



Draft Environmental Impact Report

for

**Santa Monica Mountains North Area Plan and
Community Standards District Update**

SCH# 2018071065



Los Angeles County
Department of Regional Planning

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Executive Summary

The County of Los Angeles Department of Regional Planning (DRP) has prepared the Program Environmental Impact Report (EIR) for the Santa Monica Mountains North Area (North Area) Plan and Community Standards District Update (proposed Plan and CSD Update). DRP is the public agency with the principal responsibility for approving the project, and as such is the “Lead Agency” for the proposed Plan and CSD Update under the California Environmental Quality Act (CEQA), as defined in CEQA Guidelines Section 15367. CEQA requires the Lead Agency to consider the information contained in the EIR prior to taking any discretionary action. The EIR is intended to serve as an informational document to be considered by DRP and other permitting agencies during deliberations on the proposed project.

The Draft EIR is being released for agency and public review for a 45-day period. After completion of the public review period, all comments received on the Draft EIR will be reviewed and written responses will be prepared. The Final EIR will include any necessary revisions to the Draft EIR along with responses to comments. The Final EIR will be considered by decision makers in their review and decision on the proposed project (proposed Plan and CSD Update). DRP will consider adoption of the proposed Plan and CSD Update at a noticed public hearing after completion of the Final EIR.

During the public review period, the Draft EIR and appendices are available for review online on the DRP website and in the repositories identified on the website noted below:

<http://planning.lacounty.gov/smmnap>

All comments or questions about the Draft EIR should be addressed to:

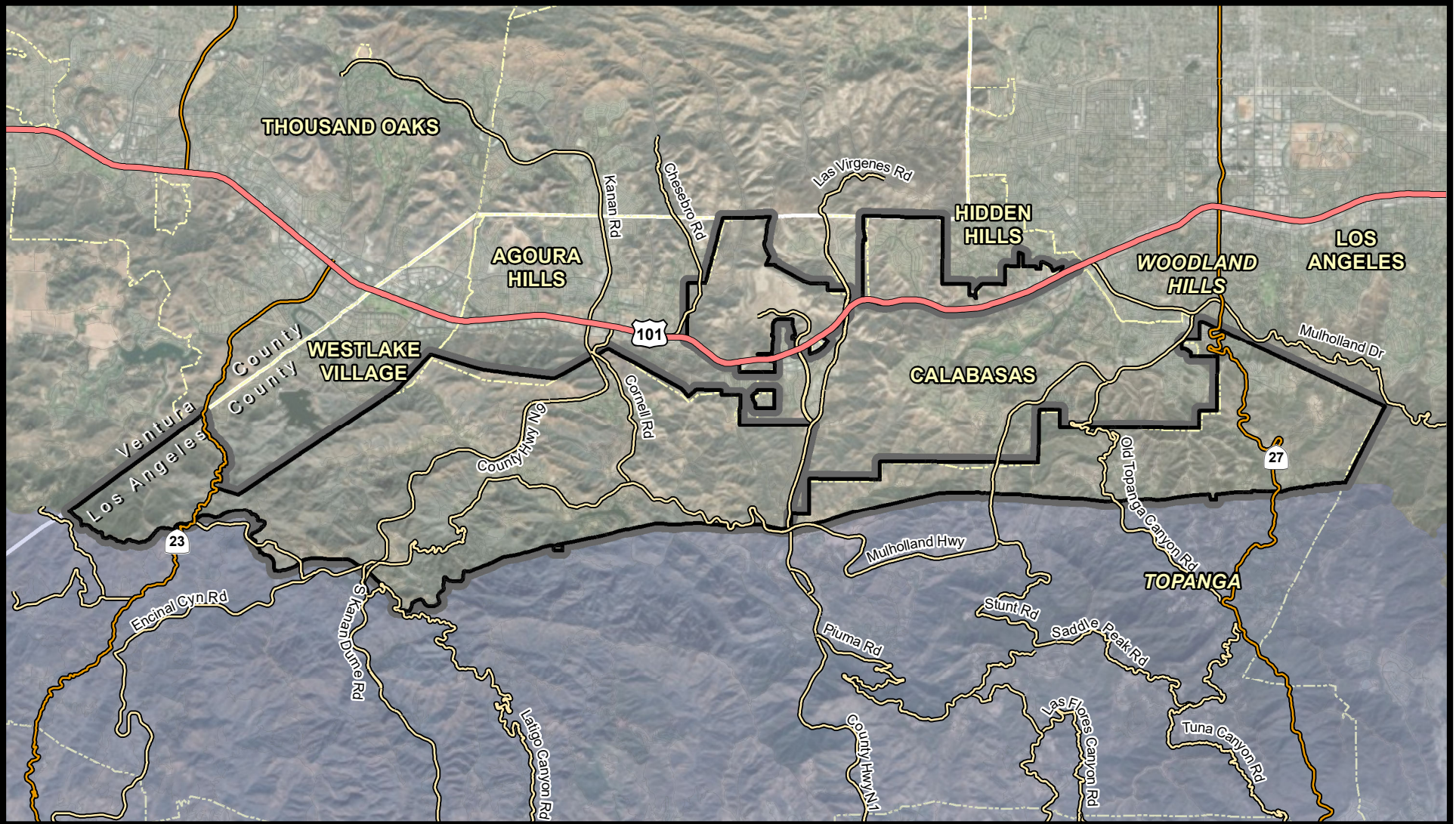
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ES.1 Introduction

DRP is proposing to update the existing North Area Plan, originally adopted in 2000, and the existing North Area Community Standards District (CSD), originally adopted in 2005 and recently amended in 2015. The North Area encompasses 32.3 square miles of unincorporated land in northwestern Los Angeles County from the US 101 Freeway corridor south to the Coastal Zone boundary (see Figure ES-1). The proposed Plan and CSD Update addresses several concerns that have developed since adoption in 2000. DRP proposes revisions to the existing North Area Plan and CSD to:

- Strengthen existing environmental resource policies;
- Identify policies and standards that will support the surrounding communities, current rural and semi-rural lifestyle; and
- Align with the policies and development standards in the 2014 Santa Monica Mountains Local Coastal Program (LCP), which was subsequently amended in 2018, to ensure consistency in land use regulations and environmental policies between the coastal zone and Santa Monica Mountains North Area.



-  Santa Monica Mountains North Area
-  Coastal Zone

Sources:
County, 2018;
Census, 2017;
Esri, 2017

Figure ES-1
Santa Monica Mountains North Area



The proposed project does not include any physical development, but rather identifies land use policies and development standards for future development projects proposed in the North Area. As a Program EIR, the document evaluates the environmental impacts in accordance with CEQA that are expected to result from implementation of the proposed Plan and CSD Update, to the extent that these impacts can be identified without a specific project. The EIR will be considered in the County's decision and must be certified by the Los Angeles County Board of Supervisors during its consideration of a decision on whether to adopt the proposed Plan and CSD Update.

This EIR analysis does not provide environmental review for future projects, but it can be used to tier future environmental analysis on future projects in the North Area. Each project in the North Area, as applicable, will have a site-specific evaluation for consistency with CEQA and may require additional site-specific studies prior to receiving permits. Future CEQA documents may incorporate by reference information in this EIR as allowed by CEQA and concentrate on site-specific issues.

CEQA Process

DRP issued a Notice of Preparation (NOP) for the EIR on August 1, 2018. Comments on the NOP were requested by no later than August 31, 2018. Eighty-nine (89) comment letters were received during the 30-day scoping period.

The Draft EIR was released for agency and public review for a 45-day public review period. After completion of the public review period, all comments received on the Draft EIR will be reviewed and written responses will be prepared, along with any necessary revisions to the Draft EIR for the purposes of its finalization. Public hearings on the proposed project will be held after completion of the Final EIR. Notice of the time and location of future public meetings and hearings will be provided prior to each public meeting and hearing date.

ES.2 Proposed Plan and CSD Update

Background on Existing North Area Plan

The Santa Monica Mountains North Area Plan was adopted by the Los Angeles County of Board Supervisors in October 2000 as a component of the Los Angeles County General Plan. The North Area Plan serves as a planning tool and provides area-specific policies for implementation of the County General Plan in the North Area. The existing plan includes the following objectives:

- Identify the community's environmental, social, and economic goals.
- Provide a forum for area residents to mold a vision for the future of the area and to resolve local land use and planning conflicts.
- State the County's policies on existing and future development needed to achieve community goals.
- Establish within local government the ability to respond to problems and opportunities concerning community development consistent with local, regional, and state goals and policies.
- Inform citizens about their community and allow for opportunities to participate in the planning and decision-making process of local government.
- Identify the need for and methods of improving the coordination of community development activities among all local units of government.

- Create a basis for subsequent planning efforts, such as the preparation of specific plans and special studies.

The existing North Area Plan includes six components: Guiding Principles and General Goals, Intergovernmental Land Use Coordination, Elements of the North Area Plan, Implementation, Glossary, and Appendices. Elements of the North Area Plan include a detailed discussion of the following key areas: Conservation and Open Space, Safety and Noise, Land Use and Housing, Circulation, and Public Facilities.

Proposed Revisions to North Area Plan

DRP has proposed updates to the existing North Area Plan to address environmental concerns that have developed since the Plan's adoption in 2000, strengthen existing environmental resource policies, and identify policies and standards that would support the surrounding communities current rural and semi-rural lifestyle. The proposed update would also bring the Plan in closer alignment with the Santa Monica Mountains LCP.

DRP held several community meetings in 2017 to 2019 to gather community input on the proposed Plan and CSD update. Members of the public who attended these meetings and provided comment included local homeowner's associations, members of the equestrian community, various other community groups, and residents. Community members identified issues such as protection of biological resources, trees, and scenic resources of the North Area. They also expressed the desire for protection of existing uses such as equestrian uses on properties as well as protecting residents from noise and traffic associated with special events held at venues in the North Area. The updated North Area Plan includes a general introduction and provides goals and policies for five elements: Conservation and Open Space, Safety and Noise, Land Use, Circulation, and Public Facilities. The Guiding Principle continues to be: *Let the land dictate the type and intensity of use*, and this Guiding Principle serves as the foundation for the goals and policies of the plan. The goals have been updated from the original plan and are listed below:

- Identify the community's environmental, social, and economic goals.
- Provide a summary of the various land uses in the North Area and the County's goals for creating the greatest compatibility amongst such uses.
- Define the County's policies on existing and future development needed to achieve community goals.
- Respond to problems and opportunities concerning community development in a way consistent with local, regional, and State goals and policies.
- Work with local citizens and stakeholders to generate a long-term vision for their community, and provide a forum for residents to help define the planning and decision-making processes of local government.
- Create a basis for subsequent planning efforts, such as the preparation of specific plans and special studies.

Background on Existing North Area CSD

The CSD was adopted in October 2002, and amended in 2005, 2007, 2010, and 2015. The CSD intends to implement the goals and policies of the North Area Plan while protecting the health, safety, and welfare of the community, especially the surrounding natural environment. The CSD serves as a focused regulatory framework on achieving specific policies in the North Area, including zoning principles and area-specific development standards.

Proposed Revisions to North Area CSD

DRP prepared an updated CSD that addresses revised goals and policies and covers key issues identified during the community and focused meetings with the public. The following bullets highlight issues that address recurring comments received during the public comment periods for the Plan and CSD Update. This summary does not identify all changes or updates. The following list provides a summary of the key revisions in the updated CSD:

- Adopt habitat protection categories and development standards to protect sensitive biological resources but allow for continued development within the North Area.
- Add development standards to protect wetlands, streams, and nesting birds.
- Establish habitat restoration guidelines and mitigation ratios.
- Require nesting bird surveys prior to vegetation removal and construction in suitable habitat for nesting birds.
- Establish tree protection such as permits and development standards to protect native/protected, Heritage, and Historic trees.
- Establish standards, best management practices (BMPs), and requirements for equestrian facilities including large and small horse boarding.
- Allow event facilities with an approved Conditional Use Permit (CUP) and address standards for elements such as noise, transportation, number of attendees, transportation, lighting, and emergency and evacuation.
- Establish allowable noise levels for the North Area and Topanga Canyon.
- Require Conditional Use Permits for grading above 500 cubic yards of soil and fill material.
- Minimize disturbance to natural surroundings by practicing natural landscaping, avoiding sprawl, and reducing building footprints.
- Provide incentives to encourage voluntary retirement of development rights on a parcel and dedication of easements for open space.
- Require retirement of a qualifying lot for each new lot or legalized lot created through a land division.
- Ensure no net increase in number of buildable lots.
- Facilitate establishment of temporary housing and rebuilding of damaged structures destroyed by disaster by allowing like-for-like replacement of legally established structures.
- Protect scenic resource areas by requiring an 18-foot height limit within scenic resource areas and near significant ridgelines.
- Establish permitted uses and uses subject to permits in Zone A-1 (Light Agriculture) and Zone A-2 (Heavy Agriculture), Zone R-R (Resort and Recreation), and Zone O-S (Open Space).

Proposed Land Use and Zone Changes

As part of the revisions to the North Area Plan and CSD, DRP has identified land use and zone changes for 132 parcels currently designated for agricultural, recreation, and residential uses. The parcels identified for this change are parcels currently owned or managed by the following agencies and organizations:

National Park Service, California State Parks, County of Los Angeles, Mountains Recreation and Conservation Authority, Mountains Restoration Trust, and Santa Monica Mountains Conservancy.

These parcels are currently used as parks, recreation uses (trail use), or are used as open space lands. The proposed changes to the land use and zoning for these parcels would bring the land use and zoning in conformance with the existing use or uses on these parcels. This update does not propose the rezoning or re-designation of land use categories for any privately-owned parcels.

ES.3 Environmental Analysis

The potential for significant impacts guides the identification of mitigation measures and of the alternatives that reduce these potential impacts. Table ES-1 at the end of this section provides a summary of the EIR findings by issue area and identifies mitigation measures that reduce impacts of the proposed project. The following summarizes the key EIR findings:

- **Proposed Project.** The EIR evaluated the proposed project's impact on 14 environmental issue areas. The assessment considered significance thresholds from Appendix G of the CEQA Guidelines in the development of the significance criteria. Three of these issue areas required mitigation measures to reduce the impacts to a less-than-significant level, while the remaining 11 issue areas were less than significant without mitigation. Refer to Table ES-1 for the impact areas and impact conclusions for all of the issue areas evaluated in the EIR.

The issue-area analysis in the EIR found that the implementation of the proposed Plan and CSD Update would result in less than significant impacts for most environmental issue areas. The proposed Plan and CSD Update incorporates both policies and development standards that address protection of natural resources such as biological and water resources and provide performance measures or thresholds for issues such as noise. For the three issue areas noted below, the EIR found that there was a potential for significant impacts. However, as allowed in CEQA, for these issues the EIR relied on the analysis and mitigation measures of the General Plan to reduce impacts.

Air Quality. While the implementation of the proposed Plan and CSD Update would not directly impact air quality, future residential, commercial, and other development in the North Area would create construction and operation emissions. To reduce potential significant impacts, mitigation measures from the County's General Plan EIR have been identified and incorporated in the Plan and CSD Update EIR. These measures address reduction of dust and pollutants and other measures such as buffers from sensitive receptors in order to reduce potential air quality impacts. With the incorporation of these measures, impacts to air quality would be less than significant.

Cultural and Tribal Resources. Cultural and historical resources have been documented in the Santa Monica Mountains area and surrounding areas. While the implementation of the proposed Plan and CSD Update would not directly impact cultural and tribal resources, future residential, commercial, and other development in the North Area could impact these resources. To reduce potential significant impacts, mitigation measures from the County's General Plan EIR have been identified and incorporated in the Plan and CSD Update EIR. These measures address protection of these resources to reduce potential for impacts. With the incorporation of these measures, impacts to cultural and tribal resources would be less than significant. In addition, DRP has consulted with tribes under Senate Bill 18 (requires involvement in land use planning) and Assembly Bill 52 (requires input on mitigation of potential impacts to tribal cultural resources) for this project.

Paleontological Resources. The North Area includes geologic formations that could have a high sensitivity for paleontological resources. Although the proposed Plan and CSD Update would not have

a direct impact on paleontological resources, future residential, commercial, and other development in the North Area could have the potential to impact these resources. To reduce potential significant impacts, one mitigation measure from the County's General Plan EIR has been identified and incorporated in the Plan and CSD Update EIR. This measure requires involvement of a paleontologist for grading deeper than six feet in depth. With the incorporation of this measure, impacts to paleontological resources would be less than significant.

- **Cumulative Project Assessment.** The EIR considered the proposed program's incremental impacts with regard to other projects proposed in the project area. The cumulative project scenario identified 20 projects within the North Area boundary, which includes ongoing and upcoming projects from the City of Calabasas, City of Westlake Village, and City of Agoura Hills. In addition, relevant and available databases were reviewed, such as CEQAnet, to augment the cumulative project list. Based on this assessment, the EIR concluded that potentially significant impacts to air quality could be reduced to less than significant after incorporating mitigation when the project was considered in conjunction with these cumulative projects. All other issue areas would not result in a significant cumulative impact or require mitigation when the project was considered in conjunction with these cumulative projects.
- **Growth-Inducing Effects.** The EIR considered the project's potential for economic, population, and housing growth. The implementation of the proposed Plan and CSD Update would not directly influence growth. Because of the rural nature of the community and the desire to maintain the area as such, the proposed project is not expected to have a significant impact on population and economics and is not expected to significantly increase demand for public services.
- **Significant Irreversible Environmental Changes.** CEQA defines an irreversible impact as an impact that uses nonrenewable resources during the initial and continued phases of the project. Significant irreversible changes resulting from the proposed project would include the use of nonrenewable energy resources; an increased commitment of public services and utilities; increased vehicle trips over the long term; and future development of vacant parcels within the Santa Monica Mountains. Compliance with all applicable regulations and the mitigation measures identified in the EIR would ensure that natural resources are conserved to the maximum extent possible.

ES.4 Areas of Controversy

Many comments were received from agencies, members of the public, and others during the 30-day scoping period. Based on this input, the following summary represents the areas of controversy:

- Safety of Santa Monica Mountains North Area, including environmental and public well-being, especially in regard to wildfires and associated public resources.
- Impacts to biological resources, such as impacts to sensitive plant and animal species.
- Impacts to viticulture processes, including potential increase in fire hazard and impacts to viable land.
- Protection of cultural resources and Native American history.
- Impacts from development in and around the North Area, such as increase in traffic, noise, and population.
- Modifications to current land use, including increase in development and reduction in open space.
- Protection of equestrian heritage and processes in Santa Monica Mountains North Area.

All scoping comments were considered in the evaluation of potential impacts from the proposed project. Each issue area or resource includes a list of applicable scoping comments that were evaluated in the impact discussions, as appropriate.

ES.5 Issues to be Resolved

Section 15123 (b) (3) of the CEQA Guidelines requires the summary section of an EIR to identify any "issues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects." The following issues will be addressed by DRP in its decision process:

- Choose among alternatives;
- Determine whether the recommended mitigation measures should be adopted or modified; and
- Determine whether additional mitigation measures need to be applied to the proposed project.

ES.6 Alternatives Analysis

Section 15126.6 of the State CEQA Guidelines states that an EIR must address "a range of reasonable alternatives to the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." The alternatives screening process considered five alternatives and found that three alternatives met or partially met the program objectives. Three alternatives were evaluated in detail in the EIR. The summary below provides the key findings of the analysis.

- **Alternative 1 – No Project Alternative.** This alternative is required by CEQA and evaluates potential impacts of continued guidance of the existing North Area Plan and CSD. While this alternative would partially meet the program objectives, it would not strengthen the environmental resource policies or provide further alignment with the Santa Monica Mountains LCP. For these reasons this alternative would have greater impacts than the proposed project for aesthetics, biological resources, land use and recreation, noise, transportation and traffic, and wildland fire and hazards.
- **Alternative 2 – Reduced Density.** This alternative proposes changes to proposed residential land use designations in the North Area. Adoption of these changes would reduce the number of future dwelling units per acre in areas where land uses are currently designated as Residential or Rural Land(s). This alternative would partially meet program objectives. Under this alternative, the only change would be to reduce the density in the North Area without the benefit of the policies and standards of the proposed Plan and CSD Update. For this reason, this alternative would have greater impacts than the proposed project for aesthetics, biological resources, land use and recreation, noise, transportation and traffic, and wildland fire and hazards.
- **Alternative 3 – Adopt Significant Ecological Area (SEA) Ordinance Review Process.** This alternative would replace the environmental review process and development standards to evaluate biological resources proposed in the North Area CSD Update with the review process and development standards in the SEA ordinance. Under this alternative, the policies and standards of the proposed Plan and CSD Update would be implemented with the only change being the manner in which biological resources are addressed. This alternative would result in similar impacts to the project except in the case of aesthetics where there is a potential for impacts. The proposed Plan and CSD Update includes area-specific and detailed biological resources policies and development standards and expanded tree protection standards. If the SEA ordinance process is adopted, biological resources would be addressed but the expanded tree protections in the proposed project would not be implemented.

Alternatives Eliminated from Further Consideration

The following list outlines the two alternatives that were not carried forward for further review in the EIR. While these options are feasible, they do not meet program objectives or reduce the significant impacts of the proposed project.

- **Mitigation Fee.** This alternative would implement a mitigation fee to compensate for impacts to habitat categories S1 and S2 in the North Area. Habitat impact fees would be charged to projects that remove or otherwise modify sensitive habitat in the Santa Monica Mountains. This alternative was eliminated because the County is currently developing a Habitat Fee Study to determine the appropriate fees to adequately compensate for loss of S1 and S2 habitats in both the Coastal Zone and in the North Area.
- **Apply Adopted Santa Monica Mountains Local Coastal Program (LCP) to North Area.** Under this alternative, the County would adopt the certified Santa Monica Mountains LCP policies and standards for application to the North Area. This alternative would protect key resources in the North Area such as biological and cultural resources. This alternative was eliminated because it would not provide an opportunity to tailor specific policies and standards to the unique characteristics of the North Area.

Environmentally Superior Alternative

Consistent with CEQA Guidelines Section 15126.6 (d) and (e)(2), the EIR identifies an environmentally superior alternative to the proposed project. The EIR determined that the proposed project would be environmentally superior. The proposed updates would have no significant unavoidable impacts to the environment whereas all three alternatives would have similar or greater impacts to environmental resources. The proposed project would have less-than-significant impacts to aesthetics, biological resources, greenhouse gas emissions, energy, hydrology and water resources, land use and recreation, noise, population and housing, public systems/utilities/service systems, transportation and traffic, and wildland fire and hazards. With mitigation, the proposed project would have less-than-significant impacts to air quality, cultural and tribal cultural resources, and paleontological resources. Implementation of any of the three alternatives may have greater impacts to aesthetics, biological resources, hydrology and water resources, land use and recreation, noise, transportation and traffic, and wildland fire and hazards.

ES.7 Impacts and Mitigation Measures

In accordance with CEQA, Table ES-1 summarizes all potential impacts associated with the proposed development, and the recommended mitigation measures to reduce significant impacts below a level of significance, where applicable. The analysis in the EIR, including the impact determinations summarized in Table ES-1, applies a uniform classification of the impacts based on the following definitions:

- **Significant impact:** cannot be mitigated to a level that is less than significant.
- **Less than Significant Impact with Mitigation;** can be reduced to a level that is less than significant through the implementation of recommended mitigation measures.
- **Less than Significant:** Adverse impact; but less than significant so mitigation is not normally recommended.
- **No Impact.**

Table ES-1: Summary of Impacts and Mitigation Measures

Impact	Summary of Mitigation Measures¹	Level of Significance
Aesthetics		
AE-1: Implementation of the proposed North Area Plan and CSD Update would adversely alter existing views of scenic vistas	No mitigation is required.	Less than Significant
AE-2: Implementation of the proposed North Area Plan and CSD Update would not substantially alter scenic resources within a state scenic highway.	No mitigation is required	No Impact
AE-3: Implementation of the proposed North Area Plan and CSD Update would alter the existing visual character of portions of the North Area and its surroundings.	No mitigation is required	Less than Significant
AE-4: Implementation of the proposed North Area Plan and CSD Update would generate additional sources of light and glare that could adversely affect day and nighttime views in the North Area.	No mitigation is required	Less than Significant
Air Quality		
AQ-1: Implementation of the proposed North Area Plan and CSD Update could be inconsistent with the applicable adopted Air Quality Management Plan.	No mitigation is required	Less than Significant
AQ-2: Implementation of the proposed North Area Plan and CSD Update would not generate emissions of criteria air pollutants that would exceed SCAQMD regional significance thresholds.	<p>AQ-1: If, during subsequent project-level environmental review, construction-related criteria air pollutants are determined to have the potential to exceed the applicable air quality management district (AQMD) adopted thresholds of significance, the County Department of Regional Planning shall require that applicants for new development projects incorporate mitigation measures as identified in the CEQA document prepared for the project to reduce air pollutant emissions during construction activities. Mitigation measures that may be identified during the environmental review include but are not limited to:</p> <ul style="list-style-type: none"> • Using construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower. • Ensuring construction equipment is properly serviced and maintained to the manufacturer's standards. • Limiting nonessential idling of construction equipment to no more than five consecutive minutes. 	Less than Significant with Mitigation

Table ES-1: Summary of Impacts and Mitigation Measures

Impact	Summary of Mitigation Measures ¹	Level of Significance
	<ul style="list-style-type: none"> • Water all active construction areas at least three times daily, or as often as needed to control dust emissions. Watering should be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water should be used whenever possible. • Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard (i.e., the minimum required space between the top of the load and the top of the trailer). • Pave, apply water three times daily or as often as necessary to control dust, or apply (nontoxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites. • Sweep daily (with water sweepers using reclaimed water if possible), or as often as needed, all paved access roads, parking areas, and staging areas at the construction site to control dust. • Sweep public streets daily (with water sweepers using reclaimed water if possible) in the vicinity of the project site, or as often as needed, to keep streets free of visible soil material. • Hydroseed or apply non-toxic soil stabilizers to inactive construction areas. • Enclose, cover, water three times daily, or apply non-toxic soil binders to exposed stockpiles (dirt, sand, etc.). <p>AQ-2: New industrial or warehousing land uses that: (1) have the potential to generate 40 or more diesel trucks per day and (2) are located within 1,000 feet of a sensitive land use (e.g. residential, schools, hospitals, nursing homes), as measured from the property line of the project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the County Department of Regional Planning prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment and the applicable air quality management district. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), particulate matter concentrations would exceed 2.5 µg/m³, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that best available control technologies for toxics (T-BACTs) are capable of reducing potential cancer and noncancer risks to an acceptable level, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to, restricting idling onsite or electrifying warehousing docks to reduce diesel particulate matter, or requiring use of newer equipment and/or vehicles. T-BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the Proposed Project.</p> <p>AQ-3: Applicants for sensitive land uses within the following distances as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, from these facilities:</p> <ul style="list-style-type: none"> • Industrial facilities within 1000 feet • Distribution centers (40 or more trucks per day) within 1,000 feet • Major transportation projects (50,000 or more vehicles per day) within 1,000 feet • Dry cleaners using perchloroethylene within 500 feet • Gasoline dispensing facilities within 300 feet 	

Table ES-1: Summary of Impacts and Mitigation Measures

Impact	Summary of Mitigation Measures ¹	Level of Significance
	<p>Applicants shall submit a health risk assessment (HRA) to the County prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment (OEHHA) and the applicable Air Quality Management District. The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children age 0 to 6 years. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06) or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk may include but are not limited to:</p> <ul style="list-style-type: none"> • Air intakes located away from high volume roadways and/or truck loading zones, unless it can be demonstrated to the County Department of Regional Planning that there are operational limitations. • Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters. <p>Mitigation measures identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the Proposed Project. The air intake design and MERV filter requirements shall be noted and/or reflected on all building plans submitted to the County and shall be verified by the County Department of Regional Planning.</p> <p>AQ-4: If it is determined during project-level environmental review that a project has the potential to emit nuisance odors beyond the property line, an odor management plan may be required, subject to County's regulations. Facilities that have the potential to generate nuisance odors include but are not limited to:</p> <ul style="list-style-type: none"> • Wastewater treatment plants • Composting, greenwaste, or recycling facilities • Fiberglass manufacturing facilities • Painting/coating operations • Large-capacity coffee roasters • Food-processing facilities <p>If an odor management plan is determined to be required through CEQA review, the County shall require the project applicant to submit the plan prior to approval to ensure compliance with the applicable Air Quality Management District's Rule 402, for nuisance odors. If applicable, the Odor Management Plan shall identify the Best Available Control Technologies for Toxics (T-BACTs) that will be utilized to reduce potential odors to acceptable levels, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to, scrubbers (e.g., air pollution control devices) at the industrial facility. T-BACTs identified in the odor management plan shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan.</p>	

Table ES-1: Summary of Impacts and Mitigation Measures

Impact	Summary of Mitigation Measures¹	Level of Significance
AQ-3: Implementation of the proposed North Area Plan and CSD Update would not generate emissions of criteria air pollutants that would exceed SCAQMD localized significance thresholds.	AQ-1: Reduce Construction Air Pollutants AQ-2: Submit a Health Risk Assessment AQ-3: Submit a Health Risk Assessment AQ-4: Odor Management Plan	Less than Significant with Mitigation
AQ-4: Implementation of the proposed North Area Plan and CSD Update would not generate emissions of toxic or hazardous air pollutants that exceed SCAQMD significance thresholds.	AQ-1: Reduce Construction Air Pollutants AQ-2: Submit a Health Risk Assessment AQ-3: Submit a Health Risk Assessment AQ-4: Odor Management Plan	Less than Significant with Mitigation
AQ-5: Implementation of the proposed North Area Plan and CSD Update would not create emissions, such as odors, that would adversely affect a substantial number of people.	No mitigation is required	Less than Significant
Biological Resources		
BR-1: The proposed North Area Plan and CSD Update would have a substantial adverse effect, either directly or through habitat modifications, on species identified as candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS.	No mitigation is required	Less than Significant
BR-2: The proposed North Area Plan and CSD Update would 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 CDFW or USFWS.	No mitigation is required	Less than Significant
BR-3: The proposed North Area Plan and CSD Update would 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.	No mitigation is required	Less than Significant

Table ES-1: Summary of Impacts and Mitigation Measures

Impact	Summary of Mitigation Measures¹	Level of Significance
BR-4: The proposed North Area Plan and CSD Update would affect the movement of a native resident or migratory fish or wildlife species or interfere with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	No mitigation is required	Less than Significant
BR-5: The proposed North Area Plan and CSD Update would require compliance with adopted Habitat Conservation Plans, Natural Community Conservation Plans, and other approved local, regional, or state policies or ordinances protecting biological resources.	No mitigation is required	No Impact
Greenhouse Gas Emissions		
GHG-1: Implementation of the proposed North Area Plan and CSD Update would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.	No mitigation is required	Less than Significant
GHG-2: Implementation of the proposed North Area Plan and CSD Update would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.	No mitigation is required	Less than Significant
Cultural and Tribal Cultural Resources		
CR-1: The proposed North Area Plan and CSD Update would cause a substantial adverse change in the significance of an historical resource as defined in §15064.5.	<p>CULT-1: Provide incentives through the Mills Act to encourage the restoration, renovation, or adaptive reuse of historic resources.</p> <p>CULT-2: Draft a comprehensive historic preservation ordinance for the unincorporated areas.</p> <p>CULT-3: Prepare an Adaptive Reuse Ordinance within the context of, and in compliance with, existing building codes that considers the conversion of older, economically distressed or historically-significant buildings into multifamily residential developments, live-and-work units, mixed use developments, or commercial uses.</p> <p>CULT-4: Prior to the issuance of any grading permit, applicants shall provide written evidence to the County of Los Angeles that a County-certified archaeologist has been retained to observe grading activities greater than six feet in depth and salvage and catalogue archaeological resources as necessary. The archaeologist shall be present at the pre-grade conference, shall establish procedures for archaeological resource surveillance, and shall establish, in cooperation with the applicant, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the artifacts as appropriate.</p>	Less than Significant with Mitigation

Table ES-1: Summary of Impacts and Mitigation Measures

Impact	Summary of Mitigation Measures ¹	Level of Significance
	<p>If the archaeological resources are found to be significant, the archaeological observer shall determine appropriate actions, in cooperation with the project applicant, for exploration and/or salvage. Prior to the release of the grading bond the applicant shall obtain approval of the archaeologist's follow-up report from the County. The report shall include the period of inspection, an analysis of any artifacts found and the present repository of the artifacts. Applicant shall prepare excavated material to the point of identification. Applicant shall offer excavated finds for curatorial purposes to the County of Los Angeles, or its designee, on a first refusal basis. These actions, as well as final mitigation and disposition of the resources, shall be subject to the approval of the County. Applicant shall pay curatorial fees if an applicable fee program has been adopted by the Board of Supervisors, and such fee program is in effect at the time of presentation of the materials to the County or its designee, all in a manner meeting the approval of the County.</p> <p>Unanticipated discoveries shall be evaluated for significance by a County-certified archaeologist. If the archaeological resources are found to be significant, then the project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; submit materials to the County of Los Angeles, or its designee, on a first refusal basis; and provide a comprehensive final report including appropriate records for the California Department of Parks and Recreation (Building, Structure, and Object Record; Archaeological Site Record; or District Record, as applicable).</p>	
CR-2: The proposed North Area Plan and CSD Update would cause a substantial adverse change in the significance a unique archaeological resource pursuant to §15064.5.	<p>CULT-1: Restoration, Renovation, or Reuse of Historic Resources</p> <p>CULT-2: Historic Preservation Ordinance</p> <p>CULT-3: Adaptive Reuse Ordinance</p> <p>CULT-4: Monitor Construction for Archaeological Resources</p>	Less than Significant with Mitigation
CR-3: The proposed North Area Plan and CSD Update would disturb any human remains, including those interred outside of formal cemeteries.	No mitigation is required	Less than Significant
TCR-1: The proposed North Area Plan and CSD Update could cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code section 21074 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.	No mitigation is required	Less than Significant

Table ES-1: Summary of Impacts and Mitigation Measures

Impact	Summary of Mitigation Measures¹	Level of Significance
TCR-2: The proposed North Area Plan and CSD Update could cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 and that is 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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	No mitigation is required	Less than Significant
Energy		
EN-1: Implementation of the proposed North Area Plan and CSD Update would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation	No mitigation is required	Less than Significant
EN-2: Implementation of the proposed North Area Plan and CSD Update would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	No mitigation is required	Less than Significant
Geology, Soils, and Paleontological Resources		
GEO-1: Implementation of the proposed North Area Plan and CSD Update could expose people or structures to potential substantial adverse effects from fault rupture.	No mitigation is required	No Impact
GEO-2: Implementation of the proposed North Area Plan and CSD Update could expose people or structures to potential substantial adverse effects from strong seismic ground shaking.	No mitigation is required	Less than Significant

Table ES-1: Summary of Impacts and Mitigation Measures

Impact	Summary of Mitigation Measures¹	Level of Significance
GEO-3: Implementation of the proposed North Area Plan and CSD Update could expose people or structures to potential substantial adverse effects from seismic-related ground failure, including liquefaction.	No mitigation is required	Less than Significant
GEO-4: Implementation of the proposed North Area Plan and CSD Update could expose people or structures to potential substantial adverse effects from landslides.	No mitigation is required	Less than Significant
GEO-5: Implementation of the proposed North Area Plan and CSD Update could result in substantial soil erosion or the loss of topsoil.	No mitigation is required	Less than Significant
GEO-6: Implementation of the proposed North Area Plan and CSD Update could be located on expansive soil creating substantial risks to life or property.	No mitigation is required	Less than Significant
GEO-7: Implementation of the proposed North Area Plan and CSD Update could have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.	No mitigation is required	No Impact
PALEO-1: Implementation of the proposed North Area Plan and CSD would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	<p>CULT-5: Prior to the issuance of any grading permit, applicants shall provide written evidence to the County of Los Angeles that a County-certified paleontologist has been retained to observe grading activities greater than six feet in depth and salvage and catalogue paleontological resources as necessary. The paleontologist shall be present at the pre-grade conference, shall establish procedures for paleontologist resource surveillance, and shall establish, in cooperation with the applicant, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the artifacts as appropriate.</p> <p>If the paleontological resources are found to be significant, the paleontologist observer shall determine appropriate actions, in cooperation with the project applicant, for exploration and/or salvage. Prior to the release of the grading bond the applicant shall obtain approval of the paleontologist's follow-up report from the County. The report shall include the period of inspection, an analysis of any artifacts found and the present repository of the artifacts. Applicant shall prepare excavated material to the point of identification.</p> <p>Applicant shall offer excavated finds for curatorial purposes to the County of Los Angeles, or its designee, on a first refusal basis. These</p>	Less than Significant with Mitigation

Table ES-1: Summary of Impacts and Mitigation Measures

Impact	Summary of Mitigation Measures ¹	Level of Significance
	actions, as well as final mitigation and disposition of the resources, shall be subject to the approval of the County. Applicant shall pay curatorial fees if an applicable fee program has been adopted by the Board of Supervisors, and such fee program is in effect at the time of presentation of the materials to the County or its designee, all in a manner meeting the approval of the County. Unanticipated discoveries shall be evaluated for significance by a County-certified paleontologist. If the paleontological resources are found to be significant, then the project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; submit materials to the County of Los Angeles, or its designee, on a first refusal basis; and provide a comprehensive final report including appropriate records for the California Department of Parks and Recreation.	
Hydrology and Water Quality		
HYD-1: Implementation of the proposed North Area Plan and CSD Update would violate water quality standards or waste discharge requirements, or otherwise substantially degrade water quality.	No mitigation is required	Less than Significant
HYD-2: Implementation of the proposed North Area Plan and CSD Update would not risk release of pollutants due to inundation from a flood, tsunami, or seiche event.	No mitigation is required	Less than Significant
HYD-3: Implementation of the proposed North Area Plan and CSD Update would not substantially decrease groundwater, interfere with groundwater recharge, or impede a sustainable groundwater management plan or water quality control plan.	No mitigation is required	Less than Significant
HYD-4: Implementation of the proposed North Area Plan and CSD Update would not result in drainage pattern alterations that would cause substantial erosion, siltation, flooding on- or off-site, or polluted runoff.	No mitigation is required	Less than Significant
Land Use and Recreation		
LU-1: Implementation of the proposed North Area Plan and CSD Update would not divide an established community.	No mitigation is required	No Impact

Table ES-1: Summary of Impacts and Mitigation Measures

Impact	Summary of Mitigation Measures¹	Level of Significance
LU-2: Implementation of the proposed North Area Plan and CSD Update would not conflict with applicable land use plans, policies, or regulations.	No mitigation is required	Less than Significant
LU-3: Implementation of the proposed North Area Plan and CSD Update would not convert FMMP-designated Farmland to a non-agricultural use.	No mitigation is required	Less than Significant
LU-4: Implementation of the proposed North Area Plan and CSD Update would not conflict with existing zoning for agricultural use, or a Williamson Act contract.	No mitigation is required	Less than Significant
LU-5: Implementation of the proposed North Area Plan and CSD Update would not conflict with existing zoning for, or cause rezoning of, forest land.	No mitigation is required	No Impact
LU-6: Implementation of the proposed North Area Plan and CSD Update would not result in the loss of forest land or conversion of forest land to non-forest use.	No mitigation is required	Less than Significant
LU-7: Implementation of the proposed North Area Plan and CSD Update would not result other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.	No mitigation is required	No Impact
LU-8: Implementation of the proposed North Area Plan and CSD Update could increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.	No mitigation is required	Less than Significant

Table ES-1: Summary of Impacts and Mitigation Measures

Impact	Summary of Mitigation Measures¹	Level of Significance
LU-9: Implementation of the proposed North Area Plan and CSD Update could include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.	No mitigation is required	Less than Significant
Noise		
N-1: Implementation of the proposed North Area Plan and CSD Update would expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance.	No mitigation is required	Less than Significant
N-2: Implementation of the proposed North Area Plan and CSD Update would result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without their implementation.	No mitigation is required	Less than Significant
N-3: Implementation of the proposed North Area Plan and CSD Update would result in a substantial temporary increase in ambient noise levels in the project vicinity above levels existing without their implementation.	No mitigation is required	Less than Significant
Population and Housing		
PH-1: The proposed North Area Plan and CSD Update could directly result in population growth in the Project Area.	No mitigation is required	Less than Significant Impact
PH-2: Implementation of the proposed North Area Plan and CSD Update could not result in the displacement of people and/or housing.	No mitigation is required	No Impact

Table ES-1: Summary of Impacts and Mitigation Measures

Impact	Summary of Mitigation Measures¹	Level of Significance
Public Services, Utilities, and Service Systems		
PS-1: Implementation of the proposed North Area Plan and CSD Update would adversely impact the environment due to the provision or alteration of governmental facilities to maintain acceptable service ratios, response times, or other performance objectives.	No mitigation is required	Less than Significant
US-1: Implementation of the proposed North Area Plan and CSD Update would result in the relocation or construction of utilities such as water facilities, electricity, natural gas, and telecommunications, which could cause adverse environmental effects.	No mitigation is required	Less than Significant
US-2: Implementation of the proposed North Area Plan and CSD Update would result in insufficient water supplies to serve reasonably foreseeable future development during normal, dry, and multiple dry years.	No mitigation is required	Less than Significant
US-3: Implementation of the proposed North Area Plan and CSD Update would result in a determination by the wastewater treatment provider which serves or may serve related projects that it has inadequate capacity to serve future projected demand in addition to the provider's existing commitments.	No mitigation is required	Less than Significant
US-4: Implementation of the proposed North Area Plan and CSD Update would not generate solid waste that may exceed waste standards or capacity of local infrastructure, or impair the attainment of solid waste reduction goals.	No mitigation is required	No Impact
US-5: Implementation of the proposed North Area Plan and CSD Update would not conflict with federal, state, or local management and reduction statutes and regulations related to solid waste.	No mitigation is required	No Impact

Table ES-1: Summary of Impacts and Mitigation Measures

Impact	Summary of Mitigation Measures¹	Level of Significance
Transportation and Traffic		
T-1: Implementation of the proposed North Area Plan and CSD Update would conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system.	No mitigation is required	Less than Significant
T-2: Implementation of the proposed North Area Plan and CSD Update would substantially increase roadway hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	No mitigation is required	Less than Significant
T-3: Implementation of the proposed North Area Plan and CSD Update would result in inadequate emergency access.	No mitigation is required	Less than Significant
T-4: Implementation of the proposed North Area Plan and CSD Update would conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., public transportation routes, bicycle routes).	No mitigation is required	Less than Significant
Wildland Fire and Hazards		
WF-1: The proposed North Area Plan and CSD Update would substantially impair an adopted emergency response plan or emergency evacuation plan.	No mitigation is required	Less than Significant
WF-2: Due to slope, prevailing winds, and other factors, the proposed North Area Plan and CSD Update would exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.	No mitigation is required	Less than Significant

Table ES-1: Summary of Impacts and Mitigation Measures

Impact	Summary of Mitigation Measures¹	Level of Significance
WF-3: The proposed North Area Plan and CSD Update would 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.	No mitigation is required	Less than Significant
WF-4: The proposed North Area Plan and CSD Update would 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.	No mitigation is required	Less than Significant
HM-1: The proposed North Area Plan and CSD Update would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	No mitigation is required	Less than Significant
HM-2: The proposed North Area Plan and CSD Update would 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.	No mitigation is required	Less than Significant
HM-3: The proposed North Area Plan and CSD Update would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	No mitigation is required	Less than Significant
HM-4: The proposed North Area Plan and CSD Update would 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 mitigation is required	Less than Significant

Table ES-1: Summary of Impacts and Mitigation Measures

Impact	Summary of Mitigation Measures¹	Level of Significance
HM-5: The North Area Plan and CSD Update, if located within an airport land use plan, or where such a plan has not been adopted within two miles of a public airport or public use airport, would result in a safety hazard or excessive noise for people residing or working in the project area.	No mitigation is required	No Impact
HM-6: The proposed North Area Plan and CSD Update would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	No mitigation is required	Less than Significant
HM-7: The proposed North Area Plan and CSD Update would expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	No mitigation is required	Less than Significant

¹. The mitigation measures identified in this table were taken from the County's EIR for adoption of 2035 General Plan (GP). These measures were included in the General Plan Programmatic EIR and were included in the certification process for the GP EIR. As allowed under CEQA Section 15152 (b), these measures have been reviewed and approved by the County and can be applied to the proposed project (proposed Plan and CSD Update).

A. Introduction

As the Lead Agency under the California Environmental Quality Act (CEQA), the County of Los Angeles Department of Regional Planning (DRP) has prepared this Program Environmental Impact Report (EIR) for the Santa Monica Mountains North Area (North Area) Plan and Community Standards District Update (proposed Plan and CSD Update). DRP is proposing to update the existing North Area Plan adopted in 2000 and the existing North Area Community Standards District (CSD) adopted in 2005 and recently amended in 2015. The North Area covers 32.3 square miles of unincorporated land in northwestern Los Angeles County from the US 101 Freeway corridor south to the Coastal Zone boundary (Figure A-1).

The proposed Plan and CSD Update are considered a “project” under CEQA and the County has evaluated this project consistent with the CEQA Statutes and Guidelines. This EIR is programmatic because it does not evaluate a specific physical project. It considers if implementation of the revisions proposed for the North Area Plan (area-specific land use plan) and North Area CSD (area-specific development standards) have the potential to cause environmental impacts, and if so, whether mitigation measures or alternatives to the proposed update are needed to reduce potential environmental impacts.

The contents of this document reflect input received by government agencies, non-governmental organizations, and private citizens during the 30-day scoping period. As described below, the scoping period followed the DRP’s publication of the Notice of Preparation (NOP) for the proposed Plan and CSD Update, which also included a noticed public scoping meeting to take public comment on the scope and content of the EIR. This introduction provides the purpose and format of this environmental document.

A.1 Purpose and Intended Uses of the EIR

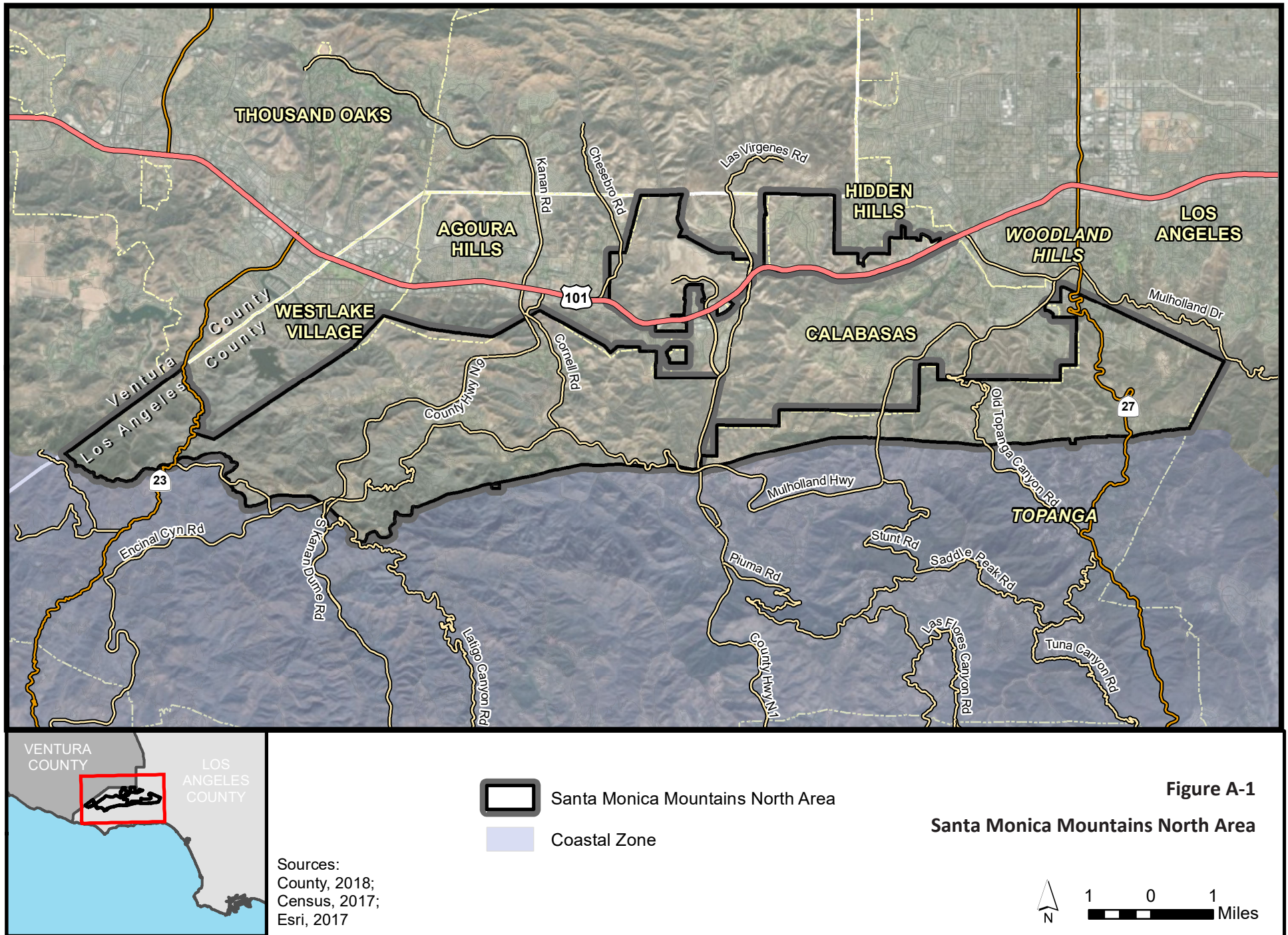
As noted above, this document is a Program EIR. Section 15168(a) of the CEQA Guidelines states that:

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

As a Program EIR, this document evaluates the environmental impacts that are expected to result from implementation of the proposed Plan and CSD Update, to the extent that these impacts can be identified without a specific project. Section 15168(b) identifies several advantages for using a Program EIR. Two of the advantages are included below:

- Provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR for an individual action.
- Allows the Lead Agency to consider board policy alternatives and program-wide mitigation measures at an early stage when the agency has greater flexibility to deal with problems or cumulative impacts [CEQA Guidelines Section 15168(b) (1) and (4)].

As described in Section 15121(a) of the CEQA Guidelines, an EIR is an informational document that will inform public agencies and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable alternatives to the project. The purpose of this EIR is to focus the discussion on those potential effects on the environment from implementation of the proposed Plan and CSD Update, which the Lead Agency has determined may have the potential to be significant.



As allowed under CEQA Guidelines Section 15063, DRP determined that an EIR was needed for the proposed Plan and CSD Update and moved forward with preparing the environmental document without the preparation of an Initial Study. This approach is common and is consistent with CEQA, which states that if the Lead Agency determines an EIR is required for a project, an Initial Study is not required. As such, DRP has prepared this full-issue EIR consistent with the requirements of CEQA.

General Plan EIR. CEQA Guidelines Section 15152 encourages lead agencies to tier-off of a prior environmental analysis to eliminate repetitive discussions of the same issues and to concentrate the later EIR “solely on the issues specific to the later project.” Section 15152 (b) states: “Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy, or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration.”

The County adopted the 2035 General Plan (General Plan) on October 6, 2015 (County of Los Angeles, 2014). As part of the decision on this plan, the County prepared and certified a Programmatic EIR that evaluated 11 planning areas including the Santa Monica Mountains Planning Area, which includes the Santa Monica Mountains North Area. Where appropriate this document refers to and incorporates information from the General Plan EIR. The General Plan EIR is publicly available on the County’s website (<http://planning.lacounty.gov/generalplan/eir>).

A.2 Overview of the Proposed Plan and CSD Update

DRP has proposed updates to the existing North Area Plan to address environmental concerns that have developed since the Plan’s adoption in 2000, strengthen existing environmental resource policies, and identify policies and standards that will support the surrounding communities current rural and semi-rural lifestyle. The proposed update would also bring the Plan in alignment with the 2014 Santa Monica Mountains Local Coastal Program (LCP) to ensure consistency in land use regulations and environmental policies between the Santa Monica Mountains Coastal Zone and Santa Monica Mountains North Area. To implement updated policies in the North Area Plan, corresponding changes would be made to the North Area CSD.

DRP held several community meetings in 2017, 2018, and 2019 to obtain input and feedback on the proposed Plan and CSD update. Members of the public including local homeowner’s associations, members of the equestrian community, various other community groups, and residents were invited to attend community meetings to provide comments on the proposed update. Following community outreach, DRP identified the following key areas that are addressed in the proposed Plan and CSD Update:

- **Habitat Protection:** Based on a site-specific biological assessment, DRP is proposing to adopt four habitat protection categories in the North Area. These categories range from the most protective to the least protective and include policies and development standards to protect sensitive biological resources, but, allow for continued development within the North Area.
- **Equestrian Standards:** Based on community meetings and input from the equestrian community, DRP has identified development standards and would require best management practices (BMPs) such as runoff diversion, waste management and tree protection for equestrian facilities.
- **Expanded Tree Protections:** Based on community meetings and input from interested groups, DRP has identified protection measures for Native, Heritage, Historic and Oak trees and has identified measures to protect nesting birds.
- **Event Facilities:** DRP has identified measures that address resident concerns with noise, traffic, lighting, emergency evacuation, time limits for operation, and maximum number of days eligible for special events.

- **Transfer of Development Credits.** To minimize impact on the environment and infrastructure as well as prevent a net increase in development in the North Area, the CSD requires applications for land divisions and tract maps to include retirement of a lot for each created or legalized lot.
- **Rebuilding after Disaster.** DRP has identified measures to address temporary housing and rebuilding damaged or destroyed structures after a catastrophic event.
- **Other Policies and Standards:** DRP has identified application review procedures for properties with sensitive biological resources and added policies/development standards for scenic resource areas, scenic routes, visual resources, significant ridgelines, and outdoor lighting and grading.

DRP developed the proposed Plan and CSD Update with input from the North Area community and these updates are the focus of the analysis in this EIR. Section B Plan and CSD Update Description provides a description of the proposed updates and Appendix 1 includes a complete version of the updated North Area Plan and CSD. Figure A-2 shows the parallel review conducted for the proposed Plan and CSD Update and the EIR.

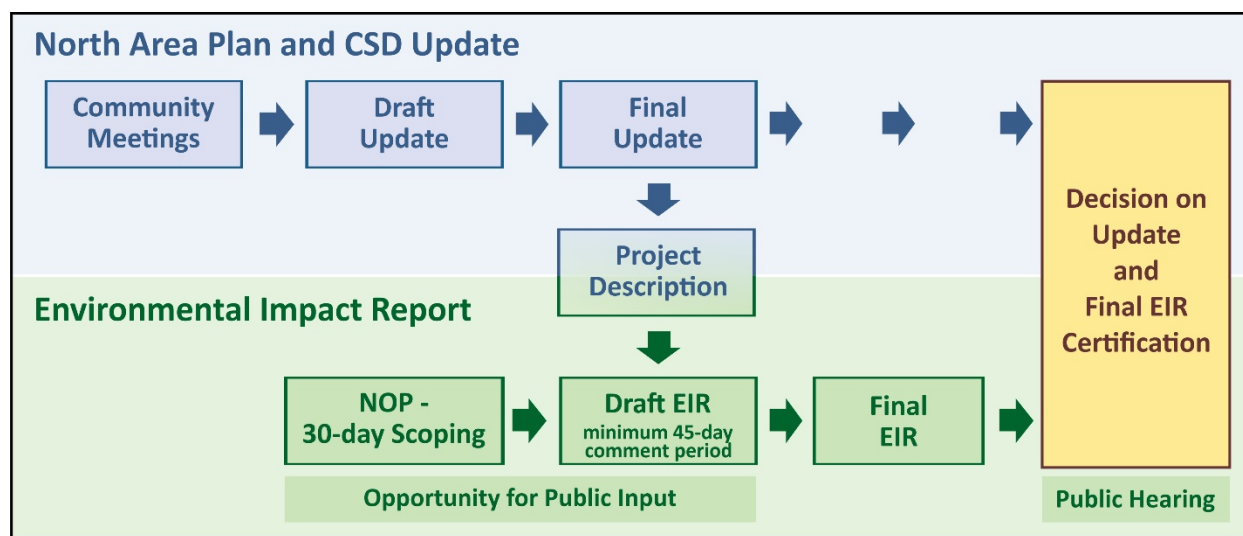


Figure A-2. Plan and CSD Update Preparation and EIR Process

A.3 EIR Public Review Process

Distribution of the NOP

In compliance with Sections 15082 and 15375 of the State CEQA Guidelines, a Notice of Preparation (NOP) was prepared by the DRP and distributed to the State Clearinghouse, Office of Planning and Research, Trustee and Responsible Agencies and other interested parties on August 1, 2018. The release of the NOP started the 30-day public review period that went from August 1, 2018, through August 31, 2018. Notification regarding the proposed update and scoping meeting included:

- The NOP was mailed to Tribes on the County's Tribal Consultation List on July 26, 2018.
- The NOP was filed with the State Clearinghouse on July 27, 2018.
- The NOP was posted at the County of Los Angeles, County Clerk's office on July 30, 2018.
- A postcard notice regarding the public scoping meeting was mailed on July 31, 2018, to approximately 250 interested parties. This notice was also posted on Facebook, Twitter, and NextDoor.

