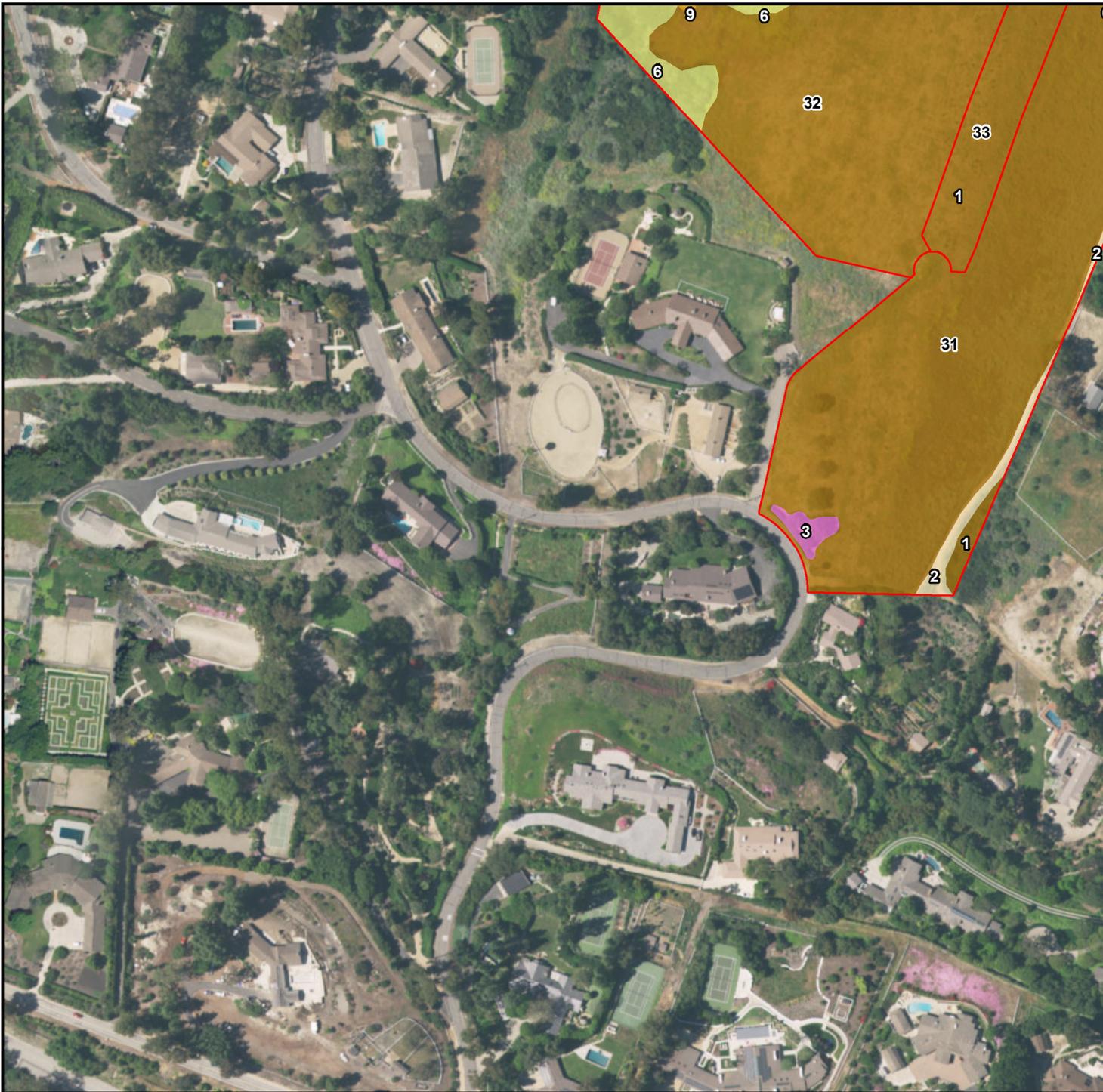
Attachment 2
Housing and Safety Element Updates
Vegetation Communities
Page 2 of 15



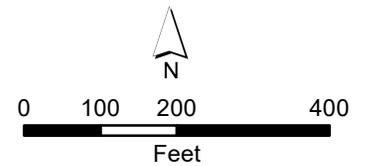
- Survey Area
- Vegetation Communities
- 1. Ruderal
 - 5. Shamel Ash Grove
 - 6. Lemonade Berry Scrub
 - 9. Ashy Buckwheat – California Sagebrush – Purple Sage Scrub



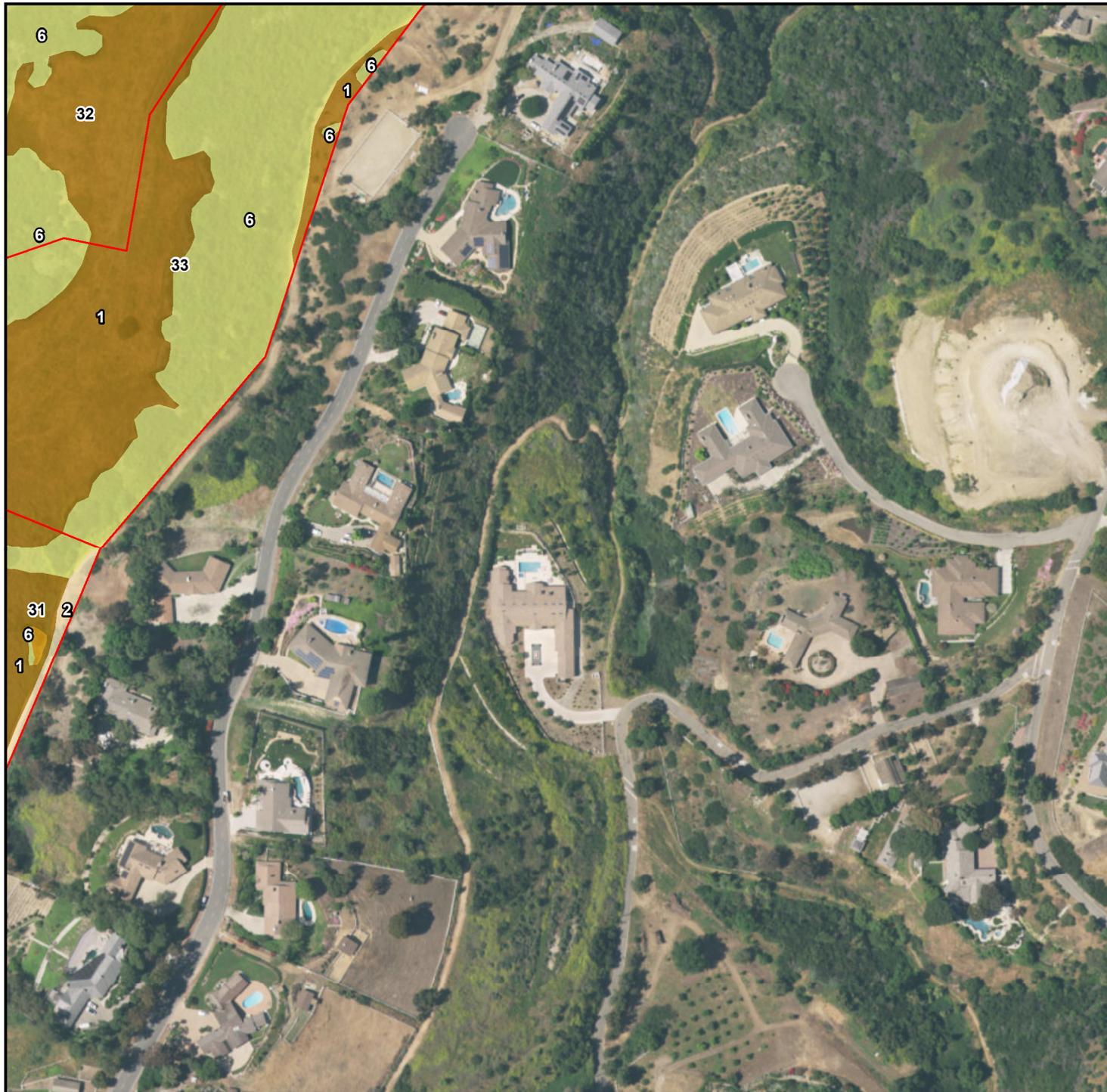
Attachment 2
Housing and Safety Element Updates
Vegetation Communities
Page 3 of 15



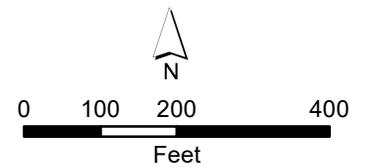
- Survey Area
- Vegetation Communities
- 1. Ruderal
 - 2. Barren
 - 3. Ornamental Landscaping
 - 6. Lemonade Berry Scrub
 - 9. Ashy Buckwheat – California Sagebrush – Purple Sage Scrub