- A notice regarding the proposed Plan and CSD Update, comment period, and public meeting was placed on the DRP's social media accounts (i.e., Facebook [August 1, 2018], Twitter [August 1, 2018], and NextDoor [August 1, 2018 – NOP and information about meeting and August 21, 2018 – meeting reminder]).
- DRP published a newspaper notice in the Malibu Times on August 2, 2018. The newspaper notice included information regarding the date, time and location for the public scoping meeting as well as the comment period.
- A public meeting notice was emailed to approximately 320 contacts on the DRP's email sign-up list.

A public scoping meeting was held on August 21, 2018, at the Los Angeles County Field Office in Calabasas. Twenty-five attendees provided oral comments at the public meeting with many more in attendance at the meeting (101 attendees based on sign-in sheets). In addition to the oral comments received during the meeting, DRP received a total of 89 comment letters and emails during the 30-day comment period. DRP received comment letters from the following nine agencies: California Department of Fish and Wildlife, Southern California Association of Governments, South Coast Air Quality Management District, California Native American Heritage Commission, Resource Conservation District of the Santa Monica Mountains, Ventura County Air Pollution Control District, Ventura County Watershed Protection District, County of Ventura Resource Management Agency, and California Department of Transportation.

All comments were considered in the preparation of this EIR. Appendix 2 includes a summary of the oral and written comments that were received during the comment period and includes copies of the comment letters and emails. The scoping comment summary was provided to all issue-area authors for use in preparation of their respective technical sections/analyses for this EIR.

Availability of the Draft EIR

The Draft EIR will be circulated for review and comment by the public and other interested parties, agencies, and organizations for a period of 45 days. The Draft EIR will be available for review at: <http://planning.lacounty.gov/smmnap>.

After completion of the 45-day review period, a Final EIR will be prepared that responds to comments on the Draft EIR submitted during the review period and modifies the Draft EIR as necessary. Public hearings on the proposed project will be held after completion of the Final EIR. Notice of the time and location of future public meetings and hearings will be provided prior to each public meeting and hearing date.

All comments or questions about the Draft EIR should be addressed to:

Thuy Hua, AICP
Los Angeles County Department of Regional Planning
320 W. Temple Street, 13th Floor | Los Angeles, CA 90012
smmnortharea@planning.lacounty.gov

Figure A-3 provides a flowchart of the EIR process. DRP has completed the initial steps of the EIR process as discussed in this section and will continue through the process as required by CEQA.

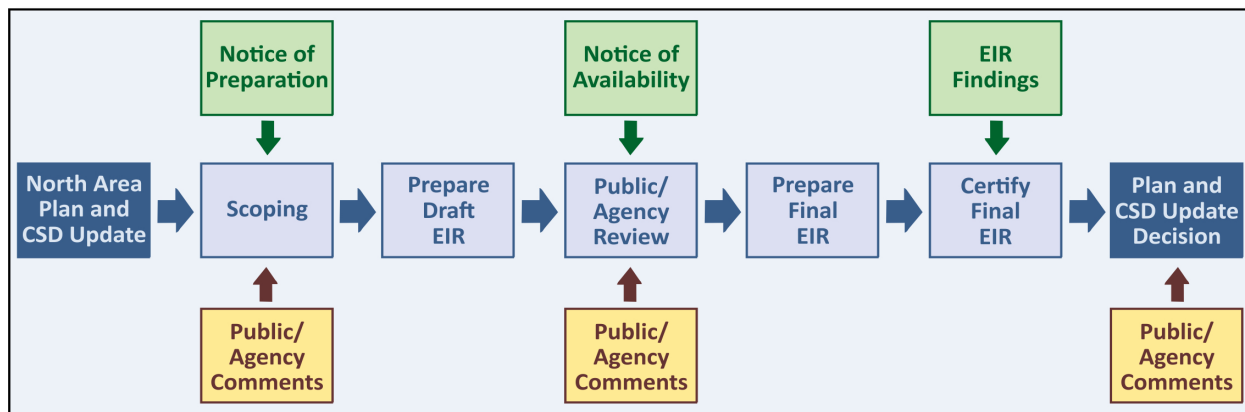


Figure A-3. The EIR Process

A.4 Organization of the EIR

This EIR is organized as follows:

Executive Summary: A summary description of the project, alternatives, environmental impacts, and mitigation measures.

Section A (Introduction): A discussion of the intended use of the EIR, brief description of the proposed Plan and CSD Update, and general organization of the EIR.

Section B (Description of Plan and CSD Update): A complete description of the proposed Plan and CSD Update including a description of the North Area, Plan and CSD objectives, and key changes to the proposed Plan and CSD.

Section C (Environmental Setting, Analysis, and Mitigation Measures): A comprehensive analysis and assessment of potential impacts and recommended mitigation measures for the proposed Plan and CSD Update. This section describes the assessment methodology and addresses 12 environmental issue areas (e.g. Aesthetics, Air Quality, etc.).

Section D (Alternatives): A description of the alternatives evaluation process, description of alternatives considered but eliminated from further analysis, and the rationale for eliminating alternatives from the analysis. This section includes an analysis of potential impacts for the retained alternatives, including consideration of the No Project Alternative to the proposed Plan and CSD Update.

Section E (Other CEQA Considerations): A summary of environmental effects found to be less than significant as described in the NOP, potential growth-inducing effects, and other CEQA required issues.

Section F (Public Participation and Consultation): A description of the public, agency, and tribal outreach conducted for the EIR and a list of County of Los Angeles and consultant team members who contributed to the preparation of the EIR.

Section G (References): A listing of references by environmental issue areas that were used in the analysis contained within this EIR.

Section H (Glossary, Acronyms, and Abbreviations): A list of terms, acronyms and abbreviations used throughout the document.

Appendices: Technical reports and background information supporting the analyses in the EIR.

B. Plan and CSD Update Description

This section provides an overview of the updates made to the Santa Monica Mountains North Area (North Area) Plan and Community Standards District (proposed Plan and CSD Update). The proposed Plan and CSD Update is the proposed project evaluated in the EIR (Section C, Environmental Analysis). The proposed project does not include any physical development, but rather identifies land use policies and development standards for future development projects proposed in the North Area. Figure A-1 (Section A Introduction) provides the location of the North Area within Los Angeles County and identifies the areas that would be subject to the policies and development standards identified in proposed Plan and CSD Update.

B.1 Introduction and Objectives

The County of Los Angeles, Department of Regional Planning (DRP) is proposing an update to the North Area Plan, adopted in 2000, and the existing Community Standards District (CSD), adopted in 2005 and recently amended in 2015. The County released a Draft Santa Monica Mountains North Area Plan and CSD (Draft Plan and CSD) on October 1, 2018. The County held community meetings to take public comment on the proposed amendments prior to releasing the Draft Plan and CSD for public comment. After release of the October 1st version of the Draft Plan and CSD, the County held a 30-day public comment period to take comments on the draft document and held one community meeting during the comment period. A second community meeting originally scheduled in November 2018 was cancelled because of the Woolsey Fire (November 2018). After the Woolsey Fire, which destroyed scenic, biological and other resources in the project area, the Draft Plan and CSD was put on hold. An additional community meeting was held on April 3, 2019, to take public input on the Draft Plan and CSD. A revised version of the Draft Plan and CSD was released to the public on August 29, 2019, and another community meeting was held on September 19, 2019 to take public comments on the revised draft documents. A second comment period was held from August 29, 2019 through September 30, 2019, on the Draft Plan and CSD.

The Draft Plan and CSD was revised based on comments received during the 2019 comment period noted above. Appendix 1 includes the proposed Plan and CSD Update (February 2020) evaluated in this EIR. The Plan and CSD Update addresses environmental concerns that have developed since adoption of the original Santa Monica Mountains North Area Plan and CSD in 2000. The County proposes revisions to the North Area Plan and CSD to:

- Strengthen existing environmental resource policies;
- Identify policies and standards that will support the surrounding communities current rural and semi-rural lifestyle; and
- Align with the policies and development standards in the 2014 Santa Monica Mountains Local Coastal Program to ensure consistency in land use regulations and environmental policies between the Coastal Zone and Santa Monica Mountains North Area.

The Santa Monica Mountains Local Coastal Program (LCP) was adopted by the Los Angeles County Board of Supervisors in August 2014 and certified by the California Coastal Commission in October 2014 under the California Coastal Act of 1976. The Santa Monica Mountains LCP is one of two plans supporting the Santa Monica Mountains area; the North Area Plan is the second governing plan. The North Area Plan and the LCP are components of the Los Angeles County General Plan and both serve as governing plans guiding

policy implementation in the Santa Monica Mountains; therefore, it is important to maintain consistency between the Santa Monica Mountains LCP and Santa Monica Mountains North Area Plan and CSD.

B.2 General Environmental Setting of North Area

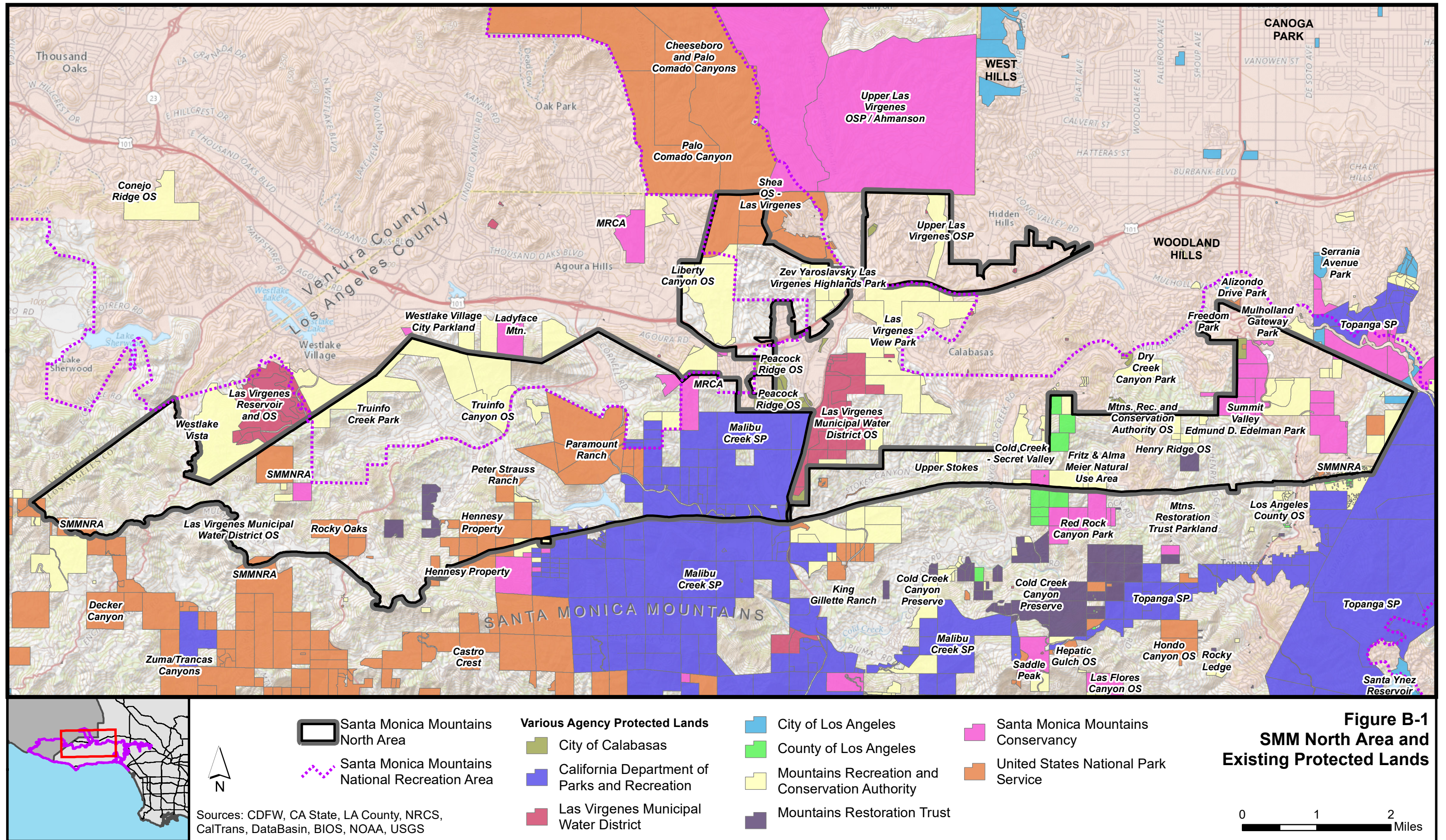
The Santa Monica Mountains North Area encompasses 32.3 square miles of unincorporated lands in western Los Angeles County. The North Area extends from the 101-freeway corridor south to the Coastal Zone boundary. The project area is bounded by Agoura Hills, Calabasas, Hidden Hills, and Woodland Hills to the north, the City of Los Angeles to the east, Ventura County and the City of Westlake to the west, and the Santa Monica Mountains Coastal Zone and City of Malibu to the south. The North Area features multiple scenic resources including Ladyface Mountain located south of Agoura Road at Kanan Dume Road, Sugar Loaf Peak near Paramount Ranch, the iconic Saddle Rock (visible for miles), and Turtle Rock located near the Rocky Oaks Park off Mulholland Drive at Kanan Dume Road. Prominent ridgelines and sandstone rock outcrops are also present near Old Topanga Road.

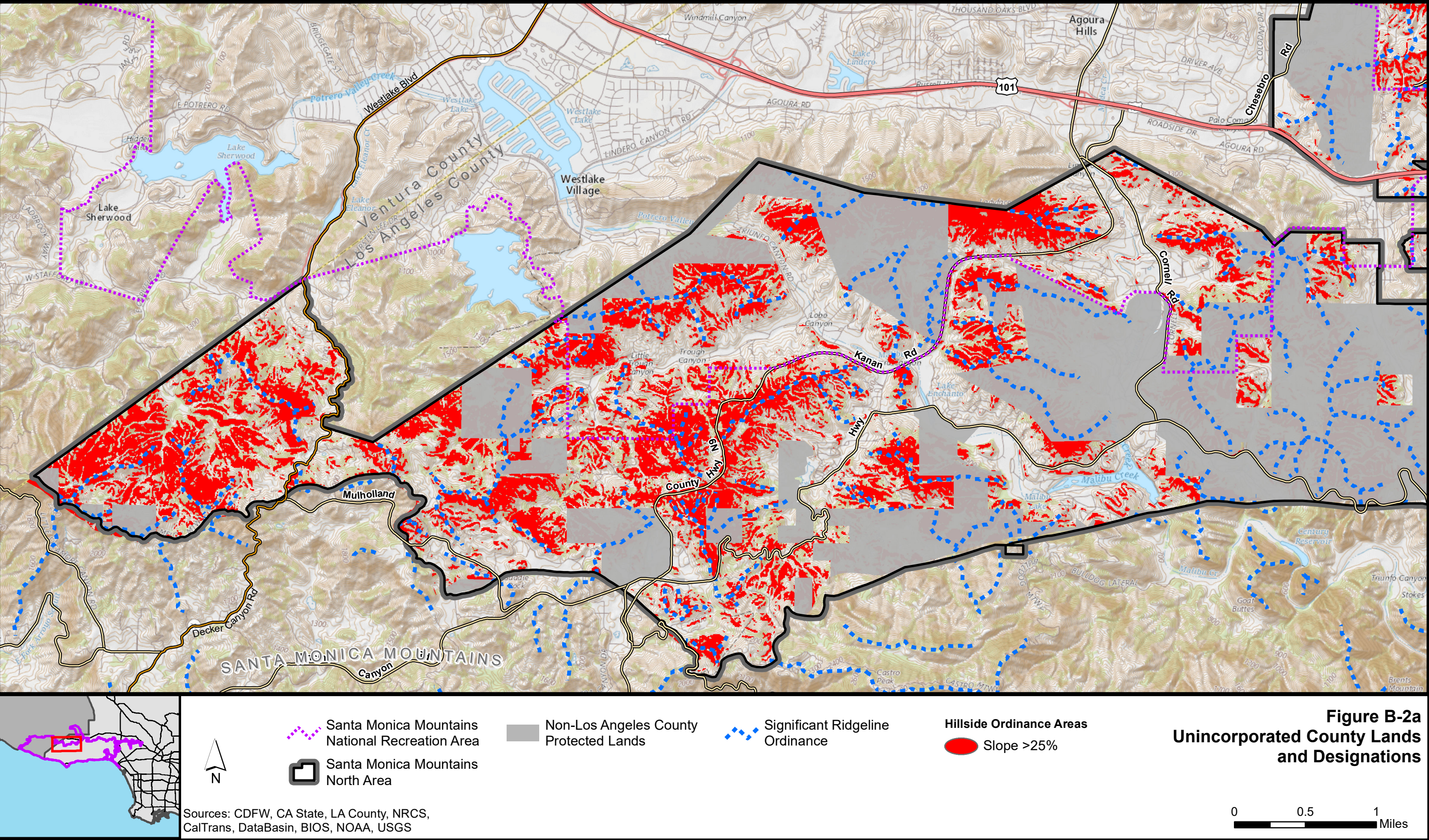
Ventura Freeway provides local vehicular access to the area's cities and Mulholland Highway, one of three State-designated County Scenic Highways in the Santa Monica Mountains. The 101 Freeway, as it is commonly called, provides access to the area's main recreational resources, including many of the regional parks in the North Area. The planning area consists of five discrete land types: urbanized areas, rural residential, ranches, vineyards, and open space. Existing land uses in the North Area include 167 acres of Commercial, 515 acres of Public/Semi-Public, 3,488 acres of Residential, and 16,514 acres of Open Space/Other (County of Los Angeles, 2020). The North Area also includes approximately 102 acres of Unique Farmland (DOC, 2016).

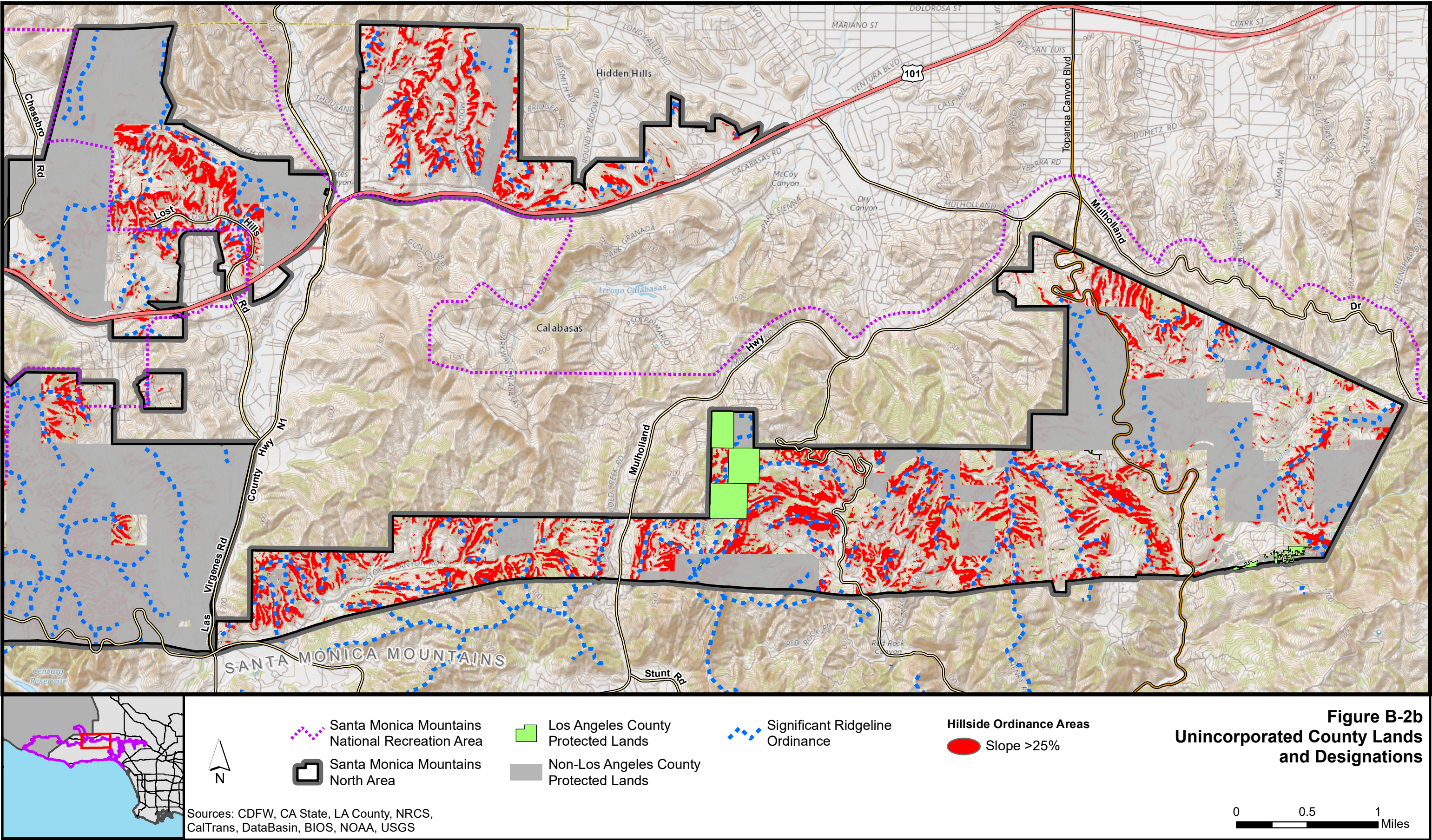
The North Area includes portions of the Santa Monica Mountains National Recreation Area administered by the National Park Service (NPS), California State Park lands, and other protected areas. Approximately 35 percent of the North Area consists of conservation and park lands, and the majority of the Santa Monica Mountains are designated as a Significant Ecological Area. The North Area is located within the Southern Ecoregion and supports some of the most important biological resources in Southern California. Figure B-1 illustrates protected and conservation lands as well as key land features within the North Area.

The Santa Monica Mountains are most notably known for the high diversity of habitats that occur in a relatively small area, including a variety of sensitive plants and wildlife, unique geologic features, important wildlife linkages, and aquatic features. Several State and federally listed species are known from the region, and the area supports some of the last undisturbed open space along the urban-wilderness interface. The coastal landscape is dominated by the Santa Monica Mountains and characterized by deep canyons, expansive oak woodlands, coastal scrub, and a wide variety of plants and wildlife, some of which are found nowhere else in the world. The North Area also supports numerous creeks, streams, seeps, and springs that provide significant riparian habitat. Although highly rural in character, the North Area is located adjacent to large urban centers and small communities are intermingled with large tracts of open land. DRP documented the resources within the North Area in the Biological Assessment Report (Aspen, 2018). Appendix 3 includes this report.

The majority of the North Area that is not committed to development or long-term open space conservation areas contains steep slopes greater than 25 percent grade, which are subject to the Hillside Management Ordinance (see Figure B-2a and B-2b). The natural hillsides provide valuable scenic and biological resources. In addition, the North Area is entirely within the Very High Fire Hazard Severity Zone.







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Woolsey Fire

The Woolsey Fire started on November 8, 2018 north of Malibu and south of Simi Valley near the Los Angeles and Ventura County boundary area and was contained on November 21, 2018 (CALFIRE, 2018). The fire burned a total of 96,349 acres, destroyed 1,643 structures, damaged an additional 341 structures, killed three people and included the evacuation of more than 200,000 people. Several cities and communities within Los Angeles and Ventura counties were affected including Thousand Oaks, Oak Park, Westlake Village, Agoura Hills, West Hills, Simi Valley, Chatsworth, Bell Canyon, Hidden Hills, Calabasas, and Malibu. The fire also affected significant portions of the Santa Monica Mountains, including the Santa Monica Mountains National Recreation Area (NRA). The Woolsey Fire burned approximately 83% of all National Park Service land in the Santa Monica Mountains NRA and is responsible for the loss of 616 structures and one mountain lion within the NRA. Within the Santa Monica Mountains NRA, large portions of the North Area and the neighboring cities of Westlake Village, Agoura Hills, and Calabasas suffered extensive fire damage. The Woolsey Fire contributed to significant vegetation loss, landscape change, and severe damage to numerous outdoor trails, park facilities, vineyards, and wine facilities in the North Area and the surrounding region. Figure B-3 shows the Woolsey Fire burn area in relation to the North Area boundary (CALFIRE, 2018; LA Times, 2018a and 2018b; NPS, 2018).

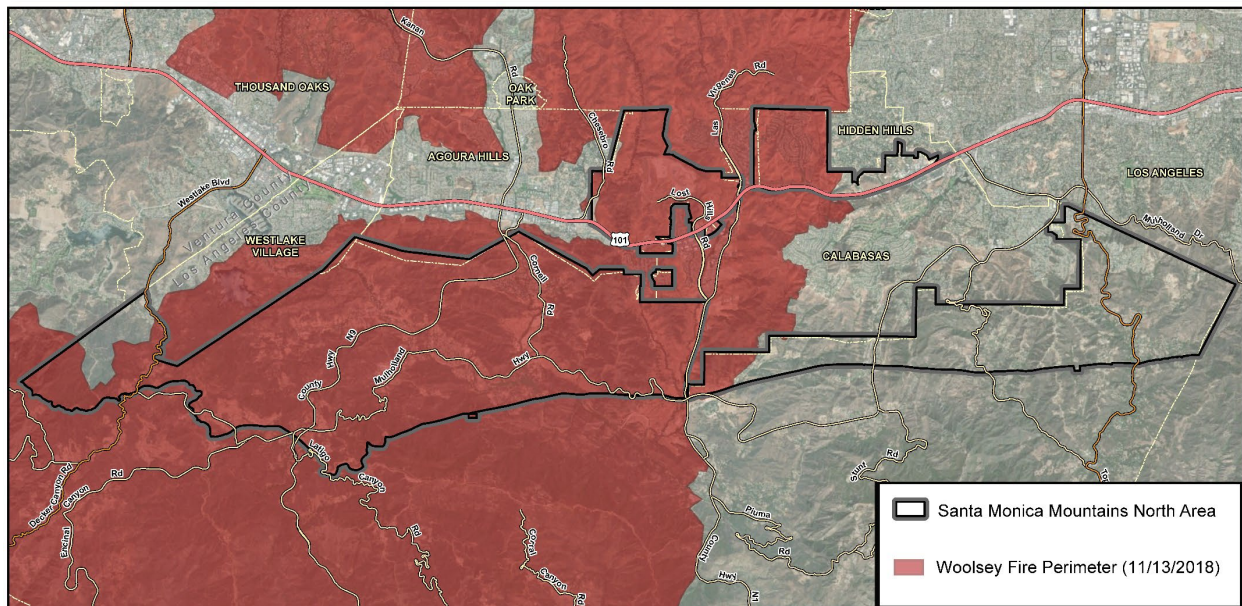


Figure B-3. Woolsey Fire Perimeter

While the Woolsey Fire significantly destroyed many resources in the project area, the rains that followed the devastating fire allowed some of the biological resources to begin growing in the project area. Although biological and scenic resources were not fully recovered at the time of publication of the EIR, this EIR considers the baseline to be when the NOP was released to the public in August 2018, consistent with Section 15125 of the CEQA Guidelines. Using this approach, the EIR evaluates the worst-case scenario for all issue-areas. The EIR, however, recognizes that fire is an issue in the project area and has addressed it in Section C.15 Wildfire and Hazards in this document. This EIR also considers the effect of the fire in the evaluation of other issue areas, such as biological and scenic resources in Section C of this EIR.

B.3 Plan and CSD Update Development Process

DRP held several public meetings in 2017, 2018, and 2019 to obtain community input and feedback on the proposed Plan and CSD Update. Members of the public including local homeowner's associations, members of the equestrian community, and various other community groups, and residents were invited to attend community and focused meetings to provide comments on the proposed updates. A summary of the community meetings and key milestones regarding the proposed Plan and CSD Update are highlighted below:

- **April 19, 2017.** Introductory kick-off meeting with local homeowners' groups.
- **August 16, 2017.** Community-wide meeting in the Santa Monica Mountains to identify community interest areas for possible regulations and to receive comments on current regulations.
- **2017-2018** (multiple dates). Met with small group of community stakeholders who would be affected by regulations on new interest areas to vet policies and get direction on how the regulations could be improved.
- **October 1, 2018.** Released the Draft Plan and CSD for public comment.
- **October 25, 2018.** Held community meeting to take comments on the Draft Plan and CSD released on October 1, 2018.
- **April 3, 2019.** Held community meeting to take comments on the October 2018 version of the Draft Plan and CSD. (A scheduled meeting in November 14, 2018 was cancelled because of the fire.)
- **October 2018 through April 2019.** Comment period for the October 2018 version of the Draft Plan and CSD. The original comment period of October 1 through November 30, 2018 was extended due to the Woolsey Fire.
- **August 29, 2019.** DRP revised the Plan and CSD based on the input received and released the final draft version of the Plan and CSD for public comment.
- **August 29 through September 30, 2019.** Comment period for the August 2019 version of the Draft Plan and CSD.
- **September 19, 2019.** DRP held a community meeting to take public comments on the August 2019 version of the Draft Plan and CSD.

In addition, DRP provided information on the status of the Draft Plan and CSD on its website (<http://planning.lacounty.gov/smmnap>). This website includes information and materials from all project-related meetings. DRP also noticed the community meetings via social media (i.e. Twitter, Facebook) and mailed postcard notices to its interested parties list. To meet AB 52 requirements, DRP also provided notice to interested tribes regarding the Draft Plan and CSD. Refer to Section C.6, Cultural and Tribal Cultural Resources, and Section F, Public Participation and Consultation regarding the AB 52 consultation process.

B.4 North Area Plan Update

B.4.1 Background on Existing North Area Plan

The Santa Monica Mountains North Area Plan was adopted by the Los Angeles County of Board Supervisors in October 2000 as a component of the Los Angeles County General Plan. The North Area Plan serves as a planning tool and provides specialized regulation policies for implementation of the County General Plan in the North Area. The existing plan includes the following objectives:

- Identify the community's environmental, social, and economic goals.

- Provide a forum for area residents to mold a vision for the future of the area and to resolve local land use and planning conflicts.
- State the County's policies on existing and future development needed to achieve community goals.
- Establish within local government the ability to respond to problems and opportunities concerning community development consistent with local, regional, and state goals and policies.
- Inform citizens about their community and allow for opportunities to participate in the planning and decision-making process of local government.
- Identify the need for and methods of improving the coordination of community development activities among all local units of government.
- Create a basis for subsequent planning efforts, such as the preparation of specific plans and special studies.

The existing North Area Plan includes six components: Guiding Principles and General Goals, Intergovernmental Land Use Coordination, Elements of the North Area Plan, Implementation, Glossary, and Appendices. Elements of the existing North Area Plan include a detailed discussion of the following key areas: Conservation and Open Space, Safety and Noise, Land Use and Housing, Circulation, and Public Facilities.

B.4.2 Proposed Revisions to North Area Plan

As noted in Section B.3 above, DRP held multiple community meetings to receive input on issues that should be addressed in the revised North Area Plan. Community members identified issues such as protection of biological resources, trees, and scenic resources of the North Area. There were concerns raised regarding protection of existing uses such as equestrian uses on properties as well as protecting residents from noise and traffic associated with special events held at wineries and other venues in the project area.

The updated plan includes a general introduction and provides goals and policies for five elements: Conservation and Open Space Element, Safety and Noise Element, Land Use Element, Circulation Element, and Public Facilities Element. The Guiding Principle continues to be: *Let the land dictate the type and intensity of use*, and this Guiding Principle

PROPOSED NORTH AREA PLAN POLICIES

Conservation and Open Space Element

- Revised Biological Resources policies to protect biological resources and add four habitat protection categories.
- New Water Quality and Availability policies to protect watersheds from agricultural and equestrian activities.
- New Tree Protection policies to preserve Native, Heritage, Historic and Oak trees in the North Area.
- Revised Scenic Resources policies to address significant ridgelines and scenic routes.
- New Open Space policies to address opportunities to preserve open space in the North Area.

Safety and Noise Element

- Revised Noise policies that address excessive noise in the North Area.

Land Use and Housing Element

- New goals/policies to allow Event Facilities while meeting public safety, dark skies, noise and land use policies.
- New goals/policies to address equestrian activities that balance land use, equestrian activities, and environmental protection.
- Revised/added Land Use and Open Space policies for outdoor lighting, grading, and access roads, as examples.
- New Agricultural Land Use goals/policies to address agricultural use of water, soil and erosion and conservation of the natural resources.

Circulation Element

- Modified policies to address roadway capacity, roadway efficiency, and transportation alternatives.

Public Facilities Element

- Added goals and policies that address fire and paramedic, police, and solid waste services.

serves as the foundation for the goals and policies of the plan. The goals have been updated from the original plan and are listed below:

- Identify the community’s environmental, social, and economic goals.
- Provide a summary of the various land uses in the North Area and the County’s goals for creating the greatest compatibility amongst such uses.
- Define the County’s policies on existing and future development needed to achieve community goals.
- Respond to problems and opportunities concerning community development in a way consistent with local, regional, and State goals and policies.
- Work with local citizens and stakeholders to generate a long-term vision for their community, and provide a forum for residents to help define the planning and decision-making processes of local government.
- Create a basis for subsequent planning efforts, such as the preparation of specific plans and special studies.

Appendix 1 includes a complete version of the updated North Area plan. A summary of key proposed revisions to the North Area Plan are provided in the adjacent list.

B.5 North Area CSD Update

B.5.1 Background on Existing North Area CSD

The Santa Monica Mountains North Area Community Standards District (CSD) was adopted in October 2002, and amended in 2005, 2007, 2010, and 2015. The box at right shows a summary of revisions for each amendment.

The CSD intends to implement the goals and policies of the North Area Plan while protecting the health, safety, and welfare of the community, especially the surrounding natural environment. The CSD provides a focused framework on achieving specific policies in the North Area, including zoning principles and area-specific development standards.

B.5.2 Proposed Revisions to North Area CSD

Based on the goals and policies of the North Area Plan, DRP prepared an updated CSD that addresses revised goals and policies and covers the key issues identified during the community and focused meetings with residents, homeowner’s groups, and special interest groups (equestrian). The bullets below highlight issues that address recurring comments received during the public comment periods for the Plan and CSD Update. This summary does not identify all changes or updates. Appendix 1 of this EIR includes the complete updated CSD and should be reviewed for all changes to the CSD.

Application and Review Procedures (Section 22.336.050)

- Add biological inventory or biological assessment as part of a development application, depending on habitat protection category of project site.

REVISIONS TO THE CSD

- 2005 – Included Grading and Significant Ridgeline Ordinance to establish restrictions on grading and ridgeline development, including criteria for significant ridgelines.
- 2007 – Included Commercial Zoning Ordinance to require commercial uses to obtain Conditional Use Permits dependent on the land use category.
- 2010 – Included Fences, Walls, and Landscaping Ordinance to establish regulations of fences, walls, and surrounding landscape.
- 2015 – Included Vineyard Ordinance to create regulations for existing vineyards and require all new or expanding vineyards to obtain a Conditional Use Permit.

Biological Resources Standards (Section 22.336.060)

Biological Resources

- Adopt habitat protection categories and policies/development standards to protect sensitive biological resources but allow for continued development within the North Area.

S1 Habitat = Habitat of limited distribution, particular rarity, or important habitat function.

S2 Habitat = Intact, but broadly distributed habitat.

S3 Habitat = Disturbed, non-native, and cleared habitat.

S4 Habitat = Developed and agricultural lands.

- Require special Conditional Use Permits for projects located in S1, S2, and S3 habitats.
- Add development standards to protect wetlands, streams and nesting birds. Standards address fencing and walls and wireless communication facilities in S1 and S2 habitat.
- Identify a mitigation ratio of 3:1 for impacts to S1 Habitat (rare/very sensitive habitat) and 2:1 mitigation ratio for S2 Habitat (sensitive habitat). Allow for future use of a mitigation fee once implemented by the County.
- Establish habitat restoration guidelines that include permitting requirements and habitat restoration plans.
- Require nesting bird survey prior to vegetation removal and construction in suitable habitat for nesting birds.

Trees

- Require a Protected Tree Permit to remove or encroach on a protected tree species.
- Establish Heritage Tree Protections that allow species that add value to the landscape or ecosystem to be registered and afforded the same protections as smaller Native trees (trunk size more the 36 inches in diameter).
- Establish a Historic Tree standard to protect trees that are culturally or historically significant to the area or on a list of Historic Resources and/or Historic Places.
- Require a Site Plan to remove or encroach on protected trees.
- Require a Conditional Use Permit for removal of Heritage or Historic trees and removal of more than two Native trees.
- Require noticing for removal of protected trees and establish mitigation ratios for impacts to protected trees.

Community-Wide Development Standards (Section 22.336.070)

Equestrian Standards

- Allow equestrian facilities on lots with a minimum lot size of one acre.
- Allow small horse boarding by right in A-1 zones, with maximum of 20 horses.
- Require best management practices (BMPs) such as runoff diversion and waste management
- Require vested legally-established equestrian facilities to comply with BMPs.
- Establish requirements/development standards for equestrian facilities.

Event Facilities

- Allow event facilities with an approved Conditional Use Permit (CUP); existing facilities without discretionary approval must have a CUP within three years to continue operations.
- Limit attendees to no more than 200 including staff, caterers, photographers and vendors.
- Address standards for noise, transportation, lighting, emergency and evacuation, as examples.
- Allow event facilities on 10-acre minimum lot size in the A-1 zone.

Noise

- Establish daytime maximum noise level of 45 dBA at an L90 measurement for most of the North Area and a 50 dBA at an L90 measurement in Topanga Canyon from 8:00 am to 8:00 pm.
- Prohibit outdoor amplified sound between 8:00pm and 8:00am.

Grading

- Require Conditional Use Permit for any grading above 500 cubic yards of soil (cut material) plus fill material.
- Minimize disturbance to natural landscape by conforming to natural topography, clustering structures, locating structures close to legal established streets, reducing building footprints and other measures.

Incentive Program for Certain Development Actions

- Allow for voluntary retirement of development rights on a parcel, dedication of ingress/egress easements for open space access or dedicate a trail/trail easement to help further North Area goals. Incentive may be an increase in grading threshold or increase in maximum approvable building site.

Building Site Area

- Establish maximum area for building and grading on site based on parcel size.
- Allow for the first 300 feet of driveway and required fire turnaround to be exempted.

Transfer of Development Credits

- Require retirement of a qualifying lot for each new lot or legalized lot created through a land division.
- Ensure no net increase in the number of buildable lots in the North Area to minimize impact on the environment and infrastructure.

Rebuilding after Disaster

- Facilitate establishment of temporary housing for residents and rebuilding of structures damaged or destroyed by disaster by allowing like-for-like replacement of legally-established structure(s).

Scenic Resource Areas

- Add protection for scenic resource areas by an 18-foot height limit within scenic resource areas and near significant ridgelines.

Zone-Specific Development Standards (Section 22.336.080)

- Establish permitted uses and uses subject to permits in Zone A-1 (Light Agriculture) and Zone A-2 (Heavy Agriculture).

B.6 Proposed Land Use and Zone Changes

As part of the revisions to the North Area Plan and CSD, DRP has identified land use and zone changes for 132 parcels currently designated for agricultural, recreation, and residential uses. The parcels identified for this change are parcels currently owned or managed by the following agencies and organizations: National Park Service, California State Parks, County of Los Angeles, Mountains Recreation and Conservation Authority, Mountains Restoration Trust, and Santa Monica Mountains Conservancy.

Table B-1 lists the parcels identified to have their land use designation and zoning changed to or from an open space designation. These parcels are currently used as parks, recreation uses (trail use), or are used as open space lands. The proposed changes to the land use and zoning for these parcels would bring the land use and zoning in conformance with the existing use or uses on these parcels.

Table B-1. Parcels to Be Re-designated/Rezoned

Area/Facility	APN	Current		Proposed	
		Land Use	Zoning	Land Use	Zoning
Owner/Agent: National Park Service					
Castro Crest	4464-003-901	N20	A-1-20	OS-C	O-S
Castro Crest	4464-018-900	OS-P	A-1-10	OS-C	O-S
Castro Crest	4464-018-901	OS-P	A-1-20	OS-C	O-S
Castro Crest	4464-018-902	OS-P	A-1-20	OS-C	O-S
Castro Crest	4464-018-903	OS-P	A-1-20	OS-C	O-S
Castro Crest	4464-018-904	OS-P	A-1-20	OS-C	O-S
Castro Crest	4464-020-926	N20	A-1-20	OS-C	O-S
Owner/Agent: California State Parks					
Not Available	2063-008-905	OS-P	A-1-20	OS-C	O-S
Not Available	2063-008-906	OS-P	A-1-20	OS-C	O-S
Not Available	2063-008-908	OS-P	A-1-20	OS-C	O-S
Not Available	2063-012-919	OS-P	A-1-20	OS-C	O-S
Not Available	2063-012-920	OS-P	A-1-20	OS-C	O-S
Not Available	2063-012-921	OS-P	A-1-20	OS-C	O-S
Not Available	2063-027-900	N20	A-1-20	OS-C	O-S
Not Available	2063-027-901	OS-P	A-1-20	OS-C	O-S
Owner/Agent: County of Los Angeles					
La Sierra–Hormel	2058-017-905	N10	A-1-10	OS-C	O-S
La Sierra–Hormel	2058-017-906	N10	A-1-10	OS-C	O-S
La Sierra–Polk Bros	2058-010-905	N10	R-R-10	OS-C	O-S
La Sierra–Polk Bros	2058-010-904	N10	R-R-10	OS-C	O-S
La Sierra–Polk Bros	2058-010-906	N10	R-R-10	OS-C	O-S
La Sierra–Polk Bros	2058-010-907	N10	R-R-10	OS-C	O-S
Calabasas to Cold Creek–Secret Valley–Hopp	4455-005-901	N10	A-1-10	OS-C	O-S
Owner/Agent: County of Los Angeles and Mountains Restoration Trust					
La Sierra - Varney	4464-017-012	N5	A-1-5	OS-PR	O-S
Owner/Agent: Mountains Recreation and Conservation Authority					
Zev Yaroslavsky Las Virgenes Highland Park	2052-011-905	N10	A-2-10	OS-PR	O-S
Zev Yaroslavsky Las Virgenes Highland Park	2052-011-906	N10	A-2-10	OS-PR	O-S
Zev Yaroslavsky Las Virgenes Highland Park	2052-011-907	N10	A-2-10	OS-PR	O-S
Zev Yaroslavsky Las Virgenes Highland Park	2052-012-906	N10	A-2-10	OS-PR	O-S
Zev Yaroslavsky Las Virgenes Highland Park	2052-012-907	N10	A-2-10	OS-PR	O-S
Triunfo Creek Park	2058-001-902	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-001-903	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-002-903	OS-P	A-1-20	OS-PR	O-S

Table B-1. Parcels to Be Re-designated/Rezoned

Area/Facility	APN	Current		Proposed	
		Land Use	Zoning	Land Use	Zoning
Triunfo Creek Park	2058-002-904	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-002-905	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-002-906	OS-P	A-1-20	OS-PR	O-S
Lobo Canyon	2058-012-903	OS-P	A-1-20	OS-C	O-S
Not Available	2058-012-905	N20	A-1-20	OS-C	O-S
Triunfo Creek Park	2058-025-900	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-025-901	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-025-902	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-025-903	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-025-904	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-025-905	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-025-906	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-025-907	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-025-908	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-025-909	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-025-910	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-025-911	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2063-001-901	OS-P	R-R-20	OS-PR	O-S
Triunfo Canyon–Balch	2063-004-900	N20	A-1-20	OS-C	O-S
Triunfo Canyon–Balch	2063-004-901	N20	A-1-20	OS-C	O-S
Triunfo Canyon–Balch	2063-004-902	N20	A-1-20	OS-C	O-S
La Palma	2063-008-904	OS-P	A-1-20	OS-C	O-S
Kanan Dume	2063-018-900	OS-P	A-1-20	OS-C	O-S
Summit Valley Ed Edelman Park	4434-004-907	N5	R-1-5	OS-PR	O-S
MGP South	4434-005-901	OS	A-1-10	OS-C	O-S
MGP South	4434-005-902	OS	A-1-10	OS-C	O-S
MGP South	4434-005-903	OS	A-1-10	OS-C	O-S
Santa Maria–Shewell	4434-007-900	N10	A-1-10	OS-C	O-S
Santa Maria–Shewell	4434-008-900	N10	A-1-10	OS-C	O-S
Yedvart Property	4434-009-903	N10	A-1-10	OS-C	O-S
Summit to Summit–Semet	4436-002-900	N10	A-1-10	OS-C	O-S
Summit to Summit–Semet	4436-002-901	N10	A-1-10	OS-C	O-S
Summit to Summit–Semet	4436-002-902	N10	A-1-10	OS-C	O-S
Summit to Summit–Semet	4436-003-900	N10	A-1-10	OS-C	O-S
Fritz & Alma Meier Natural Use Area	4436-005-901	OS-P	A-1-10	OS-PR	O-S
Summit to Summit–Semet	4436-023-900	N10	A-1-10	OS-C	O-S
Summit to Summit–Semet	4436-023-901	N10	A-1-10	OS-C	O-S
Summit to Summit–Semet	4436-023-902	N10	A-1-10	OS-C	O-S
Summit to Summit–Semet	4436-023-903	N10	A-1-10	OS-C	O-S

Table B-1. Parcels to Be Re-designated/Rezoned

Area/Facility	APN	Current		Proposed	
		Land Use	Zoning	Land Use	Zoning
Summit to Summit–Semet	4436-024-900	N10	A-1-10	OS-C	O-S
Topanga Surplus–LA County	4442-006-900	N5	A-1-5	OS-C	O-S
Topanga Surplus–LA County	4442-006-901	N5	A-1-5	OS-C	O-S
Topanga Surplus–LA County	4442-007-901	N5	A-1-5	OS-C	O-S
Topanga	4442-007-903	N5	A-1-5	OS-C	O-S
Topanga	4442-007-904	N5	A-1-5	OS-C	O-S
Topanga Surplus–LA County	4442-008-901	N5	A-1-5	OS-C	O-S
Topanga Surplus–LA County	4442-008-902	N5	A-1-5	OS-C	O-S
Topanga Surplus–LA County	4442-008-904	N5	A-1-5	OS-C	O-S
Topanga Surplus–LA County	4442-008-905	N5	A-1-5	OS-C	O-S
Fritz & Alma Meier Natural Use Area	4455-008-903	OS-P	A-1-10	OS-PR	O-S
Fritz & Alma Meier Natural Use Area	4455-008-904	OS-P	A-1-10	OS-PR	O-S
Cold Creek–Community Plus	4455-008-906	N10	A-1-10	OS-C	O-S
Upper Stokes	4455-012-901	N10	A-1-10	OS-C	O-S
Upper Stokes	4455-012-902	N10	A-1-10	OS-C	O-S
Upper Stokes	4455-014-900	N10	A-1-10	OS-C	O-S
Stokes Canyon Las Virgenes	4455-027-908	N20	A-1-20	OS-C	O-S
Stokes Canyon Las Virgenes	4455-027-909	N20	A-1-20	OS-C	O-S
Stokes Canyon Las Virgenes	4455-027-910	N20	A-1-20	OS-C	O-S
Stokes Canyon	4455-031-902	N20	A-1-20	OS-C	O-S
Stokes Canyon	4455-031-903	N20	A-1-20	OS-C	O-S
Stokes Canyon	4455-032-902	N20	A-1-20	OS-C	O-S
Stokes Canyon	4455-032-903	N20	A-1-20	OS-C	O-S
Stokes Canyon	4455-032-904	N20	A-1-20	OS-C	O-S
Stokes Canyon	4455-032-905	N20	A-1-20	OS-C	O-S
Stokes Canyon	4455-032-906	N20	A-1-20	OS-C	O-S
Stokes Canyon	4455-032-907	N20	A-1-20	OS-C	O-S
Stokes Canyon	4455-032-908	N20	A-1-20	OS-C	O-S
Stokes Canyon	4455-032-909	N20	A-1-20	OS-C	O-S
Stokes Canyon	4455-032-910	N20	A-1-20	OS-C	O-S
Vintage at Hidden Park Dedication	4464-023-900	N20	A-1-20	OS-C	O-S
Vintage at Hidden Park Dedication	4464-023-901	N20	A-1-20	OS-C	O-S
Vintage at Hidden Park Dedication	4464-023-902	N20	A-1-20	OS-C	O-S
Vintage at Hidden Park Dedication	4464-023-903	N20	A-1-20	OS-C	O-S
Vintage at Hidden Park Dedication	4464-023-904	N20	A-1-20	OS-C	O-S
Vintage at Hidden Park Dedication	4464-023-905	N20	A-1-20	OS-C	O-S
Vintage at Hidden Park Dedication	4464-023-906	N20	A-1-20	OS-C	O-S
Vintage at Hidden Park Dedication	4464-023-907	N20	A-1-20	OS-C	O-S

Table B-1. Parcels to Be Re-designated/Rezoned

Area/Facility	APN	Current		Proposed	
		Land Use	Zoning	Land Use	Zoning
Malibu Creek – Phase II	4464-020-928	N20	A-1-20	OS-C	O-S
Fran Pavley Meadows	2052-009-901	N5	A-1-5	OS-C	O-S
Fran Pavley Meadows	2055-010-902	OS-P	A-1-5	OS-C	O-S
Liberty Canyon Wildlife Corridor Acquisition	2052-013-903	N5	A-2-5	OS-C	O-S
Ballard Mountain	2058-008-900	N20	A-1-20	OS-C	O-S
Rasmussen–Liberty Canyon	2063-048-902	N20	A-1-20	OS-C	O-S
Rasmussen–Liberty Canyon	2063-048-901	N5	A-1-5	OS-C	O-S
Rasmussen–Liberty Canyon	2063-048-900	N5	A-1-5	OS-C	O-S
Triangle Ranch Phase One	2063-036-900	N2	RPD-2-0.5U	OS-C	O-S
Triangle Ranch Phase One	2063-006-902	N5	RPD-2-0.5U	OS-C	O-S
Triangle Ranch Phase Two	2063-005-900	N2	RPD-2-0.5U	OS-C	O-S
Triangle Ranch Phase Three	2063-006-904	N5	RPD-2-0.5U	OS-C	O-S
Topanga Surplus- LA County	4441-009-900	N5	R-1-5	OS-C	O-S
Topanga Surplus- LA County	4441-009-902	N5	R-1-5	OS-C	O-S
Topanga Surplus- LA County	4442-009-902	N5	A-1-5	OS-C	O-S
Lebow	4472-007-912	OS-P	A-1-20	OS-C	O-S
Malibu Creek–Phase II	4464-020-932	N20	A-1-1	OS-C	O-S
Malibu Creek–Phase II	4464-020-934	N20	A-1-20	OS-C	O-S
Malibu Creek–Phase II	4464-020-929	N20	A-1-20	OS-C	O-S
Not Available	4441-015-905	N5	R-1-5	OS-C	O-S
Not Available	4436-001-903	N10	A-1-10	OS-C	O-S
Not Available	4436-001-904	N10	A-1-10	OS-C	O-S
Not Available	4436-001-905	N10	A-1-10	OS-C	O-S
Owner/Agent: Santa Monica Mountains Conservancy					
Lobo Canyon	2058-012-902	OS-P	A-1-20	OS-C	O-S

Source: County of Los Angeles, 2019.

B.7 Implementation of North Area Plan and CSD Update

This Program EIR provides the environmental review for the proposed Plan and CSD Update in accordance with the requirements of CEQA. This document evaluates potential impacts that may arise with implementation of the revised Plan and CSD if adopted by the County Board of Supervisors. This document must be certified by the Board during its consideration of a decision on whether to adopt the proposed Plan and CSD Update. This EIR will be considered in the County's decision.

The analysis in this EIR does not provide environmental review for future projects, but it can be used to tier future environmental analysis on future projects in the North Area. Each project in the North Area, as applicable, will have a site-specific evaluation for consistency with CEQA and may require additional site-specific studies prior to receiving permits. Future CEQA documents may incorporate by reference information in this EIR as allowed by CEQA and concentrate on site-specific issues.

C. Environmental Setting, Analysis, and Mitigation Measures

C.1 Introduction to Environmental Analysis

Section C describes the environmental assessment methodology used to identify potential environmental impacts associated with implementing the policies in the North Area Plan and CSD Update (proposed project). Each individual issue area discussion in Section C includes an overview of the regional, local, and regulatory setting as well as an impact evaluation. The evaluation of cumulative impacts of the project is based on the information in Section C.1.3 (Cumulative Scenario and Methodology), which includes a list of cumulative projects in the North Area.

C.1.1 Organization of Section C

Based on the California Environmental Quality Act (CEQA) requirements, Section C evaluates 14 issue areas. County of Los Angeles Department of Regional Planning (DRP) prepared and published a Notice of Preparation (NOP) in August 2018 and held a 30-day comment period as required by CEQA. The NOP was distributed to the public, regulatory agencies, and interested parties. Eighty-nine (89) comment letters were received from agencies and the public in response to the NOP (see Appendix 2). The analysis in this EIR considers the scoping comments received on the NOP prepared for the proposed project and evaluates the following environmental issue areas:

- C.2 Aesthetics
- C.3 Air Quality
- C.4 Biological Resources
- C.5 Greenhouse Gas Emissions
- C.6 Cultural and Tribal Cultural Resources
- C.7 Energy
- C.8 Geology, Soils, and Paleontological Resources
- C.9 Hydrology and Water Quality
- C.10 Land Use and Recreation
- C.11 Noise
- C.12 Population and Housing
- C.13 Public Services, Utilities, and Service Systems
- C.14 Transportation and Traffic
- C.15 Wildland Fire and Hazards

C.1.2 Environmental Assessment Methodology

The methodology used to determine potential project impacts consists of five key components. Each of these components are summarized below and discussed in each issue area in Sections C.2 through C.15, which follow this introduction. Refer to Section D (Alternatives) for the alternatives to the proposed project that were evaluated in this report and to Section E (Other CEQA Considerations) for more information on other project-related impacts.

- **Environmental Setting.** The environmental setting describes existing conditions in the Santa Monica Mountains North Area. Pursuant to CEQA Guidelines (Section 15125(a)), the environmental setting used for the impact analysis reflects the conditions at the time of the issuance of the NOP (August 2018).
- **Regulatory Setting.** The regulatory setting includes a description of federal, state, and local laws or policies applicable to the assessment of the proposed project.
- **Thresholds of Significance and Methodology.** This section describes the resource-specific thresholds used to evaluate the significance of environmental impacts and approach followed to determine the type and magnitude of impacts that could occur.
- **Environmental Impacts and Mitigation Measures.** This section evaluates the potential environmental impacts of the proposed project based on predetermined, specific significance criteria. If an adverse

impact is potentially significant despite existing requirements, mitigation measures are proposed to reduce or avoid the impact. Mitigation measures are only required for significant adverse impacts.

- **Cumulative Impact Analysis.** This section addresses the geographic extent of the cumulative analysis and cumulative impacts for each environmental issue area.

CEQA requires that a significance determination be made for each adverse impact identified in an EIR. Significance criteria, based on the CEQA Guidelines Environmental Checklist (Appendix G), are identified for each environmental resource area. The significance criteria serve as a benchmark for determining if a project would result in significant adverse environmental impacts when evaluated against existing environmental conditions (baseline). Impacts are assessed relative to each impact criterion to determine whether the project would have an impact on the environment and to what level. Impacts are quantified to the extent possible, and mitigation measures identified to reduce impacts where possible.

To provide a systematic evaluation of potential environmental impacts, a classification system has been applied to the impacts of the proposed project. These classifications indicate whether an identified impact is significant and whether mitigation measures can reduce the severity of the impact to a level that is not significant. The following determinations were uniformly applied in this EIR:

- **Significant and Unavoidable Impact.** Impact that cannot be mitigated to a level that is less than significant.
- **Less than Significant Impact with Mitigation.** Impact can be mitigated to a level that is less than significant through the implementation of recommended mitigation measures.
- **Less than Significant Impact.** Minor change or effect on the environment; no mitigation is required.
- **No Impact.** No adverse change to the environment.

C.1.3 Cumulative Scenario and Methodology

Cumulative effects are those impacts from related projects that would occur in conjunction with the proposed project. To document the process used to determine cumulative impacts, this section provides the CEQA requirements, the methodology used in the cumulative assessment, and the projects identified and applicable to the cumulative analysis. Sections C.2 through C.15 provide the analysis of cumulative impacts by environmental issue area.

CEQA Requirements

CEQA requires that cumulative impacts be analyzed in an EIR when the resulting impacts are cumulatively considerable, and therefore, potentially significant. The discussion of cumulative impacts must reflect the severity of the impacts, as well as the likelihood of their occurrence; however, the discussion does not need to be as detailed as the discussion of environmental impacts attributable to the proposed project alone. Further, the discussion is intended to be guided by the standards of practicality and reasonableness. As stated in Public Resources Code Section 21083(b), “a project may have a significant effect on the environment if the possible effects of a project are individually limited but cumulatively considerable.”

According to Section 15355 of the CEQA Guidelines:

Cumulative impacts refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

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

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

Further, according to CEQA Guidelines Section 15130 (a)(1):

As defined in Section 15355, a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR.

In addition, as stated in the CEQA Guidelines, Section 15064(h)(4) it should be noted that:

The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable.

Therefore, the cumulative discussion in an EIR focuses on whether the impacts of the project under review are cumulatively considerable within the context of impacts caused by other past, present, or future projects. Cumulative impact discussions for each issue area are provided in the respective sections.

Methodology

The area evaluated under the cumulative scenario varies because the nature and range of potential effects differ by resource or issue. For instance, air quality impacts tend to disperse over a large area or region whereas noise impacts are typically more localized in nature. For this reason, the geographic scope for the analysis of cumulative impacts must be identified for each resource area.

The analysis of cumulative effects considers a number of variables including geographic (spatial) limits, time (temporal) limits, and the characteristics of the resource being evaluated. The geographic scope of the analysis is based on the nature of the geography surrounding the proposed project and the characteristics and properties of each resource and the region to which they apply. In addition, each project in a region will have its own implementation schedule, which may or may not coincide or overlap with the proposed project's schedule. Thus, the evaluation of cumulative effects is a consideration of short-term impacts associated with the proposed project.

Table C.1-1 lists projects in the North Area or in the vicinity of the North Area boundary. Figure C.1-1 identifies the location of these projects in relation to the North Area boundary. City websites were reviewed for ongoing and upcoming projects including the City of Calabasas, City of Westlake Village, and City of Agoura Hills. In addition, relevant and available databases were also reviewed, such as CEQANet, to augment the cumulative project list. This list was developed in 2018 prior to the Woolsey Fire and there may now be changes. With 20 projects, the cumulative project list represents the general number and type of projects that will or could occur in the project area. Therefore, cumulative impacts based on the cumulative project list may represent a "worst-case" scenario because some of the cumulative projects may not be built, some projects may be completed prior to adoption of the North Area Plan and CSD Update, or some projects may have been cancelled or postponed.

During the scoping comment period, the County received public comments requesting the Southern California Metroplex Project (SoCal Metroplex) be considered a cumulative project for the EIR analysis. Based on review of the SoCal Metroplex and with consideration of the comments received, the County has decided that SoCal Metroplex will not be evaluated in the cumulative environmental impact analysis because it is *not* anticipated to contribute to cumulative impacts. The SoCal Metroplex project involved upgrading the existing ground-based navigation system to satellite-based technology to improve

efficiency in the Southern California airspace. This project also included redesigning multiple existing air routes to improve access to Southern California airports. The Federal Aviation Administration (FAA) prepared an Environmental Assessment and concluded that the SoCal Metroplex project would have no significant environmental impacts and stated no airport related development, land acquisition, construction, or other ground disturbance activities would occur. The FAA signed the Finding of No Significant Impact and Record of Decision in August 2016. Since the SoCal Metroplex project was certified to proceed in 2016 and implementation of the SoCal Metroplex effort was completed in summer of 2018, the SoCal Metroplex will instead be considered as part of the baseline for the North Area Plan and CSD Update environmental impact analysis.

Table C.1-1. Santa Monica Mountains North Area Cumulative Projects List

Map No.	Project Name	Project Description	Location	CEQA Status	Project Status
1	Agoura Village Specific Plan	The Specific Plan proposes to redesign the Agoura Village area to include mixed-use developments such as residential, commercial, and office uses. The plan emphasizes pedestrian and bicycling safety accessibility while improving traffic circulation and preserving natural resources. The project area spans about 135 acres on both undeveloped and developed land.	Specific Plan area is bordered by US-101 to the north, open space to the south, and spans 2 blocks east of Cornell Road and one block west of Kanan Road in Agoura Hills, CA	Final Environmental Impact Report published March 2006	<i>Agoura Village Specific Plan published October 2008, current ongoing development process</i>
2	Agoura Park Project	Proposed 45,000-sq.ft., two-story fitness facility structure and 4,000-sq.ft. retail center including parking lot on 3.79-acre project site.	29431 and 29439 Agoura Road, Agoura Hills, CA	Final Initial Study/Mitigated Negative Declaration published October 2015	Completed
3	Oakmont Agoura Hills	Oakmont Senior living, LLC (applicant) proposes to construct a 71,020-sq.ft. senior residential facility on a 5.78-acre project site.	29353 Canwood Street, Agoura Hills, CA	Draft Initial Study Mitigated Negative Declaration published November 2017	Construction: <i>Scheduled to begin in 2019</i> Operation: <i>Expected completion 2020</i>
4	Marriott Courtyard and Towneplace Suites Hotel	Proposed three-story hotel development with an outdoor swimming pool, lounge area, roof deck, and parking lot on a 5.52-acre vacant site.	29505 and 29515 Agoura Road, Agoura Hills, CA	Draft Initial Study-Mitigated Negative Declaration published May 2016	Construction: <i>TBD</i> Operation: <i>TBD</i>
5	Chesebro Crossing @ 101	Caltrans (applicant) proposes to widen Palo Comado Canyon Road and Palo Comado Canyon overcrossing on US-101 and improve on and off ramps to enhance traffic circulation and safety for pedestrians, bicyclists and motorists.	Intersection of US-101 and Palo Comado Canyon Road, Agoura Hills, CA	Mitigated Negative Declaration/Finding of No Significant Impact published October 2012	Construction: <i>Scheduled to begin in 2018</i> Operation: <i>Two years from start of construction</i>

Table C.1-1. Santa Monica Mountains North Area Cumulative Projects List

Map No.	Project Name	Project Description	Location	CEQA Status	Project Status
6a	Liberty Canyon Improvement Project	Los Angeles County Flood Control District (LACFCD) proposes to establish approximately 3,000 feet of multi- use trail, replace approximately 370 feet of trapezoidal channel, repair approximately 1,000 feet of the channel, replace and install 7,000 feet of fencing, and plant native vegetation along the entire eastern boundary of the LACFCD right of way.	Liberty Canyon Road between Agoura Road and Park Vista Road in Agoura Hills, California.	The project may be eligible for a categorical exemption under the California Environmental Quality Act - Case 2. However, additional research and investigation will be done during the project design to validate the eligibility.	<i>Concept Report Stage</i> Construction: <i>Unknown at this time</i> Operation: <i>Unknown at this time</i>
6b	Liberty Canyon Wildlife Habitat Connectivity Project	Caltrans (applicant) proposes to create a wildlife crossing across US-101 west of Liberty Canyon Road to facilitate safe crossing for wildlife and improve safety for motorists.	US-101, West of Liberty Canyon Road, Agoura Hills, CA	Initial Study with Mitigated Negative Declaration/ Environmental Assessment with Finding of No Significant Impact published April 2018	Construction: <i>Scheduled to begin 2019</i> Operation: <i>Expected completion 2022</i>
7	AVE Project	California Commercial Investment Group, Inc. (applicant) proposes to construct a mixed-use development including retail, restaurant, office, multi-family residential, and hotel uses. The project site is an 18.45-acre undeveloped area.	Southeast corner of Kanan Road and Agoura Road, Agoura Hills, CA	Notice of Preparation for Draft Environmental Impact Report published October 2018	Construction: <i>TBD</i> Operation: <i>TBD</i>
8	Cornerstone Mixed-Use Project	Agoura and Cornell Roads (applicant) proposes to construct a mixed-use commercial and residential development including multi-family housing, retail, restaurants, and office space. The project site is approximately 8.2 acres spanning 24 parcels on vacant, hillside land.	Southeast corner of Agoura Road and Cornell Road, Agoura Hills, CA	Final Initial Study/ Mitigated Negative Declaration published November 2016. On May 23, 2018, Los Angeles Superior Court ruled against approval of project due to insufficient environmental review and requires City of Agoura Hills to complete an Environmental Impact Report.	Construction: <i>TBD</i> Operation: <i>TBD</i>

Table C.1-1. Santa Monica Mountains North Area Cumulative Projects List

Map No.	Project Name	Project Description	Location	CEQA Status	Project Status
9	Westlake Village Inn Spa and Guest Room Expansion	Westlake Properties, Inc. (applicant) proposes to develop a spa, salon, 12-16 additional hotel rooms, pool, yoga pavilion, and bridge over existing pond.	31943 Agoura Road, Westlake Village, CA	Initial Study/Mitigated Negative Declaration published March 2017	Construction: TBD Operation: TBD
10	Westlake Village North Business Park Specific Plan	The Specific Plan would encourage reuse of existing structures and redesign underused developments and include residential, commercial and office uses. The project site is approximately 200 acres.	Thousand Oaks Boulevard to the north, Lindero Canyon Road to the east, US-101 to the south, and City of Thousand Oaks to the west, in Westlake Village, CA	Notice of Preparation for Draft Environmental Impact Report published May 2018	<i>Draft Specific Plan published September 2012</i>
11	Audi Calabasas Remodel and Addition	Proposed remodel and addition of approximately 111,608 sq.ft. to existing 35,058-sq.ft. Audi dealership.	24650 Calabasas Road, Calabasas, CA	In Progress	Construction: TBD Operation: TBD
12	Raznick Mixed Use Project	Ken Stockton Architects, Inc. (applicant) plans to demolish an existing office building and develop a new 63,301-sq.ft. mixed use area including commercial and residential uses.	23480 Park Sorrento, Calabasas, CA	Final Initial Study/Mitigated Negative Declaration published November 2017	Construction: <i>Scheduled to begin in 2018</i> Operation: <i>Expected one year after construction begins</i>
13	Hilton Garden Inn Expansion Project	Proposed expansion of Hilton Garden Inn to include detached three-story, 21,787-sq.ft. building.	24150 Park Sorrento, Calabasas, CA	Initial Study/Mitigated Negative Declaration published October 2015	Construction: <i>Ongoing</i> Operation: <i>2019</i>
14	Craftsman's Corner Territory Annexation	Proposed annexation of approximately 145 acres in the City of Calabasas and 12 acres in the City of Hidden Hills. Area is currently unincorporated.	North of US-101 between Calabasas, CA and Hidden Hills, CA	Second Addendum to Final Environmental Impact Report for the City of Calabasas 2030 General Plan published March 2018	<i>Expected completion of annexation 2020</i>
15	Las Virgenes Creek Restoration Project Phase II	Restoration of 1.5-mile stretch of Las Virgenes Creek.	Las Virgenes Creek from Agoura Road to Juan Bautista de Anza Park, Calabasas, CA	Mitigated Negative Declaration approved December 2015	Construction: <i>Ongoing</i> Operation: TBD
16	Rondell Oasis Hotel Project	Rondell Oasis (applicant) proposes to construct a 4-story hotel, with a pool, lounge area, and exercise room on an approximately 4.12-acre vacant site.	26300 Rondell Street, Calabasas, CA	Final Initial Study/Mitigated Negative Declaration published January 2016	Construction: <i>Ongoing</i> Operation: <i>2019</i>

Table C.1-1. Santa Monica Mountains North Area Cumulative Projects List

Map No.	Project Name	Project Description	Location	CEQA Status	Project Status
17/18	Viewpoint Tennis Courts and Parking Lot Project	Proposed redevelopment of three sites, installation of six tennis courts, including additional parking, accessory buildings, and renovation of two existing residential buildings.	23620 Mulholland Highway, 23238 Mulholland Highway, 23602 Dry Canyon Cold Creek Road and 23604 Dry Canyon Cold Creek Road	Final initial Study/Mitigated Negative Declaration published November 2015	Construction: <i>Ongoing</i> Operation: <i>TBD</i>
19	West Village at Calabasas	The New Home Company (applicant) proposes development of a residential, commercial, and public open space area on an undeveloped 77.72-acre site.	4790 Las Virgenes Road, Calabasas, CA	Notice of Preparation of Draft Environmental Impact Report published August 2017	Construction: <i>TBD</i> Operation: <i>TBD</i>

Source: Caltrans, 2012, 2018; CEQANet, 2018, Chesebro Crossing @ 101, 2018; City of Agoura Hills, 2008, 2015, 2016a, 2016b, 2017a, 2017b, 2018a, 2018b; City of Calabasas, 2018; City of Westlake, 2018; San Fernando Business Journal, 2018.

C.1.4 Mitigation Measures

Where potentially significant impacts are identified in this section, mitigation measures are recommended. CEQA requires that feasible mitigation measures be identified to reduce or avoid significant impacts. CEQA Guidelines Section 15370 define mitigation as:

- Avoiding the impact altogether by not taking a certain action or parts of an action;
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation;
- Rectifying the impact by repairing, rehabilitating, or restoring the affected environment;
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and
- Compensating for the impact by replacing or providing substitute resources or environments.

For significant impacts identified in the following resource/issue sections, mitigation measures have been proposed to define the specific requirements to reduce impacts.

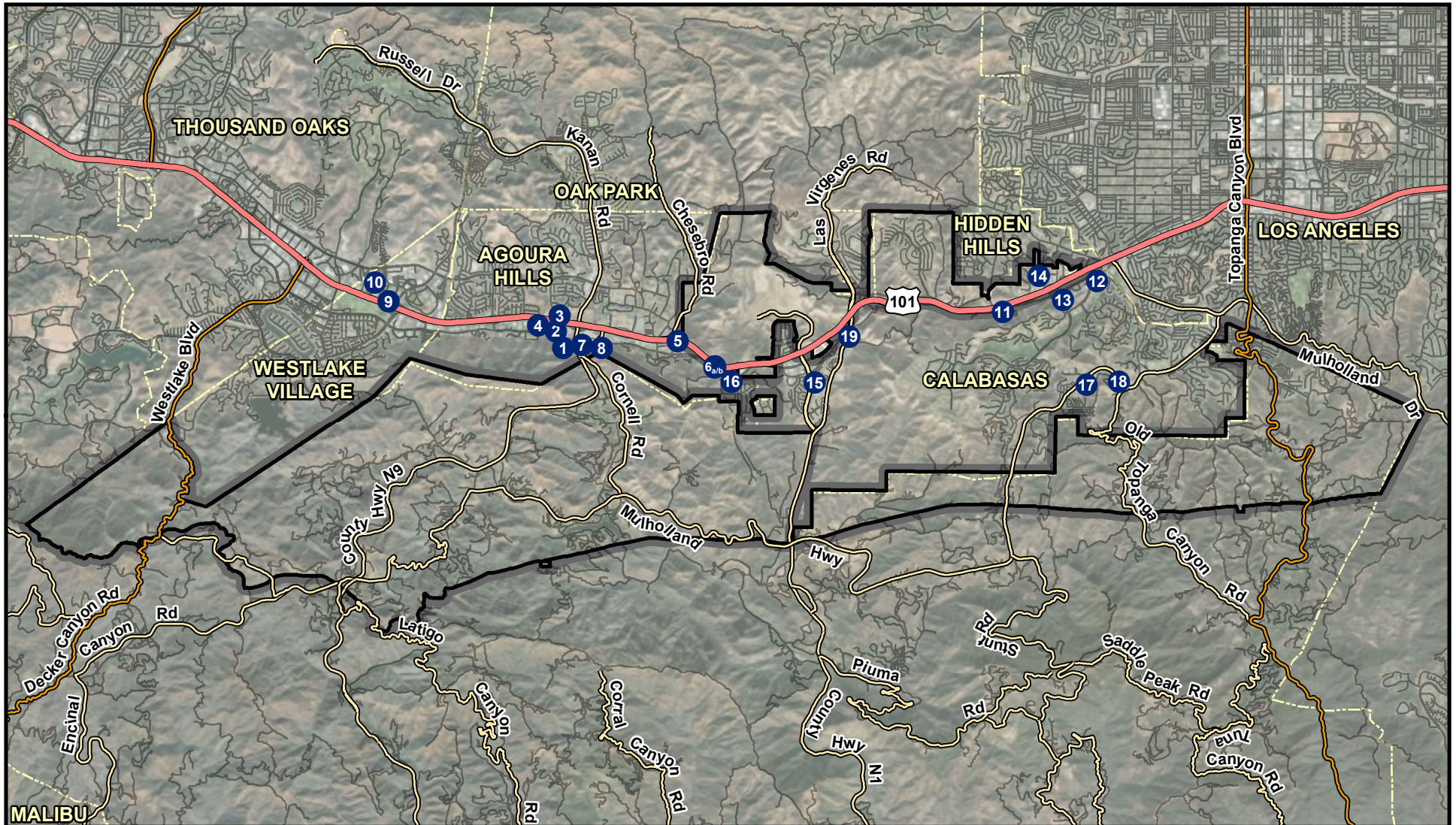
General Plan EIR. DRP prepared a comprehensive programmatic EIR that applies countywide and that supported the County's decision on the General Plan (County of Los Angeles, 2015). As required in CEQA, the County also adopted a Mitigation Monitoring and Reporting Program (MMRP). The General Plan mitigation measures are considered on a case-by-case basis by DRP when reviewing applications for development in the County. The analysis completed in this EIR considers the impacts and mitigation measures identified in the General Plan EIR as part of the evaluation of potential impacts in implementing the proposed North Area Plan and CSD. Where applicable, the analysis includes reference to adopted General Plan mitigation measures that apply to the North Area and that would reduce potential impacts.

C.1.5 Mitigation Monitoring

Public Resources Code Section 21081.6 establishes two distinct requirements for agencies involved in the CEQA process. Subdivisions (a) and (b) of the section relate to mitigation monitoring and reporting, and the obligation to mitigate significant effects where possible. Pursuant to subdivision (a), whenever a public agency completes an EIR and makes a finding pursuant to Section 21081(a) of the Public Resources Code

taking responsibility for mitigation identified in the EIR, the agency must adopt a program of monitoring or reporting that ensures compliance with mitigation measures during implementation of the project.

As required by CEQA and depending on the decision on the proposed Project, DRP would adopt a mitigation and monitoring program to ensure compliance with the recommended mitigation measures identified in this EIR. The mitigation and monitoring program for the proposed project will be included in the Final EIR consistent with CEQA requirements.

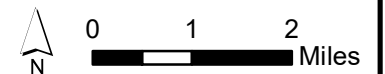


- Santa Monica Mountains North Area
- Cumulative Project (See Table C.1-1. for details)

Sources:
Aspen, 2018;
TIGER, 2017;
Esri, 2019

Figure C.1-1

Cumulative Projects



C.2 Aesthetics

Introduction

This section evaluates potential visual impacts to the landscape associated with implementation of the proposed North Area Plan and Community Standards District (CSD) Update, which would not directly result in any physical changes to the landscape. The study area for the aesthetics analysis is the North Area Boundary.

Scoping Comments Received. During the scoping period for the EIR, written and verbal comments were received from agencies, organizations, and the public. These comments identified various substantive issues and concerns relevant to the EIR analysis. Appendix 2 includes all comments received during the scoping comment period.

One comment was received that requested the proposed North Area plan identify protections for Kanan Road as a Scenic Route as designated in the Local Coastal Plan.

C.2.1 Environmental Setting

The consideration of visual resources and general aesthetics utilizes resource-specific quantitative and qualitative terminology. The following terms are utilized within this section to describe visual resources:

- **Viewshed:** The landscape that can be directly seen under favorable atmospheric conditions, from a particular point/area or along a transportation corridor.
 - Foreground View: 0–1 mile.
 - Middleground View: 1–3 miles.
 - Background View: >3 miles.
- **Visual Quality:** The relative value of a landscape from a visual perception point of view.
- **Visual sensitivity:** The concern by viewers with changes to visual quality. Visual sensitivity is generally higher in natural or unmodified landscapes.
- **Visual Contrast:** Opposition or unlikeness of different forms, lines, colors, or textures in a landscape. Generally, increased visual contrast within foreground distances would be more noticeable to viewers than increased visual contrast within background distances.

Affected Environment and Study Area

Scenic resources in the North Area consist of designated scenic highways and corridors (or routes), hillsides, viewsheds and ridgelines. The Santa Monica Mountains contain three designated State Scenic Highways that are listed in the existing General Plan; Mulholland Highway (both sections), Malibu Canyon–Las Virgenes Highway, and Topanga Canyon Boulevard. Hillsides play a major role in physically defining the diverse communities in the North Area. They not only create dramatic backdrops against developed

KEY FINDINGS

- North Area contains unique and important visual resources distinguishing the Santa Monica Mountains landscape.
- Proposed North Area Plan and CSD are designed to protect the North Area's visual character.
- Proposed North Area Plan and CSD enhance the County's General Plan and ordinances by specifically protecting the North Area's scenic and visual qualities.
- Proposed North Area Plan policies and CSD standards ensure future development results in less-than-significant impacts to the existing landscape, designated State Scenic Highways, and minimize new sources of light and glare.

suburbs and communities, but also provide extensive environmental and public benefits to residents. The vast majority of the native plant and animal species reside within the hilly and mountainous terrain. Scenic viewsheds vary by location and community and can include ridgelines, unique rock outcroppings, waterfalls, or various other unusual or scenic landforms. Finally, there are numerous ridgelines that provide dramatic views for North Area residents.

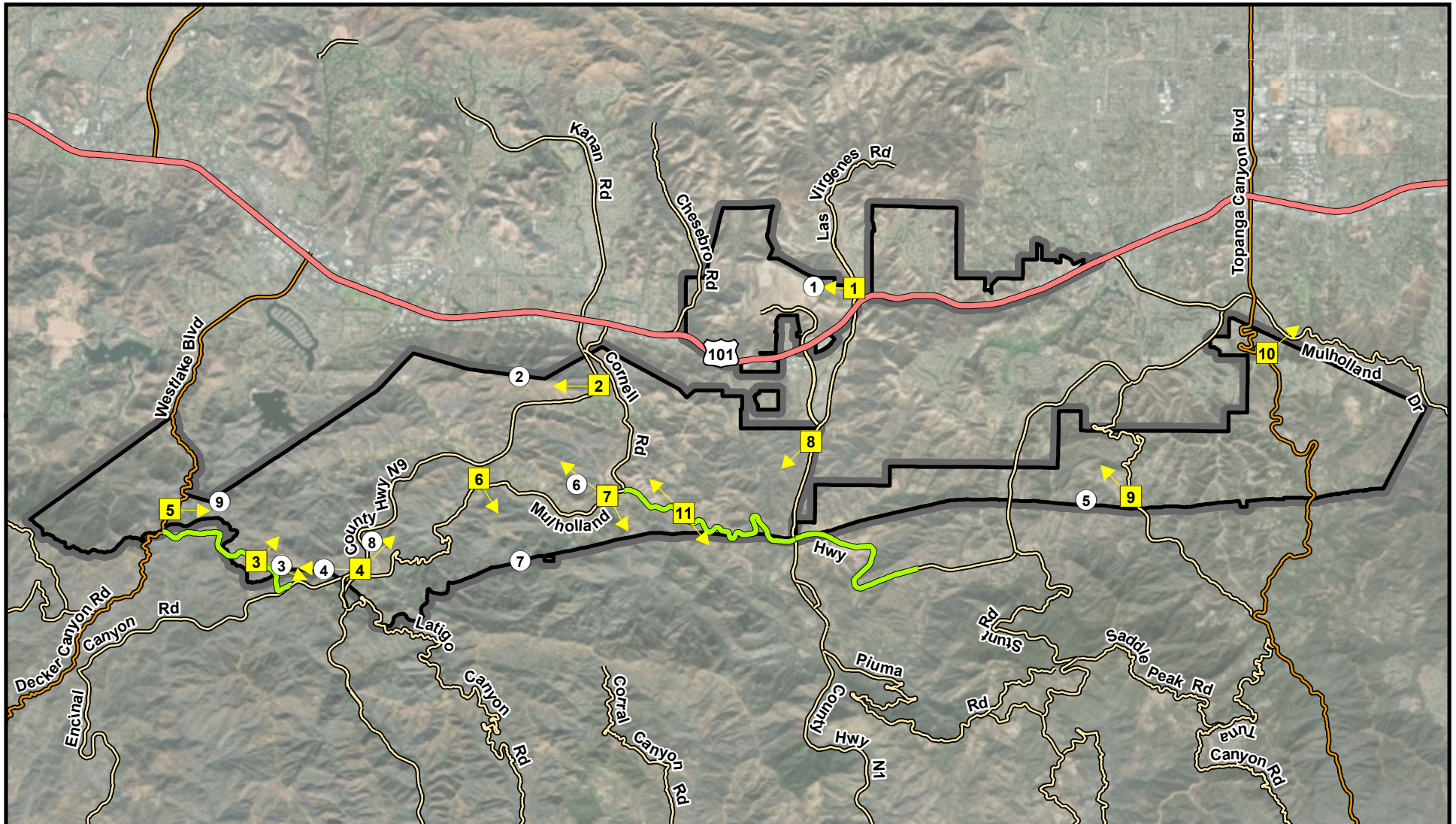
Major issues associated with scenic resources involve:

- 1) Protection from human activities; and
- 2) Regulation of hillsides and hillside development.

The County Hillside Management Area (HMA) Ordinance applies to all unincorporated areas that contain terrain with a natural slope of 25 percent or greater. The goal of the ordinance is to ensure that development preserves the physical integrity and scenic value of HMAs, conserves open space, and enhances community character.

The North Area covers scenic portions of the Santa Monica Mountains. While large portions are held in private ownership, the planning area contains a considerable amount of dedicated open space, recreation opportunities, and environmentally sensitive areas. An abundance of natural scenic resources and steep coastal mountains contribute to the character of this region. From public observer positions, 11 locations were selected as key observation points (KOPs) that provide public viewsheds of various scenic resources and landscapes within the North Area. Because it would be difficult to photograph and identify all locations within the North Area providing scenic public viewsheds, these 11 KOPs were selected as a sampling of the varying landscapes within the North Area and for defining an aesthetics study area for analysis from key public roadways and locations. Figure C.2-1 illustrates the location and direction of each KOP in relation to the project site. As shown in Figure C.2-1:

- KOP 1 represents public views from Las Virgenes Road looking west toward Zev Yaroslavsky Highland Park Open Space area.
- KOP 2 represents public views from Kanan Road looking west toward the base of Ladyface Mountain.
- KOP 3 represents public views to the east from Mulholland Highway toward Saddle Rock and to the northeast from Mulholland Highway toward distant sandstone peaks.
- KOP 4 represents public views to the northeast from the junction of Kanan Road and Mulholland Highway toward rolling hills and vineyards and to the west from the junction of Kanan Road and Mulholland Highway toward Turtle Rock.
- KOP 5 represents public views from Westlake Boulevard (State Route 23) looking east toward sandstone peaks.
- KOP 6 represents public views from Mulholland Highway looking toward Malibu Creek and open space.
- KOP 7 represents public views to the northwest from Mulholland Highway looking toward adjacent rolling hills and to the southeast from Mulholland Highway looking toward adjacent mountain peaks.
- KOP 8 represents public views from Las Virgenes Road looking across open space and rolling hills.
- KOP 9 represents public views from Old Topanga Boulevard toward distant sandstone mountain peaks.
- KOP 10 represents public views from Topanga Canyon Boulevard from the “Top of Topanga Overlook” across the San Fernando Valley.
- KOP 11 represents public views to the northwest from Mulholland Highway looking toward adjacent topography and to the southeast from Mulholland Highway looking across open space and rolling hills.



General Plan - Designated Scenic Resources

Santa Monica Mountains North Area

Photograph Locations/Directions

Scenic Highway

① Palo Comado

② Lady Face Ridge

③ Saddle Rock

④ Turtle Rock

⑤ Old Topanga Sandstone

⑥ Sugar Loaf

⑦ Cornell Sandstone Peaks

⑧ Upper La Sierra Canyon

⑨ West Mulholland Highway Sandstone

Figure C.2-1
Key Observation Points
in the North Area Plan Boundary

0 1 2
Miles



Sources: Aspen, 2019; County, 2018;
Census, 2017; Esri, 2017

Figures C.2-2 through C.2-9 show the views from KOPs 1 through 11. A description of each KOP viewshed is provided below.

KOP 1

At this location, the predominant visual elements are surface vegetation and the beginning slopes of the Zev Yaroslavsky Highland Park Open Space area. The surface vegetation of low green grasses (which are tan in the dry months) and mature trees creates coarse visual textures, creating rolling plane of tertiary cool colors in the foreground. Due to the intervening terrain, foreground and background views are blocked. The rolling topography and expansive skyline is a focal point at this KOP, drawing the viewer's eye to the curving lines of the horizon. Despite the urban elements (such as roadways, signage, street lighting, vehicles etc.), the rural open space landscape exhibits a moderately high degree of intactness and coherence of form and character without substantial visual contrast.

KOP 2

As shown in Figure C.2-2, views from KOP 2 are similar to those described for KOP 1. However, KOP 2 shortens foreground views of vegetation and open lands due to the steep slope of this location, which extends west and forms Ladyface Mountain. Also, prevalent in the foreground is man-made vertical slopes creating a large roadway shoulder. From this viewshed, middleground and background view are obstructed due to the topography. The landscape exhibits a moderate degree of intactness due to the roadway shoulder and chain link fence, with the view dominated by surface vegetation on the intervening terrain, creating moderate visual quality at KOP 2.

KOP 3

Eastern views from KOP 3 show the view of Saddle Rock, a designated scenic resource within the North Area, visible from Mulholland Highway and the surrounding area. From this public viewshed on Mulholland Highway, there is a low degree of disturbance to the natural landscape form and character with the exception of the roadway infrastructure. Saddle Rock provides a dramatic and dominant visual element in the foreground, creating sharp visual contrast with the horizon and disrupting middleground and background views to the east. While vegetation around this unique rock outcropping provides a color contrast to the earthen tones of Saddle Rock, the viewshed exhibits a high degree of intactness and coherence of form and character in the warmer months when green grasses turn tan. From KOP 3, the visual quality of the existing landscape is considered high.

Northeastern views from KOP 3 show expansive rolling hills and distant sandstone peaks visible from Mulholland Highway and the surrounding area. From this public viewshed on Mulholland Highway, there is a low degree of disturbance to the natural landscape form and character with the exception of fencing in the immediate foreground. The surface vegetation of low green grasses (which are tan in the dry months) and mature trees creates coarse visual textures, creating rolling plane of tertiary cool colors in the foreground and middleground. Background views of sandstone peaks create a rolling horizon, with these peaks and expansive skyline creating a focal point at this KOP. From KOP 3, the visual quality of the existing landscape is considered high.



KOP 1: View from Las Virgenes Road looking west toward Zev Yaroslavy Highland Park Open Space area.



KOP 2: View from Kanan Road looking west toward the beginning slope of Ladyface Mountain.

Figure C.2-2
North Area KOPs 1 and 2



KOP 3 East: View from Mulholland Highway toward Saddle Rock.



KOP 3 Northeast: View from Mulholland Highway toward distant sandstone peaks.

Figure C.2-3
North Area KOP 3

KOP 4

Views from KOP 4 looking northeast show a high degree of disturbance to the natural landscape form and character. Roadways, electrical infrastructure, and residential development dominate the foreground and middleground views, overtaking the rolling hills and vegetation that comprise the landscape. Hilltop residences and horizontal rows of electrical distribution lines blur the horizon and disrupt background views of skyline. The landscape exhibits a low degree of intactness and coherence of form and character, thus providing moderate to low visual quality.

West facing views from KOP 4 show the view of Turtle Rock, a designated scenic resource within the North Area, visible from Mulholland Highway and the surrounding area. From this public viewshed on Mulholland Highway, there is a moderate degree of disturbance to the natural landscape form and character from roadway infrastructure, signage, and electrical distribution lines. Turtle Rock provides a dramatic and dominant visual element in the foreground-middleground, creating sharp visual contrast with the horizon and disrupting background views to the west. While this unique rock outcropping provides a visual focus and creates a dramatic horizon line, foreground views of electrical distribution infrastructure drastically reduce the degree of intactness and coherence of form and character of the natural landscape. From KOP 4 looking west, the visual quality of the existing landscape is considered moderate.

KOP 5

Views from KOP 5 show expansive rolling hills with varying surface texture and vegetation visible from the foreground to the background. Immediate coarse vegetation (burned from the recent Woolsey Fire) creates stark visual contrast from surrounding green vegetation and flowing landscape. Background views of the Mulholland Highway Sandstone Peaks, a designated scenic resource in the North Area, are slightly blocked from middleground hills. These varying peaks from middleground and background elevations creates a strong horizon and skyline. While residential development in the middleground creates industrial forms and visual contrast, the overall undisturbed land help create a low degree of disturbance to the natural landscape form and character, with the landscape providing moderate to high visual quality.

KOP 6

Views from KOP 6 show a similar coarse surface texture and color as that of KOP 5. However, KOP 6 includes foreground views of quickly elevating topography and the linear color contrast of Malibu Creek and its bank. Due to descending slopes of adjacent topography, the Malibu Creek bank creates a more predominant visual element, framing the change in elevation. These varying peaks from middleground and background elevations creates a strong horizon and skyline. While residential development creates industrial forms in the middleground, views of the undisturbed landscape within the foreground and background help create a low to moderate degree of disturbance to the natural landscape form and character, with the landscape providing moderate to high visual quality.

KOP 7

Northwest views from KOP 7 show dramatic views of rolling hills referred to as Sugar Loaf, a designated scenic resource in the North Area. This view contains blending colors and textures with undisturbed landscape, creating strong foreground and middleground views of descending slopes, which block background views. The undisturbed landscape creates a low degree of disturbance to the natural landscape form and character, resulting in high visual quality.



KOP 4 Northeast: View from junction of Kanan Road and Mulholland Highway toward rolling hills and vineyards.



KOP 4 West: View from junction of Kanan Road and Mulholland Highway toward Turtle Rock.

Figure C.2-4
North Area KOP 4



KOP 5: View from Westlake Boulevard (State Route 23) looking east toward sandstone peaks.



KOP 6: View from Mulholland Highway looking toward Malibu Creek and open space.

Figure C.2-5
North Area KOPs 5 and 6



KOP 7 Northwest: View from Mulholland Highway looking toward adjacent rolling hills.



KOP 7 Southeast: View from Mulholland Highway looking toward adjacent mountain peaks.

Figure C.2-6
North Area KOP 7

Southeast views from KOP 7 show a high degree of disturbance to the natural landscape form and character. Roadways and electrical infrastructure dominate foreground and middleground views, overtaking the rolling hills and vegetation that comprise the landscape. Horizontal rows of electrical distribution lines blur the horizon and disrupt foreground views dominated by small topography slopes, middleground views of rolling hills, and background horizon views. The landscape exhibits a low to moderate degree of intactness and coherence of form and character, thus providing moderate to low visual quality.

KOP 8

Views from KOP 8 occur on a segment of Las Virgenes Road designated as a scenic highway. At this location, views show a low-moderate degree of disturbance to the natural landscape form and character, with only roadway surface and immediately located electrical distribution poles and lines disrupting the natural landscape. Rolling hills and lush vegetation provides a dramatic and dominant visual element in the expansive foreground-middleground views, with background mountain views shaping the horizon. While this landscape browns during the dry months, the rolling topography and undisturbed landscape provide continuous visual focus and creates a dramatic horizon line. The high degree of intactness and coherence of form and character of the natural landscape create high visual quality from this designated scenic highway.

KOP 9

Views from KOP 9 show middleground views of the easternmost section of Old Topanga Sandstone peaks, a designated scenic resource in the North Area. However, KOP 9 includes foreground views of structures associated with school development and residential areas of Old Topanga. Due to descending slopes from this roadway, rooftops of this intervening development create strong foreground view obstruction, as well as electrical distribution poles and lines creating a predominant visual contrast with the middleground landscape. While vegetation, electrical infrastructure, and industrial forms block middleground views, the undisturbed landscape of the sandstone peak create a strong backdrop and horizon, result in a moderate degree of disturbance to the natural landscape form and character, with the landscape providing moderate visual quality.

KOP 10

Views from KOP 10 show expansive views of the San Fernando Valley from a developed lookout area from Topanga Canyon Boulevard. Due to the elevation from this KOP, background views of the San Fernando Valley and distant San Gabriel Mountains dominate the landscape, with the horizon and blue sky dominating the viewshed. While the overall landscape is highly disturbed and developed, the overall expansive view creates a moderate to high visual quality due to the scenic nature of the outlook.

KOP 11

Views from KOP 11 occur on a segment of Mulholland Highway designated as a scenic highway. At this location, northwest views show a low-moderate degree of disturbance to the natural landscape form and character, with only roadway surface and immediately located electrical distribution poles and lines disrupting the natural landscape. Steep terrain with rolling vegetation provides the dominant visual element in foreground-middleground views, with background views blocked by the intervening terrain. While this landscape browns during the dry months, the rolling topography provide continuous visual focus and creates a dramatic horizon line. The moderate degree of intactness and coherence of form and character of the natural landscape create moderate visual quality in this direction.



KOP 8: View from Las Virgenes Road looking across open space and rolling hills.



KOP 9: View from Old Topanga Boulevard toward distant sandstone mountain peaks.

Figure C.2-7
North Area KOPs 8 and 9



KOP 10: View from Topanga Canyon Boulevard from "Top of Topanga Outlook" across the San Fernando Valley

Figure C.2-8
North Area KOP 10



KOP 11 Northwest: View from Mulholland Highway looking toward adjacent topography.



KOP 11 Southeast: View from Mulholland Highway looking across open space and rolling hills.

Figure C.2-9
North Area KOP 11

From KOP 11 looking southeast, views from this designated scenic highway show a low degree of disturbance to the natural landscape form and character. Rolling hills and lush vegetation provides a dramatic and dominant visual element in the expansive foreground-middleground views, with background mountain views shaping the horizon. While this landscape browns during the dry months, the rolling topography and undisturbed landscape provide continuous visual focus and creates a dramatic horizon line. The high degree of intactness and coherence of form and character of the natural landscape create high visual quality in this direction from this designated scenic highway KOP.

Light and Glare

There are two major causes of ambient light pollution that could generate adverse impacts, including glare and spill light. Glare occurs when our eyes see a bright object against a dark background, such as when we experience oncoming headlights while driving. Spill light is caused by misdirected light sources, primarily nighttime safety lighting that is not projected downward allowing for light spillage outside a small area underneath. In general, the North Area produces minimal light sources, with the exception being highly developed areas along the U.S. 101 corridor. Within the more rural southern portion of the North Area boundary, the primary sources of light are outdoor lights from surrounding residences.

Existing Viewer Groups

Viewer sensitivity or concern is based on the visibility of resources in the landscape, the proximity of viewers to the visual resources, the relative elevation of viewers to the visual resources, the frequency and duration of views, the number of viewers, and the types and expectations of the individuals and viewer groups. Generally, visual sensitivity increases with an increase in the total number of viewers, the frequency of viewing, and the duration of views. However, visual sensitivity is higher for views seen by people who are driving for pleasure, engaging in recreation activities, or are homeowners, and sensitivity is lower for people commuting to and from work.

Viewer groups associated with the North Area primarily consist of residents, commuters, and recreationists (hikers, campers, pedestrians, and bicyclists). Given the high-quality scenery provided throughout the North Area, many locations and roadways are scenic destinations for Los Angeles area residents and tourists. Based on frequency of viewing and duration of views, residents within the North Area have the most visual sensitivity, followed by recreationists and commuters.

C.2.2 Regulatory Setting

Applicable Local Regulations

The North Area is completely within unincorporated Los Angeles County. A number of provisions are included within the County of Los Angeles General Plan that relate to the preservation of scenic resources and prevention or adverse aesthetic effects. The applicable local regulations presented below are focused on key goals and policies within the General Plan that serve to protect and enhance visual resources within the North Area (County of Los Angeles, 2015):

County of Los Angeles General Plan; Land Use Element

Goal LU 3: A development pattern that discourages sprawl, and protects and conserves areas with natural resources and SEAs.

- *Policy LU 3.1:* Encourage the protection and conservation of areas with natural resources, and SEAs.
- *Policy LU 3.2:* Discourage development in areas with high environmental resources and/or severe safety hazards.
- *Policy LU 3.3:* Discourage development in undeveloped areas where infrastructure and public services do not exist, or where no major infrastructure projects are planned, such as state and/or federal highways.

Goal LU 6: Protected rural communities characterized by living in a non-urban or agricultural environment at low densities without typical urban services.

- *Policy LU 6.8:* Encourage land uses and developments that are compatible with the natural environment and landscape.
- *Policy LU 6.9:* Encourage low density and low intensity development in rural areas that is compatible with rural community character, preserves open space, and conserves agricultural land.

Goal LU 7: Compatible land uses that complement neighborhood character and the natural environment.

- *Policy LU 7.1:* Reduce and mitigate the impacts of incompatible land uses, where feasible, using buffers and other design techniques.

Goal LU 10: Well-designed and healthy places that support a diversity of built environments.

- *Policy LU 10.2:* Design development adjacent to natural features in a sensitive manner to complement the natural environment.
- *Policy LU 10.3:* Consider the built environment of the surrounding area and location in the design and scale of new or remodeled buildings, architectural styles, and reflect appropriate features such as massing, materials, color, detailing or ornament.
- *Policy LU 10.5:* Encourage the use of distinctive landscaping, signage and other features to define the unique character of districts, neighborhoods or communities, and engender community identity, pride and community interaction.
- *Policy LU 10.10:* Promote architecturally distinctive buildings and focal points at prominent locations, such as major commercial intersections and near transit stations or open spaces.

Goal LU 11: Development that utilize sustainable design techniques.

- *Policy LU 11.7:* Encourage the use of design techniques to conserve natural resource areas.

County of Los Angeles General Plan; Conservation and Natural Resources Element

Goal C/NR 1: Open space areas that meet the diverse needs of Los Angeles County.

- *Policy C/NR 1.1:* Implement programs and policies that enforce the responsible stewardship and preservation of dedicated open space areas.
- *Policy C/NR 1.2:* Protect and conserve natural resources, natural areas, and available open spaces.

Goal C/NR 13: Protected visual and scenic resources.

- *Policy C/NR 13.1:* Protect scenic resources through land use regulations that mitigate development impacts.
- *Policy C/NR 13.2:* Protect ridgelines from incompatible development that diminishes their scenic value.
- *Policy C/NR 13.3:* Reduce light trespass, light pollution and other threats to scenic resources.
- *Policy C/NR 13.4:* Encourage developments to be designed to create a consistent visual relationship with the natural terrain and vegetation.

- *Policy C/NR 13.6:* Prohibit outdoor advertising and billboards along scenic routes, corridors, waterways, and other scenic areas.
- *Policy C/NR 13.8:* Manage development in hillside management areas (HMAs) to protect their natural and scenic character and minimize risks from natural hazards, such as fire, flood, erosion, and landslides.

C.2.3 Thresholds of Significance and Methodology

This section discusses the potential aesthetic impacts to the North Area that could potentially result from implementation of the Plan and CSD Update. The evaluation of aesthetics and aesthetic impacts is highly subjective by nature. It requires the application of a process that is empirical in nature to identify the visual features of the environment and their importance. Aesthetic description involves identifying existing visual character, including visual resources and scenic vistas unique to the North Area. Visual resources are determined by identifying landforms (e.g., topography and graded areas), views (e.g., scenic resources such as natural features or urban characteristics), viewpoints/locations, and existing light and glare (e.g., nighttime illumination). Changes to aesthetic resources due to implementation of the Plan and CSD Update are identified and evaluated based on the proposed modifications to the existing setting and the viewer's sensitivity.

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment with respect to aesthetics if the project would:

- Have a substantial adverse effect on a scenic vista.
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
- 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). In an urbanized area, conflict with applicable zoning and other regulations governing scenic quality.
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

C.2.4 Environmental Impacts and Mitigation Measures

Impact AE-1: Implementation of the North Area Plan and CSD Update would adversely alter existing views of scenic vistas. (Less than Significant Impact)

As discussed in Section C.2.1, Environmental Setting, the North Area contains a variety of unique and important visual resources. The discussion provided herein focuses on scenic vistas and corridors, excluding the impacts on state scenic highways, which are addressed below under Impact C.2-2.

Implementation of the Plan and CSD Update does not involve any physical changes that could affect views of scenic vistas. Instead, it is intended to guide new development of the North Area in a manner that protects the health, safety, and welfare of the community, especially the surrounding natural environment. Although future growth could result in impacts to existing scenic views, potential impacts would be minimized by a number of factors. These include the North Area Plan's expansion of conservation and open space areas, its emphasis on focusing growth in established communities,

implementation of the CSD, and adherence to the overall County of Los Angeles General Plan goals and policies. These factors and their ability to minimize impacts on scenic vistas are described below.

North Area Plan and CSD Update

The North Area Plan and CSD Update reduces potential impacts to scenic vistas by establishing goals and policies related to preserving open space and hillside management, which contain the North Area's scenic vistas. Chapter 2 of the North Area Plan and guiding regulations within the CSD enhance the County's General Plan and ordinances by specifically protecting the scenic and visual qualities within the North Area. North Area Plan Policies CO-79 through CO-91 (see attachment at end of this section) and a number of CSD design standards would retain the natural landscape, topographic character, and vegetation of hillsides to the maximum extent possible and ensure that all development in such areas is sited and designed to provide maximum protection to public scenic views. Furthermore, they would retain the scenic beauty of the Plan area by considering and protecting its scenic and visual qualities as a resource of public importance. Additionally, their implementation would set aside extensive areas for conservation or open space, generally guiding new growth in a manner consistent with protecting scenic vistas. Policies in the Land Use Element of the North Area Plan are complemented by those in the Conservation and Open Space Element. While the former encourages the development of land use patterns that preserve scenic vistas, the latter would ensure protection of unique scenic views.

Where deemed appropriate by the County, land uses developed within the North Area consistent with General Plan designations would require compliance with the North Area Plan and CSD policies. Consequently, future growth would be developed consistent with the North Area Plan vision for protecting scenic resources and minimizing future obstructions of existing views. This would include new development not blocking existing views of hillsides and rolling hills or adversely affecting ridgeline and hillside landscapes. The designation of additional open space lands occurring under the Plan and CSD Update would protect long-range views of the open landscape that characterizes the Santa Monica Mountains and to limit adverse effects to scenic resources. In summary, the North Area Plan policies and CSD design standards seek to minimize or avoid adverse effects on localized scenic views from new development. At a programmatic level, the goals and policies proposed by the North Area Plan and CSD would reduce potential adverse impacts to scenic vistas to a less-than-significant level.

County General Plan

The proposed North Area Plan is an extension of the General Plan. The General Plan organizes the county into eleven planning areas to provide for the development of local plans that respond to the needs of communities through the Planning Areas Framework. The Santa Monica Mountains North Area Plan will govern the Santa Monica Mountains Planning Area. As described above in Section C.2.2, Regulatory Setting, General Plan goals and policies would also regulate physical development within the North Area by controlling not only the appearance of new development, but also by controlling the placement of new development with consideration for surrounding uses. Additionally, regulations in the County Code that limit the size of and control the siting of signs, particularly outdoor signs including billboards, would also limit the impact of future development on scenic vistas within the North Area. Compliance with these provisions would be ensured through the County's development review and building permit process.

Programmatic Nature of Proposed Project

The programmatic nature of the proposed Project would lessen potential impact to scenic vistas, since subsequent discretionary projects within the North Area would be subject to separate project-level environmental review in accordance with CEQA. The individual project's contribution to the degradation

of scenic vistas would be assessed at the time formal development plans/applications are submitted to the County for review and approval. In particular, future development within the North Area would be evaluated for compliance with the North Area Plan and CSD policies during CEQA review.

Conclusion

In summary, the existing County General Plan and Los Angeles County Code, as well as the goals and policies in the proposed North Area Plan and CSD, would serve to lessen potential impacts to scenic vistas. Additionally, approval of the proposed Project itself does not authorize construction of development that would affect scenic vistas. Therefore, impacts would be less than significant.

Impact AE-2: Implementation of the proposed North Area Plan and CSD Update would not substantially alter scenic resources within a state scenic highway. (No Impact)

There are two adopted State Scenic Highways in the North Area: State Route 27 (SR-27) which is also designated as Topanga Canyon Boulevard and two section of Mulholland Highway (from Route 1 to Kanan Dume Road and from Cornell Road to Las Virgenes Road). As discussed under Impact C.2-1, the implementation of the North Area Plan and CSD Update does not introduce new development, nor does it propose any other physical changes to the scenic corridors that traverses the North Area boundary. The areas that the scenic routes travels through would benefit from additional protection of the existing landscape from North Area Plan policies and CSD standards that would retain the natural topographic character and vegetation of hillsides to the maximum extent possible and ensure that all development in such areas is sited and designed to provide maximum protection to public scenic views. Furthermore, they would retain the scenic beauty of the Plan area by considering and protecting its scenic and visual qualities as a resource of public importance. Therefore, implementation of the North Area Plan and CSD would not alter scenic resources within a State Scenic Highway.

As noted earlier, a scoping comment was received that asked that Kanan Road be shown as a designated State Scenic Highway in the North Area Plan. As shown in Figure C.2-1, while Kanan Road is not a designated Scenic Highway, the aesthetics analysis included two specific key observation points on Kanan Road. Additionally, the County of Los Angeles LCP boundary does not include the North Area boundary (refer to map shown at: http://planning.lacounty.gov/assets/upl/project/coastal_adopted-map1.pdf). Therefore, any policies or directives within the LCP are not applicable to the North Area.

North Area Plan and CSD Update

The North Area Plan and CSD Update reduces potential impacts to State Scenic Highways by establishing goals and policies related to preserving scenic quality. Chapter 2 of the North Area Plan and guiding regulations within the CSD enhance the County's General Plan and ordinances by specifically protecting the scenic and visual qualities within the North Area. The following proposed CSD development standards are relevant to preserving visual quality:

- **22.336.060 (A) Biological Resources.** Preserves natural habitat and features.
- **22.336.060 (A.4.j) Maximum Building Site Area.** Minimizes the maximum allowable building size to preserve natural landscapes.
- **22.336.060 (B) Trees.** Protects trees and requires tree replacement should tree removal be authorized for future development.
- **22.336.060 (F) Event Facilities.** Establishes regulations pertaining to setbacks and light pollution from such facilities to maintain scenic quality.
- **22.336.070 (R) Scenic Resource Areas.** Establishes a number of protections to scenic areas.

- **22.336.070 (T) Signs.** Establishes design standards to ensure signage impacts to scenic quality is minimized.
- **22.336.070 (W) Transfer of Development Credit Program.** Establishes regulations pertaining to retiring lot use and creating more open space to maintain scenic quality.
- **22.336.070 (Y) Vineyards.** Establishes regulations pertaining to landscaping and ridgeline use from such facilities to maintain scenic quality.

In summary, the North Area Plan policies and CSD design standards seek to minimize or avoid adverse changes to scenic quality from new development. At a programmatic level, the goals and policies proposed by the North Area Plan and CSD would result in no impact to State Scenic Highways.

Impact AE-3: Implementation of the proposed North Area Plan and CSD Update would alter the existing visual character of portions of the North Area and its surroundings. (Less than Significant Impact)

As discussed in Section C.1.1, Environmental Setting, visual character within the North Area contains mountain ranges, foothills, valleys, and built environment that all contribute to its visual character. Furthermore, although most of the area's unincorporated communities have a rural character, they still vary from each other and each has a unique visual atmosphere.

Growth within the North Area would alter the existing visual character. However, an overarching goal of the North Area Plan is to manage future growth in a way that maintains the character of the planning area as a whole. As discussed under Impact C.2-1, North Area Plan goals/policies would retain the natural topographic character and vegetation of hillsides to the maximum extent possible and ensure that all development in such areas is sited and designed to provide maximum protection to public scenic views. Furthermore, Plan policies would retain the scenic beauty of the North Area by considering and protecting its scenic and visual qualities as a resource of public importance. Policies in the Land Use Element of the North Area Plan are complemented by those in the Conservation and Open Space Element. While the former encourages the development of land use patterns that preserve scenic vistas, the latter would ensure protection of unique scenic views.

North Area Plan and CSD Update

The North Area Plan and CSD Update reduces potential impacts to State Scenic Highways by establishing goals and policies related to preserving scenic quality. Chapter 2 of the North Area Plan and guiding regulations within the CSD enhance the County's General Plan and ordinances by specifically protecting the scenic and visual qualities within the North Area. The following proposed CSD development standards are relevant to preserving visual quality:

- **22.336.060 (A) Biological Resources.** Preserves natural habitat and features.
- **22.336.060 (A.4.j) Maximum Building Site Area.** Minimizes the maximum allowable building size to preserve natural landscapes.
- **22.336.060 (B) Trees.** Protects trees and requires tree replacement should tree removal be authorized for future development.
- **22.336.060 (F) Event Facilities.** Establishes regulations pertaining to setbacks and light pollution from such facilities to maintain scenic quality.
- **22.336.070 (R) Scenic Resource Areas.** Establishes a number of protections to scenic areas.
- **22.336.070 (T) Signs.** Establishes design standards to ensure signage impacts to scenic quality is minimized.

- **22.336.070 (W) Transfer of Development Credit Program.** Establishes regulations pertaining to retiring lot use and creating more open space to maintain scenic quality.
- **22.336.070 (Y) Vineyards.** Establishes regulations pertaining to landscaping and ridgeline use from such facilities to maintain scenic quality.

The overall approach of the CSD is to refine existing standards to address issues that have arisen since the original adoption of the North Area CSD. The CSD maintains many of the existing requirements and has specifically defined other requirements to support Plan goals. For example, the CSD now requires additional protection of biological resources and native trees that contribute to scenic resources in the North Area. Therefore, implementation of CSD requirements would ensure that the rural visual character of the North Area is preserved.

Furthermore, existing regulations contained in the County's Zoning Ordinance relating to the regulation of building form, massing, subdivisions, signs, architectural features, design, and oak tree preservation would serve to lessen the impact of future development on the visual character of the North Area. For example, future development in the North Area would continue to be subject to Part 1 (General Design Requirements) of Chapter 22.52 (General Regulations) of the County's Zoning Ordinance as well as any community-specific design standards set forth in Part 2 (Community Standards Districts) of Chapter 22.44 (Supplemental Districts). The continued application of such regulations would serve to reduce potential impacts related to changes to the visual character associated with implementation of the Plan and CSD Update. Compliance with County-wide provisions and the Plan and CSD Update would be ensured through the County's development review and building permit process.

Conclusion

At a programmatic level, the North Area Plan and CSD Update are designed to protect the visual character of the North Area. Their implementation in conjunction with the existing County-wide regulatory framework would serve to lessen potential impacts by minimizing changes to the existing landscape from future development. Additionally, the North Area Plan and CSD Update would lessen or mitigate potential impacts to the North Area by providing direction for future decision making, as well as by requiring additional future review of individual development projects. Therefore, while changes to the North Area's visual appearance and character would likely occur in the future, these would not be inherently adverse changes as the Plan and CSD Update would seek to lessen or avoid such impacts. Therefore, impacts related to visual character and quality would be less than significant.

Impact AE-4: Implementation of the proposed North Area Plan and CSD Update would generate additional sources of light and glare that could adversely affect day and nighttime views in the North Area. (Less than Significant Impact)

Existing levels of lighting and light pollution vary widely in the North Area. They are relatively high near the U.S. 101 corridor where commercial development and suburban-scaled housing developments spread ambient light and light pollution over a wide area. However, the North Area also contains many rural, undeveloped, and remote areas, including those throughout the Santa Monica Mountains. In these areas, existing nighttime light and light pollution is very low. Implementation of the North Area Plan and CSD Update would not result in new development. Therefore, the update would not directly introduce new or additional sources of light into the North Area and its surroundings. However, such impacts from future development would be reduced upon implementation of the goals and policies of the North Area Plan and development standards of the CSD.

North Area Plan and CSD Update

The North Area Plan and CSD Update reduces potential impacts to State Scenic Highways by establishing goals and policies related to preserving scenic quality. Chapter 2 of the North Area Plan and guiding regulations within the CSD enhance the County's General Plan and ordinances by specifically protecting the scenic and visual qualities within the North Area. The following proposed CSD development standards are relevant to preserving visual quality:

- **22.336.060 (A) Biological Resources.** Preserves natural habitat and features.
- **22.336.060 (A.4.j) Maximum Building Site Area.** Minimizes the maximum allowable building size to preserve natural landscapes.
- **22.336.060 (B) Trees.** Protects trees and requires tree replacement should tree removal be authorized for future development.
- **22.336.060 (F) Event Facilities.** Establishes regulations pertaining to setbacks and light pollution from such facilities to maintain scenic quality.
- **22.336.070 (R) Scenic Resource Areas.** Establishes a number of protections to scenic areas.
- **22.336.070 (T) Signs.** Establishes design standards to ensure signage impacts to scenic quality is minimized.
- **22.336.070 (W) Transfer of Development Credit Program.** Establishes regulations pertaining to retiring lot use and creating more open space to maintain scenic quality.
- **22.336.070 (Y) Vineyards.** Establishes regulations pertaining to landscaping and ridgeline use from such facilities to maintain scenic quality.