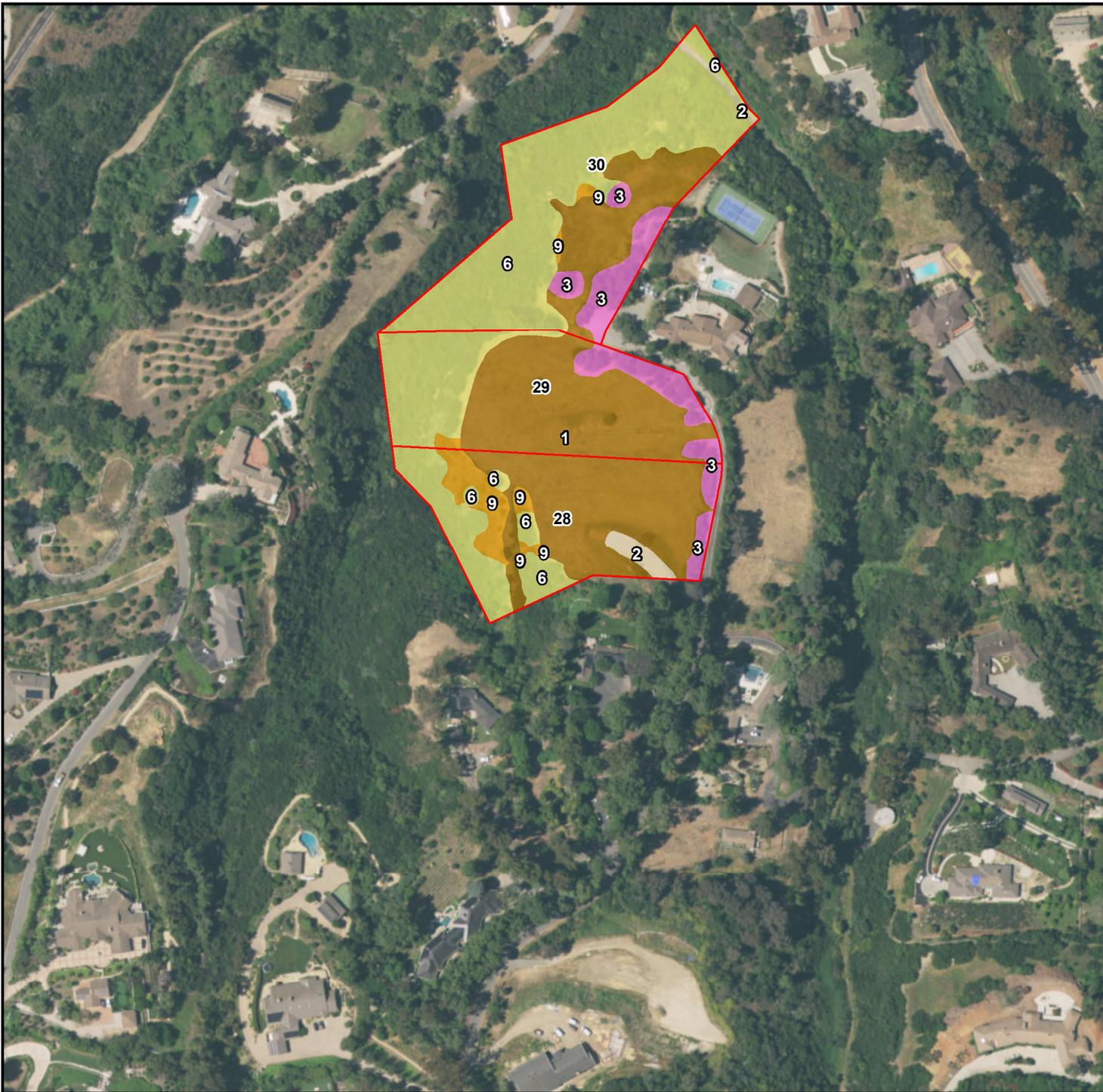
Attachment 2
Housing and Safety Element Updates
Vegetation Communities
Page 4 of 15



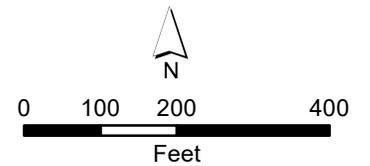
- Survey Area
- Vegetation Communities
- 1. Ruderal
 - 2. Barren
 - 6. Lemonade Berry Scrub
 - 9. Ashy Buckwheat – California Sagebrush – Purple Sage Scrub



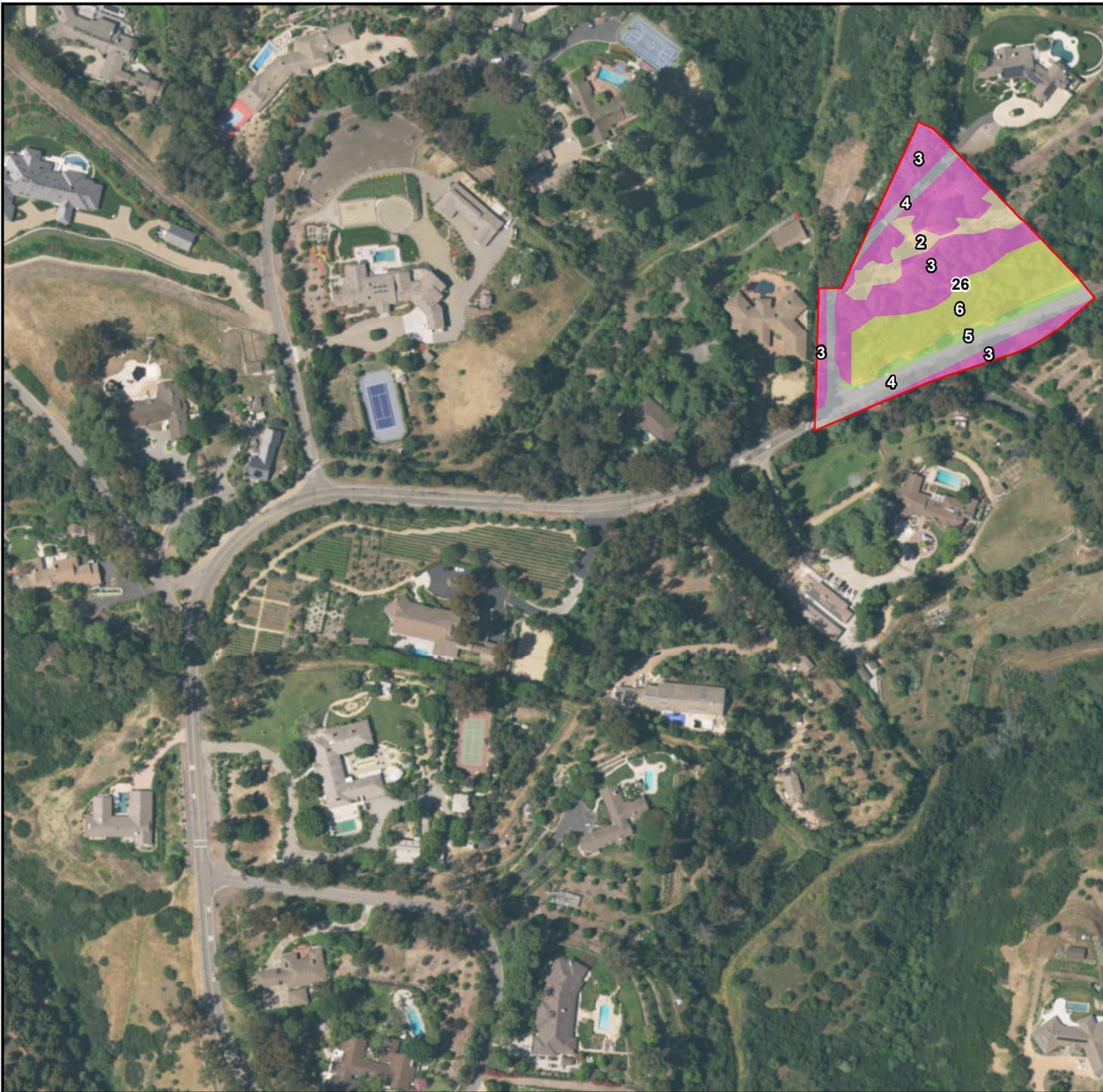
Attachment 2
Housing and Safety Element Updates
Vegetation Communities
Page 5 of 15



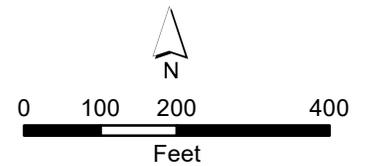
- Survey Area
- Vegetation Communities
- 1. Ruderal
 - 2. Barren
 - 3. Ornamental Landscaping
 - 6. Lemonade Berry Scrub
 - 9. Ashy Buckwheat – California Sagebrush – Purple Sage Scrub



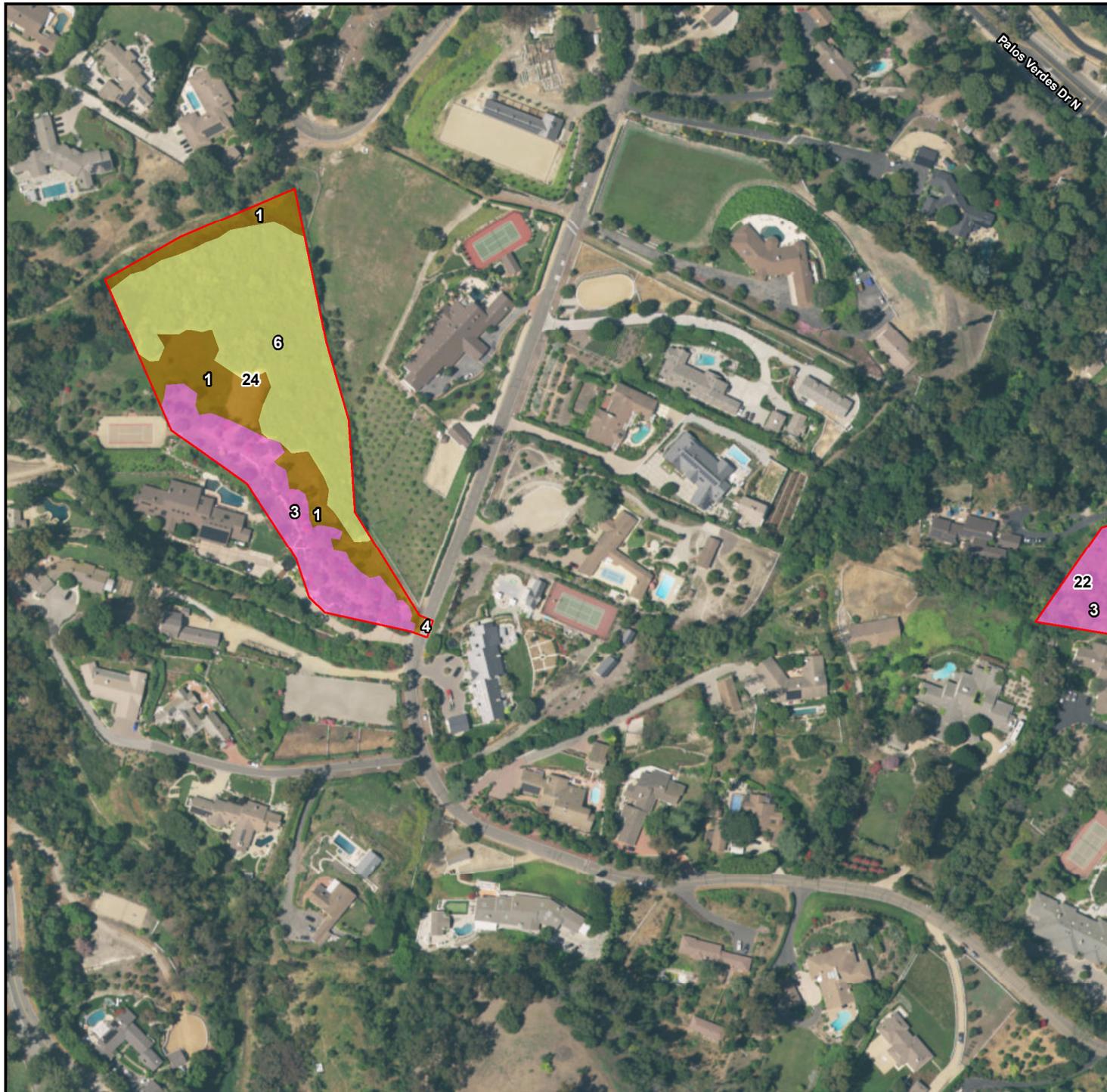
Attachment 2
Housing and Safety Element Updates
Vegetation Communities
Page 6 of 15



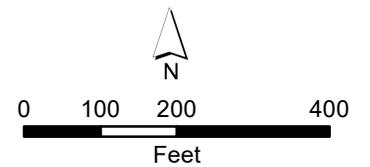
-  Survey Area
- Vegetation Communities
 -  2. Barren
 -  3. Ornamental Landscaping
 -  4. Developed
 -  5. Shamel Ash Grove
 -  6. Lemonade Berry Scrub



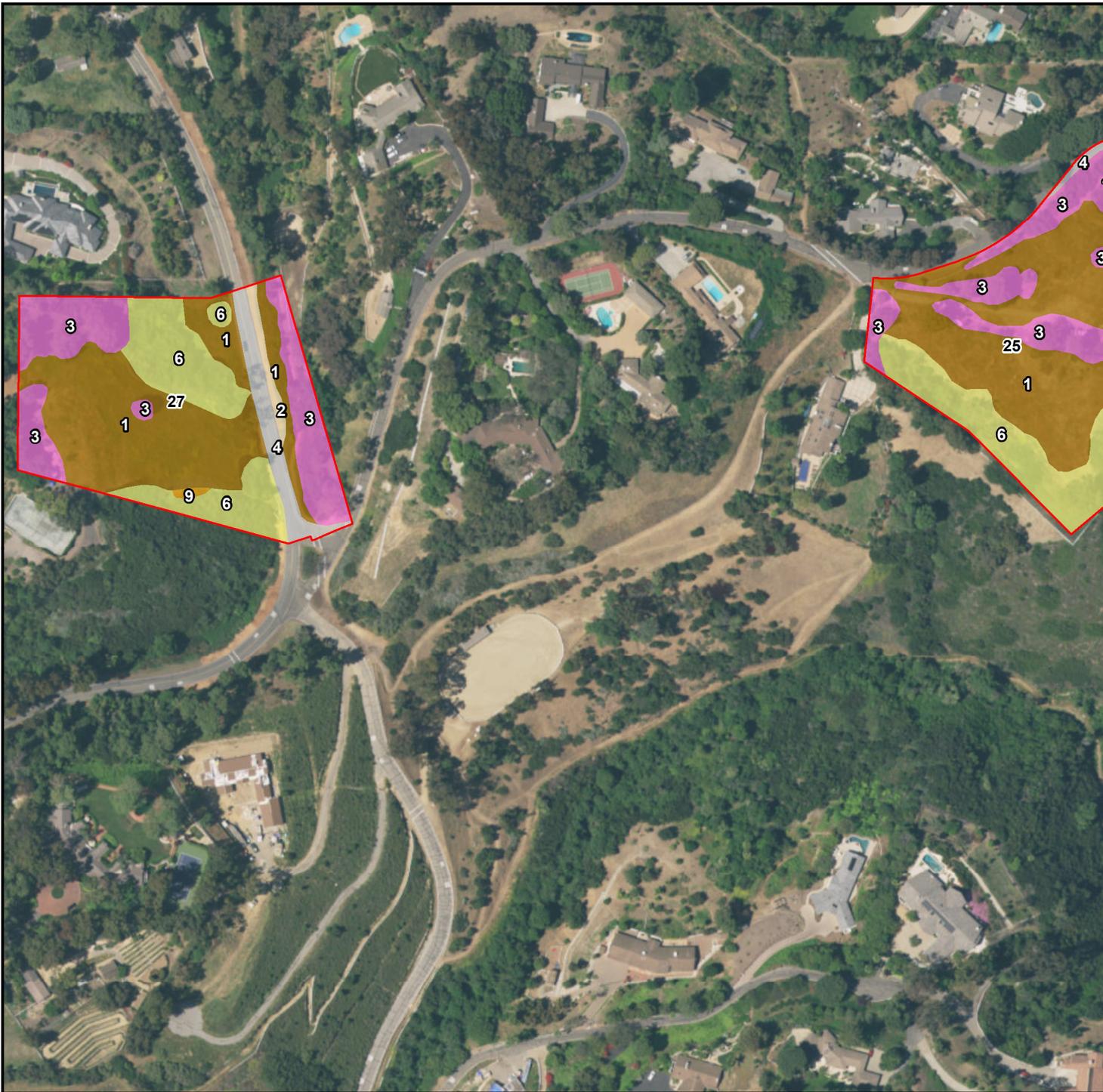
Attachment 2
Housing and Safety Element Updates
Vegetation Communities
Page 7 of 15



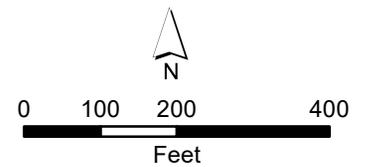
- Survey Area
- Vegetation Communities
 - 1. Ruderal
 - 3. Ornamental Landscaping
 - 4. Developed
 - 6. Lemonade Berry Scrub



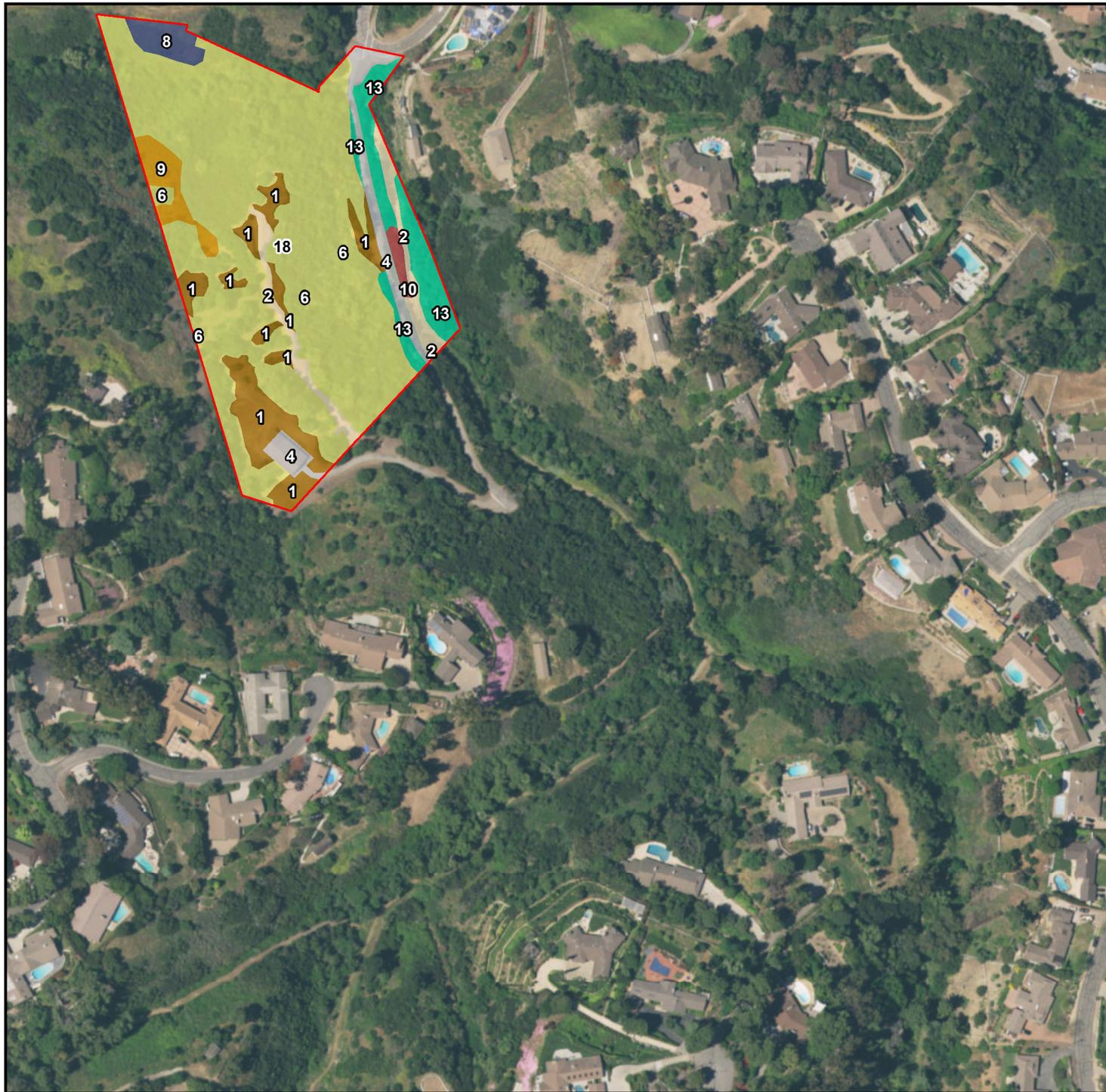
Attachment 2
Housing and Safety Element Updates
Vegetation Communities
 Page 8 of 15