The proposed CSD includes Development Standard R. *Scenic Resource Areas* 3.c., which would require new development to incorporate colors and exterior materials that are compatible with the surrounding landscape and prohibits the use of highly reflective materials, except solar panels. The proposed CSD Development Standard F. *Event Facilities* 4.d. would also require private events within the North Area to ensure parking is designed so that headlights of parked cars are facing inward toward the property and are not directed onto adjacent properties or sensitive habitat.

In addition to the proposed policies and regulations of the North Area Plan and CSD, the County's existing Zoning Ordinance (Title 22 of the County Code) contains provisions intended to limit adverse light and glare impacts. For example, Section 22.52.820 (General Regulations) of Part 10 (Signs) requires that no lighted signs be placed or directed so as to permit illumination to be directed or beamed upon a public street, highway, sidewalk, or adjacent premise. Part 9 (Rural Outdoor Lighting District) of Chapter 22.44 (Supplemental Districts) establishes rural outdoor lighting districts. These provisions are particularly important to mitigating this impact because they protect dark sky resources in the portions of North Area where additional light pollution would be particularly pronounced, such as undeveloped areas of the Santa Monica Mountains. Compliance with these and other applicable provisions of the County's Zoning Ordinance would be enforced through the County's development review and building permit process.

In addition to applicable provisions of the County Code mentioned above (including the Rural Outdoor Lighting Ordinance, which applies to rural areas throughout Los Angeles County), CEQA requires that development projects requiring discretionary approval be required to undergo separate project-level environmental review, wherein the individual project's contribution to additional sources of light and glare would be assessed at the time formal development plans/applications are submitted to the County for review and approval. Additionally, the California Building Code contains standards for outdoor lighting that are intended to reduce light pollution and glare by regulating light power and brightness, shielding, and sensor controls. These regulations would serve to mitigate potential impacts of new land uses.

Conclusion

The North Area Plan and CSD Update would not directly contribute to any new sources of light or glare. Instead, they serve to ensure that future development within the planning area would not generate additional sources of light and glare that could adversely affect existing day and nighttime views. Furthermore, the North Area Plan would guide growth within established communities where existing levels of nighttime illumination exist under baseline conditions. Future individual projects that would have potentially significant impacts related to lighting, such as commercial buildings, would be subject to project-level CEQA review. Upon implementation of applicable sections of the existing County Code, provisions of the California Building Code, and goals and policies in the proposed North Area Plan and CSD Update, impacts related to light and glare would be less than significant.

C.2.5 Cumulative Impact Analysis

Cumulative projects, shown on Figure C.1-1 and listed in Table C.1-1, would have the potential to result in a cumulative impact to aesthetic resources as they would contribute to increased urbanization of the North Area (primarily the U.S. 101 corridor). The implementation of the update in combination with the cumulative projects could contribute toward a substantial adverse change to the valued visual character of the North Area.

Scenic Vistas and Scenic Resources

Future infill projects anticipated in the North Area could affect scenic vistas and specific scenic resources. However, as shown in Figure C.1-1, most cumulative projects are located along the U.S. 101 corridor within the most urbanized segment of the North Area. Because development allowed under the proposed North Area Plan and CSD Update would be subject to goals, policies, and design standards that reduce visual impacts on scenic resources within the North Area, the proposed Plan and CSD's contribution to visual impacts would not be cumulatively considerable. Therefore, cumulative impacts of the Plan and CSD Update related to scenic vistas and scenic resources would be less than significant.

Visual Character and Quality

As discussed earlier, the proposed North Area Plan and CSD would not directly result in any physical change. Instead, they are designed to guide future growth and development. While the cumulative projects identified in Table C.1-1 would fundamentally alter visual character and quality in some areas, the Plan and CSD Update would not directly result in physical impacts. Instead, future development would be subject to goals, policies, and design standards; the Plan and CSD Update would not contribute to visual impacts and would not be cumulatively considerable. Therefore, cumulative impacts of the Plan and CSD Update related to visual character and quality would be less than significant.

Light and Glare

The construction and operation of the cumulative projects have the potential to result in a new source of light and glare from new development or redevelopment that requires night lighting, such as security lighting in commercial areas, or is constructed with materials that could result in glare, such as expanses of glass on buildings. However, impacts from light and glare are generally localized and not cumulative in nature. Although a cluster of cumulative projects located along U.S. 101 through the North Area would likely generate cumulative effects in the form of increased overall illumination of the commercial corridor, implementation of the proposed North Area Plan and CSD Update would help reduce future project contribution to light and glare impacts (primarily within undeveloped and rural portions of the North

Area). Therefore, the proposed Plan and CSD Update would not contribute to a significant adverse cumulative effect related to light or glare (less than significant).

C.2.6 Level of Significance After Mitigation

No significant adverse impacts related to aesthetics have been identified and no mitigation measures are proposed. Aesthetic impacts would be less than significant.

Attachment C.2

Aesthetics Policies and Standards

(Appendix 1 includes all policies and standards)

Proposed North Area Plan Update

Conservation and Open Space Element

- **Policy CO-79:** Protect public views within Scenic Areas and throughout the North Area. Places on, along, within, or visible from Scenic Routes, public parklands, public trails, and state waters that offer scenic vistas of the mountains, canyons, and other unique natural features are considered Scenic Resource Areas. Scenic Resource Areas do not include areas that are largely developed such as existing, predominantly built-out residential subdivisions.
- **Policy CO-80:** Maintain and enhance the visual quality of vistas along the unincorporated portions of identified scenic routes and routes with scenic qualities.
- **Policy CO-81:** Regulate the alteration of the natural landscape and terrain to ensure minimal visual disruption of existing settings.
- **Policy CO-82:** Protect public views of designated Scenic Elements and Significant Ridgelines, canyon walls, geological formations, creeks, ridgelines, and waterfalls. Preserve and protect the viewshed and line-of-sight to these scenic resources.
- **Policy CO-83:** Prioritize avoidance of impacts to scenic resources through site selection and design alternatives over use of landscaping or building material screening.
- **Policy CO-84:** Limit the extent of vegetation clearance to that required for fire safety, and where possible, site structures so that no vegetation clearance encroaches on adjacent properties; consider the size and siting of development to reduce the level of vegetation clearance needed.
- **Policy CO-85:** Limit and design exterior lighting to preserve the visibility of the natural night sky and stars to the extent feasible and consistent with public safety.
- **Policy CO-86:** Limit the height of retaining walls by using stepped or terraced retaining walls, with plantings in-between. Where feasible, long continuous walls shall be broken into sections or shall include undulations to provide visual relief.
- **Policy CO-87:** Require wireless telecommunication facilities to be designed and sited in such a manner that they minimize impacts to visual resources and blend into the landscape. Such facilities shall be collocated where feasible. This may include requiring one taller pole rather than allowing multiple shorter poles. New wireless telecommunication facilities may be disguised as trees of a species that would likely be found in the surrounding area and that blend with the natural landscape when it is not feasible to co-locate on an existing pole.
- **Policy CO-88:** Transition all overhead transmission lines and utility infrastructure underground to eliminate visual impacts along scenic routes and in scenic resource areas.
- **Policy CO-89:** Prohibit the placement of new, and phase out any existing off-site advertising signs and onsite pole signs along designated scenic highways and the Ventura Freeway.
- **Policy CO-90:** Public works projects along scenic routes that include hardscape elements such as retaining walls, cut-off walls, abutments, bridges, and culverts shall incorporate veneers, texturing, and colors that blend with the surrounding landscape.

- **Policy CO-91:** Minimize impacts to visual resources from land divisions, including lot line adjustments, through design techniques such as but not limited to clustering.

Proposed Community Standards District Update

Section 22.336.060 Biological Resources Standards

- A. Biological Resources
- A.4.jMaximum Building Site Area
- B. Trees
- F. Event Facilities

22.336.070 Community Wide Development Standards

- R. Scenic Resource Areas
- T. Signs
- W. Transfer of Development Credit Program
- Y. Vineyards

C.3 Air Quality

Introduction

This section describes effects on air quality that would be caused by implementing the policies in the proposed North Area Plan and CSD Update. The following discussion addresses existing environmental conditions in the affected area, identifies and analyzes environmental impacts for the proposed North Area Plan and CSD Update, and as applicable recommends measures to reduce or avoid anticipated adverse impacts. In addition, existing laws and regulations relevant to air quality are described. In some cases, compliance with these existing laws and regulations would serve to reduce or avoid certain impacts that would otherwise occur. The analysis of the impacts from greenhouse gas emissions is provided separately in Section C.5 (Greenhouse Gas).

Scoping Comments Received. During the scoping period for the EIR, written and verbal comments were received from agencies, organizations, and the public. These comments identified various substantive issues and concerns relevant to the EIR analysis for air quality. The issues below summarize these comments. Appendix 2 includes all comments received during the scoping comment period.

EIR should include descriptions of feasible mitigation measures necessary to reduce significant impacts, and all design features that mitigate air quality impacts.

- Regional and local emissions impacts from demolition, construction, and operation activities should be evaluated.
- The impact evaluation should address appropriate CEQA analysis guidance documents and emissions significance thresholds.
- Recommend use of the CalEEMod land use emission software.
- Concern with air pollution from traffic associated with special events.

C.3.1 Environmental Setting

The Santa Monica Mountains North Area (planning area) encompasses 32.3 square miles in Los Angeles County and is located several miles inland from the Pacific Ocean. The planning area is entirely within the South Coast Air Basin (SCAB) under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAB consists of the urbanized areas of Los Angeles, Riverside, San Bernardino, and Orange Counties, and the ocean areas in South Coast waters. The SCAB onshore area covers 6,000 square miles. On a localized level, the area of influence is related to the planning area's location within SCAQMD jurisdiction. The SCAQMD has 37 separate General Forecast/Air Monitoring Areas, and the planning area covers two of these areas, Northwest Los Angeles County Coastal and West San Fernando Valley.

KEY FINDINGS

- Air quality in the South Coast Air Basin has been slowly improving since the 1970s.
- South Coast Air Basin, including North Area, remain nonattainment of the Federal and State ozone and PM2.5 ambient air quality standards and nonattainment of the State PM10 ambient air quality standard.
- County General Plan (GP) includes numerous policies and the associated GP EIR includes mitigation measures to reduce the impacts of new development projects.
- Adherence to GP policies and GP EIR mitigation measures would reduce air quality impacts from new development projects to a less than significant level.

C.3.1.1 Regional Climate and Meteorology

The climate of the SCAB is characterized as Mediterranean climate with warm, dry summers and cool winters with seasonally heavy precipitation that occurs primarily during the winter months. Summers typically have clear skies, warm temperatures, and low humidity. A monthly climate summary for the City of Agoura Hills was selected to characterize the climate of the North Area, noting that areas to the east will be generally a bit warmer and areas to the west and south a bit cooler; and some areas will be a bit drier and some may be a bit wetter. As described in Table C.3-1, average summer (June through September) high and low temperatures in the study area range from 96° Fahrenheit (°F) to 53°F. Average winter (December-March) high and low temperatures in the study area range from 72°F to 38°F. The North Area climate is influenced by being separated by topography and being several miles from the Pacific Ocean, meaning it is much warmer in the summer than coastal locations within the SCAB and it is generally cooler than coastal areas of the SCAB in winter.

Table C.3-1. Agoura Hills Monthly Average Temperatures and Precipitation

Month	Temperature (°F)		Precipitation
	Average High	Average Low	
January	68	40	3.83
February	70	41	4.40
March	72	42	3.60
April	78	45	0.88
May	81	49	0.32
June	89	53	0.07
July	95	57	0.01
August	96	58	0.15
September	92	55	0.24
October	84	49	0.62
November	75	42	1.29
December	69	38	2.38

Source: Intellicast, 2018

The average annual precipitation is approximately 17.8 inches with nearly 80 percent occurring between December and March and over 90 percent occurring between November and April. The months of May through September are very dry with all of these months averaging less than a half of an inch of precipitation. Little precipitation occurs during summer because a high-pressure cell blocks migrating storm systems over the eastern Pacific Ocean.

Winds across the North Area are an important meteorological parameter as they control both the initial rate of dilution and direction of pollutant dispersion. The North Area is fairly large and will have multiple influencing characteristics, such as elevation and local topography and distance from the Pacific Ocean. As seen near the center of the North Area in Agoura Hills, the winds are most often from west from the end of March through the first half of October, and from the North for the rest of year. The average wind speed is highest in winter with the average speed being more than 9 miles per hour in December and January and lowest in summer with the average wind speed in August being a bit more than 5 miles per hour (Weather Spark, 2018). However, the North Area is over 32 square miles and includes a large amount of rugged topography, with peaks and small valleys that greatly influence the local wind speed and wind direction.

C.3.1.2 Air Pollutants and Monitoring Data

Air pollutants are defined as two general types: (1) “criteria” pollutants, representing six pollutants for which national and state health- and welfare-based ambient air quality standards have been established; and (2) toxic air contaminants (TACs), which may lead to serious illness or increased mortality even when present at relatively low concentrations. Generally, TACs do not have ambient air quality standards. The three TACs that do have ambient air quality standards (lead, vinyl chloride, and hydrogen sulfide) are not pollutants that are expected to be relevant to the implementation of the proposed Plan and CSD Update because the North Area includes residential, commercial and public open space uses and existing land uses will not significantly change with the proposed Plan and CSD Update.

C.3.1.3 Criteria Pollutants

The U.S. Environmental Protection Agency (USEPA), California Air Resources Board (ARB), and the local air districts classify an area as attainment, unclassified, or nonattainment depending on whether or not the monitored ambient air quality data shows compliance, insufficient data available, or non-compliance with the ambient air quality standards, respectively. The National and California Ambient Air Quality Standards (NAAQS and CAAQS, respectively) relevant to the proposed Plan and CSD Update are provided in Table C.3-2. Table C.3-3 summarizes the federal and State attainment status of criteria pollutants for the SCAB area under SCAQMD jurisdiction based on the NAAQS and CAAQS, respectively.

Table C.3-2. National and California Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards	National Standards	Pollutant Health Effects
Ozone (O ₃)	1-hour	0.09 ppm	—	Breathing difficulties, lung tissue damage
	8-hour	0.070 ppm	0.070 ppm ¹	
Respirable particulate matter (PM ₁₀)	24-hour	50 µg/m ³	150 µg/m ³	Increased respiratory disease, lung damage, cancer, premature death
	Annual	20 µg/m ³	—	
Fine particulate matter (PM _{2.5})	24-hour	—	35 µg/m ³	Increased respiratory disease, lung damage, cancer, premature death
	Annual ²	12 µg/m ³	12 µg/m ³	
Carbon monoxide (CO)	1-hour	20 ppm	35 ppm	Chest pain in heart patients, headaches, reduced mental alertness
	8-hour	9.0 ppm	9 ppm	
Nitrogen dioxide (NO ₂)	1-hour	0.18 ppm	0.100 ppm ²	Lung irritation and damage
	Annual	0.030 ppm	0.053 ppm	
Sulfur dioxide (SO ₂)	1-hour	0.25 ppm	0.075 ppm ²	Increases lung disease and breathing problems for asthmatics
	3-hour	—	0.5 ppm	
	24-hour	0.04 ppm	—	

Source: ARB, 2001; ARB, 2016

Notes: ppm = parts per million; µg/m³ = micrograms per cubic meter; "—" = no standards

1 - The federal 8-hour ozone standard was lowered from 0.075 to 0.070 ppm on October 1, 2015. The attainment status designation is currently based on the former standard.

2 - The federal standard shown is the primary standard, the secondary standard is 15 µg/m³.

3 - The new federal 1-hour NO₂ and SO₂ standards are based on the 98th and 99th percentile of daily hourly maximum values, respectively.

Table C.3-3. Attainment Status for the SCAB

Pollutant	Attainment Status ¹	
	Federal	State
Ozone	Nonattainment/Extreme	Nonattainment
PM ₁₀	Attainment/Maintenance	Nonattainment
PM _{2.5}	Nonattainment/Serious	Nonattainment
CO	Attainment/Maintenance	Attainment
NO ₂	Attainment/Maintenance	Attainment
SO ₂	Attainment	Attainment

Source: SCAQMD, 2018a

1 - The Attainment designations shown in this table may actually be unclassified/unclassifiable or cannot be classified designations that for regulatory purposes are the same as an attainment designation.

The SCAQMD and the Ventura County Air Pollution Control District (VCAPCD) operate regional air quality monitoring stations, the nearest of which to the North Area are the SCAQMD operated Reseda station (NO₂, ozone, CO, and PM_{2.5}) and the VCAPCD operated Thousand Oaks station (ozone and PM_{2.5}). The nearest station with PM₁₀ and SO₂ monitoring is the Westchester Parkway station, located just north of the Los Angeles International Airport, that monitors all of the federal criteria pollutants except PM_{2.5}. Table C.3-4 presents the maximum pollutant levels measured at these three monitoring stations from 2015 through 2018. Values in exceedance of the most restrictive ambient air quality standard for each pollutant and averaging period are shown in **bold**.

Table C.3-4. Background Ambient Air Quality Data

Pollutant – Monitor	Averaging Time	Maximum Concentration (ppm or µg/m ³) ¹			
		2015	2016	2017	2018
Ozone – Reseda	1-hour	0.119	0.122	0.140	0.120
	8-hour	0.094	0.098	0.114	0.101
Ozone – Thousand Oaks	1-hour	0.078	0.080	0.090	0.080
	8-hour	0.069	0.076	0.073	0.073
PM ₁₀ – Westchester	24-hour	42	43	47	45
	Annual	21.2	21.6	20.2	20.5
PM _{2.5} – Reseda	24-hour (98th percentile)	28.4	24.5	20.7	31.0
	Annual	8.8	9.2	9.7	10.3
PM _{2.5} – Thousand Oaks	24-hour (98th percentile)	21.5	19.0	21.0	23.6
	Annual	8.7	9.6	8.9	9.2
CO - Reseda	1-hour	3.0	2.4	3.0	3.4
	8-hour	2.5	1.9	2.5	2.1
NO ₂ - Reseda	1-hour	0.072	0.055	0.062	0.057
	1-hour (98th percentile)	0.052	0.046	0.054	0.050
	Annual	0.013	0.012	0.012	0.012
SO ₂ - Westchester	1-hour	0.015	0.010	0.010	0.012
	1-hour (99th percentile)	0.007	0.006	0.007	0.005
	24-hour	0.002	0.002	0.003	0.002

Source: SCAQMD, 2019; ARB, 2019; USEPA, 2019

ppm = parts per million; µg/m³ = micrograms per cubic meter

1 - Gaseous pollutant (ozone, SO₂, NO₂, and CO) concentrations are shown in ppm and particulate (PM₁₀ and PM_{2.5}) concentrations are shown in µg/m³.

The ambient air quality data provided above shows exceedances of the State and federal ozone standards and the State PM₁₀ standard, however the data shows no exceedances of the State or federal PM_{2.5}, CO, NO₂, or SO₂ standards. As can be seen comparing the data from Reseda and Thousand Oaks, the North Area's air quality would generally be better to the west and worse to the east. It is also likely the air quality is generally better to the south, closer to the Pacific Ocean, and worse to the north closer to Highway 101. This is not surprising since the Ventura County area of the South Central Coast Air Basin has a better federal nonattainment status than the SCAB for ozone (serious versus extreme nonattainment) and unlike the SCAB is attainment of the federal and State PM_{2.5} AAQS.

While the SCAB is still non-attainment of several federal and State AAQS, and the progress towards attainment of certain AAQS (such as ozone and state PM₁₀) have slowed, the air quality of the air basin has improved substantially since air quality regulations were enacted in the 1970s. For example, there

hasn't been a single Stage II Smog Alert in the SCAB since the 1980s; and the last Stage I Smog Alert, event that used to occur 100 to 120 times a year, occurred in 2003.

C.3.1.4 Toxic Air Contaminants

TACs are compounds that are known or suspected to cause adverse long-term (cancer and chronic) and/or short-term (acute) health effects. TACs are emitted from mobile sources, including diesel particulate matter (DPM); industrial processes and stationary sources, such as dry cleaners, gasoline stations, paint and solvent operations; and stationary fossil fuel-burning combustion. The SCAQMD estimates in the draft Multiple Air Toxics Exposure Study IV (MATES IV) that over 68 percent of the background airborne air toxics risk in the SCAB is due to DPM (SCAQMD, 2015a). DPM is by far the largest TAC emissions source from emissions sources within the North area; therefore, this EIR focuses on the impacts of DPM emissions.

SCAQMD Multiple Air Toxics Exposure Study IV (MATES IV)

The MATES IV Study, which monitored TACs concentrations and estimated health risk within the SCAB, was completed by SCAQMD in 2015 (SCAQMD, 2015a). The air toxics risk is determined as additional cancer case risk. This study found that the air toxics risk peak in the SCAB was approximately 2,500 in a million in the area surrounding the Ports of Los Angeles/Long Beach and that the average risk for the SCAB was about 900 per million¹. The comparative population weighted average risk determined in the MATES III Study was approximately 2,100 in a million. The MATES IV Study found that approximately 68 percent of the cancer risk was from DPM, whereas that level was 84 percent in the MATES III Study.

In the North Area, the risks range from just over 200 in a million in the more remote areas of the Santa Monica Mountains to nearly 600 in a million along the 101 Freeway near Calabasas. Overall, the entire North Area has average air toxics health risk values well below the SCAB average.

C.3.1.5 Sensitive Receptors

The impact of air emissions on sensitive members of the population is a special concern. Sensitive receptor groups include children and infants, pregnant women, the elderly, and the acutely and chronically ill. According to SCAQMD guidance, sensitive receptor locations include schools, hospitals, convalescent homes, day care centers, and other locations where children, chronically ill individuals, or other sensitive persons could be exposed. In addition, this analysis includes residents as sensitive receptors.

The majority of North Area is rural in nature; and there are no hospitals, or known convalescent or senior homes or known licensed child day care centers located within the SMMNA. However, there are at least three schools/preschools and over 4,500 residential properties, with a total population of more than 9,000 individuals, located within the SMMNA (County of Los Angeles, 2015).

C.3.2 Regulatory Setting

Sources of air emissions in the SCAB are regulated by the USEPA, ARB, and SCAQMD. In addition, regional and local jurisdictions play a role in air quality management. The role of each regulatory agency is discussed below.

¹ The risk values quoted are based on the values obtained using the revised 2015 OEHHHA risk assessment calculation methodology, which increases the calculated risk by a multiplication factor of approximately 2.5. It should also be noted that the average overall lifetime cancer incidence rate, is over 380,000 in a million (38 percent), so the MATES IV average SCAB air toxics caused cancer incidence rate is a small fraction (less than 0.25 percent) of the total incidence rate.

C.3.2.1 Federal

The federal Clean Air Act (CAA) of 1963 and its subsequent amendments form the basis for the nation's air pollution control effort. The USEPA is responsible for implementing most aspects of the CAA. Basic elements of the act include the NAAQS for major air pollutants, hazardous air pollutant standards, attainment plans, motor vehicle emission standards, stationary source emission standards and permits, acid rain control measures, stratospheric ozone protection, and enforcement provisions.

The CAA delegates the enforcement of the federal standards to the states. In California, the ARB is responsible for enforcing air pollution regulations. In the SCAB, the SCAQMD has this responsibility. Other USEPA regulations promulgated under the authority of the CAA or other federal authority that are relevant, directly or indirectly, to the proposed Plan and CSD Update are described below.

Emission Standards for Non-Road Diesel Engines

The USEPA has established a series of cleaner emission standards for new off-road diesel engines culminating in the Tier 4 Final Rule of June 2004 (USEPA, 2004a). The Tier 1, Tier 2, Tier 3, and Tier 4 standards require compliance with progressively more stringent emission standards. Tier 1 standards were phased in from 1996 to 2000 (year of manufacture), depending on the engine horsepower category. Tier 2 standards were phased in from 2001 to 2006, and the Tier 3 standards were phased in from 2006 to 2008.

The Tier 4 standards complement the latest 2007 and later on-road, heavy-duty engine standards by requiring 90 percent reductions in diesel particulate matter (DPM) and NO_x when compared against current emission levels. The Tier 4 standards are currently being phased in, starting with smaller engines in 2008 until all but the very largest diesel engines meet NO_x and PM standards in 2015.

Non-Road Diesel Fuel Rule

In May 2004, the USEPA set sulfur limits for non-road diesel fuel. Under this rule, sulfur levels in non-road diesel fuel are now limited to 15 ppm (USEPA, 2004b, p. 4), which make it equivalent to sulfur content restrictions of the California Diesel Fuel Regulations (described below).

Emission Standards for On-Road Trucks

To reduce emissions from on-road, heavy-duty diesel trucks, the USEPA established a series of cleaner emission standards for new engines, starting in 1988. These emission standards have been revised over time. The latest effective regulation, the 2007 Heavy-Duty Highway Rule, provides for reductions in PM, NO_x, and non-methane hydrocarbon emissions that were phased in during the model years 2007 through 2010 (USEPA, 2000, p. 2).

C.3.2.2 State

In California, the ARB is designated as the responsible agency for all air quality regulations. The ARB, which became part of the California Environmental Protection Agency (Cal/EPA) in 1991, is responsible for implementing the requirements of the federal CAA, regulating emissions from motor vehicles and consumer products, and implementing the California Clean Air Act of 1988 (CCAA). The CCAA outlines a program to attain the CAAQS for O₃, NO₂, SO₂, and CO by the earliest practical date. Since the CAAQS are often more stringent than the NAAQS, attainment of these more stringent CAAQS will require more emission reductions than what will be required to show attainment of the NAAQS. Similar to the federal system, the State requirements and compliance dates are based on the severity of the ambient air quality standard violation within a region.

Other ARB regulations promulgated under the authority of the CCAA that are relevant, directly or indirectly, to the proposed Plan and CSD Update are described below.

California Diesel Risk Reduction Plan

ARB has adopted several regulations that are meant to reduce the health risk associated with on- and off-road and stationary diesel engine emissions. This plan recommends many control measures with the goal of an 85 percent reduction in DPM emissions by 2020. The regulations noted below, which may also serve to significantly reduce other pollutant emissions, are all part of this risk reduction plan.

Emission Standards for On-Road and Off-Road Diesel Engines

The ARB, similar to the USEPA on-road and off-road emissions standards, regulations described above, has established emission standards for new on-road and off-road diesel engines. These regulations have model year-based emissions standards for NO_x, hydrocarbons, CO, and particulate matter (PM).

In-Use Off-Road Vehicle Regulation

The State has also enacted a regulation for the reduction of DPM and criteria pollutant emissions from in-use off-road diesel-fueled vehicles (CCR Title 13, Division 3, Chapter 9, Article 4.8, Section 2449). This regulation provides target emission rates for PM and NO_x emissions from owners of fleets of diesel-fueled off-road vehicles and applies to off-road equipment fleets of three specific sizes² and the target emission rates are reduced over time. Specific regulation requirements:

- Impose limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles;
- Require all vehicles to be reported to ARB (using the Diesel Off-Road Online Reporting System, DOORS) and labeled;
- Restrict the adding of older vehicles into fleets starting on January 1, 2014; and
- Require fleets to reduce their emissions by retiring, replacing, or repowering older engines, or installing Verified Diesel Emission Control Strategies, VDECS (i.e., exhaust retrofits) (ARB, 2016b, p. 1).

The construction contractor(s) who complete construction activities for projects proposed in the North Area (with or without adoption of the proposed Plan and CSD Update) would have to comply with the requirements of this regulation.

Heavy-Duty Diesel Truck Idling Regulation

This ARB rule became effective February 1, 2005. This rule prohibits heavy-duty diesel trucks from idling for longer than five minutes at a time, unless they are queuing, provided the queue is located beyond 100 feet from any homes or schools (ARB, 2006).

² The three off-road equipment fleet sizes covered under this regulation are:

Small – fleet or municipality with less than or equal to 5,000 total equipment horsepower; and municipality fleet in low population county, captive attainment area fleet, or non-profit training center, regardless of total horsepower.

Medium – fleet with 2,501 to 5,000 total equipment horsepower.

Large – Fleet with greater than 5,000 total equipment horsepower, and all state and federal government fleets regardless of total horsepower.

California Diesel Fuel Regulations

In 2004, the ARB set limits on the sulfur content of diesel fuel sold in California for use in on-road and off-road motor vehicles (ARB, 2004). Under this rule, diesel fuel used in motor vehicles has been limited to 500 ppm sulfur since 1993. The sulfur limit was reduced to 15 ppm beginning on September 1, 2006.

Statewide Portable Equipment Registration Program (PERP)

The PERP establishes a uniform program to regulate portable engines and portable engine-driven equipment units (ARB, 2018). Once registered in the PERP, engines and equipment units may operate throughout California without the need to obtain individual permits from local air districts, as long as the equipment is located at a single location for no more than 12 months. There may be construction equipment that would be required to be PERP registered, but there are no known operating emissions sources that would be subject to this regulation.

C.3.2.3 Local

South Coast Air Quality Management District (SCAQMD)

The SCAQMD is primarily responsible for planning, implementing, and enforcing federal and State ambient standards within this portion of the SCAB. As part of its planning responsibilities SCAQMD prepares Air Quality Management Plans (AQMPs) and Attainment Plans as necessary based on the attainment status of the air basins within its jurisdiction. The SCAQMD is also responsible for permitting and controlling stationary source criteria and air toxic pollutants as delegated by the USEPA.

Air Quality Management Plans

The SCAQMD adopts air quality management plans that are designed to bring the SCAB into attainment of the NAAQS and other plans that are designed to provide progress towards attaining the CAAQS and meet other state air quality regulations. The latest federal air quality attainment plans are the 2012 plan that is the current federally approved plan and the 2016 plan that is approved at the state level and awaiting federal approval (SCAQMD, 2018b). The attainment strategies in these plans include mobile source control measures and clean fuel programs that are enforced at the federal and state levels on engine manufacturers and petroleum refiners and retailers, as well as, additional control measures for stationary sources, commercial sources, and residential sources of emissions. The AQMP also includes analysis of air toxics control strategies and climate and energy.

On March 3, 2017, SCAQMD's Governing Board adopted the 2016 AQMP, which addresses several State and federal planning requirements and builds upon the approach identified in the previous AQMPs for attainment of federal PM and ozone standards. This AQMP provided the following revised attainment status requests:

- 2012 Annual PM_{2.5} NAAQS (12 µg/m³) - reclassification to serious nonattainment area and attainment demonstration by 2025
- 2006 24-hour PM_{2.5} NAAQS (35 µg/m³) - attainment demonstration by 2019
- 2008 8-hour Ozone NAAQS (75 ppb) - attainment demonstration by 2031
- 1997 8-hour Ozone NAAQS (80 ppb) - attainment demonstration by 2023
- 1979 1-hour Ozone NAAQS (120 ppb) - attainment demonstration by 2022

The SCAQMD adopts AQMP control measures into the SCAQMD rules and regulations, which are then used to regulate sources of air pollution in the SCAB. The future actions approved under the proposed Plan and CSD Update would comply with these regulatory requirements. Therefore, future emissions sources in the North Area would be required to conform with the emissions control forecasts for all approved AQMP control measures.

The proposed Plan and CSD Update, which does not change buildout projections adopted in the 2035 General Plan, would conform with the growth projections in the Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP), so it would not exceed the future growth projections in the AQMPs and it would not conflict with or obstruct implementation of the State Implementation Plan (SIP). As a result, future actions approved as part of the proposed Plan and CSD Update would conform to the applicable AQMPs.

Rule and Regulations

Through the attainment planning process, the SCAQMD develops the SCAQMD Rules and Regulations to regulate sources of air pollution in the SCAB (SCAQMD, 2018c). The SCAQMD rules that would be potentially applicable to the proposed Plan and CSD Update are listed below.

SCAQMD Rule 201 – Permit to Construct and Rule 202 – Permit to Operate

Any non-self-propelled portable equipment used during construction that have engines that are over 50 horsepower would be required to obtain SCAQMD permits; or be permitted under the ARB PERP program.

SCAQMD Rule 401 – Visible Emissions

This rule prohibits discharge of air contaminants or other material, which are as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or obscure an observer's view.

SCAQMD Rule 402 – Nuisance

This rule prohibits discharge of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public; or that endanger the comfort, repose, health, or safety of any such persons or the public; or that cause, or have a natural tendency to cause, injury or damage to business or property.

SCAQMD Rule 403 – Fugitive Dust

The purpose of this rule is to control the amount of PM entrained in the atmosphere from man-made sources of fugitive dust. Under Rule 403, no person shall conduct active operations without utilizing the applicable best available control measures to minimize fugitive dust emissions. Construction and operation fugitive dust emission sources are subject to this rule, which covers all fugitive dust emissions sources, such as excavation and other earthmoving operations, storage piles, and unpaved and paved roads. Best available control measures would include site watering as necessary to maintain sufficient soil moisture content.

SCAQMD Regulation XI – Source Specific Standards

This regulation is composed of several dozen individual rules, most of which would not be expected to be applicable to the proposed Plan and CSD Update. Specific rules that may be applicable include:

- *Rule 1113 – Architectural Coatings. This rule limits the VOC contents of paints applied to various surfaces that would be applicable to any construction painting operations.*

- *Rule 1166 – Volatile Organic Compound Emissions from Decommissioning of Soils. This rule sets requirements to control emissions from excavating, grading, handling and treating VOC-contaminated soils that may be encountered during project construction.*

There could be many more applicable regulations for the range of actions and new or modified stationary sources that may be proposed in the North Area. However, projects proposed in the North Area would be required to be comply with applicable Source Specific Standards.

County of Los Angeles

General Plan

The County of Los Angeles' General Plan has a number of approved air quality goals and policies that may apply to the proposed Plan and CSD Update (County of Los Angeles, 2015). The adopted air quality goals and policies are as follows:

- **Goal AQ 1: Protection from exposure to harmful air pollutants**
 - *Policy AQ 1.1: Minimize health risks to people from industrial toxic or hazardous air pollutant emissions, with an emphasis on local hot spots, such as existing point sources affecting immediate sensitive receptors.*
 - *Policy AQ 1.2: Encourage the use of low or no volatile organic compound (VOC) emitting materials.*
 - *Policy AQ 1.3: Reduce particulate inorganic and biological emissions from construction, grading, excavation, and demolition to the maximum extent feasible.*
 - *Policy AQ 1.4: Work with local air quality management districts to publicize air quality warnings, and to track potential sources of airborne toxics from identified mobile and stationary sources.*
- **Goal AQ 2: The reduction of air pollution and mobile source emissions through coordinated land use, transportation and air quality planning.**
 - *Policy AQ 2.1: Encourage the application of design and other appropriate measures when siting sensitive uses, such as residences, schools, senior centers, daycare centers, medical facilities, or parks with active recreational facilities within proximity to major sources of air pollution, such as freeways.*
 - *Policy AQ 2.2: Participate in, and effectively coordinate the development and implementation of community and regional air quality programs.*
 - *Policy AQ 2.3: Support the conservation of natural resources and vegetation to reduce and mitigate air pollution impacts.*
 - *Policy AQ 2.4: Coordinate with different agencies to minimize fugitive dust from different sources, activities, and uses.*

These goals and policies are fairly general in nature, where some would not apply to a specific project action, where for others compliance with the existing SCAQMD regulations would meet the intent of the policy, and a few others (such as AQ 2.1 and AQ 2.3) compliance with the policy may need to be evaluated for each proposed future action.

General Plan Programmatic EIR. The Programmatic EIR prepared for the adoption of the 2035 General Plan EIR evaluated 11 planning areas including the Santa Monica Mountains Planning Area, which includes the Santa Monica Mountains North Area. The General Plan EIR included evaluation of air quality within the County and concluded implementation of the General Plan would have the potential to cause significant but mitigable impacts to air quality (placement of sensitive receptors near source of TACs,

objectionable odors from industrial uses) and significant unavoidable air quality impacts to air quality (consistency with air quality management plans, short- and long-term criteria air pollutant emissions, new sources of criteria air pollutants/toxic air contaminants near sensitive receptors). The EIR identified mitigation measures to reduce impacts to air quality, which were considered in this analysis.

C.3.3 Thresholds of Significance and Methodology

An Air Quality impact would be considered significant if actions resulting from the North Area Plan and CSD Update would:

- Be inconsistent with the applicable adopted Air Quality Management Plan (AQMP).
- Generate emissions of criteria air pollutants that would exceed SCAQMD regional significance thresholds.

The table below provides the SCAQMD Regional Emissions Thresholds for Construction and Operation (SCAQMD, 2015b).

SCAQMD Regional Emissions Thresholds		
Pollutant	Emissions Thresholds (lbs/day)	
	Construction	Operation
NO _x	100	55
VOC	75	55
PM10	150	150
PM2.5	55	55
SO _x	150	150
CO	550	550

- Generate emissions of criteria air pollutants that would exceed SCAQMD localized significance thresholds.

The SCAQMD localized significance thresholds are based on emissions rates that could cause exceedances of ambient air quality standards for pollutants that are in attainment (CO and NO₂) and are based on incremental allowances for pollutants that are not in attainment (PM10 and PM2.5, 10.4 µg/m³ for construction and 2.5 µg/m³ for operation). SCAQMD has published daily emissions rates; based on the project location, project size, and the distance to nearest sensitive receptor that can be assumed to comply with the localized thresholds (SCAQMD, 2009). SCAQMD does not have localized emissions thresholds for VOC (ozone precursors) or SO₂.

- Generate emissions of toxic or hazardous air pollutants that exceed SCAQMD significance thresholds.

The table below provides the SCAQMD Air Toxics significant risk thresholds (SCAQMD, 2015b).

SCAQMD Air Toxics Thresholds	
Impact	Impact Threshold
Cancer Risk	≥ 10 in 1 million
Cancer Burden	> 0.5 excess cancer cases (in areas with risk >1 in a million)
Chronic Hazard Index	≥ 1
Acute Hazard Index	≥ 1

- Create emissions, such as odors, that would adversely affect a substantial number of people.

For cumulative impacts assessment, SCAQMD considers projects that exceed the regional emissions thresholds to also have significant cumulative air quality impacts (SCAQMD, 2003).

C.3.4 Environmental Impacts and Mitigation Measures

Impact AQ-1: Implementation of the proposed North Area Plan and CSD Update could be inconsistent with the applicable adopted Air Quality Management Plan. (Less than Significant Impact)

SCAQMD and Southern California Association of Governments (SCAG) have developed air quality management plans (AQMPs) to meet the requirements of the Federal Clean Air Act. AQMPs were developed in 2003, 2007, 2012, and 2016 to address various federal non-attainment and attainment/maintenance pollutant planning requirements. These plans are incorporated into the State Implementation Plan by ARB and are then reviewed and approved or disapproved by USEPA. USEPA has approved portions of the 2016 AQMP and is currently reviewing other parts of the 2016 AQMP.

There are no applicable emissions reduction measures in these air quality plans that are not already part of approved air quality regulations. The implementation of the proposed Plan and CSD Update does not include the construction of new major stationary emissions sources, so very few SCAQMD regulations would apply, and all future projects proposed in the North Area would be required to comply with applicable SCAQMD rules and regulations. Additionally, the proposed Plan and CSD Update would not cause substantial new growth in the North Area.

The Transfer of Development Credit Program (Section 22.336.070 - Community-Wide Development Standards, subpart W) would prevent an increase in the net amount of development in the Santa Monica Mountains North Area. This program would limit development to prevent overburdened public services and would prevent new development from occurring in areas with steep slopes or sensitive resources. All land division proposals would be required to participate in this program, which would result in no net increase in the number of buildable lots in the North Area. Therefore, the implementation of the proposed Plan and CSD Update would not conflict with or obstruct the applicable air quality plans. Potential impacts would be less than significant.

Impact AQ-2: Implementation of the proposed North Area Plan and CSD Update would not generate emissions of criteria air pollutants that would exceed SCAQMD regional significance thresholds. (Less than Significant Impact with Mitigation)

The proposed Plan and CSD Update would not directly result in any activities that generate air pollutant emissions. However, future residential, commercial, open space/recreation, and other development allowed under the proposed Plan and CSD Update would create construction and operation emissions.

The General Plan Programmatic EIR evaluated the potential for air quality emissions from future development in the County and identified four mitigation measures that would reduce emissions countywide. A Mitigation Monitoring and Reporting Program (MMRP) as required in Section 15091 (d) of the CEQA Guidelines was adopted by the County as part of its decision on the General Plan. The mitigation measures in the General Plan identified to reduce potential air quality impacts countywide are provided below.

- AQ-1** If, during subsequent project-level environmental review, construction-related criteria air pollutants are determined to have the potential to exceed the applicable air quality management district (AQMD) adopted thresholds of significance, the County Department of Regional Planning shall require that applicants for new development projects incorporate mitigation measures as

identified in the CEQA document prepared for the project to reduce air pollutant emissions during construction activities. Mitigation measures that may be identified during the environmental review include but are not limited to:

- Using construction equipment rated by the United States Environmental Protection Agency as having Tier 3 (model year 2006 or newer) or Tier 4 (model year 2008 or newer) emission limits, applicable for engines between 50 and 750 horsepower.
- Ensuring construction equipment is properly serviced and maintained to the manufacturer's standards.
- Limiting nonessential idling of construction equipment to no more than five consecutive minutes.
- Water all active construction areas at least three times daily, or as often as needed to control dust emissions. Watering should be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water should be used whenever possible.
- Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard (i.e., the minimum required space between the top of the load and the top of the trailer).
- Pave, apply water three times daily or as often as necessary to control dust, or apply (nontoxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites.
- Sweep daily (with water sweepers using reclaimed water if possible), or as often as needed, all paved access roads, parking areas, and staging areas at the construction site to control dust.
- Sweep public streets daily (with water sweepers using reclaimed water if possible) in the vicinity of the project site, or as often as needed, to keep streets free of visible soil material.
- Hydroseed or apply non-toxic soil stabilizers to inactive construction areas.
- Enclose, cover, water three times daily, or apply non-toxic soil binders to exposed stockpiles (dirt, sand, etc.).

AQ-2 New industrial or warehousing land uses that: (1) have the potential to generate 40 or more diesel trucks per day and (2) are located within 1,000 feet of a sensitive land use (e.g. residential, schools, hospitals, nursing homes), as measured from the property line of the project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the County Department of Regional Planning prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment and the applicable air quality management district. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), particulate matter concentrations would exceed 2.5 µg/m³, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that best available control technologies for toxics (T-BACTs) are capable of reducing potential cancer and noncancer risks to an acceptable level, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to, restricting idling onsite or electrifying warehousing docks to reduce diesel particulate matter, or requiring use of newer equipment and/or vehicles. T-BACTs identified in the HRA shall be identified as mitigation measures in the environmental

document and/or incorporated into the site development plan as a component of the Proposed Project.

AQ-3 Applicants for sensitive land uses within the following distances as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, from these facilities:

- Industrial facilities within 1000 feet
- Distribution centers (40 or more trucks per day) within 1,000 feet
- Major transportation projects (50,000 or more vehicles per day) within 1,000 feet
- Dry cleaners using perchloroethylene within 500 feet
- Gasoline dispensing facilities within 300 feet

Applicants shall submit a health risk assessment (HRA) to the County prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment (OEHHA) and the applicable Air Quality Management District. The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children age 0 to 6 years. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06) or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk may include but are not limited to:

- Air intakes located away from high volume roadways and/or truck loading zones, unless it can be demonstrated to the County Department of Regional Planning that there are operational limitations.
- Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized maximum efficiency rating value (MERV) filters.

Mitigation measures identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the Proposed Project. The air intake design and MERV filter requirements shall be noted and/or reflected on all building plans submitted to the County and shall be verified by the County Department of Regional Planning.

AQ-4 If it is determined during project-level environmental review that a project has the potential to emit nuisance odors beyond the property line, an odor management plan may be required, subject to County's regulations. Facilities that have the potential to generate nuisance odors include but are not limited to:

- Wastewater treatment plants
- Composting, greenwaste, or recycling facilities
- Fiberglass manufacturing facilities
- Painting/coating operations
- Large-capacity coffee roasters
- Food-processing facilities

If an odor management plan is determined to be required through CEQA review, the County shall require the project applicant to submit the plan prior to approval to ensure compliance with the applicable Air Quality Management District's Rule 402, for nuisance odors. If applicable, the Odor Management Plan shall identify the Best Available Control Technologies for Toxics (T-BACTs) that will be utilized to reduce potential odors to acceptable levels, including appropriate enforcement mechanisms. T-BACTs may include, but are not limited to, scrubbers (e.g., air pollution control devices) at the industrial facility. T-BACTs identified in the odor management plan shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan.

Future development projects proposed in the North Area would undergo separate analysis for potential air quality impacts and would be required to meet General Plan and North Area goals, policies, and development standards. The applicability of mitigation measures identified in the General Plan Programmatic EIR would also be evaluated and considered as part of the County's evaluation of future projects proposed in the North Area. Proper implementation of applicable mitigation measures identified in the General Plan Programmatic EIR would reduce future development emissions below the SCAQMD regional significance thresholds. Therefore, no additional mitigation measures are needed to address potential impacts that could result from implementation of the proposed Plan and CSD Update.

Mitigation Measures

With the implementation of the mitigation measures (AQ-1 through AQ-4) identified in the General Plan Programmatic EIR, potential air quality impacts from implementation of the proposed Plan and CSD Update would be reduced to less than significant. The proposed Plan and CSD Update would not create new significant air quality impacts and would not substantially add to or increase identified impacts as analyzed in the General Plan Programmatic EIR. As such, the mitigation measures identified for the General Plan Programmatic EIR apply to the proposed Plan and CSD Update and no additional program-level mitigation is needed.

Impact AQ-3: Implementation of the proposed North Area Plan and CSD Update would not generate emissions of criteria air pollutants that would exceed SCAQMD localized significance thresholds. (Less than Significant Impact with Mitigation)

The proposed Plan and CSD Update would not directly result in any activities that generate localized air pollutant emissions. However, future development allowed by the proposed Plan and CSD Update would create localized construction and operation emissions. Future development projects proposed in the North Area would undergo separate analysis for potential air quality impacts and would be required to meet General Plan and North Area goals, policies, and development standards. The applicability of mitigation measures identified in the General Plan Programmatic EIR would also be evaluated and considered as part of the County's evaluation of future projects proposed in the North Area. Proper implementation of these mitigation measures would reduce future development emissions below the SCAQMD localized significance thresholds.

Mitigation Measures

With the implementation of the mitigation measures (AQ-1 through AQ-4) identified from the General Plan Programmatic EIR, potential air quality impacts from implementation of the proposed Plan and CSD Update would be reduced to less than significant. The proposed Plan and CSD Update would not create new significant air quality impacts and would not substantially add to or increase identified impacts as analyzed in the General Plan Programmatic EIR. As such, the mitigation measures identified for the

General Plan Programmatic EIR apply to the proposed Plan and CSD Update and no additional program-level mitigation is needed.

Impact AQ-4: Implementation of the proposed North Area Plan and CSD Update would not generate emissions of toxic or hazardous air pollutants that exceed SCAQMD significance thresholds. (Less than Significant Impact with Mitigation)

The proposed Plan and CSD Update would not directly result in any activities that generate toxic air contaminant (TAC) emissions. However, future development allowed by the proposed Plan and CSD Update could generate TAC emissions; specifically, new development construction activities would generate diesel particulate matter (DPM) emissions and other air toxics from gasoline fueled equipment that would cause some increase in TAC health risks. Future development projects proposed in the North Area would undergo separate analysis for potential air quality impacts and would be required to meet General Plan and North Area goals, policies, and development standards. The applicability of mitigation measures identified in the General Plan Programmatic EIR would also be evaluated and considered as part of the County's evaluation of future projects proposed in the North Area. Proper implementation of applicable mitigation measures would reduce future development health risks below SCAQMD health risk significance thresholds.

Mitigation Measures

With the implementation of the mitigation measures (AQ-1 through AQ-4) identified from the General Plan Programmatic EIR, potential air quality impacts from implementation of the proposed Plan and CSD Update would be reduced to less than significant. The proposed Plan and CSD Update would not create new significant TAC impacts and would not substantially add to or increase identified impacts as analyzed in the General Plan Programmatic EIR. As such, the mitigation measures identified for the General Plan Programmatic EIR apply to the proposed Plan and CSD Update and no additional program-level mitigation is needed.

Impact AQ-5: Implementation of the proposed North Area Plan and CSD Update would not create emissions, such as odors, that would adversely affect a substantial number of people. (Less than Significant Impact)

The proposed Plan and CSD Update would not directly result in any activities that generate air pollutant emissions. However, future projects allowed by the proposed Plan and CSD Update could generate potentially objectionable odors that would be temporarily created during construction activities, primarily from paving operations associated with the construction of future development. However, these asphalt odors would be temporary, not overly offensive or regularly experienced in an urban/suburban setting. Other minor odor sources during construction and operation include tailpipe emissions from off-road equipment and on-road vehicles used during construction and new development operation, and odors from new restaurants. Given the semi-rural nature of existing land uses in the North Area and the limited change in land uses under the proposed Plan and CSD Update, these minor odor sources would not be expected to pose a significant concern in the North Area.

The construction and operation of future North Area development projects would not cause a large amount of airborne dust, given compliance with SCAQMD Rule 403 fugitive dust control requirements, or other emissions that could cause a nuisance or otherwise adversely affect a substantial number of people surrounding the project site. Proposed policies and standards limit grading and restrict development on steep slopes. These proposed policies and standards would be consistent with SCAQMD requirements

(see Attachment C.3) Therefore, less than significant impacts would occur in the North Area from adoption of the proposed Plan and CSD Update.

C.3.5 Cumulative Impact Analysis

The existing ambient air quality conditions are summarized in Section C.3.1.3. The proposed Plan and CSD Update is located in a portion of the SCAB that is designated as nonattainment of the federal and State ozone and PM_{2.5} standards and the State PM₁₀ standard. Air quality has improved over time as various regulations affecting emissions sources, such as the mobile and stationary sources regulations enacted by CARB and SCAQMD, have started to take effect. Concentrations of all criteria pollutants within the SCAB have gone down, even considering significant population growth, since major air quality regulations were enacted in the 1970s. Air quality is forecast to improve slowly within the SCAB as current regulations continue to reduce air pollutant emissions from stationary, mobile, and area emission sources.

As noted earlier, the adoption of the proposed Plan and CSD Update would not directly increase or cause air quality emissions, odor emissions, or TACs in the North Area. However, future projects could increase emissions in the North Area under the proposed Plan and CSD Update. The potential for air quality impacts for future North Area development allowed under the proposed Plan and CSD Update (described in Section C.3.4) to combine with the effects of other proposed, planned, and reasonably foreseeable future projects (see Table C.1-1) are described below for each significance criterion.

Consistency with the Air Quality Management Plan. This criterion is a project-specific analysis, there are no cumulative project impacts related to this criterion (Impact AQ-1).

Regional Air Pollutant Emissions Impacts. Future North Area development projects were found to have less than significant regional criteria pollutant emissions impacts during construction and operation after mitigation. The SCAQMD thresholds used for significance determination are project-specific thresholds and the SCAQMD has not developed separate cumulative emissions thresholds for regional emissions impacts. SCAQMD guidance provides the following discussion on cumulative impact analysis:

Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant. (SCAQMD, 2003)

Based on this SCAQMD guidance, the proposed Plan and CSD Update would not have cumulatively considerable air pollutant emissions impacts during construction and operation after mitigation. Therefore, the proposed Plan and CSD Update would have less than significant regional air quality cumulative impacts after mitigation during construction and operation. (Impact AQ-2)

Local Air Pollutant Emissions Impacts. The SCAQMD LST lookup tables used to determine project significance for criteria pollutants do not apply to cumulative project evaluations; in fact, the SCAQMD LST guidelines do not mention cumulative project impact analysis (SCAQMD, 2009). However, the significance criteria are based on downwind pollutant concentrations causing a new exceedance (NO_x and CO) of an air quality standard, or substantially increasing current exceedances (PM₁₀ and PM_{2.5}) of an air quality standard, and these general criteria are applicable standards for localized impact cumulative project analysis. For the emissions of any two development projects to have the potential for significant cumulative downwind concentrations, they must both be concurrent and in close proximity to limit the downwind dispersion from one site to the other. Future development projects would not be expected to have large amounts of concurrent and adjacent air pollutant emissions that would contribute to cumulative impacts with the cumulative projects (Table C.1-1). Therefore, the potential for cumulative impacts to sensitive

receptors is less than significant with mitigation; construction and operation of future projects would not create a substantial contribution to cumulative impacts on sensitive receptors from criteria pollutants after mitigation (Impact AQ-3).

Air Toxic Pollutant Emissions Impacts. Construction activities and operation emissions associated with future North Area development projects would not have large amounts of TAC emissions, other than DPM. Additionally, the majority of the DPM emissions occur at large distances from receptors during construction activities and are dispersed over long linear travel routes during operation. Therefore, emissions in any single area that could create a significant risk or contribute a cumulatively considerable risk to local populations are limited. Given these considerations, the proposed Plan and CSD Update would not create a substantial contribution to cumulative health risk impacts. (Impact AQ-4)

Odors and Other Adverse Emissions Impacts. Future North Area development projects would have minimal odor impacts and would not create cumulative odor impacts or substantially contribute to significant odor impacts in the North Area. Additionally, future development projects would not create a substantial contribution to dust or other emissions that could cumulatively, adversely affect a substantial number of people (Impact AQ-5).

C.3.6 Level of Significance After Mitigation

The proposed Plan and CSD Update would not directly result in any activities that generate air pollutant emissions. Future development projects within the North Area would be required as necessary to use the County General Plan **Mitigation Measures AQ-1 through AQ-4** to reduce impacts to air quality. With proper implementation of mitigation measures, all air quality impacts would be less than significant.

Attachment C.3

Air Quality Policies and Standards

(Appendix 1 includes all policies and standards)

Proposed North Area Plan Update

Conservation and Open Space Element

- **Policy CO-40:** Manage the temporary storage of construction materials for public projects or landslide material on road shoulders using the most current BMPs to eliminate erosion into adjacent drainage courses, to protect air and water quality, and to minimize the spread of invasive plant species. Ensure that landslide material is deposited in permitted landfills or sites with valid permits to accept fill.

Safety and Noise Element

- **Policy SN-43:** Protect the area's residents, workers, and visitors from the risks inherent in the transport, distribution, use, and storage of hazardous materials and hazardous wastes, recognizing that the use of these materials is necessary in many parts of society.

Circulation Element

- **Policy CI-1:** Maximize the capacity and operational efficiency of highways consistent with environmental protection and neighborhood preservation, without widening roadways to increase capacity.
- **Policy CI-5:** Where appropriate, increase the capacity of existing major and secondary highways through the application of transportation system management technology within established rights-of-way and roadway widths by:
 - Minimizing the number of driveway access points by consolidating driveways and exploring other options to reduce uncontrolled access;
 - Minimizing or eliminating conflicting turning movements on links or at intersections;
 - Restricting on-street parking during peak travel periods where such restrictions will not adversely impact public access to parks; and
 - Employing traffic signal synchronization technology.
- **Policy CI-6:** Improve roadway efficiency and highway access through redesign of road intersections and establishment of periodic passing, turnout, and acceleration/deceleration lanes, where appropriate.

Proposed Community Standards District Update

Section 22.336.070 Community-Wide Development Standards

- A. Prohibited Uses
- F. Event Facilities
- I. Grading
- R. Scenic Resource Areas
- W. Transfer of Development Credit Program

C.4 Biological Resources

Introduction

This section describes effects on biological resources that could occur from implementing the policies in the proposed North Area Plan and CSD Update. The following discussion addresses existing environmental conditions in the affected area, identifies and analyzes environmental impacts for the proposed Plan and CSD Update, and as applicable recommends measures to reduce or avoid anticipated adverse impacts. In addition, existing laws and regulations relevant to biological resources are described.

The information presented in this section is based in part on the Biological Resources Assessment prepared for the proposed Plan and CSD Update (Aspen, 2018). Appendix 3 of this EIR includes the Biological Resources Assessment report.

Scoping Comments Received. During the scoping period for the EIR, written and verbal comments were received from agencies, organizations, and the public. These comments identified various substantive issues and concerns relevant to the EIR analysis for biological resources. The issues below summarize these comments. Appendix 2 includes all comments received during the scoping comment period.

- Conservation of, and mitigation for impacts to, wetlands and riparian corridors.
- Adverse impacts to listed and other special-status species and natural communities.
- Impacts to biological resources from vineyards.
- Water extraction impacts to nearby habitat if supported by groundwater.
- Wildlife corridor/movement areas. Mitigation measures to protect sensitive plants, animals, and habitats from impacts, with an emphasis on impact avoidance.
- Non-native trees with heritage and historic tree status.
- Preservation of native trees, including oaks and sycamores.
- Weed management.
- Establish native and heritage tree program, with maximum protection afforded for native oaks, sycamores, black walnuts, and native shrubs.
- EIR should include description of non-native, invasive species and non-endangered species.
- Concern with habitat disturbance and destruction in area.
- Noise impacts on local wildlife in the North Area.
- Impacts of rodenticides on wildlife. Prohibit use of toxic pesticides and herbicides.