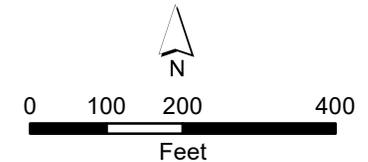
- Survey Area
- Vegetation Communities
- 1. Ruderal
- 2. Barren
- 3. Ornamental Landscaping
- 4. Developed
- 6. Lemonade Berry Scrub
- 9. Ashy Buckwheat – California Sagebrush – Purple Sage Scrub



Attachment 2
Housing and Safety Element Updates
Vegetation Communities
Page 9 of 15



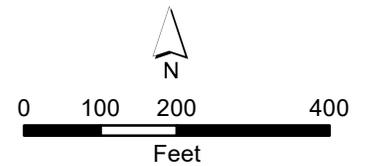
- Survey Area
- Vegetation Communities
 - 1. Ruderal
 - 2. Barren
 - 4. Developed
 - 6. Lemonade Berry Scrub
 - 8. Black Sage Scrub
 - 9. Ashy Buckwheat – California Sagebrush – Purple Sage Scrub
 - 10. Laurel Sumac Scrub
 - 13. Arroyo Willow Thickets



Attachment 2
Housing and Safety Element Updates
Vegetation Communities
Page 10 of 15



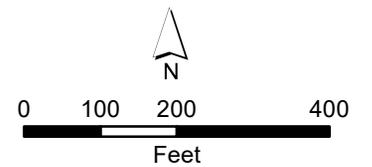
- Survey Area
- Vegetation Communities
- 1. Ruderal
 - 3. Ornamental Landscaping
 - 4. Developed
 - 6. Lemonade Berry Scrub
 - 7. Holly Leaf Cherry – Toyon Chaparral



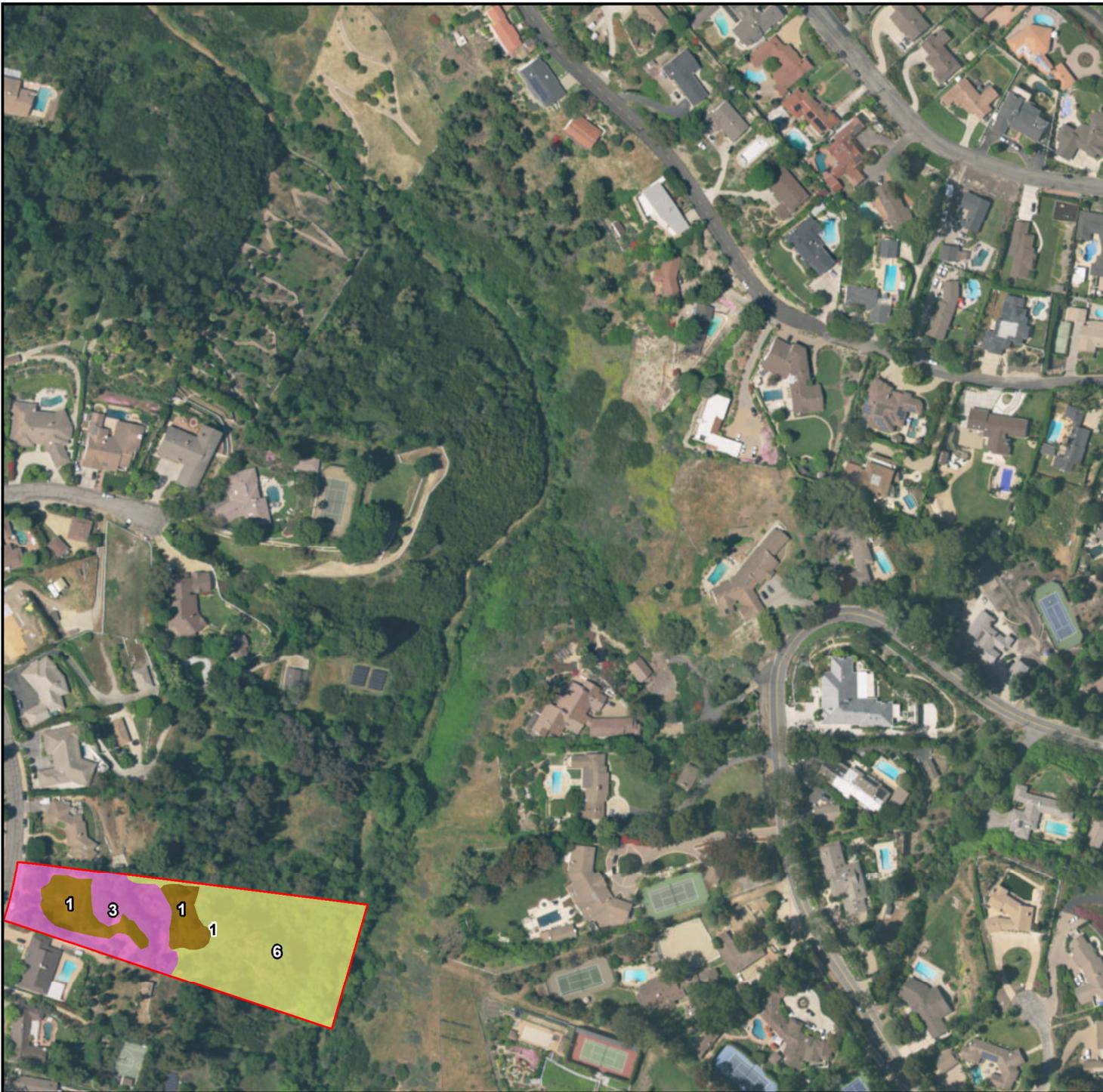
Attachment 2
Housing and Safety Element Updates
Vegetation Communities
Page 11 of 15



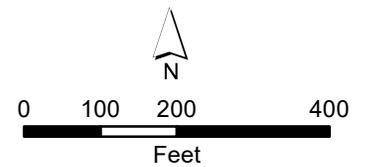
- Survey Area
- Vegetation Communities
- 1. Ruderal
 - 3. Ornamental Landscaping
 - 4. Developed
 - 6. Lemonade Berry Scrub
 - 8. Black Sage Scrub



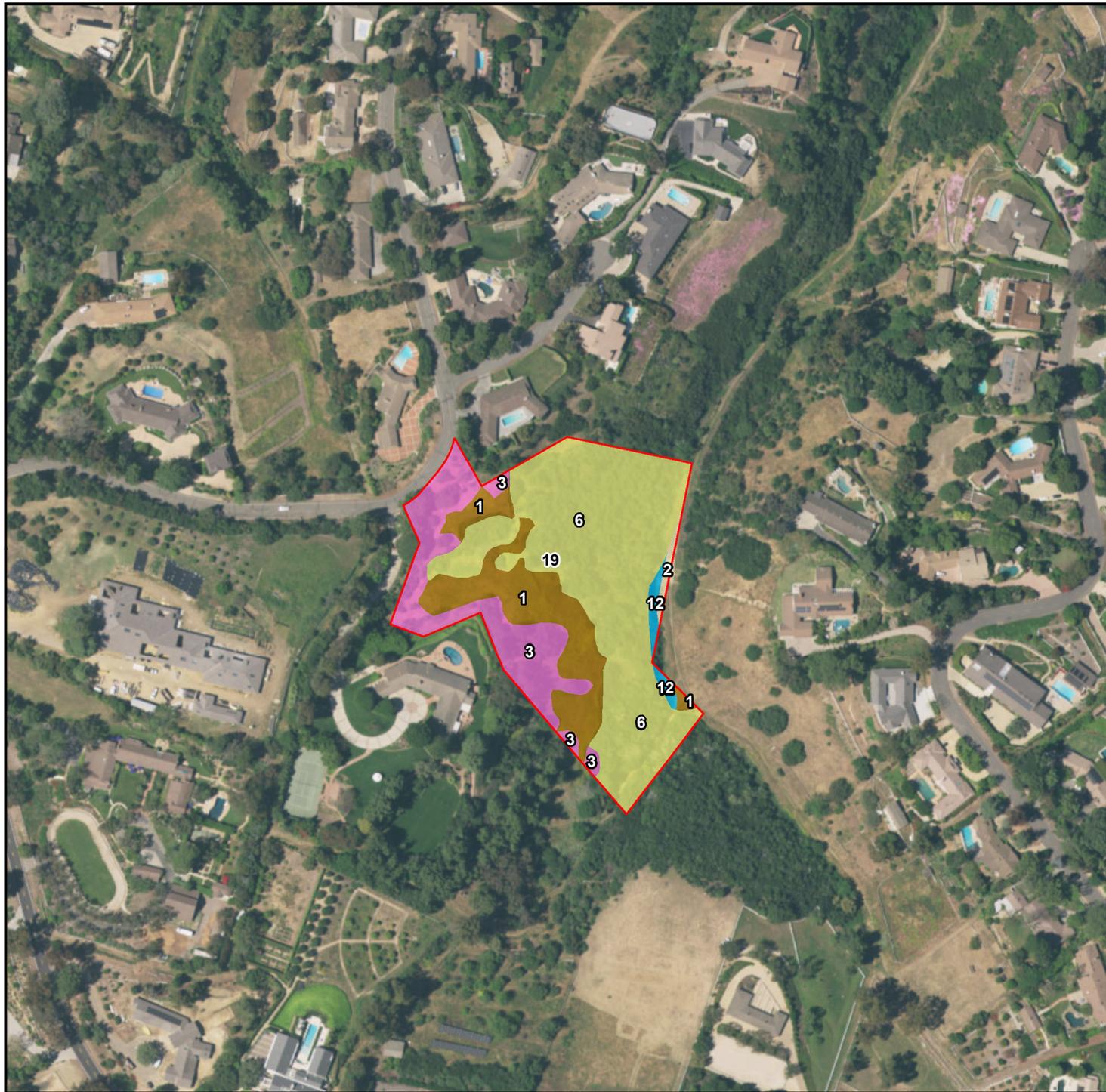
Attachment 2
Housing and Safety Element Updates
Vegetation Communities
Page 12 of 15