KEY FINDINGS

- North Area supports important biological resources, including over 400 birds, 23 reptiles, 41 mammals, and over 900 vascular plant species.
- Proposed North Area Plan Update emphasizes: *resource protection has priority over development.*
- Proposed CSD Update contains development standards that address habitat categories, nesting bird protection, fencing requirements, wireless communications facilities, mitigation ratios, habitat impact fees, and tree protections.
- Proposed plan goals/policies and CSD standards would ensure development impacts to biological resources in the North Area would be less than significant.

C.4.1 Environmental Setting

Regional Setting

The Santa Monica Mountains are an east-west trending mountain range within the Transverse Ranges, which spread over 40 miles between Point Mugu in Ventura County and Glendale in Los Angeles County. Most of the range is bounded to the south by Santa Monica Bay, with the eastern portion stretching inland to divide the Los Angeles Basin from the San Fernando Valley to the north. The western portion of the range, in which the North Area is located, separates the Conejo Valley to the north from the Malibu coast.

Natural conditions in the North Area are dictated by climate, which can greatly influence the abundance and distribution of many plants and wildlife. The Santa Monica Mountains experience a classic Mediterranean climate, with hot, dry summers and cool wet winters. A Mediterranean climate is globally rare, occurring in only six places on Earth. Most of the annual precipitation comes in the form of winter rains. Mean annual precipitation in the region varies from about 12 to approximately 14 inches, although some mountain faces may experience substantially more rainfall. Annual rainfall totals often vary with some years experiencing little to no rain while El Niño conditions may result in multiple extreme rain events. Snow is uncommon in the region, occurring only rarely during unusually cold winter storms. While coastal fog is common in the mornings, most of the North Area receives less fog compared to coastal areas and coastal-facing slopes.

Local Setting

The Santa Monica Mountains North Area includes 32.3 square miles of unincorporated Los Angeles County lands from the U.S. 101 freeway corridor south to the Coastal Zone boundary (see Figure A-1, Section A). The planning area consists of five discrete land types: urbanized areas, rural residential, ranches, vineyards, and open space. The North Area includes portions of the Santa Monica Mountains National Recreation Area administered by the National Park Service (NPS), California State Park lands, and other protected areas. Approximately 35 percent of the North Area consists of conservation and park lands (see Figure B-1 and Appendix 3, Figures 1 and 2 in Attachment 1).

Much of the North Area consists of steep vegetated slopes in excess of 25 percent grade, and elevations range from 550 feet to 2,508 feet above sea level. The North Area supports many well-known features including Ladyface Mountain located south of Agoura Road at Kanan Dume Road, Sugar Loaf Peak near Paramount Ranch, the iconic Saddle Rock (visible for miles), and Turtle Rock located near the Rocky Oaks Park off Mulholland Drive at Kanan Dume Road. Prominent ridgelines and sandstone rock outcrops are also present near Old Topanga Road.

Natural Communities and Landforms

The vegetation of the Santa Monica Mountains is extremely varied and can be categorized broadly as chaparral, coastal sage scrub, riparian scrub, riparian woodlands, oak woodlands, and annual grasslands. The North Area supports several vegetation types that are locally common but restricted regionally, such as greenbark ceanothus (*Ceanothus spinosus*) shrubland and ashy buckwheat (*Eriogonum cinereum*) shrubland.

Comprehensive vegetation mapping data were obtained from the NPS (CDFG et al., 2006; AIS and ESRI, 2007). Table C.4-1 identifies the acreages of each vegetation category mapped in the North Area, and Figure 4 in Attachment 1 of the Biological Resources Assessment (Appendix 3) illustrates the vegetation distribution. A description of each vegetation and landform category is provided following the table. See

Attachment 3 of Appendix 3 for a detailed description of the vegetation mapped in the North Area by the NPS and cooperating agencies, including the alliances that fall within each category.

Table C.4-1. Natural Communities and Landforms in the North Area

Vegetation/Landform Type	Acres on Public Lands	Acres on Private Lands	Total Acres in North Area
Chaparral	2,997	5,572	8,569
Coastal Sage Scrub	1,519	1,858	3,377
Riparian Habitats	341	455	796
Oak Woodlands	630	608	1,238
Annual Grasslands	1,300	863	2,163
Wetlands and Water	7	51	58
Rock Outcrops	13	43	56
Vineyards and Other Agriculture	0	94	94
Disturbed, Developed, and Ruderal	212	4,014	4,226
Exotic Vegetation	18	89	107
Total:	7,037	13,647	20,684

Source: Aspen, 2018; AIS and ESRI, 2007

Chaparral consists of evergreen, broad-leafed or needle-leafed, sclerophyllous (hard-leafed), medium height to tall shrubs that form a dense cover on steep slopes below 5,000 feet in Southern California. Dominant species found within this community include various species of ceanothus (*Ceanothus* spp.), toyon (*Heteromeles arbutifolia*), scrub oak (*Quercus berberidifolia*), sugar bush (*Rhus ovata*), holly-leaved cherry (*Prunus ilicifolia*), holly leaf redberry (*Rhamnus ilicifolia*), chamise (*Adenostoma fasciculatum*), laurel sumac (*Malosma laurina*), and manzanita (*Arctostaphylos* spp.). This plant community occurs throughout the North Area and occupies most of the higher elevations and steep slopes.

Redshank chaparral is a subtype in which redshank (*Adenostoma sparsifolium*) is the dominant species with lesser amounts of other chaparral species. This community is less common in the North Area compared to other types of chaparral, and it is noteworthy because it is disjunct from extensive redshank stands located in the Peninsular Ranges, to the southeast. It occurs in small patches, on steep slopes in the far western portion of the North Area. It often occurs within a mosaic of other chaparral communities and is adapted to slightly cooler and drier microhabitats.

Coastal sage scrub consists of drought-deciduous, low, soft-leafed shrubs and herbs on gentle to steep slopes under 1,500 feet in elevation. This community is dominated by California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), black sage (*Salvia mellifera*), purple sage (*Salvia leucophylla*), and California encelia (*Encelia californica*). Coastal sage scrub is distributed throughout the North Area along dry ridgelines, slopes, and areas previously disturbed by fire.

Riparian habitats occur in association with streams and creeks, wetlands, rivers, lakes, and other freshwater features. These habitats are water-dependent, although in arid areas such as the Santa Monica Mountains they are often associated with ephemeral drainages where water is only present for part of the year or where the water table is very high. Riparian communities are considered sensitive and a high priority for inventory by the California Department of Fish and Wildlife (CDFW) (CDFW, 2018). Riparian habitats in the North Area include riparian scrub and riparian woodlands.

Riparian Scrub. In the North Area, vegetation mapped as riparian scrub is typically dominated by mulefat (*Baccharis salicifolia*). This vegetation occurs on gentle to steep slopes and is widespread

across the North Area in intermittent drainages. It is locally variable, and co-occurring shrubs can include arroyo willow (*Salix lasiolepis*), coyote brush (*Baccharis pilularis*), tree tobacco (*Nicotiana glauca*; nonnative), California sagebrush, and laurel sumac. Riparian scrub has sparse tree cover, but emergent or scattered coast live oak, California sycamore (*Platanus racemosa*), and red willow (*Salix laevigata*) can occur. Although alliances dominated by mulefat are not considered sensitive by CDFW, they are considered sensitive for the purposes of this EIR because riparian habitats are increasingly rare in California and they provide habitat for a disproportionately high number of species compared with most upland habitats, including rare and listed species.

Riparian Woodlands. Riparian woodlands occur along perennial and intermittent streams in the North Area and have a well-established tree layer usually with sparse to open shrub and herbaceous layers. Many riparian corridors within the North Area contain perennial sections that are among the last remaining major drainages in the Santa Monica Mountains in an undeveloped condition. In the canyon bottoms are riparian forests, which are sensitive habitats because of their rarity and historic losses to channelization and development. Most riparian forests in the Santa Monica Mountains are comprised of California sycamore and coast live oak, Fremont and black cottonwood (*Populus fremontii* ssp. *fremontii* and *P. trichocarpa*), and leatherleaf ash (*Fraxinus velutina*). Riparian woodlands can be dominated or co-dominated by California sycamore, red willow, and arroyo willow. California walnut and valley oak can also be present.

While not typically considered a true riparian woodland, California bay woodland is usually associated with a water source such as seeps or drainages below seeps. It occurs on moist north-facing concave to neutral slopes and protected ravine and canyon bottoms, but can also occur on similar south facing situations. Steepness can vary from gently sloping to extremely steep on bottoms to upper slopes. Similarly, California walnut woodland is not restricted to stream channels but occurs on more mesic sites than most other upland vegetation. It is an open woodland dominated by Southern California black walnut. Occurring on moist, fine-textured soils, the open tree canopy usually has a grassy understory. Other characteristic species include coast live oak, sugar bush, and skunk bush. This community occurs in shaded ravines and on north-facing slopes, primarily with formations of marine sediments (J. Decruyenaere, pers. obs.). The North Area includes some of the largest remaining stands of California walnut woodland (AIS and ESRI, 2007).

Oak woodlands in the North Area are dominated either by coast live oak or valley oak. Coast live oak woodland usually has a poorly developed shrub layer, which may include toyon, currant and gooseberry (*Ribes* spp.), laurel sumac, elderberry (*Sambucus nigra* ssp. *caerulea*), and mulefat. Some coast live oak woodlands in the area include scattered California walnut or valley oaks. This community occurs throughout the North Area, often along canyon bottoms and more mesic, north-facing slopes. Valley oak woodland is an open woodland community dominated by valley oak. The understory is a grassy savannah composed mostly of non-native grasses. Valley oak woodland occurs mostly in the north and central portions of the North Area in shaded ravines and on north-facing slopes. Stands of valley oaks typically occur inland and at lower elevations, in savannas on lower slopes of rolling hills, valley bottoms, and upper terraces of floodplains. This community is regionally rare and does not occur in extensive stands (AIS and ESRI, 2007).

Oak trees are recognized by the County as significant historical, aesthetic, and ecological resources, and impacts to oaks are regulated under the County's Oak Tree Ordinance, which requires an oak tree permit for any impacts to oak trees. Although not considered a sensitive alliance by CDFW, for the purposes of this EIR, coast live oak woodland is considered sensitive consistent with County ordinances and reflective

of its key role in the ecology of the Santa Monica Mountains; therefore, any oak woodland regardless of dominant tree species is considered sensitive. Oak woodland habitat is very slow growing and even modest impacts may take many years to replace.

Grassland communities consist of low, herbaceous vegetation that is dominated by grasses. Grasslands also harbor native forbs and bulbs, as well as naturalized annual forbs. Grasslands within the North Area include both non-native and native grasses. Non-native grassland consists of dominant invasive annual grasses that are primarily of Mediterranean origin, however, important native grasslands/native forblands can have a high representation of non-native species. Dominant species found within this community include wild oat (*Avena fatua*), slender oat (*A. barbata*), red brome (*Bromus madritensis* ssp. *rubens* [*B. rubens*]), ripgut brome (*B. diandrus*), and herbs, such as black mustard (*Brassica nigra*) and wild radish (*Raphanus sativus*). Annual grasslands are mapped in small to large patches throughout the North Area in previously disturbed areas, cattle pastures, valley bottoms, and along roadsides, but many have apparently developed naturally. Some areas mapped as annual grasslands contain a high proportion of native bunchgrasses and wildflowers such as mariposa lilies (*Calochortus* spp., many of which are considered rare species). Small patches of native grasslands and wildflower fields also occur within openings in broader areas mapped as coastal sage scrub.

Wetlands and Water. Wetland communities are characterized by erect, rooted, herbaceous hydrophytes (plants that grow in or on water) generally less than six feet tall. These areas are typically dominated by monocots such as cattails (*Typha latifolia*), sedges (*Carex* spp.), rushes (*Juncus* spp.), and bulrush (*Scirpus* spp.). Other common species include water speedwell (*Veronica anagallis-aquatica*), lady's thumb (*Polygonum* spp.), rabbits foot grass (*Polypogon monspeliensis*), and watercress (*Rorippa nasturtium-aquaticum*). Emergent willows may also be present within these habitat areas.

Areas mapped as water include all natural and man-made water bodies, including creeks, ponds, lakes, and open reservoirs. They also include the sparsely vegetated to non-vegetated sandy, cobble-covered, or gravelly area within a stream floodplain. A sand or gravel bar is a level flat surface that may be a transitory feature (AIS and ESRI, 2007).

Lakes and ponds are characterized by pooled water where suspended organisms (e.g., phytoplankton and zooplankton), submerged plants, and floating rooted aquatics thrive. Vegetation is usually limited to shallow edge areas and can contain dense monocultures of cattails and bulrush (typically referred to as wetlands). Other common species include lady's thumb, nutsedge (*Cyperus esculentus*), and various species of rush (*Juncus* spp.). Floating aquatic plant species include pond lilies (*Nuphar luteum*), mosquito fern (*Azolla filiculoides*), and duckweed (*Lemna* spp.). At many locations, these communities intergrade with willow riparian or scrub habitats. A few prominent man-made lakes and ponds occur in the North Area including Malibou Lake, Rocky Oaks dam, and Lake Enchanto.

Various small man-made ponds occur across the North Area. These features usually contain species compositions similar to natural ecosystems, although in some man-made impoundments, a single species may dominate. Vegetation usually includes cattails, sedges, and bulrush. Pond lilies and duckweed may also occur on the surface of ponded water.

Seeps and springs are important communities in the North Area, with a unique association of plants and wildlife including ferns and mosses, wildflowers, invertebrates, and amphibians (especially salamanders). Depending on the location, they may occur in or near an existing stream or creek, or near the base of hills and canyons. In some areas, seeps can support mature willow woodlands. Because many seep and spring communities are not subject to regular disturbance, they may contain late successional stages of riparian plant communities. Seeps and springs are uncommon, valuable sources of water in the otherwise arid

landscape of the North Area. Seeps and springs are small and difficult to discern on aerial imagery and are not mapped because they are smaller than the one-acre minimum mapping unit.

Rock Outcrops. This mapping category consists of a sparsely vegetated community occurring on cliffs and rock outcroppings of sedimentary, metamorphic, and volcanic rocks along the ridges and peaks of the hills and mountains. Outcrops in the Santa Monica Mountains derive from volcanic origins (mainly in the west and within the Zuma Creek watershed) or from sedimentary/sandstone origins (central ridge and Topanga). Between the rocks and in the crevices, the few plants found are usually upland species most often known from chaparral and coastal sage scrub.

Rock outcrops are frequently associated with rare annuals and lichens. Other plants often found on the rock faces in protected areas include *Dudleya* spp., *Selaginella* spp., and various lichens. Agoura Hills dudleya is federally listed as Threatened and occurs on rock outcrops in and near the North Area. It is an endemic plant that occurs nowhere else on earth. Rock outcrops are found throughout the North Area, especially in areas of steeper topography. However, because many rock outcrops are smaller than the one-acre minimum mapping unit used in the NPS vegetation study, this landform is under-represented in the vegetation mapping data. Rock outcrops occur within nearly all of the vegetation types mapped within the North Area.

Vineyards and Other Agriculture. Most of the agricultural lands mapped in the North Area consists of vineyards. However, orchards supporting fig trees, citrus, and avocados also occur. It is likely that other small farms also occur but were either too small to be mapped or fell within a broader mapping category. Vineyards are prevalent around Mulholland Highway and Kanan Dume Road and in Triunfo Canyon.

Disturbed, Developed, and Ruderal. Areas that either have existing structures (e.g. houses and roads) or areas that are devoid of vegetation due to continual disturbance by horses, vehicles, or other human causes are mapped as Developed. Developed areas include residential properties, roadways and physical structures (e.g., corrals and stables).

Areas mapped as disturbed include artificial cuts and embankments, cleared land, fire breaks, and areas that are regenerating after fire or clearing. These areas are often dominated by ruderal vegetation. Ruderal vegetation communities are dominated by herbaceous, introduced, pioneering plant species that readily colonize open disturbed soil and thrive as a result of human impacts. Ruderal communities may provide a certain degree of erosion control for recently disturbed or graded areas; such communities are also a threat to the natural biodiversity of an area. Invasive species continually distribute highly competitive propagules into otherwise native vegetation; however, if ruderal grassland stands remain undisturbed for several years they can sometimes undergo succession towards more stable and less weedy plant communities. These ruderal communities may include monocultures of Russian thistle (*Salsola tragus*), black mustard, or summer mustard, or combinations of all three. Non-native and often invasive herbs may include tumbling pigweed (*Amaranthus albus*), scarlet pimpernel (*Anagallis arvensis*), mayweed (*Anthemis cotula*), pineapple weed (*Matricaria discoidea*), Italian thistle (*Carduus pycnocephalus*), red stem filaree (*Erodium cicutarium*), and sweet fennel (*Foeniculum vulgare*). Prickly lettuce (*Lactuca serriola*), horehound (*Marrubium vulgare*), bur-clover (*Medicago polymorpha*), and cocklebur (*Xanthium spinosum*) may also occur.

Exotic Vegetation. Exotic species are prevalent in the North Area and are a component of many native vegetation communities. Exotic species often displace native plants and wildlife but can be used by some species for nesting and foraging. They can often alter the fire ecology of a region and increase fire frequency. In the North Area, patches of giant reed (*Arundo donax*) are common in many drainages and stands of non-native pine (*Pinus* spp.), gum tree (*Eucalyptus* spp.), and black locust (*Robinia pseudoacacia*)

are just a sample of the non-native species in the region that have colonized native vegetation communities.

Giant reed is an extremely invasive non-native species to southern California. Giant reed forms dense monotypic stands that outcompete most of the native species for resources. Although native birds occasionally nest in this community type, giant reed provides poor wildlife habitat and can increase the fire frequency in areas that would not normally be fire prone (e.g., riparian areas).

Eucalyptus groves are characterized by gum trees (*Eucalyptus* spp.), which are non-native species originally from Australia. These trees naturalize in southern California from trees originally planted as windbreaks, ornamentals, or for fuel production. Although this vegetation is non-native, it supports several species of wildlife because it provides shelter and a good location for nests. In some locations, eucalyptus can eliminate or greatly reduce understory vegetation due to allelopathic properties in the leaves.

Black locust is an invasive tree that naturally occurs in the southeastern United States. Black locust stands are similar to Eucalyptus groves in structure and function, and they intergrade with native vegetation communities.

Critical Habitat

Critical habitat is designated by the USFWS under the federal Endangered Species Act of 1973 (FESA). Critical habitat refers to a specific geographic area(s) that contains features essential for conservation of a threatened or endangered species and that may require special management and protection. This designation may include an area that is not currently occupied by the species but that will be needed for its recovery.

Designated critical habitat for the endangered Lyon's pentachaeta (*Pentachaeta lyonii*) occurs at several locations within the westernmost North Area. Designated critical habitat for the threatened California red-legged frog (*Rana draytonii*) abuts the northern boundary of the North Area in upper Las Virgenes Canyon, but does not extend into the North Area. Figure 5 in Attachment 1 of Appendix 3 shows the distribution of critical habitat in and near the North Area.

Special-Status Plants and Wildlife

The North Area is home to a wide variety of species that are considered rare by State, federal, or local governments. Some of these species are afforded protection under the State or federal Endangered Species Acts, are Fully Protected, or require special consideration and protections when planning and implementing development or conservation projects. There are also many species that are considered locally rare or uncommon in the Santa Monica Mountains and the North Area. Special-status species are plants and animals that meet one or more of the following criteria:

- Have been designated as either rare, threatened, or endangered by CDFW or the USFWS, and are protected under the California or federal Endangered Species Act (ESA);
- Are candidate species being considered or proposed for listing under these same acts;
- Are considered Species of Special Concern by CDFW;
- Are fully protected by the California State Fish and Game Code, Sections 3511, 4700, 5050, or 5515;
- Are classified as California Rare Plant Rank (CRPR) 1, 2, 3, or 4 by CDFW and the California Native Plant Society (CNPS);

- Are of express concern to resource/regulatory agencies or local jurisdictions;
- Are locally uncommon in the North Area; or
- Are listed on watch lists or provided with special conservation designations by professional working groups/societies (e.g., Western Bat Working Group).

The following summarizes the special-status plants and wildlife that are known from or have potential to occur in the North Area. See Attachment 2 and Figure 5 of Appendix 3 for a complete description of special-status species in the North Area.

Listed and Fully Protected Species. Of the many different plants and wildlife that occur in the North Area, there are several federally listed, state-listed, or fully protected species that are known to occur here, or that have the potential to occur and are found nearby. Listed or fully protected species include:

- Branton's milk-vetch (*Astragalus brauntonii*), Federally Endangered
- Agoura Hills dudleya (*Dudleya cymosa ssp. agourensis*), Federally Threatened
- Marcescent dudleya (*Dudleya cymosa ssp. marcescens*), Federally Threatened and State Rare
- Santa Monica Mountains dudleya (*Dudleya cymosa ssp. ovatifolia*), Federally Threatened
- Santa Susana tarplant (*Deinandra minthornii*), State Rare
- Lyon's pentachaeta (*Pentachaeta lyonii*), State and Federally Endangered
- Santa Cruz Island fringe-pod (*Thysanocarpus conchuliferus*), Federally Endangered
- California red-legged frog (*Rana draytonii*), Federally Threatened
- Ringtail (*Bassariscus astutus*), State Fully Protected
- White-tailed kite (*Elanus leucurus*), State Fully Protected
- Golden Eagle (*Aquila chrysaetos*), State Fully Protected, Bald and Golden Eagle Protection Act
- Peregrine Falcon (*Falco peregrinus anatum*), State Fully Protected
- Tricolored blackbird (*Agelaius tricolor*), State Candidate for listing as Endangered

Other Special-Status Species. In addition to the listed species and fully protected species above, numerous vertebrates ranked as California Species of Special Concern and plants included in the California Rare Plant Ranking system occur or may occur in the North Area and are dependent on its habitats for at least a portion of the year. All special-status species potentially occurring in the North Area are identified in Attachment 2 of Appendix 3, with brief summaries of their habitats, conservation status, and potential to occur. The special-status species known from the North Area are listed below:

- Malibu baccharis (*Baccharis malibuensis*) – rocky areas in chaparral, lower Las Virgenes Canyon
- South Coast Range morning-glory (*Calystegia collina ssp. venusta*) – volcanic outcrops, especially in the vicinity of Malibu Lake
- Round-leaved filaree (*California macrophylla*) – grassland in heavy clay soil, often with other scarce forbs
- Ojai navarretia (*Navarretia ojaiensis*) – clay lenses at interface between oak woodland and grassy openings
- Catalina mariposa lily (*Calochortus catalinae*) – heavy clay soil

- Slender mariposa-lily (*Calochortus clavatus* var. *gracilis*) – various habitats
- Plummer's mariposa-lily (*Calochortus plummerae*) – various habitats
- San Bernardino ringneck snake (*Diadophis punctatus modestus*) – various habitats
- Two-striped gartersnake (*Thamnophis hammondi*) – riparian corridors, usually with permanent water
- Southern western pond turtle (*Actinemys pallida*) – pools along permanent creeks, small ponds
- Coast horned lizard (*Phrynosoma blainvillii*) – sandy soils, often along ridgelines
- Coastal whiptail (*Aspidoscelis tigris stejnegeri*) – various habitats
- Loggerhead shrike (*Lanius ludovicianus*) – extensive grassland, often with low, scattered shrubs
- Northern harrier (*Circus cyaneus*) – extensive grassland
- Yellow-breasted chat (*Icteria virens*) – dense riparian vegetation near permanent water
- Yellow warbler (*Setophaga petechia*) – high-canopy riparian woodland
- Long-eared owl (*Asio otus*) – stringers of willows and oaks through grassland
- Bats (various)

Uncommon or Locally Rare Species. The Santa Monica Mountains and portions of the North Area support a variety of plants and wildlife that are considered uncommon or rare in the region. Some of these species, such as California juniper, are widespread in Los Angeles County, yet occur in the Santa Monica Mountains at only a few locations within the North Area. Other species such as tidytips (*Layia platyglossa*), a small yellow-colored daisy, were once common in the range, and are widespread in the Antelope Valley and Mojave Desert, but now occur in only a few locations of the North Area.

Birds including greater roadrunner (*Geococcyx californianus*), northern harrier (*Circus cyaneus*), and Bell's sparrow (*Artemisiospiza belli*) were once more common and are now observed less frequently in the North Area. Mammals such as the American badger may no longer occur, and the western gray squirrel is being displaced by the non-native fox squirrel. In addition, several species of butterfly including the cloudy tailed-copper (*Lycaena aorta*), Comstock's fritillary (*Speyeria callippe comstocki*), and Gorgon copper (*Lycaena gorgon*) have experienced declines in recent years. Similarly, California treefrog (*Pseudacris cadaverina*), a species common to southern California streams, has been extirpated from many drainages in the North Area. Most of these species do not have a designated conservation status; nonetheless, resource agencies and local experts consider them to be locally uncommon and warrant additional consideration.

Wildlife Movement

Local Movement. The Santa Monica Mountains maintains large areas of open space, and although roads and pockets of development can hamper wildlife movement, data from the NPS indicate that large mammals such as mountain lions, bobcats, and coyotes move freely throughout the mountains (see Figure 6 in Attachment 1 of Appendix 3). The North Area's size, topographic complexity, and open space allow movement in all directions on a local scale. Malibu Creek State Park, which partially overlaps the North Area, has been identified as the central core habitat area in the Santa Monica Mountains, connecting the Simi Hills to the north, and the large open space preserves of Topanga State Park to the east and Mugu State Park to the west (in Ventura County) along with various undeveloped areas in between (Edelman, 1990). However, this core area is now highly used by recreationists, including hikers, trail-bikers, and rock-climbers, while other areas (e.g., Cold Creek Preserve) have been largely off-limits to human intrusion.

Therefore, the designation of “core habitat” is highly dependent on management, as well as geography, and may change through time.

The movement of species through the North Area is crucial to maintain the genetic diversity and population viability of the plant and wildlife species within the Santa Monica Mountains. The NPS has identified open space linkages between Kanan Dume Road and Calabasas Parkway along the U.S. 101 freeway corridor as particularly important for continued connectivity of wildlife populations, due to a lack of alternative routes and encroachment of development (Nelson, 2000). Although there are large open spaces within the North Area, various bottlenecks also occur. Maintaining habitat linkages and connectivity throughout the mountains is critical for long-term ecosystem health and sustainability.

Regional Movement. Although many large and medium-sized mammal species move through the North Area, movement outside the mountains is important for large mammals such as deer, bobcat, and mountain lion. Regional movement is also important for smaller species in the North Area such as wrentit (*Chamaea fasciata*) because it allows access to new genetic material that slowly spreads through the system and prevents inbreeding. The Santa Monica-Sierra Madre Connection, a regional landscape linkage, is one of the last connections in the region between coastal and inland areas. This linkage connects habitats of the Santa Monica Mountains to the protected wildland habitats of the Simi Hills and Sierra Madre Mountains to the north.

The greatest barrier to movement between the Santa Monica Mountains and habitats to the north is U.S. 101 (Penrod et al., 2006). This barrier effectively reduces wildlife movement across the North Area and has resulted in wildlife mortality from vehicle collisions. The underpass of U.S. Route 101 at Liberty Canyon Road is one of the few active wildlife passage areas along the entire extent of U.S. Route 101 through the Santa Monica Mountains. Other watercourse and street crossings of U.S. Route 101 are very constrained or entirely impassible for wildlife. There are widely documented concerns for the consequences of genetic isolation for the small band of mountain lions of the Santa Monica Mountains. Mountain lions have been documented by the NPS and others using this crossing to transit back and forth between the Santa Monica Mountains and the greater lion populations of the Simi Hills and areas to the north. Caltrans, with the support of a coalition of government agencies, non-governmental organizations, conservation groups, and others, is proposing a wide, vegetated overpass to provide safe wildlife crossing over U.S. Route 101 at Liberty Canyon. The U.S. 101 Liberty Canyon Wildlife Crossing Project is currently in the design and environmental review phase and would help to preserve and enhance the greater Santa Monica-Sierra Madre Connection.

Mountain lions are particularly vulnerable to the effects of habitat fragmentation and barriers to movement in the Santa Monica Mountains and surrounding areas because they have large home ranges (about 200 square miles for adult males and 75 square miles for adult females; NPS 2017), and young lions must be able to disperse out of the resident adults’ territories or they risk being injured or killed in intraspecific conflicts (NPS, 2017). In fact, the leading cause of death of the mountain lions tracked by the NPS has been “intraspecific conflict,” or mountain lions killing other mountain lions (NPS, 2017). There are currently approximately 15 mountain lions known in the Santa Monica Mountains, and a recent study conducted by biologists from NPS and UCLA found that this population faces the possibility of extinction in the near future due to loss of genetic diversity from inbreeding, a result of their isolation from other mountain lion populations. However, enhancing gene flow by providing avenues for connectivity, such as the proposed Liberty Canyon wildlife crossing, could maintain current levels of genetic diversity and preserve the mountain lion population in the Santa Monica Mountains (Benson et al., 2016).

C.4.2 Regulatory Setting

There are a number of laws, regulations, and ordinances that relate to the conservation of biological resources in the North Area; these are summarized below.

Federal Regulations

Federal Endangered Species Act. The Endangered Species Act (ESA) (16 USC 1531 et seq.) establishes legal requirements for the conservation of endangered and threatened species and the ecosystems upon which they depend.

Section 9. Section 9 of the ESA lists those actions that are prohibited under the ESA, including take (i.e., to harass, harm, pursue, hunt, wound, or kill) of listed species without special exemption. "Harm" is further defined to include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing behavioral patterns such as breeding, feeding, or shelter. "Harass" is further defined as actions that create the likelihood of injury to listed species to an extent as to significantly disrupt normal behavior patterns which include breeding, feeding, and shelter.

Section 10. Section 10 allows for the "incidental take" of endangered and threatened species by non-federal entities. Incidental take is defined by the ESA as take that is "incidental to, and not the purpose of, the carrying out of an otherwise lawful activity." Section 10 requires an applicant for an incidental take permit to submit a habitat conservation plan that specifies, among other things, the impacts that are likely to result from the taking and the measures the applicant will undertake to minimize and mitigate such impacts.

Critical Habitat. Designation of an area as critical habitat provides a means by which the habitat of an endangered or threatened species can be protected from adverse changes or destruction resulting from federal activities or projects. A critical habitat designation does not set up a preserve or refuge and usually applies only when federal funding, permits, or projects are involved.

Clean Water Act. The Clean Water Act (33 USC 1251 et seq.) establishes legal requirements for the restoration and maintenance of the chemical, physical, and biological integrity of the nation's waters.

Section 401. Section 401 requires that an applicant for a federal license or permit that allows activities resulting in a discharge to waters of the United States must obtain a State certification that the discharge complies with other provisions of the Clean Water Act. The Regional Water Quality Control Boards (RWQCBs) administer the certification program in California.

Section 404. Section 404 establishes a permit program administered by the U.S. Army Corps of Engineers (USACE) regulating the discharge of dredged or fill material into waters of the United States, including wetlands. Implementing regulations by the USACE are found at 33 CFR Parts 320-330. Guidelines for implementation are referred to as the Section 404(b)(1) Guidelines and were developed by the EPA in conjunction with the USACE (40 CFR Parts 230). The Guidelines allow the discharge of dredged or fill material into the aquatic system only if there is no practicable alternative that would have less adverse impacts.

Migratory Bird Treaty Act. The Migratory Bird Treaty Act (MBTA) (16 USC 703-711) is a treaty signed by the United States, Canada, Mexico, and Japan that prohibits take of any migratory bird, including eggs or active nests, except as permitted by regulation (e.g., hunting waterfowl or upland game species). Under the MBTA, "migratory bird" is broadly defined as "any species or family of birds that live, reproduce or migrate

within or across international borders at some point during their annual life cycle” and thus applies to most native bird species.

Bald and Golden Eagle Protection Act. The BGEPA (16 USC, 668, enacted by 54 Stat. 250) protects bald and golden eagles by prohibiting the taking, possession, and commerce of such birds and establishes civil penalties for violation of this act. Under BGEPA, take includes “disturb,” which means “to agitate or bother a bald eagle or a golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, (1) injury to an eagle, (2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or (3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior.”

Plant Protection Act of 2000. Prevents importation, exportation, and spread of pests that are injurious to plants, and provides for the certification of plants and the control and eradication of plant pests. The Act consolidates requirements previously contained within multiple federal regulations including the Federal Noxious Weed Act, the Plant Quarantine Act, and the Federal Plant Pest Act.

State Regulations

California Endangered Species Act. The California Endangered Species Act (CESA) (Fish and Game Code 2050 et seq.) establishes the policy of the state to conserve, protect, restore, and enhance threatened or endangered species and their habitats. CESA mandates that state agencies not approve projects that would jeopardize the continued existence of threatened or endangered species if reasonable and prudent alternatives are available that would avoid jeopardy. For projects that affect a species listed under both CESA and the federal ESA, compliance with the federal ESA will satisfy CESA if CDFW determines that the federal incidental take authorization is consistent with CESA under Fish and Game Code Section 2080.1. For projects that will result in take of a species listed under CESA but not under the federal ESA, the applicant must apply for a take permit under Section 2081(b).

Fully Protected Designations – California Fish and Game Code Sections 3511, 4700, 5515, and 5050. Prior to enactment of CESA and the federal ESA, California enacted laws to “fully protect” designated wildlife species from take, including hunting, harvesting, and other activities. Unlike the subsequent CESA and ESA, there was no provision for authorized take of designated fully protected species. Currently, 36 fish and wildlife species are designated as fully protected in California, including golden eagle.

California Senate Bill 618 (signed by Governor Brown in October 2011) authorizes take of fully protected species, where pursuant to a Natural Conservation Community Plan, approved by CDFW. The legislation gives fully protected species the same level of protection as is provided under the Natural Community Conservation Planning Act for endangered and threatened species.

Native Birds – California Fish and Game Code Sections 3503 and 3513. California Fish and Game Code Section 3503 prohibits take, possession, or needless destruction of bird nests or eggs except as otherwise provided by the Code; Section 3503.5 prohibits take or possession of birds of prey or their eggs except as otherwise provided by the Code; and Section 3513 provides for the adoption of the MBTA’s provisions (above). With the exception of a few non-native birds such as European starling, the take of any birds or loss of active bird nests or young is regulated by these statutes. Most of these species have no other special conservation status as defined above. The administering agency for these sections is the CDFW. As with the MBTA, these statutes offer no statutory or regulatory mechanism for obtaining an incidental take permit for the loss of non-game migratory birds.

California Native Plant Protection Act – California Fish and Game Code Sections 1900 et seq. Prior to enactment of CESA and the federal ESA, California adopted the Native Plant Protection Act (NPPA). CESA

(above) generally replaces the NPPA for plants originally listed as endangered under the NPPA. However, plants originally listed as rare retain that designation, and take is regulated under provisions of the NPPA. The California Fish and Game Commission has adopted revisions to the NPPA allowing CDFW to issue incidental take authorization for listed rare plants, effective January 1, 2015.

Lake and Streambed Alteration Agreements – California Fish and Game Code Sections 1600-1616. Under these sections of the Fish and Game Code, an applicant is required to notify CDFW prior to constructing a project that would divert, obstruct, or change the natural flow, bed, channel, or bank of a river, stream, or lake. Preliminary notification and project review generally occur during the environmental review process. When a fish or wildlife resource may be substantially adversely affected, CDFW is required to propose reasonable project changes to protect the resource. These modifications are formalized in a Lake and Streambed Alteration Agreement (LSAA) that becomes part of the plans, specifications, and bid documents for the project. CDFW jurisdiction is determined to occur within the water body of any natural river, stream, or lake. The term “stream,” which includes creeks and rivers, is defined in Title 14, CCR, Section 1.72.

California Porter-Cologne Water Quality Control Act. Pursuant to the California Porter-Cologne Water Quality Control Act, the State Water Resources Control Board (SWRCB) and the nine RWQCB may require permits (“waste discharge requirements”) for the fill or alteration of “Waters of the State.” The term “Waters of the State” is defined as “any surface water or groundwater, including saline waters, within the boundaries of the state” (California Water Code, Section 13050[e]). Although “waste” is partially defined as any waste substance associated with human habitation, the SWRCB interprets this to include fill discharge into water bodies. The SWRCB and the RWQCB have interpreted their authority to require waste discharge requirements to extend to any proposal to fill or alter “Waters of the State,” even if those same waters are not under the jurisdiction of the USACE.

Pursuant to this authority, the SWRCB and the RWQCB may require the submission of a “report of waste discharge” under Water Code Section 13260, which is treated as an application for a waste discharge requirement.

Oak Woodlands Conservation (SB 1344). California Public Resources Code Section 21083.4 requires each county in California to consider a project’s impacts to oak woodlands during the CEQA environmental review process. If a county determines that there would be significant impacts to oak woodlands, it must require one or more specified mitigation alternatives to mitigate the significant effect of the conversion of oak woodlands.

County of Los Angeles Plans and Ordinances

Santa Monica Mountains North Area Plan (2000). A component of the Los Angeles County General Plan, the SMMNAP’s primary role is to provide more focused policy for the regulation of development within the unincorporated area of the Santa Monica Mountains west of the City of Los Angeles and north of the Coastal Zone boundary--the planning area--as part of the overall General Plan area of Los Angeles County. The North Area Plan refines the policies of the county-wide General Plan as it applies to this planning area. It includes goals and policies to preserve and protect biological resources including undeveloped areas, key watersheds, and biological habitats and linkages.

Santa Monica Mountains Community Standards District. The Santa Monica Mountains North Area Community Standards District is established to implement the goals and policies of the Santa Monica Mountains North Area Plan through tailored development regulations for the area, which protect the health, safety, and welfare of the community, especially the surrounding natural environment.

Los Angeles County Oak Woodlands Conservation Management Plan (2011). The main goal of the Plan is to preserve and restore oak woodlands, so they are conserved in perpetuity with no net loss of existing woodlands. There are three important objectives of the plan: prioritize the preservation of oak woodlands, promote conservation by integrating oak woodlands into the development process in a sustainable manner, and effectively mitigate the loss of oak woodlands. The plan implements these objectives through a series of recommendations that are grouped in the following categories:

- Alterations to the County’s development and environmental review process;
- Revisions to the process by which County agencies address impacts to oak woodlands;
- Expansion of goals and policies contained in the County’s General Plan;
- Changes to the County Zoning Code; and
- Long-range implementation and monitoring efforts.

Significant Ecological Areas. SEAs are officially designated areas within Los Angeles County identified as having irreplaceable biological resources. These areas represent the wide-ranging biodiversity of the County and contain some of the County’s most important biological resources. Each individual SEA was configured to support sustainable populations of its component species and includes undisturbed to lightly disturbed habitat along with linkages and corridors that promote species movement. The Santa Monica Mountains North Area is almost entirely within the Santa Monica Mountains SEA. The County recently adopted the SEA Ordinance in January 2020.

Hillside Management Areas Ordinance. The policies of the Los Angeles County General Plan, and area and community plans where applicable, seek to preserve significant natural features in hillside areas. The Hillside Management Areas Ordinance and the Hillside Design Guidelines implement those policies by ensuring that hillside development projects use sensitive and creative engineering, architectural, and landscaping site design techniques.

Oak Tree Ordinance. The purpose of the County’s Oak Tree Ordinance is to preserve and maintain healthy oak trees in the development process. It requires a permit for impacts to oak trees and their protected zones (i.e., the area within an oak tree’s dripline plus five feet outside the dripline, or 15 feet from the trunk(s) of the oak, whichever is greater).

Rural Outdoor Lighting District Ordinance. This ordinance is an amendment to Title 22 – Planning and Zoning of the Los Angeles County Code to establish a rural outdoor lighting district and regulate outdoor lighting in the district to promote and maintain dark skies at night for the residents and wildlife in the district. The Santa Monica Mountains North Area is within the rural outdoor lighting district.

Vineyard Ordinance. On December 8, 2015, the Los Angeles County Board of Supervisors adopted an ordinance amending Title 22– Santa Monica Mountains North Area Community Standards District (CSD), which regulates vineyard development in the Santa Monica Mountains North Area. The ordinance defines vineyards as a use, requires a Conditional Use Permit (CUP) for all new and expanding vineyards, and establishes development standards for all new, expanding, and existing vineyards. The regulations contained in the vineyard ordinance are intended to address the potential impacts of vineyard development in the Santa Monica Mountains North Area.

C.4.3 Thresholds of Significance and Methodology

In accordance with Appendix G of the CEQA Guidelines, development facilitated by the proposed project would have a significant effect on biological resources if it would:

- 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 CDFW or USFWS.
- 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 CDFW or USFWS.
- 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.
- 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.
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

HABITAT CATEGORIES
■ S1 Habitat: Very Sensitive Habitat Development Restricted
■ S2 Habitat: Sensitive Habitat Development Limited
■ S3 Habitat: Disturbed Habitat Development Less Restricted
■ S4 Habitat: Developed Land Development Permitted

C.4.4 Environmental Impacts and Mitigation Measures

The scope of this assessment is at a programmatic level rather than a project-specific level; thus, this analysis of impacts to biological resources is discussed qualitatively. The adoption of the proposed Plan and CSD Update does not include physical development that could directly impact biological resources. However, implementation of the proposed Plan and CSD Update would continue to allow development within the unincorporated lands in the North Area. Each project, under the existing Plan/CSD and under the proposed Plan and CSD Update, would require subsequent analysis to evaluate impacts to biological resources, significance, need for project-specific mitigation, and any subsequent discretionary permits or coordination with resource agencies (e.g., USFWS, USACE, CDFW, RWQCB) that may be required.

The following impact analysis addresses thresholds of significance as presented in Section C.4.3. The last impact discussion addresses two thresholds (last two significance thresholds).

Impact BR-1: The proposed North Area Plan and CSD Update would have a substantial adverse effect, either directly or through habitat modifications, on species identified as candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. (Less than Significant Impact)

The Santa Monica Mountains are home to over 400 species of birds, 23 species of reptiles, 10 species of amphibians, 41 species of mammals, and over 900 species of vascular plants; many of these are special-status species (see Appendix 3). The natural communities, as well as somewhat disturbed semi-natural communities, that are found throughout the Santa Monica Mountains have the potential to support one or more of these sensitive species.

The proposed North Area Plan and CSD Update would incorporate four habitat categories, which are designed to identify the North Area's most sensitive biological resources. These habitat categories were identified through the Biological Assessment study (Appendix 3) and goals, policies and development

standards have been incorporated in the proposed Plan and CSD Update to address the protection of biological resources.

The Conservation and Open Space Element of the proposed North Area Plan Update includes 37 policies that specifically address protection of biological resources. These policies include Policy CO-1 through CO-30; the list of policies is included at the end of this section.

Implementation of these policies would have both direct and indirect beneficial effects for special-status species by emphasizing avoidance and minimization of impacts to habitats (e.g., by avoiding the most biologically sensitive areas and concentrating development in previously disturbed areas and preserving sensitive habitats as open space) and encouraging greater protection for habitat and resources. However, the future projects proposed in the North Area could result in impacts to various habitat types, which could in turn result in the loss of special-status species through direct mortality or via indirect effects (e.g., through wildlife habitat loss and edge effects at the urban-wildland interface).

Development standards in the Application and Review Procedures of the proposed CSD Update (B. Biological Review) would ensure that, on a project-specific level, the conduct of necessary biological surveys to analyze project-specific impacts and propose appropriate mitigation measures to offset those impacts. Any new development would, depending on the affected habitat categories, be reviewed by the County Biologist or the Significant Ecological Areas Technical Advisory Committee (SEATAC).¹ SEATAC is an advisory committee to the County Department of Regional Planning, which consists of experts who specialize in various areas of biology in Los Angeles County. SEATAC advises on the adequacy of analyses presented in project-specific biological reports; provides recommendations intended to help the applicant avoid, minimize, or mitigate biological impacts; and advises on a project's compatibility with the CSD. Additionally, for federal and state-listed species, consultation with regulatory agencies for compliance with state and federal Endangered Species Acts and species-specific permits and mitigation may be required for other regulatory agency review. Furthermore, for waters, wetlands, and riparian habitat under the jurisdiction of the USACE, CDFW, and/or RWQCB, permits and mitigation may be required, subject to the approval of the regulatory agencies.

While the proposed North Area Plan Update includes specific policies to protect biological resources of the North Area, the CSD includes development standards that protect sensitive biological resources by requiring site-specific information on biological resources as part of the application process. Future proposed development should be sited and designed to ensure compatibility with the objectives for resource protection within each affected habitat category. However, the habitat categories do not guarantee preservation, nor do they protect all habitats potentially supporting special-status species. Rather, they are a planning tool to provide a higher level of scrutiny for those areas and resources of greatest biological concern within the County (i.e., S1 and S2 habitats).

Section 22.336.050 (Application and Review Procedures) of the CSD would require surveys by a qualified biologist to assess the potential for special-status species on a proposed development site and Section 22.336.060 (Biological Resource Standards) would ensure that no direct mortality to nesting birds would occur from construction activities by requiring pre-construction surveys (and construction monitoring where warranted). Other protective measures include landscaping standards that prohibit the use of invasive plant species, outdoor lighting standards that conform to the regulations of the rural outdoor lighting districts, fencing standards that limit the use of wildlife impermeable designs to developed areas,

¹ The SMMNA CSD, Section 22.336.050 requires all projects in Habitat Category S1 and any projects in S2 and S3 habitat categories which require discretionary review to be subject to review by SEATAC. In all cases, the County Staff Biologist will conduct a site review to assess the onsite biological resources.

fuel modification of habitable structures to limit vegetation removal in dedicated open space areas, and standards that limit the conflict between vineyard development with wildlife linkages and movement corridors. The updated CSD would require new development to be sited in a manner that avoids the most biologically-sensitive habitat. Any development that would result in impacts to S1 habitat that cannot be avoided through the implementation of siting and design alternatives would require a Conditional Use Permit, and in some cases a variance, pursuant to Section 22.336.060 (Biological Resource Standards) and Section 22.336.070 (Community-Wide Development Standards) and subject to payment of Habitat Impact Fees. The updated CSD development standards also provide for preservation and protection of streams, drainages, wetlands and other water features. Because the proposed Plan and CSD Update incorporates the protective measures recommended in the Biological Resources Assessment for the North Area, implementation of the proposed update would result in less than significant impacts.

The Transfer of Development Credit Program, Section 22.336.070 (Community-Wide Development Standards) of the proposed CSD Update, would prevent an increase in the net amount of development in the Santa Monica Mountains North Area. This program serves to limit development to prevent overburdened public services and prevent new development from occurring in dangerous or sensitive areas. Implementation of the proposed CSD Update would result in no net increases of development in the North Area and thus, limit opportunities for new development to impact sensitive special-status species. Lots approved for development in habitat categories S2 through S4 would require lots to be retired to mitigate impacts associated with the new development. Thus, for each new lot that is developed, another lot is retired and its potential for development would be permanently extinguished. This program would reduce impacts to special-status species by conserving land with sensitive habitat and by reducing the potential for adverse effects (e.g. grading and vegetation removal) associated with increased development.

Indirect impacts from habitat loss would be minimized through various policies and development standards requiring dedication of open space, mitigation for habitat impacts, clustering development and incentivizing siting on disturbed locations, habitat protection, and implementing a transfer of development credit program. Therefore, impacts to special-status species would be less than significant.

Impact BR-2: The proposed North Area Plan and CSD Update would 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 CDFW or USFWS. (Less than Significant Impact)

Los Angeles County supports many sensitive plant community alliances (See Appendix 3). The sensitive upland plant communities include four types of chaparral, six types of coastal sage scrub, coast live oak woodland, valley oak woodland, California bay woodland, California walnut woodland, and sparsely vegetated rock outcrops. Riparian and aquatic habitats in the North Area are all considered sensitive, and include mule fat scrub, California sycamore woodland, willow woodland, wetlands, sand/gravel bar, and open water.

The proposed Plan and CSD Update would incorporate the four habitat categories (S1 Habitat to S4 Habitat, listed above), which are designed to identify the North Area's most sensitive biological resources, including riparian habitat and sensitive plant communities. Future development in the North Area would be required to meet policies and development standards that ensure consistency with the objectives for resource protection within each habitat category, with emphasis on protecting S1 and S2 habitats. However, the habitat categories do not guarantee preservation, nor do they protect all riparian habitat and sensitive plant communities found within the North Area.

The Conservation and Open Space Element of the proposed North Area Plan Update includes 30 policies for protection of riparian habitat and sensitive plant communities. Policies CO-2 through CO-26 address riparian habitat and sensitive plant communities (see list at end of this section). Implementation of all these policies will have both direct and indirect beneficial effects for riparian habitat and sensitive plant communities by avoiding the most biologically sensitive areas, concentrating development in previously disturbed areas, and by emphasizing avoidance, minimization, and mitigation of impacts to habitats.

The Transfer of Development Credit Program in the proposed CSD Update, as noted earlier, would limit full build-out of parcels in sensitive environmental areas in the Santa Monica Mountains North Area. Implementation of this program would mitigate adverse cumulative effects of development on sensitive natural communities and instead encourage development in areas that do not contain sensitive resources. This program would result in no net increases of development in the North Area and thus, limit opportunities for new development to impact sensitive natural communities. For each new lot that is developed, another lot is retired and its potential for development would be permanently extinguished. This program would reduce impacts to sensitive natural communities by conserving land with sensitive habitat and reducing the potential for adverse effects (e.g. grading and vegetation removal) associated with increased development.

In addition, the proposed CSD Update includes development standards that require greater habitat protection within the highest value habitats (S1), including those associated with riparian communities. The proposed standards would require avoidance of the most biologically-sensitive habitat, and any development that would result in impacts to S1 habitat that cannot be avoided through the implementation of siting and design alternatives would require a Conditional Use Permit, pursuant to Section 22.336.060 (Biological Resource Standards) and would be subject to payment of Habitat Impact Fees. Section 22.336.060 (Biological Resource Standards) would prohibit development in streams, except where it has been demonstrated that there are no feasible less-environmentally-damaging alternatives and where feasible mitigation measures have been identified to minimize adverse environmental effects. Allowable development subject to Section 22.336.060 would be limited to necessary water supply projects, flood protection, access roads, and culverts. The proposed CSD Update also addresses the loss of or indirect impact to existing sensitive habitats through the implementation of conservation easements and designation of compensatory mitigation areas as Open Space. Conversion of native vegetation through development could result in some reduction of common habitat. However, the proposed goals and policies of the proposed North Area Plan Update and the development standards in the proposed CSD Update address the recommendations (protective measures) of the Biological Resources Assessment prepared for the North Area, which would prioritize protecting the most ecologically sensitive habitats. The proposed CSD Update also includes a Transfer of Development Credit Program (Section 22.336.070) that would prevent a net increase in overall development in the North Area and discourage development of ecologically sensitive areas. Therefore, with implementation of the proposed North Area Plan and CSD Update, impacts to riparian habitat and sensitive natural communities would be less than significant.

Impact BR-3: The proposed North Area Plan and CSD Update would 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 Impact)

The North Area supports a few prominent manmade lakes and ponds, including Malibou Lake, Rocky Oaks dam, and Lake Enchanto. The North Area also contains many smaller streams and tributaries that support important riverine and riparian habitat, including wetlands. Three key agencies regulate activities within inland streams, wetlands, and riparian areas in California: the USACE, CDFW, and RWQCB. Any project that involves permanently or temporarily impacting jurisdictional waters and/or wetlands through filling,

stockpiling, construction access, conversion to a storm drain, channelization, bank stabilization, road or utility line crossings, geotechnical investigations, or any other modifications that involve the discharge of fill and/or alteration of a jurisdictional resource, would likely require permits from these State and federal agencies, before any land disturbance can commence. Both permanent and temporary impacts are regulated by these agencies.

The proposed Plan and CSD Update would incorporate the proposed habitat categories, which are designed to identify the North Area's most sensitive biological resources, including riparian habitats and wetland areas. The policies and development standards address consistency with the objectives for resource protection within each specific habitat category. However, the habitat categories do not guarantee preservation, nor do they protect all wetland habitat occurring within the North Area.

The Conservation and Open Space Element of the proposed North Area Plan Update includes 10 policies that address protection of wetlands. Policies CO-2 through CO-4, CO-6, CO-15 through CO-17, CO-23, and CO-25 through CO-26 all address the protection of wetlands in the North Area (see list at the end of this section). Implementation of all these policies will have both direct and indirect beneficial effects for wetlands by avoiding the most biologically sensitive areas, concentrating development in previously disturbed areas, and by emphasizing avoidance, minimization, and mitigation of impacts to wetland areas.

Section 22.336.060 (Biological Resource Standards) of the CSD Update contains development standards for habitat categories that include wetlands and water resources. The standards would prohibit diking, filling, or dredging of open waters and wetlands except where it has been demonstrated that there is no feasible less-environmentally-damaging alternative, and mitigation measures have been provided to minimize adverse environmental effects. Under the proposed standards, direct impacts to wetlands would only be allowed for the following uses: scientific research and educational uses, incidental public services such as burying cables and pipes, and wetland habitat restoration projects. Limiting allowable development on or near wetlands would reduce the number of impacts to wetlands in the North Area. Additionally, most of the allowable development (i.e. scientific research, education, and restoration) would be considered beneficial and would be expected to have minimal impacts to wetlands, as opposed to large-scale commercial or industrial development.

Consistent with the proposed North Area Plan, the proposed CSD Update assigns values to the various habitats contained within the North Area and requires greater habitat protection within the highest value habitats (S1), including those associated with wetlands and water resources. The proposed standards would require new development to be sited in a manner that avoids the most biologically-sensitive habitat, and any development that would result in impacts to S1 habitat that cannot be avoided through the implementation of siting and design alternatives would require a Conditional Use Permit, pursuant to Section 22.336.060 (Biological Resource Standards) and subject to payment of Habitat Impact Fees. Thus, the standards would require any potential impacts to S1 habitat to be mitigated by payment of the Habitat Impact Fee or restoration/enhancement of other lands with like habitat at the specified ratios in the proposed CSD Update.

Development of properties adjacent to riparian communities or other wetland habitats should be designed to protect water quality and the riverine biological ecological functions. Only 3.78 acres of wetland sites were mapped in the mapping completed for the Biological Resources Assessment. Wetlands may be more broadly distributed in the North Area than is represented in the National Park Service's data that was used to identify wetland habitats, due to mapping constraints (minimum mapping units) and the intergradation of wetlands with riparian areas in the available data. Therefore, development projects would need to be analyzed on a project-by-project basis for the presence of and potential impacts to wetlands. Consideration of wetlands is included as a development standard in the proposed CSD Update

as this issue would be addressed through the required biological studies that would be required to support future development applications. As presented in the Biological Resources Assessment, all wetlands, lakes, ponds, seeps, vernal pools or seasonal pools, springs, ephemeral, intermittent, and perennial drainages are classified as S1 habitats and are subject to the most stringent protection and avoidance requirements. Protection of wetland habitats where they occur throughout the North Area would assist in the preservation of these resources within the Santa Monica Mountains. Best management practices during construction to minimize erosion and sedimentation would contribute to the protection of water quality.

The proposed goals and policies of the proposed North Area Plan Update and the development standards in the proposed CSD Update address the recommendations (protective measures) of the Biological Resources Assessment regarding wetlands and water resources in the North Area. Therefore, with implementation of the proposed North Area Plan and CSD Update, impacts to riparian habitat and sensitive natural communities would be less than significant.

Impact BR-4: The proposed North Area Plan and CSD Update would affect the movement of a native resident or migratory fish or wildlife species or interfere with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. (Less than Significant Impact)

As discussed above, the North Area supports one regional wildlife linkage, the Santa Monica-Sierra Madre Connection, and numerous local connections including Malibu Creek State Park and open space linkages between Kanan Dume Road and Calabasas Parkway along the U.S. 101 freeway corridor. The large open spaces throughout the North Area support local and regional wildlife movement.

The Conservation and Open Space Element of the proposed North Area Plan Update includes seven policies for the protection of habitat connectivity and wildlife movement. These policies include: Policy CO-2 through CO-4, CO-13, CO-14, CO-18, and CO-19 (see list at the end of this section). Implementation of all these policies would have both direct and indirect beneficial effects for protecting regional wildlife linkages and facilitating wildlife movement by avoiding the most biologically sensitive areas and concentrating development in previously disturbed areas. To support these policies, the CSD Update includes standards for wildlife-permeable fencing and emphasizes protection of wildlife passages and movement. To protect native and migratory fish movement, the standards from Section 22.336.060 of the proposed CSD Update would prohibit the diminishing of fish passage where flood control projects affect streams. The proposed CSD Update would also allow for the construction of minor culverts that provide passage for wildlife while allowing for drainages through access roads.

The proposed goals and policies of the proposed North Area Plan Update and the development standards in the proposed CSD Update provide guidance to mitigate impacts associated with the development of projects that would otherwise cause substantial adverse effects to fish and wildlife species. The proposed Plan and CSD Update addresses the protection of migratory fish and wildlife corridors and nursery sites in the North Area. Therefore, implementation of the proposed Plan and CSD Update would result in less than significant impacts.

Impact BR-5: The proposed North Area Plan and CSD Update would require compliance with adopted Habitat Conservation Plans, Natural Community Conservation Plans, and other approved local, regional, or state policies or ordinances protecting biological resources. (No Impact)

There are no adopted Habitat Conservation Plans or Natural Community Conservation Plans in the North Area. Therefore, the following discussion focuses on local policies and ordinances protecting biological resources.

The Oak Tree Ordinance regulates oak trees of 25 inches or more in circumference (8 inches in diameter), or in the case of an oak with more than one trunk, whose combined circumference of any two trunks is at least 38 inches (12 inches in diameter) DBH (diameter breast height). An oak tree permit must be obtained in order to cut, destroy, remove, relocate, inflict damage, or encroach into the protected zone of any regulated oak tree. Additionally, the County adopted the Oak Woodlands Conservation Management Plan (OWCMP) in 2012, which develops a consistent policy for the management of oak woodlands. The OWCMP extends CEQA consideration of impacts to oak woodlands comprised of oaks 5 inches or larger in DBH. It is the intent of the County to maintain and expand the oak woodland habitat by requiring development designs to avoid impacts to oak woodlands and require appropriate compensatory mitigation where oak woodland impacts disturb or remove such habitat. Section 22.336.060 of the proposed CSD Update includes tree protection standards, including oaks and other native trees, which provides further protection of oak trees in the North Area.

The County Hillside Management Areas (HMA) Ordinance applies to all unincorporated areas that contain Hillside Management Areas, which includes terrain with a natural slope of 25 percent or greater. The goal of the ordinance is to ensure that development preserves the physical integrity and scenic value of HMAs, provides open space, and enhances community character. The HMA Ordinance is applied on a project-specific level and consistency with this plan would be determined on a project-by-project basis. The policies of the proposed Plan and CSD Update comply with the HMA Ordinance.

In 2015, the County amended the existing North Area CSD to adopt the Vineyard Ordinance, which regulates vineyard development in the North Area. The vineyard standards (Section 22.336.070 in CSD Update) include requirements for Integrated Pest Management (IPM) techniques to prevent and control pests that avoids harm to other organisms, air, soil, and water quality; water conservation; erosion control/water quality plan for each vineyard; landscaping standards to prevent invasive weeds; fencing requirements that do not impede wildlife movement; and other standards to protect biological resources.

The proposed North Area Plan and CSD Update have been prepared consistent with existing plans and policies. Therefore, the proposed updates to the North Area Plan and CSD would not conflict with any local ordinances or policies protecting biological resources; therefore, no impact would occur.

C.4.5 Cumulative Impact Analysis

Cumulative impacts are defined as the direct and indirect effects of a proposed project which, when considered alone, would not be deemed a substantial impact, but when considered in addition to the impacts of related projects in the area, would be considered significant. "Related projects" refers to past, present, and reasonably foreseeable probable future projects, which would have similar impacts to the proposed project. CEQA deems a cumulative impact analysis to be adequate if a list of "related projects" is included in the EIR or the proposed project is consistent with an adopted general, specific, master, or comparable programmatic plan [Section 15130(b)(1)(B)]. CEQA also states that no further cumulative impact analysis is necessary for impacts of a proposed project consistent with an adopted general, specific, master, or comparable programmatic plan [Section 15130(d)].

For the purposes of this analysis, the cumulative impacts study area includes the entire Santa Monica Mountains and extends beyond the boundaries of Los Angeles County into the adjacent Ventura County to the west. The General Plan Programmatic EIR identified cumulative impacts as remaining significant for biological resources (special-status species). The General Plan Programmatic EIR states:

Although any direct impacts to special-status species and the loss of sensitive habitats would be mitigated, due to the loss of common habitats and diminished resource availability, impacts to

special-status species remain significant at the General Plan level. It is presumed that direct impacts to special-status species and the loss of sensitive habitats would be similarly mitigated in other regions of the cumulative impacts study area. However, for the same reasons as analyzed at the General Plan level (i.e., loss of common habitats and diminished resource availability), cumulative impacts to special-status species would be significant.

The implementation of the proposed North Area Plan and CSD Update would reduce the potential for impacting biological resources because of the identified policies and development standards that would protect North Area resources. The proposed Plan and CSD Update include measures that would directly address protection of biological resources for unincorporated North Area lands. In combination with other projects, the proposed North Area Plan and CSD would not significantly change the General Plan countywide determination and cumulative biological resources impacts would remain significant.

For impacts to riparian habitat and sensitive plant communities, mitigation would ensure that unavoidable impacts to sensitive habitat are avoided, and if avoidance is not feasible, mitigated 'in-kind'; thus, impacts to sensitive habitat would be considered less than significant. Additionally, wetlands and riparian habitat under the jurisdiction of the USACE, CDFW, and/or RWQCB are subject to permits and mitigation that may be required by the regulatory agencies. Furthermore, plant communities considered sensitive by the CDFW must be analyzed under CEQA. Presuming that impacts to riparian habitat and sensitive plant communities would be similarly mitigated in other regions of the cumulative impacts study area, cumulative impacts would be less than significant.

For impacts to wetlands, mitigation would ensure that unavoidable impacts are mitigated with environmentally superior mitigation; thus, impacts to wetlands would be considered less than significant. Additionally, wetlands under the jurisdiction of the USACE, CDFW, and/or RWQCB are subject to permits and mitigation that may be required by regulatory agencies. Furthermore, plant communities considered sensitive by the CDFW must be analyzed under CEQA. Presuming that impacts to wetlands would be similarly mitigated in other regions of the study area, cumulative impacts would be less than significant.

The policies proposed in the North Area Plan Update provide for mitigation for loss of wildlife movement opportunities and nursery sites by emphasizing habitat protection and conservation of open space, including movement areas, for any unavoidable impacts to S1 and S2 habitats. Additionally, development would be clustered to the extent feasible to reduce interference with movement areas, and on an individual basis, projects would be required to incorporate fencing in a manner that does not restrict wildlife movement. Therefore, impacts to movement within the North Area would be less than significant. However, development within neighboring jurisdictions could interfere with movement into and out of the North Area, particularly development along the 101-freeway corridor where movement is already highly constrained. Therefore, while there is a substantial cumulatively significant impact to wildlife movement in the region, proposed North Area Plan Update policies would ensure that the proposed update's incremental contribution to the cumulative impact is minor.

The proposed policies in the North Area Plan Update and proposed standards of the North Area CSD Update do not conflict with local ordinances or policies protecting biological resources, nor would the proposed Plan and CSD Update conflict on a cumulative level. Rather, the proposed policies and standards are compatible with many of the goals and policies protecting biological resources within the cumulative study area. Therefore, no cumulative impacts would occur.

C.4.6 Level of Significance After Mitigation

The proposed Plan and CSD Update would include a variety of policies and standards protecting biological resources. Implementation of the proposed Plan and CSD Update would result in less-than-significant impacts to special-status species, sensitive habitats, wetlands, wildlife movement, and nursery sites. Therefore, no mitigation is required.

The proposed Plan and CSD Update would not conflict with any local ordinances or policies protecting biological resources, and there are no adopted HCPs or NCCPs in the North Area. No impacts to these issues would occur.

Attachment C.4

Biological Resources Policies and Standards

(Appendix 1 includes all policies and standards)

Proposed North Area Plan Update

Conservation and Open Space Element

- **Policy CO-1:** Implement programs and policies that enforce the responsible stewardship and preservation of dedicated open space areas.
- **Policy CO-2:** Protect and conserve natural resources, natural areas, and available open spaces.
- **Policy CO-3:** Provide and improve access to dedicated open space and natural areas for all users that considers the protection of sensitive biological resources.
- **Policy CO-4:** Prioritize open space acquisitions for available lands that contain unique ecological features, streams, watersheds, scenic features, habitat types and/or offer linkages that enhance wildlife movements and genetic diversity.
- **Policy CO-5:** Collaborate with public, non-profit, and private organizations to acquire and preserve available land for open space.
- **Policy CO-6:** Require open space easements or deed restrictions as part of development projects on sites containing S1 and S2 habitat in order to ensure that approved building site areas are limited and impacts to sensitive habitat are minimized.
- **Policy CO-7:** When development conditions of approval set aside lands for open space, clearly define the land's intended open space functions and ensure that the management and use of such lands are consistent with those intended open space functions.
- **Policy CO-8:** Depict all public or private parcels set aside as open space through the recordation on title of conservation easements, open space easements and open space deed restrictions as Open Space on the Land Use Policy Map.
- **Policy CO-9:** Require that any new development or improvement is sited and designed so required fuel modification or brush clearance does not encroach into dedicated open space or parkland.
- **Policy CO-10:** Pursue a variety of methods to preserve open space, including fee-simple acquisition, purchase of development rights, land swaps, regulations, or development density and lot retirement incentives. For County, State, and federal funds that may be earmarked for open space, assign high priority to acquiring properties designated on the National Park Service's Land Protection Plan, and to parcels within S1 and S2 habitat areas.
- **Policy CO-11:** Implement legal protections, such as deed restrictions and dedication of open space easements, to ensure designated open space lands are preserved in perpetuity.
- **Policy CO-12:** When accepting open space dedications, prioritize acquisitions to those lands that: contain unique ecological features; protect undeveloped streams, watersheds, woodlands, and grasslands; prevent vegetation clearance or grading of steep areas; help reduce development-induced runoff; and protect existing and approved recreation areas.
- **Policy CO-13:** Protect sensitive habitats by collaborating with entities such as County departments, homeowner associations and other groups to balance between land use, sensitive ecological areas (SEAs), wildlife connectivity, and emergency responses.

- **Policy CO-14:** Allow for maximum wildlife connectivity and habitat linkages throughout the North Area. All feasible strategies shall be explored to protect these areas from disturbance including purchasing open space lands, retiring development rights, clustering development to increase the amount of preserved open space, restricting the design and location of fencing, requiring the dedication of open space conservation easements, and minimizing removal of native vegetation.
- **Policy CO-15:** The most biologically significant areas are designated S1 habitat and S2 habitat and shall be subject to strict land use protections and regulations.
- **Policy CO-16:** Land uses S1 and S2 habitats shall only be allowed where they are sited and designed to avoid significant disruption of habitat values, consistent with the policies of the North Area Plan. All development shall be sited to avoid or minimize impacts to S1 and S2 habitat to the maximum extent feasible. Measures, including but not limited to signage, placement of boardwalks, utilizing established trail corridors, following natural contours to minimize grading, and limited fencing shall be implemented as necessary to protect S1 and S2 habitat.
- **Policy CO-17:** New development shall be sited in a manner that avoids the most biologically sensitive habitat onsite where feasible, while not conflicting with other North Area Plan policies. Priority shall be given to siting development in S4 habitat. If infeasible, priority shall be given to siting new development in S3 habitat. If it is infeasible to site development in S4 or S3 habitat areas, development may be sited in S2 habitat if it is consistent with the specific limitations and standards for development in S2 habitat and all other provisions of the North Area Plan. If it is infeasible to site development in S4, S3, and S2 habitat areas, development may be sited, as a last option, in S1 habitat if it is consistent with the specific limitations and standards for development in S1 habitat and all other provisions of the North Area Plan.
- **Policy CO-18:** Emphasize the protection of habitat:
 - a. Preserve, protect, and enhance habitat linkages through limitations in the type and intensity of development and preservation of riparian corridors.
 - b. Place primary emphasis on preserving large, unbroken blocks of undisturbed natural open space and wildlife habitat areas. As part of this emphasis, all feasible strategies shall be explored to protect these areas from disturbance. Such strategies include, but are not limited to, purchasing open space lands, retiring development rights, clustering development to increase the amount of preserved open space, siting development near existing roads and structures, requiring the dedication of open space conservation easements in all permits that include approval of structures within S1 or S2 habitat, and minimizing grading and the removal of native vegetation.
- **Policy CO-19:** Open space conservation easements and dedications shall be utilized, where required or offered, to ensure the preservation of habitats and habitat linkages. The receiving agency shall be a qualified public agency or land conservation agency with the ability to manage, preserve, or enhance park and open space lands. Financing for the long-term maintenance of such areas should be considered through endowments, assessments, or other public funding mechanisms.
- **Policy CO-20:** Encourage the permanent preservation of lands with greater than 50 percent slope as open space, preferably through open space dedications to a public agency or a public land conservation agency which has the authority to manage, preserve, or enhance park and open space lands, or, secondarily, through effective easements.
- **Policy CO-21:** Use primarily locally indigenous plant species in landscape areas within Fuel Modification Zones A and B of structure(s) requiring fuel modification. Non-locally indigenous plants and gardens that are not invasive may be allowed within the building site area and in Fuel Modification Zones A and B, with associated irrigation, provided that the species are consistent with Fire Department requirements and all efforts are made to conserve water. Invasive plants are strictly prohibited. The removal or trimming, thinning or other reduction of natural vegetation, including locally indigenous vegetation, is prohibited except when

required for construction of an approved development and/or for compliance with fuel modification requirements for approved or lawfully existing development. Los Angeles County will work with organizations, homeowners, and park agencies on educational programs to reduce the spread of invasive plant species within the Santa Monica Mountains.

- **Policy CO-22:** New development adjoining parklands shall be sited and designed to minimize impacts to habitat and recreational opportunities to the maximum extent feasible. Natural vegetation buffer areas shall be provided around parklands.
- **Policy CO-23:** New development in wetlands shall be restricted to the following three uses: (1) wetlands-related scientific research and educational uses; (2) incidental public service purposes, including burying cables and pipes or inspection of piers and maintenance of existing intake and outfall lines; and (3) wetland restoration projects. These uses are only permitted where it has been demonstrated that there is no feasible less environmentally damaging alternative and adverse environmental effects are mitigated.
- **Policy CO-24:** All new development shall be sited and designed to avoid, minimize, or mitigate required fuel modification and brush removal's habitat disturbance or destruction, removal or modification of natural vegetation, and irrigation of natural areas.
- **Policy CO-25:** When impacts to S1 and S2 habitat are unavoidable, mitigate habitat impacts through preservation mechanisms including permanent on-site deed restriction, dedication of land to a state or federal conservation agency, conservation easement, restrictive covenant, or conservation in-lieu fees.
- **Policy CO-26:** Where multiple habitat protection policies are applicable, the policy that is most restrictive and protective of the habitat resource shall regulate development.
- **Policy CO-27:** Cluster new development to the maximum extent feasible and locate as close as possible to existing roadways, services and other developments to minimize impacts to biological resources and removal of native vegetation.
- **Policy CO-28:** Minimize the increase in run-off and erosion from properties into the watershed that results in downstream pollution and increased size of flood plains in coastal lagoons.
- **Policy CO-29:** Promote infiltration of stormwater – onsite wherever possible – where it will not exacerbate geologic hazards through the incorporation of BMPs.
- **Policy CO-30:** Outdoor lighting shall be fully shielded and directed away from biological resources, open space, and other sensitive receptors.

Proposed Community Standards District Update

Section 22.336.050 Application and Review Procedures

- B. Biological Review

Section 22.336.060 Biological Resource Standards

- A. Biological Resources
- B. Trees

Section 22.336.070 Community-Wide Development Standards

- W. Transfer of Development Credit Program
- Y. Vineyards

C.5 Greenhouse Gas Emissions

Introduction

This section evaluates the potential for the proposed Plan and CSD Update and associated actions to cumulatively contribute to greenhouse gas (GHG) emissions impacts. Because no single future development project or the sum of all future development projects that could be undertaken within the North Area would be large enough to result in a measurable increase in global concentrations of GHG emissions, climate change impacts are considered on a cumulative basis.

Scoping Comments Received. During the scoping period for the EIR, written and verbal comments were received from agencies, organizations, and the public. These comments identified various substantive issues and concerns relevant to the EIR analysis. Appendix 2 includes all comments received during the scoping comment period.

One comment was received in relation to GHG emissions and climate change. This comment requested that the analysis should consider the combined impacts of climate change, such as wildfires. Wildfires are discussed in more detail in Section C.15.

C.5.1 Environmental Setting

C.5.1.1 Physical Setting

The global climate depends on the presence of naturally occurring greenhouse gases (GHG) to provide what is commonly known as the “greenhouse effect” that allows heat radiated from the Earth’s surface to warm the atmosphere. The greenhouse effect is driven mainly by water vapor, aerosols, carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and other constituents. Globally, the presence of GHG affects temperatures, precipitation, sea levels, ocean currents, wind patterns, and storm activity. Human activity directly contributes to emissions of six primary anthropogenic GHGs: CO₂, CH₄, N₂O, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). The standard definition of anthropogenic GHG includes these six substances under the 1997 Kyoto Protocol (UNFCCC, 1998).

The most important and widely occurring anthropogenic GHG is CO₂, primarily from the use of fossil fuels as a source of energy. Other anthropogenic activities that are major sources of CO₂ include deforestation, other changes in land use, and cement production. Fertilizer use, agriculture, and land use change are also major sources of CH₄ and N₂O, which are also long lived and among the most important anthropogenic drivers of climate change. Global objectives on climate change are measured against a 1990 base year (UNFCCC, 1998), and emissions of CO₂ in 2011 were determined to be 54 percent above the 1990 level (IPCC, 2013).

Each GHG has a global warming potential (GWP) that is calculated to reflect how long each different gas remains in the atmosphere and how strongly the pollutant absorbs energy relative to CO₂. The GWP indicates the relative and cumulative ability of a given mass of emissions to absorb energy and force climate change over the time the emissions remain in the atmosphere. Methane in the atmosphere over a 100-

KEY FINDINGS

- Climate change is a major concern for the North Area in regards to increased and intensified wildfires, biological diversity reduction, and other important effects.
- North Area predominantly includes commercial, residential and open space/recreation land uses. The direct GHG emissions generated from within the North Area are primarily traffic related emissions and emissions from the Calabasas Landfill.
- County’s General Plan, Sustainability Plan, and Climate Action Plan require substantial GHG emissions reductions for new development projects.

year horizon has a GWP of 25 according to the Intergovernmental Panel on Climate Change (IPCC) Fourth Assessment Report and 28 according to the IPCC Fifth Assessment Report. This GWP number means that one pound of CH₄ causes the equivalent warming potential of 25 to 28 pounds of CO₂. California regulators recognize the short-lived nature of CH₄ by using a GWP of 25 for CH₄ over the 100-year timespan and a GWP of 72 over a 20-year timespan (ARB, 2016). The GWP is used to quantify GHG emissions by multiplying the different GWP of each GHG pollutant by the mass of that pollutant to arrive at a CO₂-equivalent (CO₂e) mass.

C.5.1.2 Physical Effects of GHG Emissions

Changing temperatures, precipitation, sea levels, ocean currents, wind patterns and storm activity provide indicators and evidence of the effects of climate change. For the period 1950 onward, relatively comprehensive data sets of observations are available. Various indicators and evidence illustrate the many aspects of climate change, namely, how temperature and precipitation are changing, and how these changes are affecting the environment, specifically freshwater and marine systems, as well as humans, plants and animals (OEHHA, 2013; OEHHA, 2018). Consensus expressed by the Fifth Assessment Report of the IPCC shows that: “warming of the climate system is unequivocal, and since the 1950s, many of the observed changes are unprecedented over decades to millennia. The atmosphere and ocean have warmed, the amounts of snow and ice have diminished, sea level has risen, and the concentrations of greenhouse gases have increased” (IPCC, 2014).

Since California’s initial GHG strategy set forth in the 2008 Climate Change Scoping Plan, scientific evidence has continued to indicate that the climate is changing. This evidence includes rising temperatures, shifting snow and rainfall patterns, and increased incidence of extreme weather events (ARB, 2014).

The Third U.S. National Climate Assessment, released on May 6, 2014, provides the most authoritative and comprehensive source of scientific information to date about climate-change impacts across all U.S. regions and on critical sectors of the economy. For the Southwestern U.S. region, including Los Angeles County, the National Climate Assessment emphasizes the risks to scarce water resources as follows:

Climate changes pose challenges for an already parched region that is expected to get hotter and, in its southern half, significantly drier. Increased heat and changes to rain and snowpack will send ripple effects throughout the region’s critical agriculture sector, affecting the lives and economies of 56 million people — a population that is expected to increase 68 percent by 2050, to 94 million. Severe and sustained drought will stress water sources, already over-utilized in many areas, forcing increasing competition among farmers, energy producers, urban dwellers, and plant and animal life for the region’s most precious resource. (Melillo et al., 2014)

The effects of global climate change to California’s public health, infrastructure and natural resources are described in the *California’s Fourth Climate Change Assessment Statewide Summary Report* (Bedsworth et al., 2018). According to this report, which builds upon the first three climate change assessment reports, the updated projections reinforce past findings regarding the potential for more extreme events from heat waves, floods, droughts, and wildfires. These extreme climate event impacts along with reduced improvements in air quality will create an increase in human mortality and damage to property that together will cost in the order of tens of billions of dollars.

In addition to the Statewide summary report, this fourth assessment report also includes regional reports. The Los Angeles Region Report provides the following specific regional effects of climate change (Hall et al., 2018):

- *Continued future warming over the LA region. Across the region, average maximum temperatures are projected to increase around 4-5 degrees F by the mid-century, and 5-8 degrees F by the late-century.*
- *Extreme temperatures are also expected to increase. The hottest day of the year may be up to 10 degrees F warmer for many locations across the LA region by the late-century under RCP8.5 (“business-as-usual” scenario where CO₂ emissions continue to rise through the 21st century). The number of extremely hot days is also expected to increase across the region.*
- *Despite small changes in average precipitation, dry and wet extremes are both expected to increase. By the late-21st century, the wettest day of the year is expected to increase across most of the LA region, with some locations experiencing 25-30% increases under RCP8.5. Increased frequency and severity of atmospheric river events are also projected to occur for this region.*
- *Sea levels are projected to continue to rise in the future, but there is a large range based on emissions scenario and uncertainty in feedbacks in the climate system. Roughly 1-2 feet of sea level rise is projected by the mid-century, and the most extreme projections lead to 8-10 feet of sea level rise by the end of the century.*
- *Projections indicate that wildfire may increase over southern California, but there remains uncertainty in quantifying future changes of burned area over the LA region.*

Additional research by the CalEPA Office of Environmental Health Hazard Assessment (OEHHA) documented effects of climate change including impacts on terrestrial, marine, and freshwater biological systems, with resulting changes in habitat, agriculture, and food supply. These changes are occurring in conjunction with the potential to impact human well-being (OEHHA, 2018). The OEHHA categorizes climate change indicators as: changes in California’s climate; impacts to physical systems including oceans, lakes, rivers, and snowpack; and impacts to biological systems including humans, vegetation and wildlife. The primary observed changes in California’s climate include increased annual average air temperatures, more-frequent extremely hot days and nights, and increasingly severity of drought. Impacts to physical systems affected by warming temperatures and changing precipitation patterns show decreasing snow-melt runoff, shrinking glaciers, and rising sea levels (OEHHA, 2018). Examples of the terrestrial effects include increasing tree mortality, large wildfires, and changes in vegetation density and distribution (OEHHA, 2013). Land use planning decisions that account for the effects of climate change would contemplate potential effects to biological resources, water resources, and agricultural resources.

C.5.1.3 California Inventory of GHG Sources

California first formalized a strategy to achieve GHG reductions in 2008, when California produced approximately 487 million metric tons of CO₂ equivalent (MMTCO₂e), an amount equal to about 537 million tons (aka short tons) for 2008, according to the Air Resources Board inventory (ARB, 2018a). One metric ton (MT) equals 1,000 kilograms, which is 2,204.6 pounds or about 1.1 short tons. By 2016, California’s emissions had declined to approximately 429.4 MMTCO₂e (ARB, 2018a). In a global context, California emits less than one percent of the 49,000 MMTCO₂e emitted globally (IPCC, 2014). Table C.5-1 summarizes the current GHG inventory for California.

Table C.5-1. California GHG Emissions Inventory (million metric tons per year, MMTCO₂e)					
Source Category	2008	2010	2012	2014	2016
Transportation ¹	177.58	165.07	161.22	162.28	169.38
Industrial ²	90.54	91.50	91.07	93.96	89.61
Electric Power	120.14	90.34	95.09	88.24	68.58

Table C.5-1. California GHG Emissions Inventory (million metric tons per year, MMTCO₂e)

Source Category	2008	2010	2012	2014	2016
Commercial and Residential	43.52	45.05	42.89	37.37	39.36
Agriculture	35.79	34.27	36.08	35.95	33.84
High GWP	11.65	13.52	15.54	17.70	19.78
Recycling and Waste	8.11	8.37	8.49	8.59	8.81
Total Emissions	487.34	448.11	450.38	444.10	429.35

1 - Transportation category includes off-road equipment used in construction, mining, oil drilling, and other vehicles and mobile sources.

2 - Industrial category includes refineries, oil and gas extraction, and other industries including combustion of fuels plus fugitive emissions.

Source: ARB, 2018a. California Greenhouse Gas Inventory for 2000-2016, by Category as Defined in the 2008 Scoping Plan.

As Table C.5-1 shows the largest source of GHG emissions within the State is from transportation activities, with industrial activity and electric power generation coming in second and third largest. GHG emissions from electric power generation have been dropping at a rate that is quicker than any of the other emissions source categories, and the emissions reductions from electric power generation is the primary reason the state's GHG emissions have dropped over 10 percent from 2008 to 2016.

Globally, anthropogenic activity results in approximately 49,000 MMTCO₂e of annual GHG emissions (IPCC, 2014), and the U.S. GHG inventory for 2014 was 6,763 MMTCO₂e (U.S. EPA, 2018), or roughly 14 percent of the global emissions. The U.S. EPA's "Electric Power Sector" category that includes power production and transmission across the U.S. emitted over 2,000 MMTCO₂e in 2014, or over 30 percent of the U.S. total (U.S. EPA, 2018).

The County's Community Climate Action Plan (CCAP) estimates the following baseline, future baseline, and future reduction target County-wide GHG emissions:

- 2010 Baseline – 7.98 million MT CO₂e
- 2020 Forecast – 9.06 million MT CO₂e
- 2020 Interim Reduction Target – 7.10 million MT CO₂e

The CCAP does not provide GHG emissions estimates for the North Area. Building energy and transportation combined create over 90 percent of the total unincorporated Los Angeles County GHG emissions. Waste generation contributes seven percent, water conveyance and wastewater generation contributes two percent and agriculture and stationary sources both contribute less than one percent. Within the North Area, only one stationary source of GHG emissions, the Los Angeles County Sanitation District's Calabasas Landfill (ARB, 2018b) is listed in the CARB Pollution Mapping Tool (ARB, 2018b). The other sources of GHG emissions originating from activity within the North Area would primarily be from residential related sources, such as private automobile use and the indirect emissions from electricity and water use. Residential areas include a substantial number of large properties and remote properties that would increase both motor vehicle fuel use and water use in comparison with County averages in terms of CO₂e emissions per service population (SP). The North Area includes minimal commercial and industrial activities (except the Calabasas Landfill), with less than one percent of the land within the North Area designated as commercial or industrial (County of Los Angeles, 2014, Table 4-2). The North Area, which in total encompasses over 20,000 acres, includes over 15,000 acres of chaparral, coastal sage scrub, and other natural communities and landforms that would serve as a biological CO₂ sink (Aspen, 2018).

C.5.2 Regulatory Setting

C.5.2.1 Federal

There are no federal regulations relating to GHG emissions or climate change that would apply to the proposed Plan and CSD Update.

C.5.2.2 State

California Governor's Office of Planning and Research, Guidelines on GHG (SB 97)

In late December 2009, the California Natural Resources Agency adopted certain amendments to the State CEQA Guidelines for reviewing the environmental impacts of greenhouse gas emissions, to implement the California Legislature's directive in PRC Section 21083.05 (enacted as part of SB 97 (Chapter 185, Statutes, 2007)). These amendments became effective in March 2010. As part of the administrative rulemaking process, the Natural Resources Agency developed a Final Statement of Reasons explaining the legal and factual bases, intent, and purpose of the CEQA Guidelines amendments. The Final Statement of Reasons guides the scope of GHG analyses for CEQA documents and addresses the subject of life-cycle analysis.

Life-cycle analysis (i.e., assessing economy-wide GHG emissions from the processes in manufacturing and transporting all raw materials used in developing a given project and infrastructure) depends on emission factors or econometric factors that are not well established for all processes. The basis of State CEQA Guidelines set forth by the California Natural Resources Agency indicate that a full life-cycle analysis would be beyond the scope of a given CEQA document because of a lack of consensus guidance on life-cycle analysis methodologies.

California Governor's Executive Orders on GHG Emissions

The California Governor's Executive Order S-3-05 (June 2005) declared California's particular vulnerability to climate change and sets a target of an 80 percent reduction of California greenhouse gas emissions from 1990 levels by 2050 and a target to achieve 1990 levels by 2020. In response to Executive Order S-3-05 and increasing societal concern about the effects of climate change, the California Legislature enacted California Global Warming Solutions Act of 2006, Assembly Bill 32 (AB 32). In passing the bill, the California Legislature found that:

Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems [HSC Section 38501, Division 25.5, Part 1].

In September 2018, Executive Order B-55-18 established a new statewide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter. The ARB was directed to develop the framework for implementing the goal of carbon neutrality. Executive Order B-30-15 (April 2015) established a California greenhouse gas reduction target of 40 percent below 1990 levels by 2030. One purpose of this interim target is to ensure California meets its target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050. This executive order also specifically addresses the need for climate adaptation and directs state agencies to update the California Climate Adaptation Strategy to identify how climate change will affect California infrastructure and industry and

what actions the state can take to reduce the risks posed by climate change. Senate Bill 32 (SB 32) of 2016 codified the GHG emissions target to 40 percent below the 1990 level by 2030.

California Renewables Portfolio Standard (RPS) Program

Electric utilities in California must procure a minimum quantity of the sales from eligible renewable energy resources as specified by RPS requirements. The Clean Energy and Pollution Reduction Act of 2015 (SB 350), signed into law on October 7, 2015, established California's state policy objectives on long-term energy planning and procurement. The 100 Percent Clean Energy Act of 2018 [Senate Bill 100 (SB 100)] revised the RPS targets to establish the policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. With SB 350 and SB 100, California's renewable energy objectives include:

- To set the Renewable Portfolio Standard (RPS) for the procurement of California's electricity from renewable sources at 33 percent by 2020, 50 percent by 2026, and 60 percent by 2030;
- To plan for 100 percent of total retail sales of electricity in California to come from eligible renewable energy resources and zero-carbon resources by December 31, 2045; and
- To double the energy efficiency savings in electricity and natural gas end uses by retail customers by 2030.

The indirect GHG emissions from residential, commercial, and industrial electricity use will be reduced over time as utilities obtain increasing amounts of renewable energy.

AB 32 Climate Change Scoping Plan and Scoping Plan Updates

With AB 32, the 2020 GHG emissions reduction goal became law and requires California to maintain and continue reductions beyond 2020. AB 32 also directed the ARB to develop regulations and market mechanisms to reduce GHG and prepare a scoping plan to identify how best to reach the 2020 limit. The initial AB 32 Climate Change Scoping Plan (ARB, 2008) identified the strategies for achieving the maximum technologically feasible and cost-effective GHG reductions by 2020, and to maintain and continue reductions beyond 2020. The first statewide AB 32 Scoping Plan was adopted by ARB in December 2008, and the ARB approved the First Update to the Scoping Plan in May 2014 (ARB, 2014).

The 2017 Scoping Plan Update, approved on December 14, 2017, provides the strategy for achieving California's 2030 GHG emissions reduction target that was approved in SB 32 (ARB, 2017). The major statewide emission reduction programs approved through these scoping plans includes the following:

- Double building efficiency
- 50% renewable power
- More clean, renewable fuels
- Cleaner zero or near zero emissions cars, trucks, and buses
- Walkable/bikeable communities with transit
- Cleaner Freight and goods movement
- Slash potent "super-pollutants" from dairies, landfills, and refrigerants
- Cap emissions from transportation, industry, natural gas, and electricity
- Invest in communities to reduce emissions

These statewide programs wouldn't be directly applicable to new projects in the North Area, but they would indirectly, or perhaps in the case of the Calabasas Landfill directly, effect emissions from both existing and new GHG emissions sources within the North Area. In particular, programs that affect the

emissions from energy production and energy efficiency, increase renewable fuels and electricity use for transportation would reduce indirect power and water use GHG emissions and direct fuel use GHG emission from car and truck use in the North Area. Also, any reductions that may occur due to programs designed to reduce landfill super pollutant emissions could reduce GHG emissions from the Calabasas Landfill, the largest single source of GHG emissions in the North Area.

C.5.2.3 Local

Los Angeles County

Community Climate Action Plan

The County prepared the Community Climate Action Plan (CCAP) as part of the General Plan 2035 in 2015 (County of Los Angeles, 2015a). The CCAP addresses the County's local GHG emissions reduction goals for 2020 pursuant to AB 32. The 2020 GHG emissions reduction goal was targeted at 11 percent below 2010 levels. Most of the reductions needed to achieve this goal was forecast to be accomplished by State level actions (1.57 million MTCO₂e), with less than 20 percent of the goal being met by local programs. These local programs include seven green building and energy actions, twelve land use and transportation measures, two water conservation and wastewater actions, a water diversion action, and four land conservation and tree planting actions. The following six actions, in their order of emissions reductions, are forecast to provide nearly 93 percent of the local program 2020 forecast 380,857 MTCO₂e reductions:

- WAW-1 Per Capita Water Use Reduction Goal – 101,651 MTCO₂e
- BE-3 Solar Installations – 92,944 MTCO₂e
- LUT-7 Traffic Signal Synchronization Program – 72,499 MTCO₂e
- BE-2 Energy Efficiency Programs – 46,298 MTCO₂e
- LUT-6 Land Use Design and Density – 27,956 MTCO₂e
- SW-1 Waste Diversion Goal – 12,212 MTCO₂e

The CCAP actions with the most potential for emissions reductions within the North Area would be the WAW-1, BE-3, and SW-1 actions that apply both the indirect residential emissions and direct emissions from the operation of the Calabasas Landfill.

Los Angeles Countywide Sustainability Plan

The County of Los Angeles adopted the “Our County Los Angeles Countywide Sustainability Plan” in August 2019 (County of Los Angeles, 2019). This sustainability plan includes twelve primary goals that have a total of 37 separate strategies, with a total of 159 separate actions. The following are a few of the goals, strategies, and actions that could apply to new development in the North Area:

Goal 2: Buildings and infrastructure that support human health and resilience.

- **Strategy 2B:** *Require sustainable and healthy building design and construction.*

- **Action 31:** *Adopt CALGreen Tier 1 green building standards and identify which Tier 2 standards could be adopted as code amendments.*

For this Goal 2 action there are the following target dates:

- 1) *By 2025: All new buildings and 50% of major building renovations to be net zero carbon*
- 2) *By 2035: 75% of major building renovations to be net zero carbon*
- 3) *By 2045: 100% of major building renovations to be net zero carbon*

Goal 3: Equitable and sustainable land use and development without displacement

■ **Strategy 3E:** Limit development in high climate-hazards areas.

■ **Action 56:** Evaluate options to limit new large-scale development in high climate-hazard areas.

Goal 7: A fossil fuel-free LA County

■ **Strategy 7A:** Transition to a zero-carbon energy system that reduces air and climate pollution and that minimizes the dangers of a changing climate to our communities and economy

■ **Action 85:** Collaborate with the City of Los Angeles, Santa Monica and other members of the Building Decarbonization Coalition to develop building energy and emissions performance standards that put the County on a path towards building decarbonization.

For Goal 7A there are the following target dates:

- 1) *By 2025: All unincorporated areas to be powered by 100% renewable energy*
- 2) *By 2025: Countywide - Achieve a 25 percent reduction in greenhouse gas emissions and 3 GW of new distributed energy resources*
- 3) *By 2035: Countywide - Achieve a 50 percent reduction in greenhouse gas emissions and 6 GW of new distributed energy resources*
- 4) *By 2045: Countywide - 10 GW of new distributed energy resources*
- 5) *By 2050: Countywide – Achieve Carbon Neutrality*

Goal 9: Sustainable production and consumption of resources

■ **Strategy 9B:** Implement strong water conservation measures.

■ **Action 114:** Develop a Net Zero Water Ordinance for new development.

■ **Action 115:** Adopt building code changes that improve water efficiency and reduce indoor and outdoor water use above current CALGreen standards

For these Goal 9 actions there are the following target dates:

- 1) *By 2025: Per capita water demand does not exceed 115 gallons per day*
- 2) *By 2035: Per capita water demand does not exceed 100 gallons per day*
- 3) *By 2045: Per capita water demand does not exceed 85 gallons per day*

Los Angeles County General Plan

The County of Los Angeles' General Plan also has a number of approved climate change policies that may generally apply to the proposed Plan and CSD Update (County of Los Angeles, 2015b). These approved climate change goals and policies are as follows:

- **Goal AQ 3: Implementation of plans and programs to address the impacts of climate change.**
 - *Policy AQ 3.1: Facilitate the implementation and maintenance of the Community Climate Action Plan to ensure that the County reaches its climate change and greenhouse gas emission reduction goals.*
 - *Policy AQ 3.2: Reduce energy consumption in County operations by 20 percent by 2015.*
 - *Policy AQ 3.3: Reduce water consumption in County operations.*
 - *Policy AQ 3.4: Participate in local, regional and state programs to reduce greenhouse gas emissions.*
 - *Policy AQ 3.5: Encourage energy conservation in new development and municipal operations.*
 - *Policy AQ 3.6: Support rooftop solar facilities on new and existing buildings.*
 - *Policy AQ 3.7: Support and expand urban forest programs within the unincorporated areas.*

- *Policy AQ 3.8: Develop, implement, and maintain countywide climate change adaptation strategies to ensure that the community and public services are resilient to climate change impacts.*

These goals and policies are fairly general in nature, where many would not apply to a specific project action.

Existing North Area Plan and CSD

The existing North Area Plan and CSD do not directly discuss climate change or have any GHG emissions reduction/climate change specific goals or policies.

South Coast Air Quality Management District

SCAQMD has a few regulations related to GHG emissions (Regulation XXVII), but these regulations are not related to GHG emissions reductions or emissions standards, and they wouldn't apply to any specific approved action within the North Area.

C.5.3 Thresholds of Significance and Methodology

The proposed Plan and CSD Update would have a significant effect on the environment with respect to GHG emissions if it would:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

SCAQMD has adopted a significance threshold of 10,000 MTCO₂e per year for permitted (stationary) sources of GHG emissions for which SCAQMD is the designated lead agency. SCAQMD had convened a GHG CEQA Significance Threshold Working Group (Working Group), but that Working Group was last active in 2010, and no specific thresholds for development projects where SCAQMD is not the lead agency have been approved. Based on preliminary work conducted by that Working Group, the County's General Plan Draft EIR identified the following significance thresholds (County of Los Angeles, 2014):

- If the project complies with a GHG emissions reduction plan or mitigation program that avoids or substantially reduces GHG emissions in the project's geographic area (i.e., city or county), project-level and cumulative GHG emissions are less than significant.
- For projects that are not exempt or where no qualifying GHG reduction plans are directly applicable, a "bright-line" screening-level threshold of 3,000 MTCO₂e annually for all land use types or the following land-use-specific thresholds: 1,400 MTCO₂e for commercial projects, 3,500 MTCO₂e for residential projects, or 3,000 MTCO₂e for mixed-use projects. Projects with GHG emissions below these "bright-line" screening-level thresholds would have less than significant GHG emissions impacts
- For projects that exceed the "bright-line" screening level thresholds the following GHG emissions efficiency thresholds per service population (SP) were identified:
 - Horizon year 2035 emissions are compared to the efficiency threshold of 4.0 MTCO₂e/year/SP.
 - Post-2035 emissions are compared to the efficiency threshold of 1.3 MTCO₂e/year/SP.

Project's that would have GHG emissions that exceed these thresholds would be considered to have significant GHG emissions impacts.

C.5.4 Environmental Impacts and Mitigation Measures

Impact GHG-1: Implementation of the proposed North Area Plan and CSD Update would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment (Less than Significant Impact).

The proposed Plan and CSD Update would not directly result in any activities that generate GHG emissions. However, future development allowed by the proposed Plan and CSD Update would generate GHG emissions during construction and operation. These future development projects, which would primarily include commercial, residential and open space/recreation, would undergo separate analysis for potential GHG emissions impacts, and all future development projects would be required to meet the policy goals of the County's General Plan, Community Climate Action Plan, and Sustainability Plan. Implementation of the goals, policies, strategies, and actions of these plans would ensure future development projects have GHGs emissions below the applicable mass emissions or per capita emissions rate significance thresholds. Proposed policies and development standards of the Plan and CSD Update would not conflict with these existing plans (see Attachment C.5 at the end of this section). Therefore, the proposed Plan and CSD Update would have less than significant impacts with regard to GHG emissions.

Impact GHG-2: Implementation of the proposed North Area Plan and CSD Update would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs (Less than Significant Impact).

The proposed Plan and CSD Update would not directly conflict with GHG plans or regulations or impede implementation of these plans/regulations. Future development allowed by the proposed Plan and CSD Update would be required to conform with the GHG emissions and climate change policy goals of the County's General Plan, Community Climate Action Plan, and Sustainability Plan. These plans have been designed to meet or exceed State Climate Action Plan GHG emission reduction goals and policies. Additionally, future development would be required to comply with all State and local GHG emissions reduction regulations, including all green building requirements. Proposed policies and development standards of the Plan and CSD Update would not conflict with these existing plans (see Attachment C.5 at the end of this section). Therefore, the proposed Plan and CSD Update would not conflict with applicable GHG plans and would have less than significant impacts with regard to GHG plans, policies or regulations.

C.5.5 Cumulative Impact Analysis

This GHG emissions and GCC analysis concerns cumulative global impacts, therefore there is no separate cumulative effects analysis.

C.5.6 Level of Significance After Mitigation

Implementation of the proposed North Area Plan and CSD Update would result in less-than-significant impacts related to Greenhouse Gas Emissions. No mitigation is required.

Attachment C.5

Greenhouse Gas Emissions Policies and Standards

(Appendix 1 includes all policies and standards)

Proposed North Area Plan Update

Safety and Noise Element

- **Policy SN-29:** Discourage high density and intensity development within Very High Fire Hazard Severity Zones (VHFHSZ). Direct development to areas less at-risk for fire and climate change-related hazards.
- **Policy SN-30:** Consider climate change implications in fire hazard reduction planning for the wildland-urban interface and Fire Hazard Severity Zones (FHSZs).

Circulation Element

- **Policy CI-1:** Maximize the capacity and operational efficiency of highways consistent with environmental protection and neighborhood preservation, without widening roadways to increase capacity.
- **Policy CI-5:** Where appropriate, increase the capacity of existing major and secondary highways through the application of transportation system management technology within established rights-of-way and roadway widths by:
 - Minimizing the number of driveway access points by consolidating driveways and exploring other options to reduce uncontrolled access;
 - Minimizing or eliminating conflicting turning movements on links or at intersections;
 - Restricting on-street parking during peak travel periods where such restrictions will not adversely impact public access to parks; and
 - Employing traffic signal synchronization technology.
- **Policy CI-6:** Improve roadway efficiency and highway access through redesign of road intersections and establishment of periodic passing, turnout, and acceleration/deceleration lanes, where appropriate.

Proposed Community Standards District Update

Section 22.336.070 Community-Wide Development Standards

- F. Event Facilities
- R. Scenic Resource Areas.

C.6 Cultural and Tribal Cultural Resources

Introduction

Cultural resources reflect the history, diversity, and culture of the region and people who created them. They are unique in that they are often the only remaining evidence of activity that occurred in the past. Cultural resources can be natural or built, purposeful or accidental, physical or intangible. They encompass archaeological, traditional, and built environmental resources, including buildings, structures, objects, districts, and sites.

Tribal cultural resources are a defined class of resources under Assembly Bill 52 (AB 52). Tribal cultural resources include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a Tribe.

Scoping Comments Received. During the scoping period for the EIR, written and verbal comments were received from agencies, organizations, and the public. These comments identified various substantive issues and concerns relevant to the EIR analysis for cultural and tribal cultural resources. The issues below summarize these comments. Appendix 2 includes all comments received during the scoping comment period.

- Preserve Chumash history.
- Require consultation with California Native American tribes as early as possible as a North Area Plan policy.
- Require CHRIS archaeological records search for Santa Monica Mountains North planning area as part of EIR.
- Require a technical report summarizing the results of CHRIS archaeological records search when required.
- Require that NAHC be contacted for a Sacred Lands File search and Native American Tribal Consultation List of appropriate tribes for project-specific analyses.
- Require that a certified archaeologist and a culturally affiliated Native American monitor all ground-disturbing activities in areas of identified archaeological sensitivity.
- Require that project-specific mitigation monitoring reporting programs address identification and evaluation of inadvertently discovered archaeological resources, the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans, and treatment and disposition of inadvertently discovered Native American human remains.

KEY FINDINGS

- North Area includes an unusually high density of cultural resources.
- County conducted tribal consultation for the proposed Plan and CSD Update (SB18) and the EIR (AB 52).
- General Plan (GP) evaluated cultural resources and established policies, standards, and mitigation to reduce impacts; North Area was considered in this evaluation.
- Adherence to GP policies and GP EIR mitigation measures for cultural resources would reduce potential impacts to less than significant.
- Proposed Plan Update goals/policies and Proposed CSD Update standards would encourage the protection of cultural and tribal cultural resources.

C.6.1 Environmental Setting

The Santa Monica Mountains North Area encompasses 32.3 square miles in Los Angeles County. Almost the entire North Area Plan area is part of the Santa Monica Mountains National Recreation Area, a unit of the National Park System. Los Angeles County has been home to indigenous Native American groups for over 12,000 years. Archaeologists have established a detailed cultural chronology based upon excavations and site surveys across Los Angeles County.

Three kinds of cultural resources, classified by their origins, are considered in this assessment: prehistoric, ethnographic, and historic. Prehistoric archaeological resources are associated with the human occupation and use of the region prior to prolonged European contact. In California, the prehistoric period began over 12,000 years ago and extended through the eighteenth century until 1769, when the first Europeans settled in California. Ethnographic resources represent the heritage of a particular ethnic or cultural group, such as Native American, African, European, Latino, or Asian immigrants. Historic-period resources, both archaeological and architectural, are associated with Euro-American exploration and settlement of an area, and the beginning of a written historical record. The following cultural setting is partially based on a 2017 Aspen cultural resources technical report prepared for a project within the North Area (Bagwell and Dyste, 2017).

C.6.1.1 Prehistoric Overview

Many different systems for categorizing the prehistory of California are used throughout the State. To avoid confusion across interpretations, this review of North Area regional prehistory is organized into five broad time periods: the Pleistocene/Holocene Transition (11,000–7000 calibrated calendar years before present [cal B.C.]), Millingstone Period (7000–4500 cal B.C.), Early Period (4500–2000 cal B.C.), Middle Period (2000 cal B.C.–cal A.D. 1000), and Late Period (cal A.D. 1000–Missionization). At the time of Native American contact with European cultures, the North Area was inhabited by the Chumash people, with Tongva Tataviam as close neighbors to the east of Topanga Canyon (Bagwell and Dyste, 2017).

Pleistocene/Holocene Transition (11,000–7000 cal B.C.)

The term “Paleo-Coastal Tradition” refers to the possible descendants of local Paleoindians who inhabited the coast and exploited marine resources prior to the Millingstone Period. This period has been described as a time of low population density, simple technology, and high mobility. People appear to have subsisted largely on marine food resources with limited terrestrial plant and animal food sources. The Paleoindian artifact assemblage emphasized flaked stone tools, however stone milling implements were not in use during this time period. To date, there is not a substantial amount of archaeological evidence suggesting early Pleistocene/Holocene Transition Period human occupation within the Santa Monica Mountains. However, several archaeological sites from the nearby Channel Islands confirm that humans inhabited the Northern Bight by at least 11,000 cal BP (cal. 1 sigma). The earliest of these sites, CA-SRI 173, dates between 11,000 and 5,760 cal B.C. on Santa Rosa Island, while other sites dating as early as 9,600 and 8,210 cal B.C. occur on San Clemente Island and San Miguel Island. Few Paleo-Coastal sites have been identified along the mainland coastline, possibly due to the small inhabiting population, change in coastline because of rapidly rising mean sea level, or loss of archaeological deposits through cliff erosion and other natural forces.

Early Period (4500–2000 cal B.C.)

Cultural changes during the Early Period are thought to have occurred because of warmer seawater temperatures and related decreases in marine productivity, a continued rise in sea levels, and several technological innovations. These advances in technology include the introduction of a new style of projectile point, the side-notched point, the diversification of mano shapes and an overall thickness in metate tools, ocean-faring watercraft, and expanded fishing toolkits. The emergence of bedrock mortar and pestle sites at inland mountain sites suggests the introduction of acorn and other nut food resources. Collectively, these gains in technology resulted in an expansion of mainland and island exchange, where mainlanders received beads and other marine goods, while islanders received goods such as highly prized deer bone hairpins. Population appears to have fluctuated throughout the Early Period. After a steady decline until about 4000 cal B.C., population density peaks between 4000 and 3000 cal B.C., and then

declines again. Changes in social structure are reflected in the appearance of status differentiation marked by the volume and types of shell beads and other exotic goods interred with loved ones.

Middle Period (2000 cal B.C. – 1000 cal A.D.)

The Middle Period is defined by two distinct but continuous surges in technological, ideological, and social development. From 200 cal B.C. to cal 1 A.D., mainland coastal regions such as in the North Area experience a strategic shift in placement of large village centers, with major inland sites being situated at the conjunction of major watershed drainages with easy access to the coast. Locations of coastal villages reflect a preference for maritime focused specialties and a diversifying marine diet. During this time, diet preferences for the inland mountain region reflect an increased dependence on deer and rabbit, supplemented with an increase in use of nut and seed food resources. Key technological advances occur, including the introduction of the circular fishhook, notched net sinkers, contracting stem projectile points, and use of asphaltum in tool production. Major changes in social, political, ideological, organization, as well as the emergence of an expanded regional trade economy occur alongside these technological advances, including population increase, longer occupation of residential bases across multiple seasons, and enclosed cemeteries. By 500 cal A.D., the plank canoe, or *tomol*, and bow and arrow technologies emerge, setting the stage for more increasingly complex socio-political and economic development. Cooling of seawater temperatures towards the end of this Period occur at about the time of the *tomol*'s introduction, indicating an increase in marine seafood productivity.

Late Period (cal A.D. 1000 to Missionization)

Continued use of technological adaptations, particularly the *tomol* and nut/seed milling equipment during the Late Period, fostered both an increased reliance on nut and faunal resources (e.g., deer and rabbit), as well as maritime intensification along the southern California coast and Northern Bight. This dual focus led to the development of large permanent coastal villages and semi-permanent interior villages, and the expansion of the large-scale trade networks between the islands, mainland coast, and interior desert regions. The marked social and economic complexity of the southern Chumash and Tongva during the Late Period was in part related to cultural adaptations during a period of extreme drought and reduced marine productivity, referred to as the Medieval Climatic Anomaly (MCA) (cal A.D. 800 to 1400). The effects of harsh climate change during the MCA is reflected in skeletal remains that indicate a sharp increase in violence with a concomitant decrease in overall health due to insufficient dietary intake. Cultural coping mechanisms are also evident in the replacement of shellfish with marine fish food resources along the coast, and the emergence of highly specialized economies based on inland deer bone and nut food resources. Other technological adaptations emerged during this Period, such as the use of smaller triangular arrow points alongside the abandonment of asphaltum in the construction of arrows.

During the Late Period, there is linguistic evidence of what has been termed the Numic Spread, which involved the migration of “Shoshoneans” from the interior to the coast, including the Gabrieliño/Tongva who appear to have first arrived in the Los Angeles Basin around cal 500 B.C. By cal A.D. 500, they had established permanent villages as well as satellite communities and experienced diversification of linguistic patterns. An increase in religious ceremonial complexity and deity worship occurs in this Period, originating with the Tongva (Gabrieliño) in the Santa Monica Mountain range and southern Channel Islands. This religious focus is referred to as the *Chingichn(g)ish* (or *Chungichnish*) religion. This religion appears in elements of social and cultural values for several surrounding tribes, notably the Chumash, Yokuts and northern tribes of the San Diego region. All major cultural facets of the Chumash and Tongva (Gabrieliño) culture were in place by cal A.D. 1300 and were likely very similar to what the Spanish observed when they settled in A.D. 1769.

C.6.1.2 Ethnographic Overview

At the time of the Spanish conquest, the North Area was occupied by speakers of both Chumash to the west and Tongva (Gabrieliño) languages to the east. While there is evidence of a shared ideology and economic networks, there are also strong indicators visible in social and political structures that suggest the two groups remained independent of one another. This ethnographic description is based largely on King, in which he synthesis ethnohistoric documents originating from mission registers and diaries, archaeological data, and ethnographic works of John P. Harrington and other anthropologists (Bagwell and Dyste, 2017).

Chumash

Chumash is a name derived from traditional Coastal Chumash language that is used by anthropologists to refer to several closely related groups of Native Americans that spoke similar languages. At the time of European contact, Chumash territory extended along the coast from San Luis Obispo County, south to Malibu Canyon, and west to encompass the northern Channel Islands. At the time of Spanish missionization, the total Chumash population is estimated to have been approximately 15,000 to 20,000 people, with the Santa Monica Mountains population consisting of about 6.5%, or 1,300 people. Although comparatively small, the region's highly developed social, political, and religious systems ensured that kinship relationships united families of political leaders throughout the Chumash nation.

These social, political, and economic systems developed in prehistory, and are viewed by archaeologists and ethnographers alike as resulting in a continuous pattern of exchange during this Period, including food items, medicines, manufactured goods, and raw materials that moved from one village to the next, across culture groups, and between more expansive geographic territories. Trade between the islands and mainland was facilitated by canoe transport that was also regulated by high status individuals. Chiefly families that controlled multiple communities and various aspects of society were in place at the time of European exploration. Chumash society was hierarchically organized, and most social positions were ascribed. The hereditary chief (*wot*) was the central authority of the political system. There was sometimes more than one chief at a village. Chiefs are described as having great prestige and moral authority. They were wealthy and capable of buying costly items, providing hospitality to guests, sponsoring ceremonial gatherings, and rewarding those who have helped them. The most important duty of chiefs was the management of stores containing food and wealth, which they used to feed their families, the needy, and sponsor large multi-village and regional gatherings.

Historical documentation indicates that there were three major coastal and three interior Chumash villages present in the Santa Monica Mountains. Archeological data indicate that the Santa Monica Mountains Chumash specialized in the manufacture of arrows for trade to the Tongva who lived east and south of them, and bone hairpins that were traded to islanders. They also specialized in the manufacture of large stone mortars. Households varied in size, although ethnohistoric and archeological data for settlements in the Santa Monica Mountains indicate that households averaged five or six people in smaller households, and up to 150 people at coastal settlements, such as at *Humaliwu*, near the City of Malibu. Historic and archeological data indicate that villages in the Santa Monica Mountains were permanent settlements occupied over long periods of time.

It is probable that, prior to the introduction of diseases by the Spanish colonists, around twice the number of people recruited by the missions lived at the villages prior to 1770. Between 1770 and 1800, some of the interior Santa Monica Mountains villages were abandoned prior to recruitment by missions. It appears that people from these villages joined other villages which were occupied into the mission period. Archeological remains from the post-1782 occupation at CA-LAN-229 (*Ta'lopop* at Malibu Creek State

Park) and post-1782 burials at the historic village of *Humaliwu* indicate that the people of Santa Monica Mountains Chumash villages were involved with the operation of the large cattle ranches founded during the last decade of the eighteenth century. The abandonment of some villages was probably the result of migration to cattle ranches at Malibu, Las Virgenes, El Conejo, Encino, Simi and Cahuenga.

Tongva

The North Area is near the general area occupied at the time of European contact by the Tongva, a Native American group also known as the Kizh or Gabrieleño that occupied the coast in what is today the Los Angeles and Orange County area. Aside from their Chumash neighbors to the northwest, they were the wealthiest, most populous, and most powerful ethnic minority in aboriginal southern California. At the time of European contact, Tongva territory was centered on the watersheds of the Los Angeles Basin (Los Angeles, San Gabriel, and Santa Ana rivers) and extended from the coast in the Santa Monica Mountains (Topanga Creek), east through the San Fernando and San Gabriel Valleys to the San Bernardino Riverside area, and south to the Santa Ana Mountains and Newport Bay Santa Catalina, and San Nicolas islands.