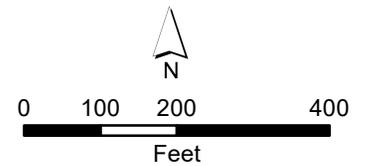
- Survey Area
- Vegetation Communities
- 1. Ruderal
 - 3. Ornamental Landscaping
 - 6. Lemonade Berry Scrub



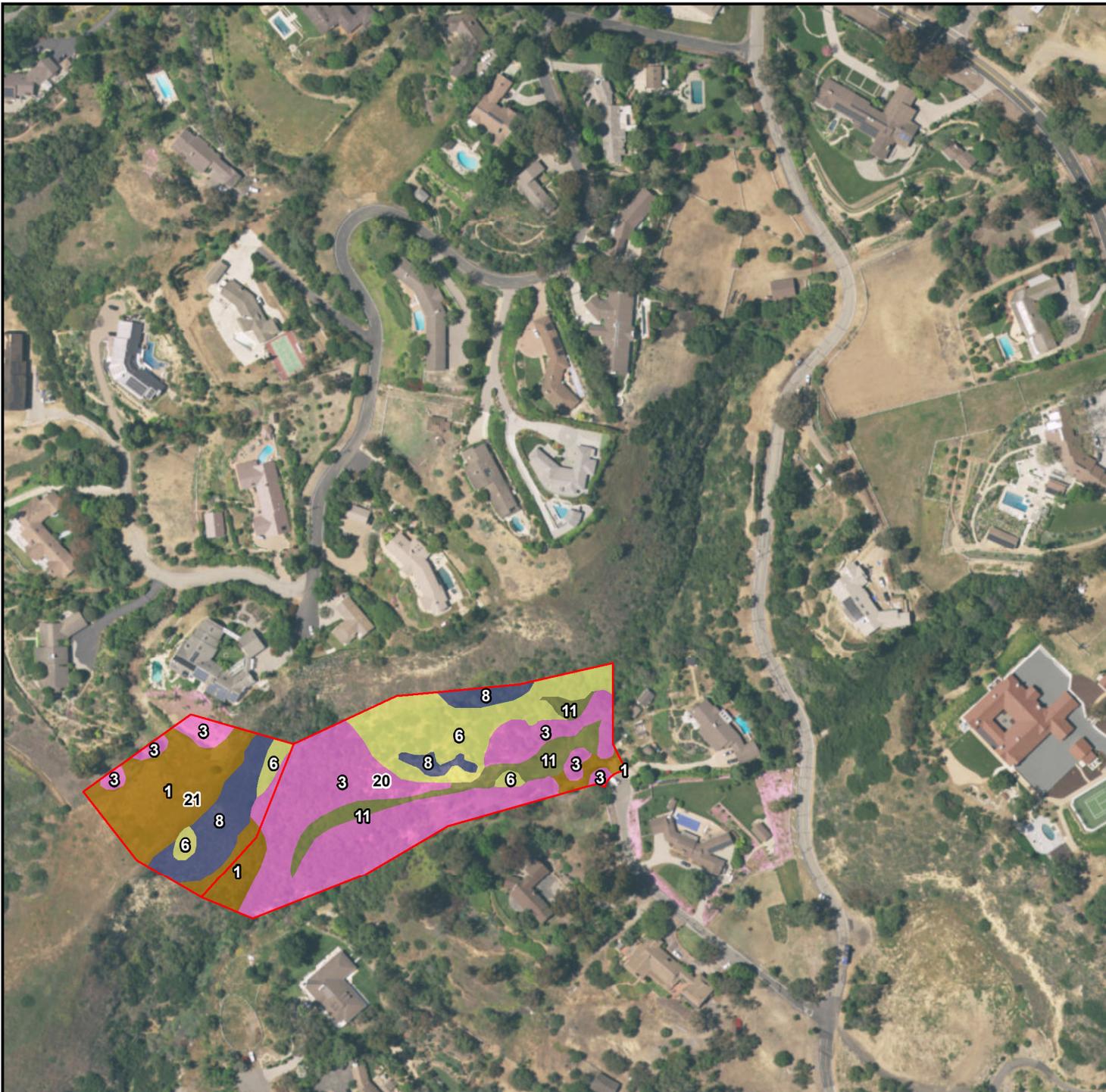
Attachment 2
Housing and Safety Element Updates
Vegetation Communities
Page 13 of 15



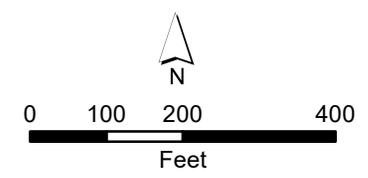
- Survey Area
- Vegetation Communities
- 1. Ruderal
 - 2. Barren
 - 3. Ornamental Landscaping
 - 6. Lemonade Berry Scrub
 - 12. Himalayan Black Berry Brambles



Attachment 2
Housing and Safety Element Updates
Vegetation Communities
Page 14 of 15



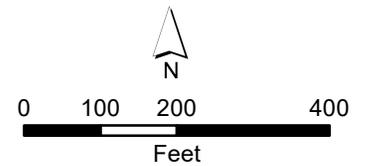
- Survey Area
- Vegetation Communities
- 1. Ruderal
- 3. Ornamental Landscaping
- 6. Lemonade Berry Scrub
- 8. Black Sage Scrub
- 11. Giant Wild Rye Grassland



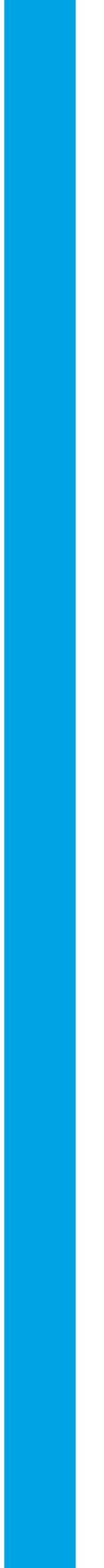
Attachment 2
Housing and Safety Element Updates
Vegetation Communities
Page 15 of 15



- Survey Area
- Vegetation Communities
- 1. Ruderal
 - 3. Ornamental Landscaping
 - 4. Developed
 - 6. Lemonade Berry Scrub



ATTACHMENT 3 – PLANT SPECIES OBSERVED



Attachment 3. Plant Species Observed

Scientific Name	Common Name
GYMNOSPERMS	
PINACEAE	PINE FAMILY
<i>Pinus halepensis</i> *	Aleppo pine
ANGIOSPERMS (EUDICOTS)	
ADOXACEAE	MUSKROOT FAMILY
<i>Sambucus nigra</i>	blue elderberry
ANACARDIACEAE	SUMAC OR CASHEW FAMILY
<i>Malosma laurina</i>	laurel sumac
<i>Rhus integrifolia</i>	lemonadeberry
<i>Schinus molle</i> *	Peruvian pepper tree
<i>Schinus terebinthifolius</i> *	Brazilian pepper tree
<i>Toxicodendron diversilobum</i>	poison oak
APIACEAE	CARROT FAMILY
<i>Foeniculum vulgare</i> *	fennel
APOCYNACEAE	DOGBANE FAMILY
<i>Asclepias fascicularis</i>	narrow-leaf milkweed
<i>Nerium oleander</i> *	oleander
ARALIACEAE	GINSENG FAMILY
<i>Hedera helix</i> *	English ivy
ASTERACEAE	SUNFLOWER FAMILY
<i>Artemisia californica</i>	California sagebrush
<i>Baccharis pilularis</i>	coyote brush
<i>Carduus pycnocephalus</i> subsp. <i>pycnocephalus</i> *	Italian thistle
<i>Centaurea melitensis</i> *	totalote
<i>Encelia californica</i>	California bush sunflower
<i>Erigeron foliosus</i>	leafy daisy
<i>Eriophyllum confertiflorum</i>	golden yarrow
<i>Glebionis coronaria</i> *	garland daisy
<i>Helminthotheca echioides</i> *	bristly ox-tongue
<i>Malacothrix saxatilis</i>	cliff malacothrix
<i>Silybum marianum</i> *	milk thistle
<i>Sonchus asper</i> subsp. <i>asper</i> *	prickly sow thistle
BIGNONIACEAE	BIGNONIA FAMILY
<i>Jacaranda mimosifolia</i> *	jacaranda
BORAGINACEAE	BORAGE FAMILY
<i>Echium candicans</i> *	pride of Madeira
BRASSICACEAE	MUSTARD FAMILY
<i>Brassica nigra</i> *	black mustard
<i>Hirschfeldia incana</i> *	shortpod mustard