Ethnographic information on the early Tongva is incomplete since population reduction caused by missionization prevented much Tongva oral history from being recorded. However, some information was collected including that their society was based on clan or lineage groups (moiety system) and that they spoke a Cupan language of the Takic family. Tongva villages were politically autonomous with at least three levels of social hierarchy, although several villages could be allied under a single leader. With the exception of the group on Santa Catalina Island, Tongva typically cremated their dead. Tongva society was organized into patrilineal lineages with a higher incidence of women residing at their husband's settlements. Naming conventions in Tongva society were based on an individual's position within society and were assigned in association with a moiety (Bean and Smith. 1978:546).

Two types of settlement patterns were noted on both the mainland and the islands and included primary villages, which were occupied continuously and were typically located on the coast, and secondary inland camp sites that were occupied during part of the year for the purpose of exploiting seasonal resources, such as sage, acorns, yucca, cacti, and pine nuts. The Tongva trade network involved shell beads, dried fish, sea otter pelts, shells, steatite (obtained from Santa Catalina Island), and possibly salt to inland Serrano groups living in the San Bernardino Mountains. The Tongva received in return a variety of goods, including acorns, seeds, obsidian, deerskins and finely worked utilitarian and ceremonial goods. Steatite was the primary export item of the Tongva as well as their most prominent technological item. Steatite was used to make animal carvings, pipes, ornaments, cooking utensils, palettes, and arrow straighteners. They traded it in rough or finished form (vessels and ornaments) to many groups such as the Chumash, Yokuts, and Luisefio. Most trade took the form of barter but could also involve currency, which took the form of strung olivella beads.

The *Chingichgnish* religion, as practiced by the Tongva, was centered on the deity *Chingichgnish*, who ruled the world after the death of *Wiyot*, a deity who produced the first race of men. *Chingichgnish* transformed these first people into the plants and animals that now serve as food for the new race of humans that exist today, who he created out of mud. To honor *Chingichgnish*, the Tongva erected sacred houses, performed ceremonies, and made offerings of food and goods. At the time of European contact, the *Chingichgnish* religion had spread to neighboring groups where it became incorporated with the *toalache* cult. *Toalache* (jimson weed) is a hallucinogen, and its roots were used in a drink that was believed to provide young adults with long life, good health, strength, and prosperity. Despite *Chingichgnish's* chiefly role, the religion was polytheistic with the Sun and Moon also being prominent deities.

C.6.1.3 Historic Overview

This review of the regional and North Area history and can be organized into three significant cultural themes: the Spanish Period (1769-1822), the Mexican Period (1822-1848) and the American Period (1848-present).

Spanish Period (1769–1822)

Starting in A.D. 1542, explorations by the Spanish of the California coast began with the expedition of Juan Rodríguez Cabrillo, whose crew first came ashore at the present-day harbor of San Diego. Cabrillo's expedition then sailed north to the Los Angeles area, passing San Pedro Bay (and possibly catching a glimpse of the Tongva village Puvungna). While these early Spanish expeditions and others made initial contact with the local Native Californians and facilitated trade networks, Spanish colonization did not fully commence until A.D. 1769 with the expeditions of the Franciscan administrator Junipero Serra and the Spanish military, under the command of Gaspár de Portola in San Diego. In July and September of 1769 Portola's expedition crossed through the territory of the Tongva in the Los Angeles Basin and through the North Area on the way to Monterey Bay following the same alignment of modern State Highway 101. The encounters continued to be peaceful, but conflicts would arise soon after.

These expeditions preceded the Spanish Missionization efforts, which involved the establishment of 21 California Missions whose purpose was to “convert” the Native Californians to Catholicism within a 10-year period, and then return the mission lands to them. The Camino Real, a 600-mile (965-kilometer) road was built to connect the missions. The segment between San Buenaventura (1782) in the north and San Fernando (1797) in the south passed through along approximately the same route as modern State Highway 101. North Area inhabitants were recruited into these and other regional missions. In order to support the Spanish settlements, missions used Native Californians to work on the farms and ranches present on mission grounds. Many of the Tongva were forced to move to missions and to provide labor. At the time of the Spanish arrival, population estimates of California Indians were placed at about 310,000 individuals. By the end of the Spanish reign, the combined effects of non-hygienic population centers, European diseases, excessive manual labor demands, poor nutrition, and fatal injuries incurred during revolts, were being felt among Native groups. As a result, the indigenous population declined by nearly one-third.

From A.D. 1784 to 1821, land grants were given out as concessions from the Spanish Crown granting settlement and grazing rights on specific tracts of land, while the crown retained the title. Within the Los Angeles, Orange, Riverside, and San Bernardino Counties, eleven ranchos were established. The primary use of these lands was for cattle and sheep ranching.

The North Area includes portions of two ranchos: El Rancho Conejo to the west and Rancho Las Vírgenes to the east. Former Santa Barbara Presidio soldiers, José Polanco and Ygnacio Rodríguez, were granted Rancho El Conejo in 1803. The land contained 48,671.56 acres, the majority of which is now in Ventura County. Polanco eventually lost his land due to neglect.

In about 1800, Miguel Ortega was granted a Spanish grazing concession called Rancho Las Vírgenes or El Rancho de Nuestra Señora La Reina de Las Vírgenes. The lands of the Rancho Las Vírgenes included present day Agoura Hills, Oak Park, and Westlake Village and part of the Santa Monica Mountains. After the death of Miguel Ortega in 1809, the Ortega family returned to Pueblo de Los Ángeles. By 1817 the rancho was widely acknowledged to be abandoned, and since the original grant was only provisional, the land was considered legally vacant according to Spanish precedent, and the Franciscans at Mission San

Fernando Rey de España petitioned Governor Solá to cede them the land to use as pasturage for their cattle.

Mexican Period (1822–1848)

The year 1821 marks the beginning of the Mexican Period (1821 to 1848) and is synonymous with Mexico's independence from Spain. Mexico became California's new ruling government, and at first, little changed for California Native Americans. The Franciscan missions continued to enjoy the free unpaid labor the natives provided, despite the Mexican Republic's 1824 Constitution that declared Indians to be Mexican citizens. This monopoly of Native American labor by a system which accounted for nearly one-sixth of the land in the state angered the newly land-granted colonial citizens. During this period, extensive land grants were established in the interior regions to spread the population inland from the more settled coastal areas where the Spanish had first concentrated their colonization efforts.

Landowners largely focused on the cattle industry and devoted large tracts to grazing. Cattle hides became a primary southern California export, providing a commodity to trade for goods from the east and other areas in the United States and Mexico. The number of non-native inhabitants increased during this period because of the influx of explorers, trappers, and ranchers associated with the land grants.

Independence from Spain in 1821 also brought an end to the ban on foreign trade in California. This brought merchants and immigrants to the State, and whaling became an important industry in Southern California. By 1840, Los Angeles had become the most populated area in Southern California. After 1834, during the secularization of the missions, plots of land were carved out of the mission lands and sold to individuals, creating 45 ranchos in Los Angeles County and 18 in Orange County. The ranchos replaced the missions as California's primary land institutions. Rather than returning land to Native Americans, the Mexican government allowed the Padres to keep the church, priests' quarters, and gardens of each mission.

During the Mexican Period, ranchos in North Area passed to new owners. Polanco eventually lost El Rancho Conejo due to neglect. In 1822, influential Santa Barbara army officer José de la Guerra y Noriega was granted Polanco's claim by Spanish Governor Pablo Vicente de Solá.

In 1834, Nemesio Domínguez and Domingo Antonio Ygnacio Carrillo were granted Rancho Las Vírgenes, which had been legally vacant since Miguel Ortega's death. In 1845, Maria Antonia Machado de Reyes purchased the Rancho Las Vírgenes from her uncle Jose Maria Dominguez. The Reyes family ran cattle on the ranch for much of the late 19th century.

American Period (1848–present)

American military forces were present within California during the summer of 1846 as a result of the Mexican-American War. Rapidly, Mexican resistance deteriorated, and the United States occupied Mexico City in 1848, marking the beginning of the American Period (A.D. 1848 to Present). In February 1848, California became a United States holding with the signing of the Treaty of Guadalupe Hidalgo. This treaty ended the Mexican-American War and ceded much of the southwest (California, Nevada, Utah, and portions of Arizona, New Mexico, Colorado, and Wyoming) to the United States. Los Angeles County was officially established in 1850, with statehood, and included portions of present-day Kern, San Bernardino, Orange, and Riverside Counties. The present Los Angeles County boundary was established in 1923 and encompasses 4,084 square miles. The census of 1860 showed a population of 3,700 and in 1870, 5,728.

With the cession of California to the United States following the Mexican-American War, the 1848 Treaty of Guadalupe Hidalgo provided that the land grants would be honored. As required by the Land Act of

1851, a claim for Rancho El Conejo was filed with the Public Land Commission in 1852, and the grant was patented to José de la Guerra y Noriega and María del Carmen de Rodríguez in 1873. The property stayed in the de la Guerra families and Rodríguez until the 1860s, when after drought and disease decimated local cattle, the two families began selling off their land. Two men owned most of Conejo Valley in the 1870s: John Edwards, who came from Wales in 1849, and Howard Mills, who came from Minnesota in 1870. While Edwards owned most of present-day Thousand Oaks and Newbury Park, Mills owned most of Westlake Village and Hidden Valley. In 1910, Harold and Edwin Janss of the Janss Investment Company purchased about 10,000 acres of land of what is now Thousand Oaks from the heir of John Edwards.

The heirs of Domingo Carrillo filed a claim for Rancho Las Vírgenes with the Public Land Commission in 1853 for an undivided half share of the 1834 grant, but the claim was rejected in 1854. Maria Antonia Machado de Reyes filed a claim with the Land Commission in 1852. The commission confirmed her claim in 1854, and the U.S. District Court for Southern California approved this decision in 1857. An appeal was dismissed in 1858, and the claim patented at 8,885 acres in 1883. Although still sizeable, the total area was considerably less than the original land grant. The United States considered the excluded land to be part of the public domain and allowed private claimants to settle. This surplus land was surveyed and opened to homesteading in 1896.

During the American Period, ranching continued to be a major activity in the region. Gradually agricultural activities increased, and the local economy diversified. Orchards and farming gradually replaced grazing and ranch lands. Since the creation of State Highway 101 between the San Fernando and Conejo Valleys in the 1960s, land use patterns have shifted to residential and commercial development. Increasing urbanization continues to be a major characteristic of the region's future.

C.6.2 Regulatory Setting

Numerous laws, ordinances, regulations, and standards on State, federal, and local levels seek to protect and manage cultural resources. The primary federal regulation governing significant cultural resources is the National Historic Preservation Act. California State regulations include the California Environmental Quality Act (CEQA) (PRC Sections 21000 et seq., Section 5024, Section 5024.5; CCR Title 14, Chapter 3, Sections 15000 et seq.), and Assembly Bill (AB) 52.

C.6.2.1 Federal Regulations

Federal protections for significant cultural resources include the National Historic Preservation Act among others. Future projects proposed in the North Area may involve federal requirements.

National Historic Preservation Act of 1966 as Amended (NHPA) (36 CFR 800) sets forth the responsibilities that federal agencies must meet in regard to cultural resources. Based on Section 106 and its implementing regulations in 36 CFR Part 800, federal agencies must conduct the necessary studies and consultations to identify cultural resources that may be affected by an undertaking, evaluate cultural resources that may be affected to determine if they are eligible for the National Register of Historic Places (NRHP) (that is, whether identified resources constitute historic properties), and assess whether such historic properties would be adversely affected. Historic properties are resources that are listed in or eligible for listing in the NRHP (36 CFR 800.16[i][1]). A property may be listed in the NRHP if it meets criteria in the NRHP regulations (36 CFR 60.4). Typically, such properties must also be 50 years or older (36 CFR 60.4[d]).

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, or association (also see Section 18.2.2.1 of this act) and:

- (A) That are associated with events that have made a significant contribution to the broad patterns of our history; or*
- (B) That are associated with the lives of persons significant in our past; or*
- (C) That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess artistic value, or that represent a significant and distinguishable entity whose components may lack individual distinction; or*
- (D) That have yielded, or may be likely to yield, information important in prehistory or history.*

Section 106 defines an adverse effect as an effect that alters, directly or indirectly, the qualities that make a resource eligible for listing in the NRHP (36 CFR 800.5[a][1]). Consideration must be given to the property's location, design, setting, materials, workmanship, feeling, and association, to the extent that these qualities contribute to the integrity and significance of the resource. Adverse effects may be direct and reasonably foreseeable or may be more remote in time or distance or be cumulative (36 CFR 8010.5[a][1]).

C.6.2.2 State Regulations

There are numerous state regulations and policies that direct management of cultural resources on state lands and by state agencies. The following is a discussion of the most pertinent laws affecting the environmental impact analysis from a state perspective. These laws identify four types of resources: historical resources, unique archaeological resources, human remains and tribal cultural resources.

California Environmental Quality Act (1970) (PRC Sections 21000 et seq., Section 5024, Section 5024.5; CCR Title 14, Chapter 3, Sections 15000 et seq.) established that historical and archaeological resources are afforded consideration and protection by the CEQA (14 CCR Section 21083.2, 14 CCR Section 15064). CEQA Guidelines define significant cultural resources under three regulatory designations: historical resources, unique archaeological resources, and tribal cultural resources. The latter is discussed separately below (see AB 52).

A historical resource is a "resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources"; or "a resource listed in a local register of historical resources or identified as significant in a historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code"; or "any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided the agency's determination is supported by substantial evidence in light of the whole record" (14 CCR Section 15064.5[a][3]).

Historical resources automatically listed in the California Register include California cultural resources listed in or formally determined eligible for the National Register and California Historical Landmarks list from No. 770 onward (PRC 5024.1[d]). Locally listed resources are entitled to a presumption of significance unless a preponderance of evidence in the record indicates otherwise.

Under CEQA, a resource is generally considered historically significant if it meets the criteria for listing in the California Register of Historical Resources (CRHR). A resource must meet at least one of the following criteria (PRC 5024.1; 14 CCR Section 15064.5[a][3]):

- Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage. Title 14, CCR Section 4852(b)(1) adds, "is associated with events that have

made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.”

- Is associated with the lives of persons important in our past. Title 14, CCR Section 4852(b)(2) adds, “is associated with the lives of persons important to local, California, or national history.”
- Embodies the distinctive characteristics of a type, period, region, or method of construction; or represents the work of an important creative individual; or possesses high artistic values. Title 14, CCR 4852(b)(3) allows a resource to be CRHR eligible if it represents the work of a master.
- Has yielded, or may be likely to yield, information important in prehistory or history. Title 14, CCR 4852(b)(4) specifies that importance in prehistory or history can be defined at the scale of “the local area, California, or the nation.”

Historical resources must also possess integrity of location, design, setting, materials, workmanship, feeling, and association (14 CCR 4852[c]).

An archaeological artifact, object, or site can meet CEQA’s definition of a unique archaeological resource even if it does not qualify as a historical resource (PRC 21083.2[g]; 14 CCR 15064.5[c][3]). An archaeological artifact, object, or site is considered a unique archaeological resource if:

it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria (PRC 21083.2[g]):

- *Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.*
- *Has a special and particular quality such as being the oldest of its type or the best available example of its type.*
- *Is directly associated with a scientifically recognized important prehistoric or historic event or person.*

Assembly Bill 52 (Gatto 2014). This bill changes sections of the public resources code to add consideration of Native American culture within the CEQA. The goal of AB 52 is to promote the involvement of California Native American Tribes in the decision-making process when it comes to identifying and developing mitigation for impacts to resources of importance to their culture. To reach this goal, the bill establishes a formal role for tribes in the CEQA process. CEQA lead agencies are required to consult with tribes about potential tribal cultural resources in a project area, the potential significance of project impacts on those resources, the development of project alternatives, and the type of environmental document that should be prepared. AB 52 specifically states that a project that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment (PRC Section 21084.2).

Tribal cultural resources, as defined by the CEQA, Section 21074(a)(1)-(2), includes either of the following:

1. *Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:*
 - a. *Included or determined to be eligible for inclusion in the California Register of Historical Resources.*
 - b. *Included in a local register of historical resources as defined in Public Resources Code section 5020.1(k).*
2. *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Public Resources Code section 5024.1(c). In applying the*

criteria set forth in 5024.1(c) for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

Tribal cultural resources can include “non-unique archaeological resources” that, rather than being important for scientific value as a resource, can also be significant because of the sacred and/or cultural tribal value of the resource. Tribal representatives are considered experts appropriate for providing substantial evidence regarding the locations, types, and significance of tribal cultural resources within their traditionally and culturally affiliated geographic area (PRC Section 21080.3.1(a)). CEQA defines a California Native American tribe as a “Native American tribe located in California that is on the contact list maintained by the Native American Heritage Commission.” This definition does not distinguish between federally recognized and non-federally recognized tribal groups and is therefore more inclusive than the federal definition of “Indian tribe” (PRC § 21073).

Native American Historic Resources Protection Act (PRC Section 5097 et seq.; Section 5097.9; Section 5097.98) establishes that both public agencies and private entities using or occupying public property, or operating on public property, under a public license, permit, grant, lease, or contract on state property under public permit, shall not interfere with the free expression or exercise of Native American religion, and shall not cause severe or irreparable damage to Native American sacred sites. In addition, this section states that “no person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.” This section also creates the Native American Heritage Commission (NAHC), charged with identifying and cataloging places of special religious or social significance to Native Americans, identifying and cataloging known graves and cemeteries on private lands, and performing other duties regarding the preservation and accessibility of sacred sites and burials.

This act also discusses the procedures that need to be followed upon the discovery of Native American human remains. The NAHC, upon notification of the discovery of human remains is required to notify those persons it believes to be the most likely descendant from the deceased Native American pursuant to subdivision (c) of Section 7050.5 of the Health and Safety Code (PRC Section 5097.98).

Public Resources Code (PRC), Section 5097.98(b) and (e) requires a landowner on whose property Native American human remains are found to limit further development activity in the vicinity until he/she confers with the Native American Heritage Commission-identified Most Likely Descendants (MLD) to consider treatment options. In the absence of MLDs or of a treatment acceptable to all parties, the landowner is required to re-inter the remains elsewhere on the property in a location not subject to further disturbance. This section does not apply to federal lands. Section 5097.99 establishes as a felony the acquisition, possession, sale, or dissection with malice or wantonness Native American remains or funerary artifacts. Finally, Section 5097.991 establishes as state policy the repatriation of Native American remains and funerary artifacts.

California Health and Safety Code 7050.5. This code establishes that any person, who knowingly mutilates, disinters, wantonly disturbs, or willfully removes any human remains in or from any location without authority of law is guilty of a misdemeanor. It further defines procedures for the discovery and treatment of Native American human remains. All work at the site of discovery must cease immediately, and notification made to the County Coroner. Within 48 hours of discovery, the coroner must determine if the remains are Native American in origin. If this is determined, then the coroner must then notify the NAHC by telephone within 24 hours.

Senate Bill 18. Senate Bill 18 places requirements on local governments for developments within or near Traditional Tribal Cultural Places (TTCP). The law requires local jurisdictions to provide opportunities for involvement of California Native Americans tribes in the land planning process for the purpose of preserving TTCPs. Guidelines recommend that the NAHC provide written information as soon as possible but no later than 30 days after being notified to inform the Lead Agency if a proposed project is determined to be in proximity to a TTCP, and another 90 days for tribes to respond to a local government if they want to consult with the local government to determine whether the project would have an adverse impact on the TTCP. There is no statutory limit on the consultation duration. Forty-five days before the action is publicly considered by the local government council, the local government refers action to agencies, following the CEQA public review timeframe. The CEQA public distribution list may include tribes listed by the NAHC who have requested consultation, or it may not. If the NAHC, the tribe, and interested parties agree upon the mitigation measures necessary for the proposed project, it would be included in the project's EIR. If the lead agency and the tribe agree that adequate mitigation or preservation measures cannot be taken, then neither party is obligated to take action.

Per SB 18, a city or county must consult with the NAHC and any appropriate Native American tribe before the adoption, revision, amendment, or update of a city's or county's general plan. Although SB 18 does not specifically mention consultation or notice requirements for adoption or amendment of specific plans, the Final Tribal Guidelines advise that SB 18 requirements extend to specific plans as well, since state planning law requires local governments to use the same process for amendment or adoption of specific plans as general plans (Government Code § 65453). In addition, SB 18 provides a new definition of TTCP requiring a traditional association of the site with Native American traditional beliefs, cultural practices, or ceremonies, or the site must be shown to actually have been used for activities related to traditional beliefs, cultural practices, or ceremonies. Previously, the site was defined to require only an association with traditional beliefs, practices, lifeways, and ceremonial activities. In addition, SB 18 amended Civil Code Section 815.3 and adds California Native American tribes to the list of entities that can acquire and hold conservation easements for the purpose of protecting their cultural places.

C.6.2.3 Local Regulations

Southern California Association of Governments

The Southern California Association of Governments Growth Management Chapter (SCAGGMC) has instituted policies regarding the protection of cultural resources.

- *Policy No. 3.21: encourages the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.*

Los Angeles County Historical Landmarks and Records Commission

The Los Angeles County Historical Landmarks and Records Commission (Commission) considers and recommends to the Board of Supervisors local historical landmarks defined to be worthy of registration by the State of California, either as California Historical Landmarks or as Points of Historical Interest. The Commission also may comment for the Board on applications relating to the NRHP. The Commission also is charged with fostering and promoting the preservation of historical records. In its capacity as the memorial plaque review committee of the County of Los Angeles, the Commission screens applications for donations of historical memorial plaques and recommends to the Board plaques worthy of installation as County property.

Los Angeles County General Plan

The following are relevant policies that promote the protection of cultural resources in Los Angeles County.

Land Use Element

- *Policy LU 3.2: Discourage development in areas with high environmental resources and/or severe safety hazards.*
- *Policy LU 4.2: Encourage the adaptive reuse of underutilized structures and the revitalization of older, economically distressed neighborhoods.*
- *Policy LU 7.1: Reduce and mitigate the impacts of incompatible land uses, where feasible, using buffers and other design techniques.*
- *Policy LU 10.4: Promote environmentally-sensitive and sustainable design.*
- *Policy LU 10.8: Promote public art and cultural amenities that support community values and enhance community context.*

Conservation and Natural Resources Element

- *Policy C/NR 14.1: Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible.*
- *Policy C/NR 14.2: Support an inter-jurisdictional collaborative system that protects and enhances historic, cultural, and paleontological resources.*
- *Policy C/NR 14.3: Support the preservation and rehabilitation of historic buildings.*
- *Policy C/NR 14.4: Ensure proper notification procedures to Native American tribes in accordance with Senate Bill 18 (2004).*
- *Policy C/NR 14.5: Promote public awareness of historic, cultural, and paleontological resources.*
- *Policy C/NR 14.6: Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.*

Parks and Recreation Element

- *Policy P/R 5.1: Preserve historic resources on County park properties, including buildings, collections, landscapes, bridges, and other physical features.*
- *Policy P/R 5.2: Expand the collection of historical resources under the jurisdiction of the County, where appropriate.*
- *Policy P/R 5.3: Protect and conserve natural resources on County park properties, including natural areas, sanctuaries, and open space preserves.*
- *Policy P/R 5.4: Insure maintenance, repair, rehabilitation, restoration, or reconstruction of historical resources in County parks and recreational facilities are carried out in a manner consistent with the most current Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings.*
- *Policy P/R 5.5: Preserve and develop facilities that serve as educational resources that improve community understanding of and appreciation for natural areas, including watersheds*

- *Policy P/R 5.7: Integrate a range of cultural arts programs into existing activities, and partner with multicultural vendors and organizations.*

C.6.3 Thresholds of Significance and Methodology

C.6.3.1 Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, impacts to cultural resources would be considered significant if the proposed North Area Plan and CSD Update would:

- Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5 [§15064.5 generally defines historical resource under CEQA].
- Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to §15064.5.
- Disturb any human remains, including those interred outside of formal cemeteries.

The proposed Plan and CSD Update's effects on tribal cultural resources (TCRs) were evaluated using the significance criteria set forth in Appendix G of the CEQA Guidelines and with consideration to AB 52 and the Governor's Office of Planning and Research "Draft Technical Advisory: AB 52 and tribal cultural resources in CEQA (June 2017)." Impacts to TCRs would be considered significant if the project would:

- Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
 - 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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

C.6.3.2 Methodology

C.6.3.2.1 Cultural Resources

An estimated 40 percent of all the land throughout the Santa Monica Mountains has been surveyed for cultural resources. More than 1,000 known cultural resources are located within the Santa Monica Mountains National Recreation Area. This region has one of the highest densities of resources found in any mountain range in the world (NPS, 2002). Known Chumash pictograph sites, sacred to traditional Native American Indians, are among the most spectacular found anywhere. Nearly every major prehistoric and historic theme associated with human interaction and development of the western United States is represented. The National Park Service that manages the Santa Monica Mountains Recreation Area has oversight for park and culturally significant places (NPS, 2002). Unfortunately, one culturally-significant place (Paramount Ranch within North Area) was destroyed by the Woolsey Fire.

The County's General Plan identified three historic structures in the Santa Monica Mountains Planning Area. One of these identified structures, Leonis Adobe, is within close proximity of the north eastern boundary of the North Area.

Sensitivity Analysis

Given the programmatic nature of this analysis, the following methods were used to provide a general idea of where cultural resources might be present in the North Area. A resource sensitivity map was generated based on three data sets: (1) proximity to named streams, water bodies; (2) proximity to ecotone boundaries; and (3) slope.

A buffer of 500 meters was applied to the named streams, water bodies, wetlands, layer (obtained from the National Hydrological Database dataset) because this was one of the most common positive factors identified in past analyses identifying resource locations. Areas within 500 meters of a drainage or water source were considered to be sensitive for cultural resources. In addition to water, access to natural resources (food and raw materials) was another important consideration for historic and prehistoric population settlement. A predictive model created for a valley in western California (Neal 2007) found a positive correlation between sites and 200 meters of an ecotone boundary (i.e., the boundary between two different vegetation zones). Areas within 200 meters of these boundaries were considered to be sensitive for cultural resources. Slope was the final data set used in the sensitivity analysis. Research conducted in Western Colorado (Kvamme, 1985) found that most prehistoric village sites were located on a 16.1 percent (9-degree) slope or lower, and that no sites were located steeper than 40 percent (21.8-degree) slope. Therefore, areas with a slope of less than 16.1 percent were included as areas where sites were likely to occur. Areas with slopes between 16.2 and 40 percent are areas where sites may be located but are unlikely to occur, and areas over 40 percent are where sites are not likely to occur.

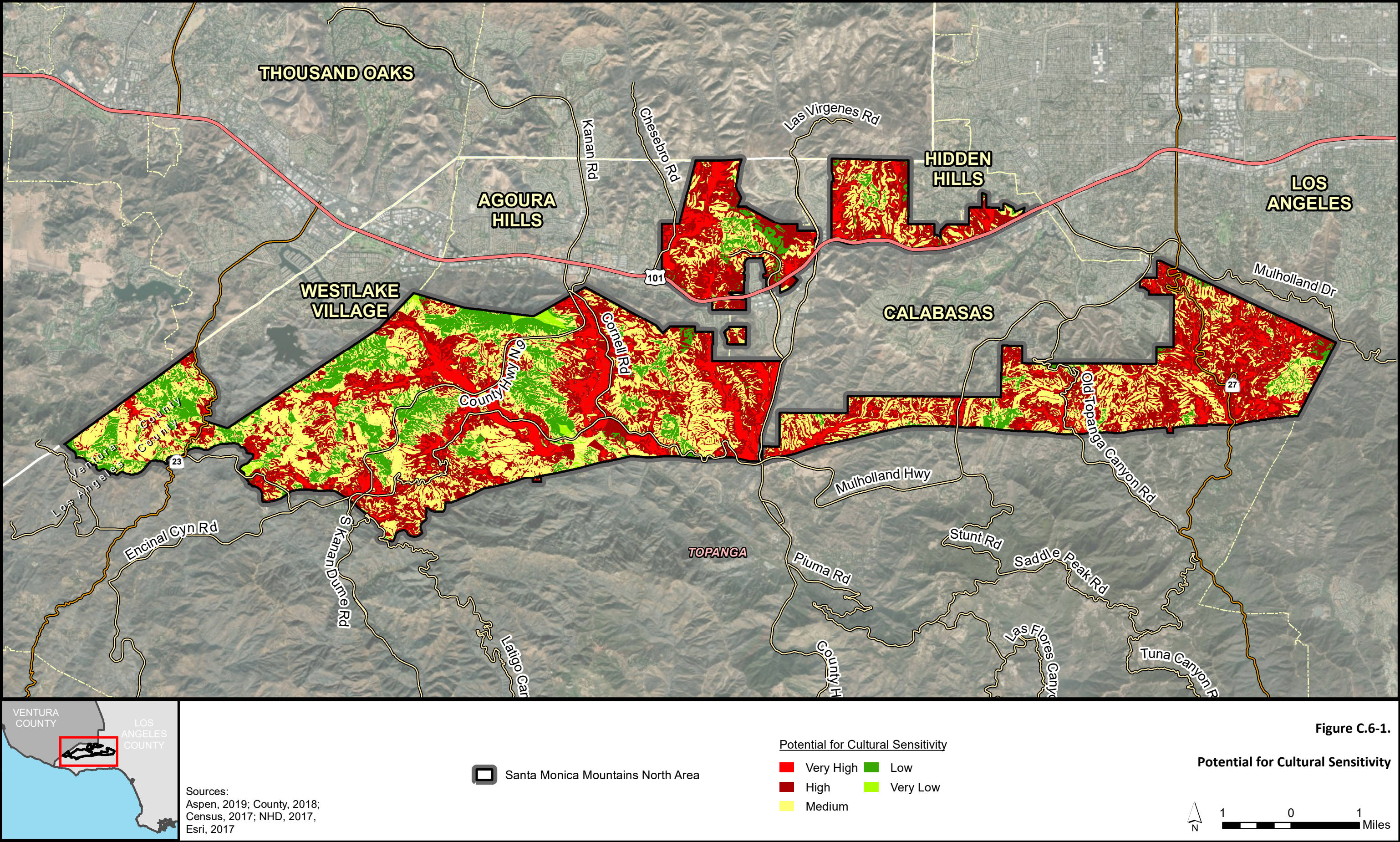
Areas the most sensitive for resources are within 500 meters of a water source, within 200 meters of an ecotone boundary, and have less than 16.1 percent slope. Figure C.6-1 provides a guide for identifying the potential for cultural sensitivity based on these three elements.

C.6.3.2.2 Traditional Tribal Cultural Places (SB 18) and Tribal Cultural Resources (AB 52)

Traditional Tribal Cultural Places or California Native American Cultural Places are defined as a Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine (Public Resources Code §5097.9); or Native American historic, cultural, or sacred site, that is listed or may be eligible for listing in the CRHR pursuant to Section 5024.1, including any historic or prehistoric ruins, any burial ground, any archaeological or historic site (Public Resources Code §5097.993). Collection or gathering sites are specific places where California Native Americans access certain plants for food, medicine, clothing, ceremonial objects, basket making, and other crafts and uses important to on-going cultural traditions and identities; these places may qualify as religious or ceremonial sites as well as sites that are listed or eligible for listing in the CRHR.

TCRs include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a Tribe. To qualify as a TCR, the resource must the requirements noted above in Section C.6.3.1 Thresholds of Significance (PRC § 21074). AB 52 also establishes that, "California Native American tribes traditionally and culturally affiliated with a geographic area may have expertise concerning their tribal cultural resources." Therefore, tribal representatives may be able to provide substantial evidence regarding the locations, types, and significance of TCRs located within their traditional and cultural affiliated geographic areas (AB 52 § 4; PRC § 21074(a)(2); PRC § 21080(e); PRC § 21080.3.1(a)). Thus, the identification and analysis of TCRs should involve consultation between the CEQA lead agency and interested tribal groups and/or tribal persons (AB 52 § 1(5); PRC § 21080.3.1(a)).

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Information presented in this section was gathered through SB 18 and AB 52 consultation between Los Angeles County and California Native American Tribes that have cultural affiliations with the North Area and that have requested to consult on the proposed Plan and CSD Update.

SB 18 Process

A letter was sent to the Native American Heritage Commission (NAHC) in October 2018 requesting a search of the Sacred Lands File and a current SB 18 contact list of tribes with traditional lands or cultural places located within Los Angeles County jurisdiction. On October 29, 2018, the NAHC responded. However, approximately 2 weeks later the Woolsey Fire began, and the County put the proposed update on hold to focus on fire recovery efforts. Project activities began again in September 2019 when the County contacted the NAHC again. The NAHC report that there were no changes to the Sacred Lands File (SLF) search or tribal contact list. The Sacred Lands File search was positive for one of the Gabrieliño-Tongva Tribe on the contact list. On October 7, 2019, the County sent certified letters to two representatives of the Gabrieliño-Tongva Tribe. The letter described the project, notified them that the project is subject to SB-18 Tribal Consultation requirements, mentioned that the NAHC identified the tribe as one with traditional lands or cultural places located within the proposed boundary of the project, notified the tribe that the results of the SLF were positive, and mentioned that the tribe has 90 days to request consultation. No responses have been received prior to publication of this document.

The NAHC also recommended that the County contact other tribes in case they have more detailed information on cultural resources or sites that may not be listed yet. On October 3 and 7, 2019 the County sent courtesy letters to 16 individuals from 10 tribes or tribal organizations letting them know that the SLF search was conducted and requesting additional information (Appendix 4). The 10 tribes and tribal organizations included: Barbareño/Ventureño Band of Mission Indians, Fernandeno Tataviam Band of Mission Indians, Gabrieliño Band of Mission Indians - Kizh Nation, Owl Clan, San Luis Obispo County Chumash Council, Santa Ynez Band of Chumash Indians, Santa Ynez Tribal Elders Council, Gabrieliño/Tongva San Gabriel Band of Mission Indians, Gabrieliño/Tongva Nation, and Gabrieliño Tongva Indians of California Tribal Council. The following responses were received:

- On November 5, 2019, a representative of the Fernandeno Band of Mission Indians called DRP. The tribe acknowledged the courtesy notification and had no further questions or information to provide.
- On January 13, 2020, a representative of the Santa Ynez Band of Chumash Indians contacted the DRP to request more information on the project. DRP provided additional information and the tribal representative stated they had no additional comments regarding the proposed project.

AB 52 Project Notification

AB 52 requires that within 14 days of the lead agency determining that a project application is complete, a formal notice and invitation to consult about the proposed project be sent to all tribal representatives who have requested in writing to be notified of projects that may have a significant effect on TCRs located within the project area (PCR § 21080.3.1(d)). In July 2018, the County mailed certified letters to representatives of the three tribes that had previously submitted a written request to the County to receive notification of proposed projects. These tribes included the Gabrieliño Tongva–San Gabriel Band of Mission Indians, Fernandeno Tataviam Band of Mission Indians, and Gabrieliño Band of Mission Indians–Kizh Nation. The letters included a brief description of the proposed Plan and CSD Update (proposed project), information on how to contact the lead agency Project Manager, and a USGS topographic quadrangle showing the project area. The letters noted that requests for consultation needed to be received within 30 days of the date of receipt of the notification letter. A fourth tribe, the Santa Ynez

Band of Chumash Indians, was identified through independent research. A courtesy letter was sent to this tribe in October 2019.

The Fernandeano Tataviam Band of Mission Indians and the Gabrieleño Band of Mission Indians - Kizh Nation requested to consult on the proposed Plan and CSD Update (see discussion below). No response was received from the Gabrieleño Tongva- San Gabriel Band of Mission Indians therefore in November 2018 the County sent a certified letter formally closing out the consultation process. The Santa Ynez Band of Chumash Indians chose not to consult.

AB 52 Native American Tribal Consultation

AB 52 states that once California Native American tribes have received the project notification letter, the tribe then has 30 days to submit a written request to consult (PCR § 21080.3.1(d)). Upon receiving a tribe's written request to consult, the lead agency then has 30 days to begin tribal consultation. Consultation must include discussion of specific topics or concerns identified by tribes. Any information shared between the tribes and the lead agency representatives is protected under confidentiality laws and not subject to public disclosure (GC § 6254(r); GC § 6254.10) and can be disclosed only with the written approval of the tribes who shared the information (PCR § 21082.3(c) (1-2)).

Consultation as defined in AB 52 consists of the good faith effort to seek, discuss, and carefully consider the views of others. Consultation between the lead agency and a consulting tribe concludes when either of the following occurs: (1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists on a TCR; or (2) a consulting party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached (PCR § 21080.3.2(b)).

The Fernandeano Tataviam Band of Mission Indians and the Gabrieleño Band of Mission Indians– Kizh Nation requested to consult on the proposed Plan and CSD Update within the 30-day time limit. The Fernandeano Tataviam Band of Mission Indians reviewed and commented on the draft document. The tribe recommended changes to a policy in the proposed North Area Plan Update, which the County subsequently incorporated. After those changes, the tribe notified the County that they considered AB 52 consultation to be complete.

The Gabrieleño Band of Mission Indians - Kizh Nation and the County met in September 2018. At this meeting the tribe requested that history and ethnohistory specific to the Gabrieleño Band of Mission Indians–Kizh Nation be incorporated into the proposed North Area Plan Update. The County requested specific language be provided to include in the proposed plan. The tribe later provided historical information about the tribe but not specific text for the proposed plan. To avoid misrepresenting the information provided by the tribe, the County did not incorporate any historical information about the tribe in the proposed North Area Plan Update. At the time of publication of this document, the tribe had not provided any additional information to the County.

C.6.4 Environmental Impacts and Mitigation Measures

The scope of this assessment is at a programmatic level rather than a project-specific level; thus, this analysis of impacts to cultural and tribal cultural resources is discussed qualitatively. Project-level analyses are not required at this program level; however, development contemplated in the North Area will require subsequent project-by-project analysis to determine an individual projects' impacts to cultural and tribal cultural resources, significance of these resources, and any project-specific mitigation measures.

The following analysis addresses the thresholds of significance as presented in Section C.6.3.1.

Impact CR-1: The proposed North Area Plan and CSD Update would cause a substantial adverse change in the significance of a historical resource as defined in §15064.5. (Less than Significant Impact with Mitigation)

Under CEQA, cultural resources listed in, or determined to be eligible for listing in, the California Register of Historical Resources or a local register meet the CEQA definition of “historical resources” and must be given consideration in the CEQA process. *Historical resources* include any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.

As described previously, the North Area has a variety of historical resources. Implementation of the proposed Plan and CSD Update would not directly demolish or materially alter any of these resources. However, resources that are eligible or potentially eligible for listing on the California Register of Historical Resources or the National Register of Historic Properties may be vulnerable to development activities after the proposed North Area Plan and CSD Update is adopted by the County. Historical resources have been identified in both the North Area and Coastal Zone.

As detailed in the Regulatory Background (Section C.6.2), there are a number of federal, State, and local policies, and regulations in place to protect historical resources in the North Area. Additionally, the Conservation and Open Space Element of the proposed North Area Plan Update outlines the following policies for the protection of historical resources (also see Attachment C.6 at the end of this section):

- **Policy CO-96:** *Protect and preserve cultural resources, tribal cultural resources, and paleontological resources from destruction, and avoid impacts to such resources where feasible. Where avoidance is not feasible, minimize impacts to resources to the maximum extent feasible.*
- **Policy CO-97:** *Regulate landform alteration to ensure minimal disturbance of known cultural resources and tribal cultural resources. New development on sites identified as archaeologically sensitive shall include onsite monitoring by a Secretary of Interior qualified archaeologist(s) and appropriate Native American consultant(s) of all grading, excavation, and site preparation that involve earthmoving operations.*
- **Policy CO-98:** *Coordinate with appropriate agencies, South Central Coastal Information Center (SCCIC), Native American Heritage Commission, and local Native American tribes, to identify archaeologically-sensitive areas. Such information should be kept confidential to protect cultural and tribal cultural resources.*
- **Policy CO-99:** *Implement appropriate mitigation measures for development within archaeologically-sensitive areas designed in accord with guidelines established by the Secretary of the Interior’s Standards for the Treatment of Historic Properties, the Society of Vertebrate Paleontology, or those agreed to as part of the AB 52 tribal consultation process.*
- **Policy CO-100:** *Preserve and protect cultural resources and traditions that are of importance to Native Americans, including the Chumash and Gabrieliño-Tongva peoples.*

These policies would require minimizing and, in some cases, avoiding impacts to historic resources by limiting development in sensitive areas. In addition, the proposed CSD Update includes specific standards that would protect historic trees, require lot retirement, and require a permit for grading of more than 500 cubic yards.

Section 22.336.060 (Biological Resource Standards) of the CSD Update primarily provides standards that protect biological resources. It also includes a standard that protects historic trees, particularly non-native trees that may otherwise be unprotected but have been identified as a historic resource by the County or listed or determined eligible for listing in the California Register of Historic Resources and/or National Register of Historic Places. This standard would protect trees that have been associated with significant local, state, or federal historical events. As such, this standard would prevent the loss or change in significance of historic trees.

Section 22.336.70 (Community-Wide Standards) would require a Conditional Use Permit for grading more than 500 cubic yards and specifies clustering of structures and reducing the building footprint. These measures would reduce the potential for impacting historic resources by limiting the area of development. The Transfer of Development Credit Program would require land divisions to retire lots so that there is no net increase in development in the North Area. Implementing this program would reduce the potential for impacting historic resources by retiring parcels with sensitive resources.

The General Plan Programmatic EIR evaluated the potential for impacts to cultural resources, which included archeological and historic resources (referred to here as historical resources and unique archaeological resources). When the General Plan was adopted, tribal consultation and the requirement for review of tribal cultural resources was not required in CEQA. However, the General Plan Programmatic EIR identified significant but mitigable impacts for archaeological resources (including historical resources and unique archaeological resources) and significant unavoidable impacts to historic resources (also called historic-era built environment resources). The mitigation measures in the General Plan developed to reduce impacts to cultural resources are identified below.

- CULT-1** Provide incentives through the Mills Act to encourage the restoration, renovation, or adaptive reuse of historic resources.
- CULT-2** Draft a comprehensive historic preservation ordinance for the unincorporated areas.
- CULT-3** Prepare an Adaptive Reuse Ordinance within the context of, and in compliance with, existing building codes that considers the conversion of older, economically distressed or historically-significant buildings into multifamily residential developments, live-and-work units, mixed use developments, or commercial uses.
- CULT-4** Prior to the issuance of any grading permit, applicants shall provide written evidence to the County of Los Angeles that a County-certified archaeologist has been retained to observe grading activities greater than six feet in depth and salvage and catalogue archaeological resources as necessary. The archaeologist shall be present at the pre-grade conference, shall establish procedures for archaeological resource surveillance, and shall establish, in cooperation with the applicant, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the artifacts as appropriate.

If the archaeological resources are found to be significant, the archaeological observer shall determine appropriate actions, in cooperation with the project applicant, for exploration and/or salvage. Prior to the release of the grading bond the applicant shall obtain approval of the archaeologist's follow-up report from the County. The report shall include the period of inspection, an analysis of any artifacts found and the present repository of the artifacts. Applicant shall prepare excavated material to the point of identification.

Applicant shall offer excavated finds for curatorial purposes to the County of Los Angeles, or its designee, on a first refusal basis. These actions, as well as final mitigation and disposition of the

resources, shall be subject to the approval of the County. Applicant shall pay curatorial fees if an applicable fee program has been adopted by the Board of Supervisors, and such fee program is in effect at the time of presentation of the materials to the County or its designee, all in a manner meeting the approval of the County.

Unanticipated discoveries shall be evaluated for significance by a County-certified archaeologist. If the archaeological resources are found to be significant, then the project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; submit materials to the County of Los Angeles, or its designee, on a first refusal basis; and provide a comprehensive final report including appropriate records for the California Department of Parks and Recreation (Building, Structure, and Object Record; Archaeological Site Record; or District Record, as applicable).

Future development projects proposed in the North Area would undergo separate analysis for potential impacts to cultural resources and would be required to meet General Plan and North Area goals, policies, and development standards. The applicability of mitigation measures identified in the General Plan Programmatic EIR would also be evaluated and considered as part of the County's evaluation of future projects proposed in the North Area. Proper implementation of applicable mitigation measures identified in the General Plan Programmatic EIR would reduce impacts to cultural resources from future development. Therefore, no additional mitigation measures are needed to address potential impacts that could result from implementation of the proposed Plan and CSD Update.

As noted in Section C.6.2 State Regulations, the recent amendments to CEQA (December 2018) require evaluation of tribal cultural resources in environmental documents. The proposed Plan and CSD Update includes policies that address consultation with interested tribes, encourage protection of tribal resources and monitoring if needed. In addition, state law requires consultation with tribes during the environmental review process. Because North Area Plan policies address tribal cultural resources consistent with State regulations, the proposed Plan and CSD Update would have less than significant impacts to tribal cultural resources.

Mitigation Measures

With the implementation of the mitigation measures (CULT-1 through CULT-4) identified in the General Plan Programmatic EIR, potential impacts to cultural resources from implementation of the proposed Plan and CSD Update would be reduced to less than significant. The proposed Plan and CSD Update would not create new significant impacts to historical or cultural resources and would not substantially add to or increase identified impacts as analyzed in the General Plan Programmatic EIR. As such, the mitigation measures identified for the General Plan Programmatic EIR apply to the proposed Plan and CSD Update and no additional program-level mitigation is needed.

The proposed Plan and CSD Update includes policies that address consultation with interested tribes, encourage protection of tribal resources and monitoring if needed, and protect trees that have been identified as historical resources. In addition, state law requires consultation with tribes during the environmental review process. Because proposed North Area Plan policies address tribal cultural resources consistent with State regulations, no additional program-level mitigation is needed.

Impact CR-2: The proposed North Area Plan and CSD Update would cause a substantial adverse change in the significance a unique archaeological resource pursuant to §15064.5. (Less than Significant Impact with Mitigation)

An archaeological artifact, object, or site is considered a *unique archaeological resource* if it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it: contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information, has a special and particular quality such as being the oldest of its type or the best available example of its type, or is directly associated with a scientifically recognized important prehistoric or historic event or person. These resources do not need to qualify as historical resources.

As detailed in the Regulatory Background (Section C.6.2), there are a number of federal, state, and local policies, and regulations in place to protect unique archaeological resources in the North Area. Additionally, the Conservation and Open Space Element of the proposed North Area Plan outlines policies that would protect unique archaeological resources (CO-96 through CO-100).

Section 22.336.70 (Community-Wide Standards) would require a Conditional Use Permit for grading more than 500 cubic yards and specifies clustering of structures and reducing the building footprint. These measures would reduce the potential for impacting unique archaeological resources by limiting the area of development. The Transfer of Development Credit Program would require land divisions to retire lots so that there is no net increase in development in the North Area. Implementing this program would reduce the potential for impacting unique archaeological resources by retiring parcels with sensitive resources.

Future development projects proposed in the North Area would undergo separate analysis for potential impacts to unique archaeological resources and would be required to meet General Plan and North Area goals, policies, and development standards. The applicability of mitigation measures identified in the General Plan Programmatic EIR would also be evaluated and considered as part of the County's evaluation of future projects proposed in the North Area. Proper implementation of applicable mitigation measures identified in the General Plan Programmatic EIR would reduce impacts to unique archaeological resources from future development. Therefore, no additional mitigation measures are needed to address potential impacts that could result from implementation of the proposed Plan and CSD Update.

Mitigation Measures

With the implementation of the mitigation measures (CULT-1 through CULT-4) identified in the General Plan Programmatic EIR, potential impacts to unique archaeological resources from implementation of the proposed Plan and CSD Update would be reduced to less than significant. The proposed Plan and CSD Update would not create new significant impacts to unique archaeological resources and would not substantially add to or increase identified impacts as analyzed in the General Plan Programmatic EIR. As such, the mitigation measures identified for the General Plan Programmatic EIR apply to the proposed Plan and CSD Update and no additional program-level mitigation is needed.

Impact CR-3: The proposed North Area Plan and CSD Update would disturb any human remains, including those interred outside of formal cemeteries. (Less than Significant Impact)

Given the high density of prehistoric and historic-era occupation of the North Area, buried as-yet-unidentified human remains are likely to be present. As detailed in the Regulatory Background (Section C.6.2), there are a number of federal, state, and local policies, and regulations in place to protect human

remains in North Area. At the state level, the following regulations address how human remains would be addressed if identified:

- Section 5097 of the California Public Resources Code requires specific protocol in the event of a discovery of human remains.
- Sections 7050.5, 7051 and 7054 of the California Health and Safety Code protect human burial remains from disturbance, vandalism, or destruction. Section 7050.5 requires work to be halted until the coroner has investigated and made recommendations regarding identified remains.

The proposed Plan and CSD Update would not impact potential human remains in the North Area because the adoption of the proposed Plan and CSD would not involve any physical development. Future projects could have potential impacts to human remains. However, projects proposed in the North Area would undergo a separate environmental review and would be required to meet State regulations and County goals, policies, and development standards. The General Plan Programmatic EIR thoroughly evaluated this issue and determined that countywide impacts to human remains would be less than significant. The proposed Plan and CSD Update would not create new significant impacts to human remains and would not substantially add to or increase identified impacts as analyzed in the General Plan Programmatic EIR. As such, the proposed Plan and CSD Update would have less than significant impacts to human remains and no mitigation is needed.

Impact TRC-1: The proposed North Area Plan and CSD Update could cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code section 21074 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. (Less than Significant Impact)

As noted in Section C.6.2 (State Regulations), the recent amendments to CEQA (December 2018) require tribal consultation and the evaluation of tribal cultural resources in environmental documents. AB 52 requires government-to-government consultation. In compliance with this requirement, the County has contacted interested tribes regarding the proposed Plan and CSD Update, as summarized in Section C.6.3.2.2 (above). No tribal cultural resources that are listed or eligible for listing in the CRHR have been identified during this consultation.

The proposed Plan and CSD Update includes policies that address consultation with interested tribes, encourage protection of tribal resources and monitoring if needed (see Policies CO-96 through CO-100). Because North Area Plan policies address tribal cultural resources consistent with State regulations, the proposed Plan and CSD Update would have less than significant impacts to tribal cultural resources that are listed or eligible for listing in the CRHR.

Impact TCR-2: The proposed North Area Plan and CSD Update could cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 and that is 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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. (Less than Significant Impact)

As noted in Section C.6.2 (State Regulations), the recent amendments to CEQA (December 2018) require tribal consultation and the evaluation of tribal cultural resources in environmental documents. AB 52 requires government-to-government consultation. In compliance with this requirement, the County has contacted interested tribes regarding the proposed Plan and CSD Update, as summarized in Section

C.6.3.2.2 (above). No tribal cultural resources have been identified during this consultation, and as such, the County has not determined any tribal cultural resource to be significant.

The proposed Plan and CSD Update includes policies that address consultation with interested tribes, encourage protection of tribal resources and monitoring if needed (see Policies CO-96 through CO-100). Because North Area Plan policies address tribal cultural resources consistent with State regulations, the proposed Plan and CSD Update would have less than significant impacts to tribal cultural resources.

C.6.5 Cumulative Impact Analysis

For purposes of this analysis, the cumulative impacts study area includes the North Area and areas immediately surrounding (within a half-mile). National Park Service and County plans identify the potential for cultural and tribal cultural resources in the Santa Monica Mountains Planning Area, which includes the North Area. There are a number of federal, State, and local policies, and regulations in place to protect cultural and tribal cultural resources in the cumulative study area. Additionally, the Conservation and Open Space Element of the proposed North Area Plan Update outlines policies that would protect cultural and tribal cultural resources (CO-96 through CO-100).

Compliance with General Plan mitigation measures, the goals and policies of the proposed North Area Plan Update, and the development standards of the proposed North Area CSD Update would reduce impacts (from future projects) to cultural resources. The proposed Plan and CSD Update would result in either less-than-significant impacts with mitigation or less-than-significant impacts. Therefore, there is no potential for the proposed Plan and CSD Update to contribute to cumulative impacts for cultural resources.

Compliance with North Area Policies CO-96 through CO-100 would reduce potential impacts (from future projects) to tribal cultural resources. The analysis found that the proposed Plan and CSD Update would have less than significant impacts to tribal cultural resources because proposed North Area policies specify avoidance of known tribal cultural resources to the extent feasible through project siting and design. Therefore, there is no potential for the proposed Plan and CSD Update to contribute to cumulative impacts for tribal cultural resources.

C.6.6 Level of Significance After Mitigation

With the implementation of the mitigation measures (CULT-1 through CULT-4) identified in the General Plan Programmatic EIR, potential impacts to historical resources and unique archaeological resources from implementation of the proposed Plan and CSD Update would be reduced to less than significant. Less-than-significant impacts would be expected to tribal cultural resources with implementation of the proposed North Area Plan policies that address protection of tribal cultural resources.

Attachment C.6

Cultural and Tribal Resources Policies and Standards

(Appendix 1 includes all policies and standards)

Proposed North Area Plan Update

Conservation and Open Space Element

- **Policy CO-96:** Protect and preserve cultural resources, tribal cultural resources, and paleontological resources from destruction, and avoid impacts to such resources where feasible. Where avoidance is not feasible, minimize impacts to resources to the maximum extent feasible.
- **Policy CO-97:** Regulate landform alteration to ensure minimal disturbance of known cultural resources and tribal cultural resources. New development on sites identified as archaeologically sensitive shall include onsite monitoring by a Secretary of Interior qualified archaeologist(s) and appropriate Native American consultant(s) of all grading, excavation, and site preparation that involve earthmoving operations.
- **Policy CO-98:** Coordinate with appropriate agencies, South Central Coastal Information Center (SCCIC), Native American Heritage Commission, and local Native American tribes, to identify archaeologically-sensitive areas. Such information should be kept confidential to protect cultural and tribal cultural resources.
- **Policy CO-99:** Implement appropriate mitigation measures for development within archaeologically-sensitive areas designed in accord with guidelines established by the Secretary of the Interior's Standards for the Treatment of Historic Properties, the Society of Vertebrate Paleontology, or those agreed to as part of the AB 52 tribal consultation process.
- **Policy CO-100:** Preserve and protect cultural resources and traditions that are of importance to Native Americans, including the Chumash and Gabrieliño-Tongva peoples.

Proposed Community Standards District Update

Section 22.336.060 Biological Resource Standards

- B. Trees

Section 22.336.070 Community-Wide Development Standards

- I. Grading

C.7 Energy

Introduction

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for implementation of the North Area Plan and CSD Update and associated actions to contribute to energy use impacts.

Scoping Comments Received. During the scoping period for the EIR, written and verbal comments were received from agencies, organizations, and the public. These comments identified various substantive issues and concerns relevant to the EIR analysis for energy. The issues below summarize these comments. Appendix 2 includes all comments received during the scoping comment period. No scoping comments were received on energy issues for the proposed Plan and CSD Update.

KEY FINDINGS

- North Area energy use is primarily from building energy use and transportation.
- County’s Sustainability Plan, General Plan, and Climate Action Plan have policies that target the North Area’s primary energy use sources.
- Existing plans require substantial energy reductions, increase energy efficiencies, and promote renewable energy production and use.

C.7.1 Environmental Setting

C.7.1.1 California’s Energy Profile

California is the most populated state and has the largest state economy, an economy that would be equivalent to the World’s fifth-largest economy; but it has the third-lowest statewide per capita energy consumption levels and the second-lowest residential sector per capita energy consumption levels in the United States (EIA, 2018). This is due in part to a mild climate and California’s energy efficiency programs. Transportation is the end-use sector with the highest energy consumption (over 40 percent of the State total) and California has the highest state consumption of jet fuel (20 percent of U.S. Total). The State’s green building and energy efficiency regulations will continue to drop per the state-wide average per-capita energy use.

Almost half of California’s net electricity production in 2017 was from renewable resources, including hydro-power. Nonhydroelectric renewable resources provided more than one quarter of the state’s net generation in 2017, and California leads the nation in electricity generation from solar, geothermal, and biomass resources (EIA, 2018). California has a number of renewable energy regulations that will continue to increase the amount of renewable electricity production within the state. See Section C.5 Greenhouse Gas Emissions for a discussion of the State’s renewable energy regulations.

C.7.2 Regulatory Setting

Energy efficiency is regulated at the federal, State, and local levels. Energy and Greenhouse Gas Emissions have many overlapping regulations and planning documents. Also see Section C.5 Greenhouse Gas Emissions for additional regulatory setting information.

C.7.2.1 Federal

The Department of Energy’s Office of Energy Efficiency & Renewable Energy Building Technologies Office (BTO) implements minimum energy conservation standards for more than 60 categories of appliances and equipment. Additionally, the BTO establishes mandatory energy efficiency requirements for new federal commercial and residential buildings, as well as, establishing such standards for manufactured homes. For

California, many of the federal energy efficiency standards, such as appliance efficiency standards, are repeated in the California regulations. Therefore, the summary of the applicable regulations focuses on the State regulations and local ordinances that apply to the proposed Plan and CSD Update.