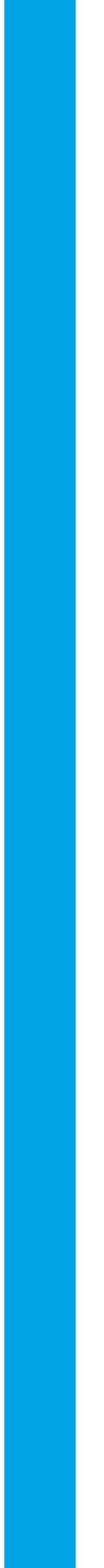
Scientific Name	Common Name
BRASSICACEAE	MUSTARD FAMILY
<i>Raphanus sativus</i> *	radish
CACTACEAE	CACTUS FAMILY
<i>Opuntia ficus-indica</i> *	mission prickly pear
<i>Opuntia littoralis</i>	coast prickly pear
CAPRIFOLIACEAE	HONEYSUCKLE FAMILY
<i>Symphoricarpos</i> sp.	snowberry
CHENOPODIACEAE	GOOSEFOOT FAMILY
<i>Salsola tragus</i> *	Russian thistle
CUCURBITACEAE	GOURD FAMILY
<i>Marah fabacea</i>	coast wild cucumber
EUPHORBIACEAE	SPURGE FAMILY
<i>Ricinus communis</i> *	castor-bean
FABACEAE	LEGUME FAMILY
<i>Acacia cyclops</i> *	cyclops acacia
<i>Lupinus albilfrons</i> var. <i>albilfrons</i>	silver bush lupine
<i>Lupinus succulentus</i>	arroyo lupine
<i>Melilotus indica</i> *	sourclover
FAGACEAE	OAK FAMILY
<i>Quercus agrifolia</i>	coast live oak
GERANIACEAE	GERANIUM FAMILY
<i>Geranium rotundifolium</i> *	round-leaved geranium
HAMAMELIDACEAE	WITCH-HAZEL FAMILY
<i>Liquidambar styraciflua</i> *	sweet gum
LAMIACEAE	MINT FAMILY
<i>Marrubium vulgare</i> *	horehound
<i>Salvia leucophylla</i>	purple sage
<i>Salvia mellifera</i>	black sage
MALVACEAE	MALLOW FAMILY
<i>Malva parviflora</i> *	cheeseweed
MYRSINACEAE	MYRSINE FAMILY
<i>Anagallis [Lysimachia] arvensis</i> *	scarlet pimpernel
MYRTACEAE	MYRTLE FAMILY
<i>Eucalyptus globulus</i> *	blue gum
NYCTAGINACEAE	FOUR O'CLOCK FAMILY
<i>Bougainvillea</i> sp. *	bougainvillea
OLEACEAE	OLIVE FAMILY
<i>Fraxinus uhdei</i> *	Shamel ash
<i>Olea europaea</i> *	olive
ONAGRACEAE	EVENING PRIMROSE FAMILY

Scientific Name	Common Name
<i>Epilobium canum</i>	California fuchsia
PHRYMACEAE	LOPSEED FAMILY
<i>Diplacus aurantiacus</i>	orange bush monkeyflower
PLANTAGINACEAE	PLANTAIN FAMILY
<i>Keckiella cordifolia</i>	heart leaved keckiella
POLYGONACEAE	BUCKWHEAT FAMILY
<i>Eriogonum cinereum</i>	ashy buckwheat, coastal wild buckwheat
<i>Eriogonum fasciculatum</i>	California buckwheat
PUNICACEAE	POMEGRANATE FAMILY
<i>Punica granatum*</i>	pomegranate
RANUNCULACEAE	BUTTERCUP FAMILY
<i>Clematis</i> sp.	clematis
RHAMNACEAE	BUCKTHORN FAMILY
<i>Ceanothus thyrsiflorus</i>	blue blossom
ROSACEAE	ROSE FAMILY
<i>Heteromeles arbutifolia</i>	toyon
<i>Prunus ilicifolia</i>	holly-leaf cherry
<i>Prunus persica*</i>	peach
<i>Rubus armeniacus*</i>	Himalayan blackberry
<i>Rubus leucodermis</i>	blackcap raspberry
<i>Rubus ursinus</i>	California blackberry
RUBIACEAE	MADDER FAMILY
<i>Galium aparine</i>	goose grass
RUTACEAE	RUE FAMILY
<i>Citrus sinensis*</i>	orange
<i>Citrus limon*</i>	lemon
SALICACEAE	WILLOW FAMILY
<i>Salix gooddingii</i>	black willow
<i>Salix lasiandra</i>	shining willow
SAPINDACEAE	SOAPBERRY FAMILY
<i>Aesculus californica</i>	California buckeye
SOLANACEAE	NIGHTSHADE FAMILY
<i>Solanum americanum</i>	small-flowered nightshade
TROPAEOLACEAE	NASTURTIUM FAMILY
<i>Tropaeolum majus*</i>	garden nasturtium
URTICACEA	NETTLE FAMILY
<i>Urtica dioica</i>	stinging nettle
ULMACEAE	ELM FAMILY
<i>Ulmus parvifolia*</i>	Chinese elm
VALERIANACEAE	VALERIAN FAMILY

Scientific Name	Common Name
<i>Centranthus ruber</i> *	red valerian
ANGIOSPERMS (MONOCOTS)	
AGAVACEAE	AGAVE FAMILY
<i>Yucca elephantipes</i> *	giant yucca
ARECACEAE	PALM FAMILY
<i>Washingtonia robusta</i> *	Mexican fan palm
POACEAE	GRASS FAMILY
<i>Arundo donax</i> *	giant reed
<i>Avena fatua</i> *	wild oat
<i>Bromus diandrus</i> *	ripgut grass
<i>Bromus madritensis</i> subsp. <i>madritensis</i> *	foxtail chess
<i>Elymus condensatus</i>	giant wild rye
<i>Festuca myuros</i> *	hairy rat-tail fescue
<i>Hordeum murinum</i> *	glaucous foxtail barley
<i>Stipa miliacea</i> var. <i>miliacea</i> *	smilo grass

*Non-Native Species

ATTACHMENT 4 – WILDLIFE SPECIES OBSERVED/DETECTED



ATTACHMENT 4 – WILDLIFE SPECIES LIST

Scientific Name	Common Name
CLASS REPTILIA	REPTILES
PHRYNOSOMATIDAE	ZEBRA-TAILED, EARLESS, FRINGE-TOED, SPINY, TREE, SIDE-BLOTCHED, AND HORNED LIZARDS
<i>Sceloporus occidentalis</i>	western fence lizard
CLASS AVES	BIRDS
ACCIPITRIDAE	HAWKS, KITES, EAGLES
<i>Buteo jamaicensis</i>	red-tailed hawk
<i>Buteo lineatus</i>	red-shouldered hawk
ODONTOPHORIDAE	NEW WORLD QUAIL
<i>Callipepla californica</i>	California quail
COLUMBIDAE	PIGEONS & DOVES
<i>Zenaida macroura</i>	mourning dove
STRIGIDAE	TRUE OWLS
<i>Bubo virginianus</i>	great horned owl
APODIDAE	SWIFTS
<i>Aeronautes saxatalis</i>	white-throated swift
TROCHILIDAE	HUMMINGBIRDS
<i>Calypte anna</i>	Anna's hummingbird
<i>Selasphorus sasin</i>	Allen's hummingbird
PICIDAE	WOODPECKERS
<i>Melanerpes formicivorus</i>	acorn woodpecker
TYRANNIDAE	TYRANT FLYCATCHERS
<i>Empidonax difficilis</i>	Pacific-slope flycatcher
<i>Sayornis nigricans</i>	black phoebe
HIRUNDINIDAE	SWALLOWS
<i>Hirundo rustica</i>	barn swallow
CORVIDAE	JAYS & CROWS
<i>Aphelocoma californica</i>	Western scrub-jay
<i>Corvus brachyrhynchos</i>	American crow
<i>Corvus corax</i>	common raven
AEGITHALIDAE	BUSHTITS
<i>Psaltriparus minimus</i>	bushtit
TROGLODYTIDAE	WRENS
<i>Thryomanes bewickii</i>	Bewick's wren
MIMIDAE	MOCKINGBIRDS, THRASHERS
<i>Mimus polyglottos</i>	northern mockingbird
ICTERIDAE	BLACKBIRDS
<i>Icterus cucullatus</i>	hooded oriole

Scientific Name	Common Name
EMBERIZIDAE	EMBERIZIDS
<i>Junco hyemalis</i>	dark-eyed junco
<i>Melospiza melodia</i>	song sparrow
<i>Melospiza crissalis</i>	California towhee
<i>Pipilo maculatus</i>	spotted towhee
CARDINALIDAE	CARDINALS
<i>Pheucticus melanocephalus</i>	black-headed grosbeak
FRINGILLIDAE	FINCHES
<i>Spinus psaltria</i>	lesser goldfinch
<i>Carpodacus mexicanus</i>	house finch
CLASS MAMMALIA	MAMMALS
LEPORIDAE	HARES & RABBITS
<i>Sylvilagus bachmani</i>	brush rabbit
SCIURIDAE	SQUIRRELS
<i>Spermophilus beecheyi</i>	California ground squirrel



ATTACHMENT 5 – SITE PHOTOGRAPHS



Photo 1.
General overview of the western half of Survey Area 1. Photo is facing northwest.



Photo 2.
General overview of the eastern half of Survey Area 1. Photo is facing southeast.



Photo 3.
General overview of the top of Survey Area 3, adjacent to the road. Photo is facing north.



Photo 4.
General overview of the west-facing hillside within Survey Area 3. Photo is facing west.



Photo 5.
General overview of the top of Survey Area 4, adjacent to the road. Photo is facing northwest.



Photo 6.
General overview of the hillside of Survey Area 4, and dense fog. Photo is facing north.



Photo 7.
Access road leading to the top of property within Survey Area 18. Photo is facing northwest.



Photo 8.
Horse stable located at the top (westernmost end) of Survey Area 18. Photo is facing southeast.



Photo 9.
General overview of the vegetated hillside leading down to stream within Survey Area 18. Photo is facing north.



Photo 10.
General overview of the vegetated hillside on the eastern side of Survey Area 19. Photo is facing north.



Photo 11.
General overview of the vegetated hillside and the stream, adjacent to the hiking trail within Survey Area 19. Photo is facing northwest.



Photo 12.
General overview of the vegetated hillside within Survey Area 19. Photo is facing southwest.



Photo 13.
General overview of western most open area, adjacent to the road, within Survey Area 19. Photo is facing southwest.



Photo 14.
General overview of northern end of Survey Area 20. Photo is facing southwest.



Photo 15.
General overview of western end of Survey Area 20. Photo is facing west.



Photo 16.
General overview of the dry streambed from the drainage leading into Survey Area 20. Photo is facing northwest.



Photo 17.
General overview of the open area (westernmost end) of Survey Area 21. Photo is facing east.



Photo 18.
General overview of the fog and hillside (easternmost end) of Survey Area 21. Photo is facing southwest.



Photo 19.
General overview of the northern end of Survey Area 22. Photo is facing south.



Photo 20.
General overview of Survey Area 22 within gated private property. Photo is facing southwest.



Photo 21.
General overview of Survey Area 23. Photo is facing southwest.



Photo 22.
General overview of Survey Area 23. Photo is facing north.



Photo 23.
General overview of Survey Area 24. Photo is facing southeast.



Photo 24.
General overview of Survey Area 24. Photo is facing northwest.



Photo 25.
General overview of dry streambed at the northern end of Survey Area 24. Photo is facing east.



Photo 26.
General overview of western end of Survey Area 25. Photo is facing northwest.



Photo 27.
General overview of Survey Area 25. Photo is facing southeast.



Photo 28.
General overview of the hillside on the northern end of Survey Area 25. Photo is facing northeast.



Photo 29.
General overview of southeastern end of Survey Area 25. Photo is facing west.



Photo 30.
General overview of the northern end of Survey Area 26. Photo is facing east.



Photo 31.
General overview of southern end of Survey Area 26 and the dry streambed north of the road. Photo is facing northeast.



Photo 32.
General overview of Survey Area 27. Portuguese Bend Road is located within Survey Area 27. Photo is facing west.



Photo 33.
General overview of the western end of Survey Area 27 (west of Portuguese Bend Road). Photo is facing southwest.



Photo 34.
General overview of the eastern end of Survey Area 28. Photo is facing north.



Photo 35.
General overview of the hillside (western end) of Survey Area 28. Photo is facing northwest.



Photo 36.
General overview of eastern end of Survey Area 29. Photo is facing west.



Photo 37.
General overview of the hillside (western end) of Survey Area 29. Photo is facing northwest.



Photo 38.
General overview of Survey Area 30. Photo is facing north.



Photo 39.
General overview of the northeastern end of Survey Area 30. Photo is facing west.



Photo 40.
General overview of the hillside (western end) of Survey Area 30. Photo is facing southwest.



Photo 41.
General overview of the western end of Survey Area 31. Photo is facing north.



Photo 42.
General overview of the hillside (eastern end) of Survey Area 31. Photo is facing north.



Photo 43.
Close-up of California sage brush patch within Survey Area 31. Photo is facing west.



Photo 44.
General overview of the eastern end of Survey Area 32. Photo is facing southwest.



Photo 45.
General overview of the hillside (western end) of Survey Area 32. Photo is facing west.



Photo 46.
General overview of the hillside (western end) of Survey Area 32. Photo is facing northeast.



Photo 47.
General overview of the western end of Survey Area 33. Photo is facing south.



Photo 48.
General overview of the northern end of Survey Area 33. Photo is facing south.



Photo 49.
General overview of vegetated hillside that runs along the eastern end of Survey Area 33. The dry stream bed feature runs between the trail and vegetated hillside. Photo is facing north.

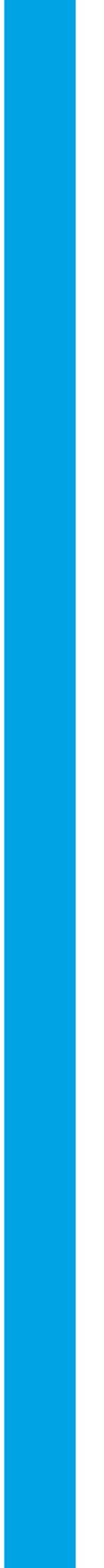


Photo 50.
General overview of Survey Area 34. Photo is facing southwest.



Photo 51.
General overview of Survey Area 34. Photo is facing northwest.

APPENDIX B – TRIBAL CONSULTATION RESPONSES



From: CHRISTINA CONLEY-HADDOCK <christina.marsden@alumni.usc.edu>
Sent: Monday, July 18, 2022 5:17 PM
To: John Signo
Cc: Robert Dorame; Connie Viramontes; Victoria Boyd
Subject: Re: FOLLOW-UP – REGARDING THE CITY OF ROLLING HILLS HOUSING ELEMENT UPDATE PROJECT

Thank you John for the update and please keep us on your distribution list for further activity.

Take care,
Christina

tehoovet taamet

CHRISTINA CONLEY

- Native American Monitor - Caretaker of our Ancestral Land
- Cultural Resource Administrator Under Tribal Chair, Robert Dorame (Most Likely Descendant)
- Native American Heritage Commission Contact
- Fully qualified as a California State Recognized Native American Tribe fulfilling SB18, AB52 Compliance Regulations
- HAZWOPER Certified
- 626.407.8761

GABRIELINO TONGVA INDIANS OF CALIFORNIA

The Gabrielino Tongva Indians of California are recognized in the State of California Bill AJR96 as the aboriginal tribe to encompass the entire Los Angeles Basin area and the Channel Islands of Santa Catalina, San Nicholas and San Clemente



NAHC recognizes GTIOC Tribal Territory

On Jun 13, 2022, at 1:14 PM, John Signo <jsigno@cityofrh.net> wrote:

Greetings. Please see attached letter.

Regards,

John F. Signo, AICP

Director of Planning and Community Services

<image003.jpg> **City of Rolling Hills – City Hall**
2 Portuguese Bend Road, Rolling Hills CA 90274
O: 310.377.1521

<Tongva Follow Up – Rolling Hills HEU.pdf>

From: John Signo <jsigno@cityofrh.net>
Sent: Tuesday, June 14, 2022 2:12 PM
To: Victoria Boyd
Subject: FW: FOLLOW-UP – REGARDING THE CITY OF ROLLING HILLS HOUSING ELEMENT UPDATE PROJECT

From: Gabrieleno Administration <admin@gabrielenoindians.org>
Sent: Tuesday, June 14, 2022 11:50 AM
To: John Signo <jsigno@cityofrh.net>
Subject: Re: FOLLOW-UP – REGARDING THE CITY OF ROLLING HILLS HOUSING ELEMENT UPDATE PROJECT

Hello John

Thank you for your email. If there is not going to be any ground disturbances taking place there will be no need for a consultation.

Admin Specialist
Gabrieleno Band of Mission Indians - Kizh Nation
PO Box 393
Covina, CA 91723
Office: 844-390-0787
website: www.gabrielenoindians.org



The region where Gabrieleño culture thrived for more than eight centuries encompassed most of Los Angeles County, more than half of Orange County and portions of Riverside and San Bernardino counties. It was the labor of the Gabrieleño who built the missions, ranchos and the pueblos of Los Angeles. They were trained in the trades, and they did the construction and maintenance, as well as the farming and managing of herds of livestock. “The Gabrieleño are the ones who did all this work, and they really are the foundation of the early economy of the Los Angeles area “. “That’s a contribution that Los Angeles has not recognized--the fact that in its early decades, without the Gabrieleño, the community simply would not have survived.”

On Mon, Jun 13, 2022 at 1:04 PM John Signo <jsigno@cityofrh.net> wrote:

Greetings. Please see attached letter.

Regards,

John F. Signo, AICP

Director of Planning and Community Services



CITY OF ROLLING HILLS – CITY HALL

2 Portuguese Bend Road, Rolling Hills CA 90274

O: 310.377.1521



GABRIELENO BAND OF MISSION INDIANS - KIZH NATION
Historically known as The Gabrielino Tribal Council - San Gabriel Band of Mission Indians
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

December 21, 2021

Project Name: The City of Rolling Hills Housing and Safety Element
Updates Project

Dear John F. Signo,

Thank you for your email dated December 13, 2021. Regarding the project above. This is to concur that we are in agreement with the Housing Element Update. However, our Tribal government would like to request consultation for any and all future projects within this location.

Sincerely,

Andrew Salas, Chairman

Albert Perez, treasurer I

Nadine Salas, Vice-Chairman

Martha Gonzalez Lemos, treasurer II

Dr. Christina Swindall Martinez, secretary

Richard Gradias, Chairman of the council of Elders

PO Box 393 Covina, CA 91723

www.gabrielenoindians.org

admin@gabrielenoindians.org



GABRIELENO BAND OF MISSION INDIANS - KIZH NATION
Historically known as The Gabrielino Tribal Council - San Gabriel Band of Mission Indians
recognized by the State of California as the aboriginal tribe of the Los Angeles basin

December 21, 2021

Project Name: The City of Rolling Hills Safety Element

Thank you for your letter regarding the project above. This is to concur that we are in agreement with the Safety Element. However, our Tribal government would like to request consultation for any and all future projects when ground disturbance will be occurring within this location.

Sincerely,

Andrew Salas, Chairman
Gabrieleno Band of Mission Indians – Kizh Nation
1(844)390-0787

Andrew Salas, Chairman

Albert Perez, treasurer I

Nadine Salas, Vice-Chairman

Martha Gonzalez Lemos, treasurer II

Dr. Christina Swindall Martinez, secretary

Richard Gradias, Chairman of the council of Elders

PO Box 393 Covina, CA 91723

www.gabrielenoindians.org

admin@gabrielenoindians.org

From: CHRISTINA CONLEY-HADDOCK <christina.marsden@alumni.usc.edu>
Sent: Thursday, January 6, 2022 1:17 PM
To: Richard Shultz <rshultz@chambersgroupinc.com>
Cc: Robert Dorame <gtongva@icloud.com>
Subject: Re: Follow-up re: 21330 City of Rolling Hills Housing & Safety Element Project SB 18/AB 52 Consult Request

Good afternoon Richard,
Apologies for the delay - I have been out on the field.

At this time, as there are no specific developments planned, we have no concerns about any future projects in the city of Rolling Hills as aforementioned, it is a sensitive area for our tribe.

Take good care,
Christina

tehoovet taamet

CHRISTINA CONLEY
Native American Monitor - Caretaker of our Ancestral Land
Cultural Resource Administrator Under Tribal Chair, Robert Dorame (MLD)
HAZWOPER Certified
626.407.8761

GABRIELINO TONGVA INDIANS OF CALIFORNIA



On Jan 3, 2022, at 12:56 PM, Richard Shultz <rshultz@chambersgroupinc.com> wrote:

Good afternoon and happy new year Christina.

I am following up on your recent letter (below). Chambers Group is assisting the City of Rolling Hills with their requirement to conduct SB 18 and AB 52 consultations related to the proposed Housing and Safety Element Updates to the General Plan and policies.

As noted in the attached consultation request letter there are no specific developments planned at this time, and the consultation is being requested for comments or concerns with the proposed Element Updates. Chambers Group and the City of Rolling Hills greatly appreciate the concerns of the Gabrielino Tongva Indians of California Tribal Council and wish to allay any apprehensions that the resources listed, and not listed, below would be affected by the proposed Element Updates.

If the Gabrielino Tongva Indians of California Tribal Council wish to consult under SB 18 or AB 52 concerning these proposed Element Updates please contact John Signo, AICP, at the City of Rolling Hills (jsigno@cityofrh.net - City Of Rolling Hills – City Hall 2; Portuguese Bend Road, Rolling Hills CA 90274; O: 310.377.1521 | F: 310.377.7288). Alternatively, feel free to contact either Kellie or myself and we will coordinate with the City.

Please let Kellie or me know if you have any questions or concerns, and we will be happy to help.

Thank you,

Richard

From: CHRISTINA CONLEY-HADDOCK <christina.marsden@alumni.usc.edu>
Sent: Friday, December 31, 2021 10:27 AM
To: Kellie Kandybowicz <kkandybowicz@chambersgroupinc.com>
Cc: Richard Shultz <rshultz@chambersgroupinc.com>; Robert Dorame <gtongva@icloud.com>
Subject: Re: Follow-up re: 21330 City of Rolling Hills Housing & Safety Element Project SB 18/AB 52 Consult Request

Good morning John,

We are in receipt of your 21330 City of Rolling Hills Housing & Safety Element Project SB 18/AB 52 Consult Request. Thank you for reaching out.

After conferring with Tribal Chair Dorame (the Most Likely Descendent), this property is highly culturally sensitive to the Gabrielino Tongva Indians of California (GTIOC) as it resides near one of our villages. The Gabrielino Tongva Indians of California request an AB52 and SB18 consultation for this project.

There are a minimum of 7 identified sites near the project area; LAN 110, LAN 191, LAN 276, LAN277, LAN278, LAN 279, LAN 280 (LAN 275 borders your project area).

The concern with all of these sites is that they are significant evidence of the existence of a village site and the area may still yield evidence of buried deposits. Artifacts unearthed in previous projects included obsidian projectiles, sandstone bowls, cog stones and more importantly, human remains.

The Gabrielino Tongva Indians of California tribe is deeply concerned with any ground disturbances in your project area and this project will need a monitor from the Gabrielino Tongva Indians of California for only ground disturbances.

Attached are our treatment plans for your project site.

Please let us know what your next steps are and how we may assist you.

Take good care and happy new year,
Christina

tehoovet taamet

CHRISTINA CONLEY

Native American Monitor - Caretaker of our Ancestral Land

Cultural Resource Administrator Under Tribal Chair, Robert Dorame (Most Likely Descendent)

HAZWOPER Certified

626.407.8761

GABRIELINO TONGVA INDIANS OF CALIFORNIA

<image001.png>

<image002.png>

From: Kellie Kandybowicz

Sent: Wednesday, December 15, 2021 9:28 AM

To: 'christina.marsden@alumni.isc.edu' <christina.marsden@alumni.isc.edu>

Cc: Richard Shultz <rshultz@chambersgroupinc.com>

Subject: 21330 City of Rolling Hills Housing & Safety Element Project SB 18/AB 52 Consult Request

Dear Christina Conley,

The City of Rolling Hills (City) is commencing its Senate Bill (SB) 18 and Assembly Bill (AB) 52 consultation processes for the Housing and Safety Element Updates Project (Project). Pursuant to Government Codes §65352.3 and §65352.4 SB 18 require local governments to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of avoiding, protecting, and/or mitigating impacts to cultural places when creating or amending General Plans, Specific Plans and Community Plans. Additionally, AB 52 (Public Resources Codes §21080.3.1 and §21080.3.2) requires public agencies to consult with California Native American tribes identified by the NAHC for the purpose of avoiding, protecting, and/or mitigating impacts to tribal cultural resources (TCRs) as defined, for California Environmental Quality Act (CEQA) projects. This letter is being provided to you because your Tribe, the Gabrielino Tongva Indians of California Tribal Council, was listed on the NAHC directory as an individual or group who may have additional knowledge pertaining to tribal cultural resources within this geographic area.

The Project consists of a Housing Element Update of the City of Rolling Hills General Plan and an update to the City's Safety Element to address various natural and human-caused hazards the City has dealt with including earthquakes, wildfires, droughts, and land movement.

The Housing Element and Safety Element Updates are policy updates only, and no specific developments are proposed at this time. A description of each of the updates is provided below.

Housing Element Update

The City's Housing Element serves as an integrated part of the General Plan, and is subject to detailed statutory requirements, including a requirement to be updated every eight years, and mandatory review by the California Department of Housing and Community Development (HCD). The City is currently adopting their 6th cycle Housing Element Update (HEU). The City's Regional Housing Needs Allocation (RHNA) for this 6th cycle, is 45 units which the City determined can be met with existing approved developments, the underutilized Rancho Del Mar school site, and Accessory Dwelling Units (ADUs). Therefore, the HEU, is a policy document; no actual development nor rezoning of parcels is included as part of the approval.

Safety Element Update

The Safety Element Update (SEU) provides the City goals, policies, and actions to minimize the hazards to safety in and around the City. The SEU evaluates natural and human-caused safety hazards that affect existing and future development and provides guidelines for protecting the community from harm. The SEU describes existing and potential future conditions and sets policies for improved public safety. The goal of the SEU is to reduce the risk of injury, death, property loss, and other hardships to acceptable levels.

As part of the proposed updates the City has requested a Sacred Lands File (SLF) search by the NAHC. The result of the SLF search conducted through the NAHC was *negative* for the Project site. The City of Rolling Hills is a rural, equestrian residential community, consisting entirely of large lot residential parcels of one acre or more (Figure 1). The community encompasses 2.99 square miles of land (approximately 1,910 acres) on the Palos Verdes Peninsula in the County of Los Angeles.

Please consider this letter notification and preliminary Project information as the initiation of the SB 18 and AB 52 requests for consultation. Pursuant to PRC 21080.3.1(d), the Gabrielino Tongva Indians of California Tribal Council have 30 days upon receipt of this letter to provide a request for AB 52 consultation on the Project. Pursuant to GC 65352.3, the Gabrielino Tongva Indians of California Tribal Council have 90 days upon receipt of this letter to provide a request for SB 18 consultation. Due to the abbreviated timeline regarding funding opportunities for this affordable housing Project, we respectfully ask that requests for SB 18 consultation also be provided within 45 days, if practicable.

Your comments are important to the City of Rolling Hills. If the Gabrielino Tongva Indians of California Tribal Council have any concerns regarding the proposed Project as it relates to Native American issues or interests, or has any information regarding sacred sites in the vicinity of the proposed Project that may help avoid impacts to those sites, please send your response to:

John F. Signo, AICP

Director of Planning and Community Services

<image006.jpg> **City of Rolling Hills – City Hall**
2 Portuguese Bend Road, Rolling Hills CA 90274
O: 310.377.1521 | F: 310.377.7288
jsigno@cityofrh.net

Attachments – Project Location Map

Kellie Kandybowicz | Cultural Resources Specialist

<image002.png>

t | 858.541.2800 x7140 f | 866.261.3100 m | 760.521.9005

6

kkandybowicz@chambersgroupinc.com www.chambersgroupinc.com

<21330_CityofRollingHillsHousing&SafetyElementProject_20211215_Conley.pdf><21330 PLAN Fig 1 Project Location_small.pdf>

<SB18-AB52 Letter Gabrielino Tongva Indians of California Tribal Council.pdf>