C.7.2.2 State

The State of California's Code of Regulations (CCR) has several building standards (Title 24) and appliance efficiency regulations (Title 20) that would apply towards reducing the energy impacts of new development projects in the North Area. Additionally, the State has standards and regulations that govern renewable energy.

California Energy Efficiency Standards for Residential and Non-Residential Buildings

These energy efficiency standards, as provided in Title 24 Part 6 of the CCR, would apply to the design of new and modified buildings in the North Area. Specific design element requirements include designing most new residential units to have installed roof-top solar and for other low-rise commercial buildings to be "solar ready." Other requirements include design of pools to have covers and the pool water recirculation piping to allow for the future addition of solar heating equipment.

California Green Building Standards Code.

These building standards, as provided in Title 24 Part 11 of the CCR include design and planning elements related to energy efficiency, water use efficiency and conservation, material conservation and resource efficiency, and environmental quality.

Appliance Efficiency Regulations

These efficiency regulations, as provided in Title 20 (Division 2, Chapter 4, Article 4) of the CCR, have efficiency standards for new appliances installed in residential, commercial, and industrial buildings. This includes efficiency standards for electric motors, residential appliances, heating, ventilation and air conditioning (HVAC) units.

There are no specific regulations or policies that relate to construction energy consumption or efficiency other than construction waste recycling policies and regulations that are related to the State's Climate Change Scoping Plan and the County's Climate Change Action Plan. These regulations may indirectly reduce energy consumption related to the fuel or materials use that could result from implementation of the proposed Plan and CSD Update. Compliance and conformance with these waste recycling regulations and policies is discussed in subsection VIII, Greenhouse Gas Emissions.

California Renewables Portfolio Standard (RPS) Program

This program is described in more detail in the Section C.5 Greenhouse Gas Emissions of this EIR. The energy consumption from fossil fuel-fired electricity will be reduced over time as utilities obtain, and North Area consumers use, increasing amounts of renewable energy.

AB 32 Climate Change Scoping Plan and Scoping Plan Updates

Section C.5 Greenhouse Gas Emissions of this EIR provides more detail regarding the AB 32 Climate Change Scoping Plan and Scoping Plan Updates. The following statewide programs approved through the scoping plan will increase energy efficiency and reduce energy use as well as increase renewable energy availability and use (ARB, 2017).

- Doubling building efficiency
- 50% renewable power
- Walkable/bikeable communities with transit

C.7.2.3 Local

Los Angeles County

The existing North Area Plan and CSD and the proposed North Area Plan and CSD Update do not directly discuss energy efficiency or renewable energy, other than not allowing wind energy and requiring restrictions to solar energy in scenic resource areas. However, there are several other County plans that do address energy efficiency and renewable energy. These plans are summarized below.

Los Angeles Countywide Sustainability Plan

Many of the actions in the Sustainability Plan that are listed in Section C.5 (Greenhouse Gas Emissions) to reduce GHG emissions would also increase energy efficiency or reduce energy consumption or increase renewable energy production. The plan includes actions that would promote sustainable building design and construction, implement transit-oriented and walkable development, transition to a zero-carbon energy system, create a zero-emissions transportation system, reduce building energy consumption, reduce water use, and reduce waste generation and capture organic waste for beneficial uses (County, 2019). Please see Section C.5, Greenhouse Gas Emissions, for a more thorough discussion of the Sustainability Plan.

Community Climate Action Plan

The Community Climate Action Plan (CCAP) is discussed in more detail in the Greenhouse Gas Emissions section (Section C.5). Many of the actions listed in the CCAP to reduce GHG emissions would also increase energy efficiency or reduce energy consumption or increase renewable energy production. The local programs in the plan include seven green building and energy actions, twelve land use and transportation measures, two water conservation and wastewater actions, a water diversion action, and four land conservation and tree planting actions (County, 2015b). The CCAP actions that would impact energy consumption or increase renewable energy production/use are generally the same as those that would provide the greatest GHG emission reduction potentials.

Los Angeles County General Plan

The County of Los Angeles' General Plan also has several energy reduction/sustainability/renewable energy goals and policies that may generally apply to the proposed Plan and CSD Update (County, 2015b). Some of these goals and policies may overlap with policies in the County's Sustainability Plan and Climate Action Plan. Some applicable energy-related goals and policies include:

- **Goal LU 11: Development that utilize sustainable design techniques.**
 - *Policy LU 11-1: Encourage new development to employ sustainable energy practices, such as utilizing passive solar techniques and/or active solar technologies*
 - *Policy LU 11-2: Support the design of developments that provide substantial tree canopy cover, and utilize light-colored paving materials and energy-efficient roofing materials to reduce the urban heat island effect.*
 - *Policy LU 11-3: Encourage development to optimize the solar orientation of buildings to maximize passive and active solar design techniques.*
- **Goal LU 11: Development that utilize sustainable design techniques.**

- *Policy LU 11-1: Encourage new development to employ sustainable energy practices, such as utilizing passive solar techniques and/or active solar technologies.*
- *Policy LU 11-2: Support the design of developments that provide substantial tree canopy cover, and utilize light-colored paving materials and energy-efficient roofing materials to reduce the urban heat island effect.*
- *Policy LU 11-3: Encourage development to optimize the solar orientation of buildings to maximize passive and active solar design techniques.*
- *Policy LU 11.4: Encourage subdivisions to utilize sustainable design practices, such as maximizing energy efficiency through lot configuration; preventing habitat fragmentation; promoting stormwater retention; promoting the localized production of energy; promoting water conservation and reuse; maximizing interconnectivity; and utilizing public transit.*
- *Policy LU 11.8: Encourage sustainable subdivisions that meet green neighborhood standards, such as Leadership in Energy and Environmental Design–Neighborhood Development (LEEDND).*
- **Goal AQ 3: Implementation of plans and programs to address the impacts of climate change.**
 - *Policy AQ 3.1: Facilitate the implementation and maintenance of the Community Climate Action Plan to ensure that the County reaches its climate change and greenhouse gas emission reduction goals.*
 - *Policy AQ 3.2: Reduce energy consumption in County operations by 20 percent by 2015.*
 - *Policy AQ 3.3: Reduce water consumption in County operations.*
 - *Policy AQ 3.5: Encourage energy conservation in new development and municipal operations.*
 - *Policy AQ 3.6: Support rooftop solar facilities on new and existing buildings.*
- **Goal C/NR 12: Sustainable management of renewable and non-renewable energy resources.**
 - *Policy C/NR 12.1: Encourage the production and use of renewable energy resources.*
- **Goal PS/F 6: A County with adequate public utilities.**
 - *Policy PS/F 6.8: Encourage projects that incorporate onsite renewable energy systems.*

C.7.3 Thresholds of Significance and Methodology

The proposed Plan and CSD Update would have a significant effect on the environment with respect to Energy, if it would:

- Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.
- Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

There are no public agency derived numeric significance thresholds for what would be wasteful, inefficient or unnecessary consumption of energy resources. All construction- and operation-related activities would involve use of energy-consuming equipment and processes. This analysis presents a qualitative discussion of energy use. As set forth in the State CEQA Guidelines, Appendix F: Energy Conservation, the goal of conserving energy implies the wise and efficient use of energy including:

- Decreasing overall per capita energy consumption;
- Decreasing reliance on fossil fuels such as coal, natural gas and oil; and
- Increasing reliance on renewable energy sources.

Lead agency actions that are consistent with these goals would not be likely to cause an energy-related impact.

C.7.4 Environmental Impacts and Mitigation Measures

Impact EN-1: Implementation of the proposed North Area Plan and CSD Update would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation (Less than Significant Impact).

The proposed Plan and CSD Update would not directly result in any activities that consume energy. However, future development allowed by the proposed Plan and CSD Update would consume energy during construction and operation. These future development projects, which would be limited in scope (due to residential, commercial and open space zoning), would undergo separate analysis for potential energy impacts, and all future development projects would be required to meet the extensive energy efficiency policy goals, strategies, and implementation actions in the County's General Plan, Community Climate Action Plan, and Sustainability Plan as well as State regulatory requirements (see Sections C.7.2.2 and C.7.2.3). Implementation of these policy goals, strategies, and implementation actions of these plans and compliance with State regulations would ensure that these future development projects would not result in wasteful, inefficient or unnecessary consumption of energy resources during their construction or operation.

The Transfer of Development Credit Program (Section 22.336.070 - Community-Wide Development Standards, subpart W) would prevent an increase in the net amount of development in the Santa Monica Mountains North Area. This program would limit development to prevent overburdened public services and would prevent new development from occurring in areas with steep slopes or sensitive resources. All land division proposals would be required to participate in this program, which would result in no net increase in the number of buildable lots in the North Area. Because this program would limit full buildout of the North Area, it could reduce energy consumption potential. In addition, proposed policies LU-1 and LU-10 (Attachment C.7 at the end of this section) would require concentrating development in existing developed areas and areas with existing utilities. Attachment C.7 provides other proposed Plan and CSD Update policies and standards that could affect energy efficiency and use. Therefore, the proposed Plan and CSD Update would have a less than significant impact on energy resources.

Impact EN-2: Implementation of the proposed North Area Plan and CSD Update would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency (Less than Significant Impact).

Future development allowed by the proposed Plan and CSD Update would be required to conform with the State energy efficiency regulations, and the policy goals and actions mandated in the County's Sustainability Plan, General Plan, and Community Climate Action Plan. These plans have been designed to meet or exceed State's efficiency regulations. Therefore, future development allowed by the proposed Plan and CSD Update would not conflict with or obstruct State or local plans for energy efficiency.

The proposed Plan and CSD Update includes development standards regarding energy and power generation. The following development standards are from Section 22.336.070 (Community-Wide Development Standards [R]) of the proposed CSD Update (proposed project):

- **Scenic Resource Areas 1n.** *Roof-mounted equipment shall not be visible from a scenic route, excluding solar energy devices. If there is no alternative location possible for the location of such*

equipment, such equipment shall be screened with materials that blend with the roof or background landscape.

- **Scenic Resource Areas 2c.** *New development shall incorporate colors and exterior materials that are compatible with the surrounding landscape. The use of highly reflective materials shall be prohibited, with the exception of solar panels.*
- **Scenic Resource Areas 2d.** *Solar energy devices/panels shall be sited on the rooftops of permitted structures, where feasible. If roof-mounted systems are infeasible, ground-mounted systems may be allowed only if sited within the building site area of permitted development. Wind energy systems are prohibited.*

The development standards noted above would provide certain restrictions on solar power development and would prohibit wind power development in scenic resource areas. However, the North Area is not a wind resource area and therefore the restriction on wind power would not significantly impact state and regional goals/policies for renewable energy development. The restrictions on solar power would only apply to the scenic resource areas in the North Area and so would not substantially affect potential solar power development in the North Area. Additionally, the County's Sustainability Plan, General Plan, and Community Climate Action Plan all have policies that encourage renewable energy development. Therefore, the proposed Plan and CSD Update would not conflict or obstruct State or local plans for renewable energy and would have a less than significant impact.

C.7.5 Cumulative Impact Analysis

This Energy analysis considers the cumulative effects on energy use and renewable energy production. Energy efficiency is a project-specific impact issue that would not have cumulative effects. Therefore, there is no separate cumulative effects analysis.

C.7.6 Level of Significance After Mitigation

Implementation of the proposed North Area Plan and CSD Update would result in less-than-significant impacts related to Energy. No mitigation is required.

Attachment C.7

Energy Resources Policies and Standards

(Appendix 1 includes all policies and standards)

Proposed North Area Plan Update

Land Use Element

- **Policy LU-1:** Direct and site new residential, commercial, or industrial to existing developed areas able to accommodate it, or where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on natural resources.
- **Policy LU-10:** Require that the extension of water, sewer, or utility infrastructure to serve development be located within legally existing roadways and road rights-of-way in a manner that avoids adverse impacts to natural resources to the maximum extent feasible. Such infrastructure shall be sized and otherwise designed to provide only for the approved development to avoid growth-inducing impacts.

Circulation Element

- **Policy CI-1:** Maximize the capacity and operational efficiency of highways consistent with environmental protection and neighborhood preservation, without widening roadways to increase capacity.
- **Policy CI-5:** Where appropriate, increase the capacity of existing major and secondary highways through the application of transportation system management technology within established rights-of-way and roadway widths by:
 - Minimizing the number of driveway access points by consolidating driveways and exploring other options to reduce uncontrolled access;
 - Minimizing or eliminating conflicting turning movements on links or at intersections;
 - Restricting on-street parking during peak travel periods where such restrictions will not adversely impact public access to parks; and
 - Employing traffic signal synchronization technology.
- **Policy CI-6:** Improve roadway efficiency and highway access through redesign of road intersections and establishment of periodic passing, turnout, and acceleration/deceleration lanes, where appropriate.

Proposed Community Standards District Update

Section 22.336.070 Community-Wide Development Standards

- R. Scenic Resource Areas.
- W. Transfer of Development Credit Program

C.8 Geology, Soils, and Paleontological Resources

Introduction

This section describes effects on geology and soil resources that would be caused by implementing the proposed North Area Plan and CSD Update. Geology of the Santa Monica Mountains North Area is dominated by very steep slopes and narrow canyons developed on tightly folded Tertiary age sedimentary and volcanic rock. Soil development will vary as the underlying parent material ranges from unconsolidated alluvium to strong bedrock, and as slope inclination ranges from steep to gentle slopes. Soil resources locally support agricultural activity.

This section also describes effects on paleontological resources that would be caused by implementing the proposed Plan and CSD Update. Paleontological resources are any fossilized remains, traces, or imprints of organisms that are preserved in the Earth's crust and are of paleontological interest and provide information about the history of life on Earth. Fossil remains may include bones, teeth, shells, leaves, and wood. They are found in geological deposits within which they were originally buried. Paleontological resources include not only the actual fossils, but also the collecting localities and the geological deposits that contain the fossils. Paleontological resources are considered nonrenewable resources because the organisms they represent no longer exist. Thus, once destroyed, these resources can never be replaced. The following discussion relies heavily on the paleontological analysis prepared for the 2002 Santa Monica Mountains National Recreation Area Final General Management Plan and Environmental Impact Statement (NPS 2002: 168-171).

Scoping Comments Received. During the scoping period for the EIR, written and verbal comments were received from agencies, organizations, and the public. These comments identified various substantive issues and concerns relevant to the EIR analysis for geology, soils and paleontological resources. The issues below summarize these comments. Appendix 2 includes all comments received during the scoping comment period.

- Erosion (during initial planting and long-term use).
- Runoff (during initial planting and long-term use).

C.8.1 Environmental Setting

C.8.1.1 Regional Geologic Setting

The Santa Monica Mountains North Area is located within the Transverse Ranges geomorphic province of southern California, which is characterized by a complex series of mountain ranges and valleys with dominant east-west trends. One distinct geographic area traverses the North Area, the Santa Monica

KEY FINDINGS

- North Area is known for unique geologic features and landforms, creating distinctive geologic exposures of bold outcrops and folded strata.
- Numerous faults and landslides are present in the North Area; no active faults cross the area.
- Proposed Plan goal/policies and CSD standards would ensure development impacts to geology and soils in the North Area would be less than significant.
- No geology and soils mitigation measures are required for the North Area Plan and CSD Update.
- Adherence to General Plan (GP) policies and a GP EIR mitigation would reduce impacts to paleontological resources to a less-than-significant level.

Mountains. The Santa Monica Mountains are an east-west trending mountain chain located at the southernmost end of the Transverse Ranges geomorphic province. The Santa Monica Mountains is a broad anticline ruptured by faulting and intruded by sills and dikes.

The Transverse Ranges geomorphic province trends east-west, which is 'transverse' to the dominant northwest-southeast trending mountain ranges in the region. The Transverse Ranges encompasses a series of east-west trending steep mountain ranges and valleys. The Santa Monica Mountains are located at the modern transform plate boundary associated with the San Andreas Fault system, where the Pacific and North American tectonic plates slide horizontally past each other. The Pacific Plate is moving in a northwest direction relative to the North American Plate.

The San Andreas Fault comprises the northern and eastern boundary of the Transverse Ranges geomorphic province. The San Andreas Fault generally trends northwest-southeast, however, north of the Transverse Ranges geomorphic province, the fault trends east-west at the Big Bend and the right-lateral strike-slip movement produces compression between the two plates. North-south compressive forces are generated at the Big Bend of the San Andreas Fault and are responsible for the formation of the broad anticline folding known as the Santa Monica Mountains. During the Oligocene (last 15 million years), the Western Transverse Ranges continental block was rotated 90 degrees counterclockwise. The Malibu Coast and Santa Monica faults are perhaps the most notable faults in the area with 0.3 and 1.0 mm of movement per year, respectively, contributing to the continued uplift of the Santa Monica Mountains.

The Santa Monica Mountains North Area is in an area of distinctive geologic character and province. The North Area is underlain by sedimentary, volcanic, igneous, and metamorphic units ranging in age from Quaternary (approximately 1.6 million years) to Mesozoic (245 million years).

The North Area encompasses 32.3 square miles of the Santa Monica Mountains that extend 80 km from the Oxnard Plain to the Los Angeles River and span between 5-16 km wide from the Pacific Ocean to the Oxnard Plain, Simi Hills, and San Fernando Valley. The Santa Monica Mountains are bounded on the south by a 150 km long zone of north-dipping reverse faults, most notably the east-west trending Malibu Coast and Santa Monica faults. The Malibu Coast fault separates two distinct geologic terranes. North of the Malibu Coast fault, the basement terrane consists of Santa Monica Slate and granodiorite of Late Jurassic and Cretaceous age, which is overlain by upper Cretaceous through upper Miocene sedimentary and volcanic rock (Yerkes and Campbell, 1979). South of the Malibu Coast fault, the basement rock is Catalina Schist (Jurassic to Cretaceous age) in turn overlain by Miocene and younger deposits. The Santa Monica Mountains are the most geologically diverse mountain range within the Transverse Ranges geomorphic province (Norris and Webb, 1990). The Santa Monica Mountains are composed of marine and non-marine sedimentary, igneous intrusive and volcanic extrusive rocks. The topographical relief of the Santa Monica Mountains is attributed to differential erosion and plate tectonics, chiefly uplift, folding and faulting.

C.8.1.2 Local Geology

The North Area is underlain Quaternary alluvial fan, river channel and stream deposits along the narrow valleys, and Tertiary sedimentary and volcanic rock forming the steep slopes and ridge lines. General descriptions of the geologic materials, listed chronologically, are summarized in Table C.8-1. Location of these units is shown on Figure C.8-1. The general characteristics of these units are described below (CGS & USGS, 2014).

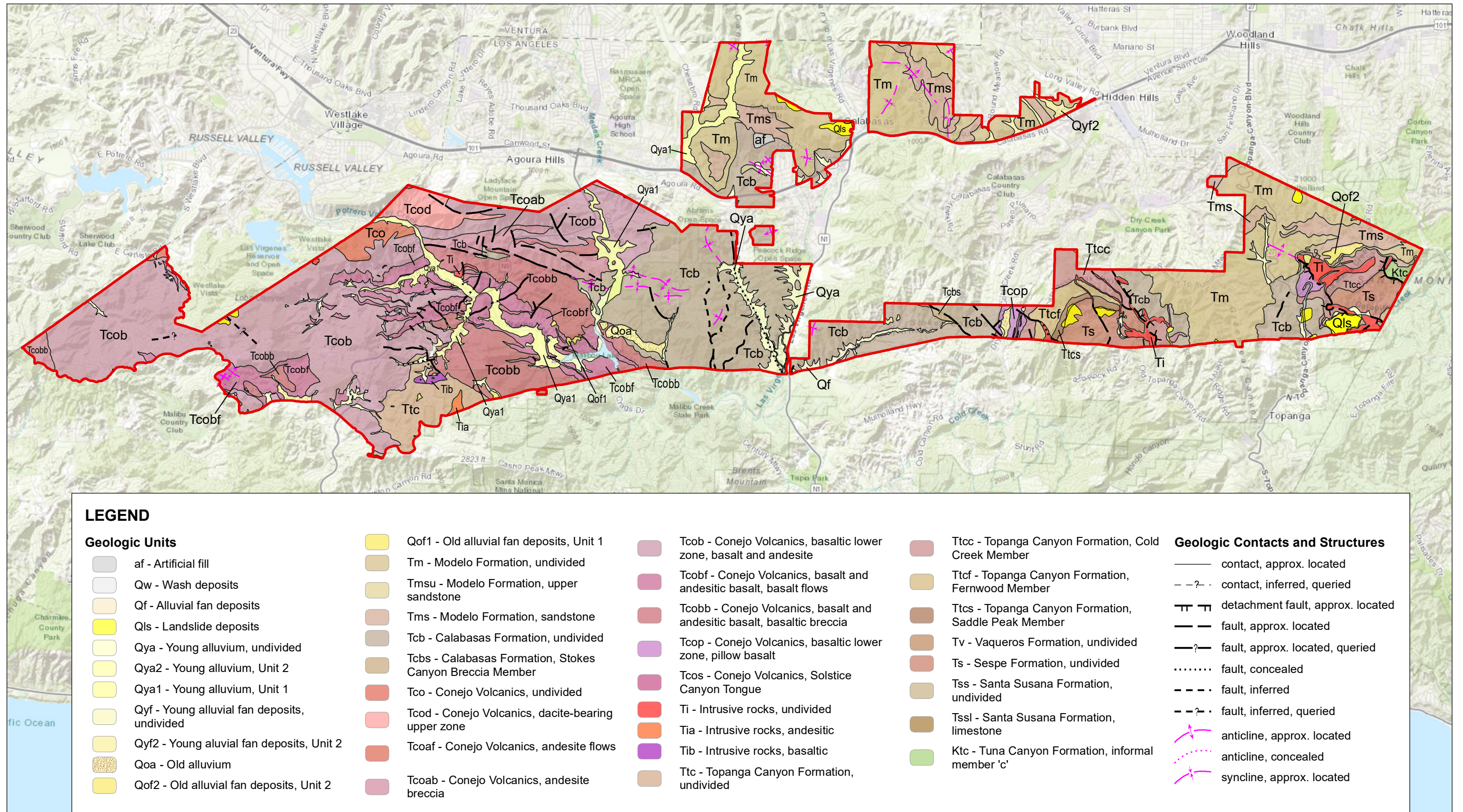


Figure C.8-1

Project Area Geology

Geology Source: Campbell, R.H., Wills, C.J., Irvine, P.J., and Swanson, B.J., 2014, Preliminary geologic map of the Los Angeles 30' x 60' quadrangle, California: Version 2.1: California Geological Survey, Preliminary Geologic Maps , scale 1:100,000.

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Table C.8-1. Geologic Units Within the SMM North Area

Formation	Age	Description/Comment
Qw – Wash deposits	Late Holocene	Unconsolidated gravel, sand and silt in active or recently active stream beds.
Qf – Alluvial fan	Holocene	Unconsolidated boulder, cobbly, gravelly, sandy, or silty alluvial deposits on active or recently active alluvial fans.
Qls – Landslide deposits	Holocene to Late Pleistocene	Rock detritus from bedrock and surficial materials deposited by landslide processes.
Qya/Qya2/Qya1 – Young alluvium	Holocene to Late Pleistocene	Unconsolidated alluvial fan, river channel, and stream deposits consisting of silt, sand, clay, and gravel.
Qyf/Qyf2 – Young alluvial fan deposits	Holocene to Late Pleistocene	Unconsolidated gravel, sand and silt.
Qoa – Old alluvium	Late Pleistocene	Unconsolidated to moderately indurated gravel, sand and silt deposited on flood plains.
Qof2/Qof1 – Old fan deposits	Late Pleistocene	Slightly to moderately consolidated silt, sand and gravel deposits on alluvial fans.
Tm/Tmsu/Tms – Modelo Formation	Late to Middle Miocene	Sandstone and shale.
Tcb/Tcbs– Calabasas Formation	Late to Middle Miocene	Sandstone, shale, and breccia.
Tco/Tcod/Tcoaf/Tcoab/Tcob/Tcobj/Tcobb/Tcop/Tcos – Conejo Volcanics	Middle Miocene	Basalt, andesitic basalt, basaltic andesite, andesite, and dacite.
Ti /Tia/Tib – Intrusive Rocks	Middle Miocene	Diabase, andesite, basalt, and gabbro.
Ttc/Ttcc/Ttcf/Ttcs – Topanga Canyon Formation	Middle to Early Miocene	Sandstone, siltstone, mudstone, and conglomerate.
Tv – Vaqueros Formation	Early Miocene to Oligocene	Sandstone, siltstone, and mudstone.
Ts – Sespe Formation	Early Miocene to late Eocene	Sandstone, mudstone, and conglomerate.
Tss/Tssl – Santa Susana Formation	Early Eocene to Paleocene	Shale, mudstone, sandstone, and limestone.
Ktc – Tuna Canyon Formation	Late Cretaceous	Sandstone, siltstone, and conglomerate.

Source: (CGS & USGS, 2014)

Wash deposits (Qw). Wash deposits consist of late Holocene unconsolidated gravel, sand and silt in active or recently active streambeds.

Alluvial fan (Qf). Alluvial fan deposits consist of Holocene unconsolidated boulder, cobbly, gravelly, sandy, or silty alluvial deposits on active and recently active alluvial fans and in some headward channel segments.

Landslide deposits (Qls). Landslide deposits represent rock detritus from bedrock and surficial materials, broken in varying degrees, deposited by landslide processes. Most landslide deposits are Holocene, some dissected landslides may be as old as late Pleistocene.

Young alluvium, undivided (Qya). Younger alluvium consists of Holocene to late Pleistocene stream-deposited silt, sand and gravel on flood plains. This unit is related to alluvial fans and streambeds. This unit is unconsolidated and generally friable.

- **Young alluvium, Unit 2 (Qya2).** Late Pleistocene young alluvium, older than unit 3, and younger than unit 1.
- **Young alluvium, Unit 1 (Qya1).** Late Pleistocene young alluvium is the oldest young alluvium unit.
- **Young fan deposits, undivided (Qyf).** Holocene to late Pleistocene unconsolidated gravel, sand and silt and is boulder along mountain fronts.
- **Young alluvial-fan deposits, Unit 2 (Qyf2).** Holocene to late Pleistocene older young fan deposit consists of unconsolidated gravel, sand and silt and is boulder along mountain fronts.

Old alluvium, undivided (Qoa). Late to middle Pleistocene unconsolidated to moderately indurated gravel, sand and silt deposited on flood plains.

Old fan deposits, Unit 2 (Qof2). This is an intermediate subunit of old fan deposits, older than unit three, and younger than unit 1. This unit is late Pleistocene age, slightly to moderately consolidated silt, sand and gravel deposits on alluvial fans.

Old fan deposits, Unit 1 (Qof1). This is the oldest of the four subunits of old fan deposits. This unit is late Pleistocene age, slightly to moderately consolidated silt, sand and gravel deposits on alluvial fans. These deposits have been uplifted or otherwise removed from the locus of recent sedimentation. The morphology of the original alluvial fan surface is usually well preserved, though dissected in varying degrees.

Modelo Formation, undivided (Tm). Modelo Formation consists predominately of late to middle Miocene gray to brown thin-bedded mudstone, diatomaceous clay shale, or siltstone, with interbeds of very fine-grained to coarse-grained sandstone.

- **Modelo Formation, upper sandstone unit at Laskey Mesa (Tmsu).** Late to middle Miocene light-gray to light-brown weathering fine to coarse grained sandstone and silty sandstone with very light-gray siliceous siltstone interbeds.
- **Modelo Formation, sandstone (Tms).** The Modelo Formation sandstone consists of middle to early Miocene sandstone and conglomerate.

Calabasas Formation, undivided (Tcb). The Calabasas Formation consists of early late to late middle Miocene interbedded clayey to silty sandstone and silty shale, with local beds of sedimentary breccia.

- **Calabasas Formation, Stokes Canyon Breccia Member (Tcbs).** Late middle Miocene sedimentary breccia consisting of angular boulders and cobbles of redeposited well-cemented sandstone with molluscan faunas diagnostic of the “Martinez” and “Domengine” stages.

Conejo Volcanics, undivided (Tco). The Conejo Volcanics, undivided consists of middle Miocene basalt, andesitic basalt, basaltic andesite, andesite, and dacite in a thick sequence of extrusive volcanic flows, flow-breccias, agglomerates, and epiclastic volcanic breccias, volcanic sandstones and siltstones.

- **Conejo Volcanics, dacite-bearing upper zone (Tcod).** The Conejo Volcanics dacite-bearing upper zone consists of middle Miocene interlayered dacite, andesite and basaltic flows, and pyroclastic rock.
- **Conejo Volcanics, andesitic central zone, andesitic flows (Tcoaf).** The Conejo Volcanics, andesitic central zone, andesitic flows consists of middle Miocene andesite flows.
- **Conejo Volcanics, andesitic central zone, andesite breccia (Tcoab).** The Conejo Volcanics, andesitic central zone, andesite breccia consists of middle Miocene andesitic and basaltic breccia and some agglomerate.

- **Conejo Volcanics, basaltic lower zone, basalt and andesitic basalt (Tcob).** The Conejo Volcanics, basaltic lower zone, basalt and andesitic basalt consists predominately of middle Miocene basalt, olivine basalt, basaltic andesite, and andesitic basalt.
- **Conejo Volcanics, basaltic lower zone, basalt and andesitic basalt, basalt flows (Tcobf).** The Conejo Volcanics, basaltic lower zone, basalt and andesitic basalt, basalt flows consists of middle Miocene basalt, andesitic basalt and basaltic andesite flows.
- **Conejo Volcanics, basaltic lower zone, basalt and andesitic basalt, basaltic breccia (Tcobb).** The Conejo Volcanics, basaltic lower zone, basalt and andesitic basalt, basaltic breccia consists of middle Miocene basalt, andesitic basalt and basaltic andesitic breccias.
- **Conejo Volcanics, basaltic lower zone, pillow basalt (Tcop).** The Conejo Volcanics, basaltic lower zone, pillow basalt consists of middle Miocene basalt pillow lavas, pillow breccias and probable aquagene tuffs.
- **Conejo Volcanics, Solstice Canyon Tongue (Tcos).** The Conejo Volcanics, Solstice canyon tongue consists of middle Miocene basaltic and andesitic flows, breccias, and tuffs.

Intrusive Rocks, undivided (Ti). Intrusive rocks of middle Miocene dikes, sills, and irregularly shaped intrusive bodies of diabase, basalt and andesite; related to Conejo Volcanics.

- **Intrusive Rocks, andesitic (Tia).** Intrusive rocks, andesitic, consists of middle Miocene andesitic dikes, sills and irregular intrusive bodies, chiefly sills in Topanga Canyon and Vaqueros Formations, and dikes in older rocks.
- **Intrusive Rocks, basaltic (Tib).** Intrusive rocks, basaltic, consists of middle Miocene basaltic, diabasic, and gabbroic dikes, sills and irregular intrusive bodies, chiefly sills in Topanga Canyon Formation and following detachment faults, and dikes in older rocks.

Topanga Canyon Formation (Ttc). Middle to early Miocene marine sandstone, commonly arkosic, with interbedded siltstone, pebbly sandstone and pebble-cobble conglomerate.

- **Topanga Canyon Formation, Cold Creek Member (Ttcc).** The Topanga Canyon Formation Cold Creek Member consists of middle to early Miocene marine sandstone, siltstone, and minor pebbly sandstone.
- **Topanga Canyon Formation, Fernwood Member (Ttcf).** The Topanga Canyon Formation Fernwood Member consists of middle to early Miocene paralic, fluvial, estuarine, and marine sandstone, pebbly sandstone, and mudstone, with minor tuff and limestone.
- **Topanga Canyon Formation, Saddle Peak Member (Ttcs).** The Topanga Canyon Formation Saddle Peak Member consists of middle to early Miocene thick-bedded to massive, medium to coarse grained marine sandstone, pebbly sandstone, and hackly fracturing silty sandstone, over a one-half meter thick basal pebble conglomerate.

Vaqueros Formation, undivided (Tv). The Vaqueros Formation consists of early Miocene to Oligocene heterogeneous sequence of thick and medium bedded sandstone and interbedded siltstone and mudstone.

Sespe Formation, undivided (Ts). The Sespe Formation consists of early Miocene to late Eocene non-marine red-bed (continental) sequence of sandstone, pebbly sandstone, varicolored mudstone, and pebble-cobble conglomerate.

Santa Susana Formation, undivided (Tss). The Santa Susana Formation consists of early Eocene to Paleocene marine clay shale and conchoidally fractured mudstone and siltstone with interbeds of fine to medium grained sandstone and lenses of pebble cobble conglomerate.

- **Santa Susana Formation, limestone (Tssl).** The Santa Susana Formation, limestone consists of early Eocene to Paleocene algal limestone that occurs as scattered lenses and pods in siltstone sequences east of Topanga Canyon.

Tuna Canyon Formation, informal member 'c' (Ktc). Pebble-cobble conglomerate and minor sandstone of late Cretaceous age.

C.8.1.3 Slope Stability

Important factors that affect the slope stability include the steepness of the slope, the relative strength of the underlying rock material, and the thickness and cohesion of the overlying colluvium. The steeper the slope and/or the less strong the rock, the more likely the area is susceptible to landslides. The steeper the slope and the thicker the colluvium, the more likely the area is susceptible to debris flows. Another indication of unstable slopes is the presence of old or recent landslides or debris flows.

Numerous landslides are mapped in the North Area. Landslides are widespread and abundant in the young alluvium and alluvial fan deposits exposed in the central project area (CGS, 2001a). Landslides are widespread in the tightly folded weaker members of the Modelo Formation in the north central project area (CGS, 1997a). In the northeastern portion of the North Area, landslides occur primarily on the dip slopes of the Modelo Formation (CGS, 1997b). At the eastern edge of the North Area, material is mapped as landslide deposits in the mountainous terrain (CGS, 1997c). In the western North Area, landslides are less abundant on the slopes underlain by the Conejo Volcanics (CGS, 2002; CGS, 2000; CGS, 2001b).

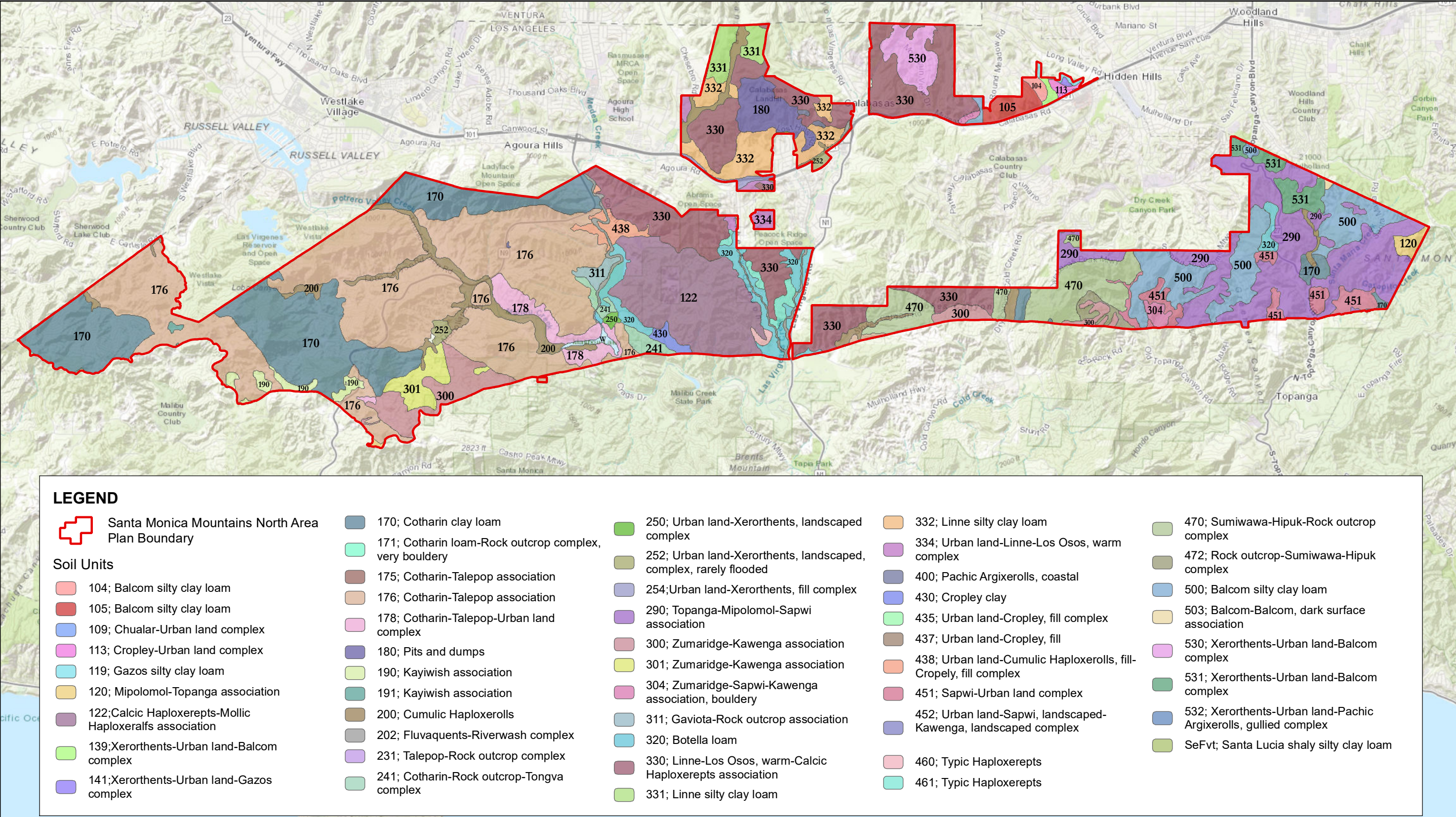
Several large ancient landslide complexes have been mapped in the Malibu Beach Quadrangle, outside the project area. In the area of Stunt Ranch, one of the largest landslide complexes is developed in Sespe and Topanga Formations, which dip north and northwest in the general direction of movement.

Fire has the potential to remove vegetative cover and burned surface soil structure over large areas of steep terrain, thus, slopes become more unstable than normal. Increased slope stability hazards from dry ravel, rockfall, debris slides, and shallow landslides can result due to the loss of stabilizing roots and soil structure and increased water affecting nearby slopes. Dry ravel is a general term that describes the rolling, bouncing, and sliding of individual particles down a slope. Rocks which have lost their supporting vegetation on steep slopes and where increased water enters bedrock fractures will have an increased rockfall potential and may roll or fall down to roadways or canyon bottoms, or to places where they are stopped by obstructions or gentler slopes. Existing debris slides found along major roads, on steep upper slopes, and deep inner gorges can be expected to have additional movement due to increased saturation of slopes and increased instability within loosely consolidated material.

Fire can affect slope stability hazards in that the potential for destructive debris flows is increased. Most of this activity will take place on steeper slopes and bedrock exposures. However, it can potentially have an impact for a significant distance down slope from the point of initiation.

C.8.1.4 Soils

The soils underlying the North Area reflect the underlying rock type (parent material), the extent of weathering of the rock, the degree of slope, and the degree of human modification. Potential hazards and impacts from soils include erosion, shrink-swell (expansive soils), and corrosion of steel and concrete. Soil mapping by the U.S. Department of Agriculture (USDA) National Resource Conservation Service (NRCS) was reviewed for information about unsuitable characteristics of surface and near-surface soil materials. GIS spatial and tabular data for West San Fernando Valley (CA676) and for the Santa Monica Mountains Recreation Area (CA692) SSURGO soil survey (NRCS, 2018a; NRCS, 2018b) was reviewed. A summary of the significant characteristics of the soil units underlying the North Area are presented in Table C.8-2. Figure C.8-2 shows the distribution of these soil units within the North Area.



0 0.5 1 2
Miles

Figure C.8-2

Project Area Soil Map

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Table C.8-2. Soil Units Underlying the SMM North Area

USDA Map Symbol	Soil Unit Name	Soil Texture	Slope (percent)	Susceptibility to Sheet and Rill Erosion ¹	Shrink/ Swell Potential ²	Risk of Corrosion	
						Concrete	Uncoated Steel
104	Balcom silty clay loam	Silty clay loam, bedrock	15 to 30	Low	Moderate	Low	Moderate
105	Balcom silty clay loam	Silty clay loam, bedrock	30 to 50	Low	Moderate	Low	Moderate
500	Balcom silty clay loam	Silty clay loam, bedrock	30 to 50	Low	Low to Moderate	Low	Moderate
503	Balcom-Balcom dark surface association	Silty clay loam, weathered bedrock	30 to 75	Low	Moderate	Low	Moderate
320	Botella loam	Loam, clay loam	2 to 9	Low	Low to Moderate	Low	Moderate
122	Calcic Haploxerepts-Mollic Haploxeralfs association	Gravelly silt loam, weathered bedrock	30 to 75	Low	Moderate	Low	Low
109	Chualar-Urban land complex	Sandy loam, sandy clay loam, clay loam	2 to 9	Low	Low	Low	Moderate
170	Cotharin clay loam	Loam, weathered bedrock	30 to 75	Low	Moderate	Low	Low
171	Cotharin loam-Rock outcrop complex	Loam, weathered bedrock	30 to 75	Low	Moderate	Low	Low
241	Cotharin-Rock outcrop-Tongva complex	Loam, weathered bedrock	30 to 75	Low	Moderate	Low	Low
176	Cotharin-Talepop association	Loam, weathered bedrock	15 to 20	Low	Moderate	Low	Low
175	Cotharin-Talepop association	Loam, weathered bedrock	30 to 75	Low	Moderate	Low	Low
178	Cotharin-Talepop-Urban land complex	Loam, weathered bedrock	0 to 50	Low	Moderate	Low	Low
430	Cropley clay	Clay	2 to 9	Low	Moderate to Very High	Low	High
113	Cropley-Urban land complex	Clay	2 to 9	Low	High	Low	High
200	Cumulic Haploxerolls	Stratified sandy loam, stratified clay loam, extremely gravelly coarse sand	0 to 9	Low	Low to Moderate	Low	High
202	Fluvaquents-Riverwash complex	Loam, fine sandy loam, sandy loam, loamy sand, extremely gravelly sand, gravelly coarse sand	0 to 5	Low	Low to Moderate	Low	Moderate

Table C.8-2. Soil Units Underlying the SMM North Area

USDA Map Symbol	Soil Unit Name	Soil Texture	Slope (percent)	Susceptibility to Sheet and Rill Erosion ¹	Shrink/ Swell Potential ²	Risk of Corrosion	
						Concrete	Uncoated Steel
311	Gaviota-Rock outcrop association	Sandy loam, unweathered bedrock	50 to 100	Low	Low	Low	Low
119	Gazos silty clay loam	Silty clay loam, unweathered bedrock	30 to 50	Low	Moderate	Low	Moderate
190	Kayiwish association	Clay, weathered bedrock	0 to 9	Low	High	Low	High
191	Kayiwish association	Clay, weathered bedrock	2 to 30	Low	High	Low	High
331	Linne silty clay loam	Silty clay loam, weathered bedrock	15 to 50	Low	Moderate	Low	Moderate
332	Linne silty clay loam	Silty clay loam, weathered bedrock	9 to 15	Low	Moderate	Low	Moderate
330	Linne–Los Osos, warm–Calcic Haploxerepts association	Silty clay loam, bedrock	15 to 65	Low	Low to Very High	Low	Moderate to High
120	Mipolomol-Topanga association	Channery loam, bedrock	30 to 75	Low	Low to Moderate	Low	Low
400	Pachic Argixerolls, coastal	Gravelly loam, gravelly clay loam, unweathered bedrock	30 to 75	Low	Moderate	Low	Low
180	Pits and dumps	Pits and dumps	—	—	—	—	—
472	Rock outcrop- Sumiwawa-Hipuk complex	Gravelly loamy sand, loamy sand, weathered bedrock, unweathered bedrock	30 to 75	Low	Low to Moderate	Moderate	Low to Moderate
SeFvt	Santa Lucia shaly silty clay loam	Channery silty clay loam, very channery silty clay loam, unweathered bedrock	30 to 50	Low	Low	—	—
451	Sapwi-Urban land complex	Loam, stony clay loam, very stony clay loam, unweathered bedrock	0 to 50	Low	Moderate	Low	Moderate
470	Sumiwawa-Hipuk Rock outcrop complex	Gravelly loamy sand, loamy sand, weathered bedrock, unweathered bedrock	30 to 75	Low	Low to Moderate	Moderate	Low to Moderate

Table C.8-2. Soil Units Underlying the SMM North Area

USDA Map Symbol	Soil Unit Name	Soil Texture	Slope (percent)	Susceptibility to Sheet and Rill Erosion ¹	Shrink/ Swell Potential ²	Risk of Corrosion	
						Concrete	Uncoated Steel
231	Talepop-Rock outcrop complex	Gravelly loam, weathered bedrock	30 to 75	Low	Moderate	Low	Low
290	Topanga-Mipolomol -Sapwi association	Gravelly loam, gravelly clay loam, bedrock	30 to 75	Low	Low to Moderate	Low	Low to Moderate
461	Typic Haploxerepts	Silty clay loam, channery clay loam, weathered bedrock	15 to 30	Low	Moderate	Low	Moderate
460	Typic Haploxerepts	Silty clay loam, channery clay loam, weathered bedrock	30 to 50	Low	Moderate	Low	Moderate
437	Urban land-Cropley, fill complex	Sandy loam, gravelly sandy clay loam, clay, sandy clay loam, clay loam, clay	0 to 8	Low	Low to High	Low	High
435	Urban land-Cropley, fill complex	Sandy loam, gravelly sandy clay loam, clay, sandy clay loam, clay loam, clay	0 to 8	Low	Low to High	Low	High
438	Urban land-Cumulic Haploxerolls, fill- Cropley, fill complex	Stratified sandy loam, stratified clay loam, extremely gravelly coarse sand	0 to 15	Low	Low to High	Low	High
334	Urban land-Linne- Los Osos, warm complex	Clay loam, bedrock	0 to 30	Low	Moderate to Very High	Low	Moderate
452	Urban land-Sapwi, landscaped-Kawenga, landscaped complex	Loam, stony clay loam, very stony clay loam, unweathered bedrock	0 to 20	Low	Moderate	Low	Low to Moderate
254	Urban land- Xerorthents, fill complex	Fill, highly variable	0 to 30	—	—	Moderate	High
250	Urban land- Xerorthents, landscaped complex	Loam, bedrock	0 to 5	Low	Low to Moderate	Low	Low
252	Urban land- Xerorthents, landscaped, complex, rarely flooded	Loam, bedrock	0 to 5	Low	Low to Moderate	Low	Low

Table C.8-2. Soil Units Underlying the SMM North Area

USDA Map Symbol	Soil Unit Name	Soil Texture	Slope (percent)	Susceptibility to Sheet and Rill Erosion ¹	Shrink/ Swell Potential ²	Risk of Corrosion	
						Concrete	Uncoated Steel
531	Xerorthents-Urban land-Balcom complex	Loam, weathered bedrock	0 to 15	Low	Low to Moderate	Low	Low to Moderate
530	Xerorthents-Urban land-Balcom complex	Loam, weathered bedrock	0 to 30	Low	Low to Moderate	Low	Low to Moderate
139	Xerorthents-Urban land-Balcom complex	Silty clay loam, weathered bedrock	5 to 15	Low	Low	—	—
532	Xerorthents-Urban land-Pachic Argixerolls, guillied complex	Loam, weathered bedrock	0 to 30	Low	Low to Moderate	Low	Low
301	Zumaridge-Kawenga association	Loam, weathered bedrock, unweathered bedrock	15 to 50	Low	Low to Moderate	Low	Low
300	Zumaridge-Kawenga association	Loam, weathered bedrock, unweathered bedrock	30 to 75	Low	Low to Moderate	Low	Low
304	Zumaridge-Sapqi- Kawenga association	Loam, weathered bedrock, unweathered bedrock	30 to 75	Low	Low to Moderate	Low	Low to Moderate

1 - Based on Erosion factor K (used by the NRCS in the Universal Soil Loss Equation), which indicates the susceptibility of a soil to sheet and rill erosion. Values of K range from 0.02 to 0.69 with higher values being more susceptible to sheet and rill erosion.

2 - Linear extensibility is the method used by NRCS to determine the shrink-swell potential of soils. Linear extensibility refers to the change in length of an unconfined clod as moisture content is decreased from a moist to a dry state. The volume change is reported as percent change for the whole soil. The amount and type of clay minerals in the soil influence volume change. The shrink-swell potential is low if the soil has linear extensibility of less than 3 percent; moderate if 3 to 6 percent; high if 6 to 9 percent; and very high if more than 9 percent. If the linear extensibility is more than 3 percent, shrinking and swelling can cause damage to buildings, roads, and other structures and to plant roots. Special design commonly is needed in areas with expansive soils.

Potential soil erosion hazards vary depending on the use, conditions, and textures of the soils. The properties of soil that influence erosion by rainfall and runoff affect the infiltration capacity of a soil, as well as the resistance of a soil to detachment and being carried away by falling or flowing water. Soils on steeper slopes would be more susceptible to erosion because of increased surface flow (runoff) on slopes where there is little time for water to infiltrate before runoff occurs. Soils containing high percentages of fine sands and silt and that loose (low density) are generally the most erodible. As the clay and organic matter content of soils increases, the potential for erosion decreases. Clays act as a binder to soil particles, thus reducing the potential for erosion.

Sheet and rill erosion are the removal of soil from the land surface by the action of rainfall and runoff. Sheet erosion occurs when water runs over a large uniform area picking up and distributing soil particles. Rill erosion occurs as concentrated surface runoff begins to remove soil along concentrated zones forming numerous small, conspicuous water channels or tiny rivulets. Susceptibility to sheet and rill erosion for the soils underlying North Area is low.

Expansive soils are characterized by their ability to undergo significant volume change (shrink and swell) due to variation in soil moisture content. Changes in soil moisture could result from several factors, including rainfall, landscape irrigation, utility leakage, and/or perched groundwater. Expansive soils are typically very fine grained with a high to very high percentage of clay. Soils with moderate to high shrink-swell potential would be classified as expansive soil. The shrink and swell potential for the soils underlying the North Area ranges widely from low to very high.

Corrosivity of soils is generally related to the following key parameters: soil electrical resistivity; presence of chlorides and sulfates; oxygen content; and pH. Typically, the most corrosive soils are those with the lowest pH and highest concentration of chlorides and sulfates. High sulfate soils are corrosive to concrete and may prevent complete curing of the concrete, reducing its strength considerably. Low pH and/or low resistivity soils could corrode buried or partially buried metal structures. The corrosion potential for the soils underlying the North Area is generally low to moderate for corrosion to uncoated steel and low to high for corrosion to concrete.

Fire could alter the surficial characteristic of the soil, affecting resistance to erosion and permeability of the soils, with the amount of effect tied to the soil burn severity. Soil burn severity describes classes of fire-caused changes to soil characteristics and surface fuel and duff consumption which in turn affects soil hydrologic function. Generally, the duration of subsurface heating determines the degree of soil burn severity and can be inferred from the fire effects on plants, other organic matter, and soils. Four classes of soil burn severity are generally used and are described below (Parsons, 2003):

- **Unburned to very low soil burn severity.** Fire has not entered the area or has very lightly charred only the litter and fine fuels on the ground; soil organic matter, structure, and infiltration unchanged.
- **Low soil burn severity.** Low soil heating or light ground char occurs; mineral soil is not changed; leaf litter may be charred or partially consumed, and the surface of the duff may be lightly charred; original forms of surface materials, such as needle litter or lichens may be visible; very little to no change in runoff response. Above-ground portions of vegetation may be consumed, but root masses are intact. Change in runoff response is usually slight.
- **Moderate soil burn severity.** Moderate soil heating with moderate ground char; soil structure is usually not altered; decreased infiltration due to fire-induced water repellency may be observed; litter and duff are deeply charred or consumed; shallow light-colored ash layer and burned roots and rhizomes are usually present. Increase in runoff response may be moderate to high, depending on degree of fire-caused changes to the pre-fire vegetation community, density of pre-fire vegetation, and presence or absence of mulch potential, sprouting vegetation, etc.
- **High soil burn severity.** High soil heating, or deep ground char occurs; duff is completely consumed; soil structure is often destroyed due to consumption of organic matter; decreased infiltration due to fire induced water repellency is often observed over a significant portion of the area; top layer of mineral soil may be changed in color (but not always) and consistence and the layer below may be blackened from charring of organic matter in the soil; deep, fine ash layer is present, often gray or white; all or most organic matter is removed; essentially all plant parts in the duff layer are consumed; increase in runoff response is usually high.

It is expected that an area which has a burn severity of moderate to high would have increased soil erosion due to the partial to complete destruction of stabilizing vegetation and root structure (Parsons, 2003). Fire also has the potential to create 'hydrophobic' soils. Fire induced water repellency as the potential to significantly reduce water infiltration and increase runoff and erosion and thus the soils in a burn area would be substantially more unstable than pre-fire conditions.

Potential for Damage to Soils by Fire

Potential for damage to soils by fire is an indication of the potential for damage to nutrient, physical, and biotic soil characteristics by fire. The potential for damage to soils by fire rating is expressed as high, moderate or low. Potential for damage by fire could result from a number of factors, including texture of the surface layer, content of rock fragments and organic matter in the surface layer, thickness of the surface layer, and slope. A high potential for fire damage rating indicates that fire damage can occur due to one or more undesirable soil properties and overcoming the unfavorable properties requires special design, additional maintenance, and costly alteration. The following three units in the North Area exhibit a high potential for fire damage: the Calcic Haploxerepts-Mollic Haploxeralfs association, the Cropley clay, and the Sumiwawa-Hipuk Rock outcrop complex.

The Calcic-Haploxerepts-Mollic Haploxeralfs association exhibits a high potential for fire damage due to the following features: texture, rock fragments, surface depth, and slope. This association is comprised of gravelly silt loam and weathered bedrock. The parent material consists of colluvium and residuum weathered from calcareous shale. Depth to a root restrictive layer, bedrock, paralithic is 20 to 39 inches. Slopes are 30 to 75 percent. The Calcic Haploxerepts-Mollic Haploxeralfs association comprises approximately 1341 acres or 6.5 percent of the North Area.

The Cropley clay unit exhibits a high potential for fire damage due to texture, rock fragments, and surface depth. This unit is comprised of clay. The parent material is alluvium derived from calcareous shale. Depth to a root restrictive layer, bedrock, paralithic is more than 80 inches. The Cropley clay comprises only 57 acres or 0.3 percent of the North Area.

The Sumiwawa-Hipuk Rock outcrop complex has a high potential for fire damage due to the following features: texture, rock fragments, surface depth, and slope. The complex is comprised of gravelly loamy sand, loamy sand, weathered bedrock, and unweathered bedrock. The parent material is colluvium derived from sandstone and/or residuum weathered from sandstone. Depth to a root restrictive layer, bedrock, paralithic is 10 to 20 inches. The Sumiwawa-Hipuk Rock outcrop complex comprises approximately 803 acres or 3.9 percent of the North Area.

Septic Tank Absorption Fields

Septic tank absorption fields are areas in which effluent from a septic tank is distributed into the soil through subsurface tiles or perforated pipe. Septic tank absorption field ratings evaluate only the soil between depth of 24 and 60 inches and is based on the soil properties that affect the absorption of the effluent, construction and maintenance of the system, and public health. The following soil characteristics affect absorption of the effluent: saturated hydraulic conductivity (Ksat), depth to a water table, ponding, depth to bedrock or a cemented hard pan, and flooding. Lateral seepage and surfacing of the effluent in downslope areas may be caused by excessive slope. This rating indicates the extent to which the soil absorption is limited by the soil features. A “not limited” rating indicates that the soil has features that are very favorable for the absorption field use, while “very limited” rating indicates that the soil has one or more features that are unfavorable for the specified use. The septic tank absorption field ratings for the soils underlying the North Area is very limited (NRCS, 2018a; NRCS, 2018b).

C.8.1.5 Subsidence

Land subsidence can occur in valleys containing aquifer systems that are, in part, made up of fine-grained sediments and that have undergone extensive ground-water development (USGS, 2003). As the ground-water is withdrawn, the pore-fluid pressure in the sediments decreases allowing the weight of the overlying sediment to permanently compact or compress the fine-grained units. This effect is most pronounced

in younger, unconsolidated sediments. Land subsidence is generally characterized by a broad zone of deformation where differential settlements are small. The North Area is not in a known area of subsidence.

C.8.1.6 Seismicity

The seismicity of Southern California is dominated by the intersection of the north-northwest trending San Andreas Fault system and the east-west trending Transverse Ranges fault system. Both systems are responding to strain produced by the relative motions of the Pacific and North American tectonic plates. This strain is relieved by right-lateral strike-slip faulting on the San Andreas and related faults, left-lateral strike slip on the Garlock fault, and by vertical, reverse-slip or left-lateral strike-slip displacement on faults in the Transverse Ranges. The effects of this deformation include mountain building, basin development, deformation of Quaternary marine terraces, widespread regional uplift, and generation of earthquakes. Both the Transverse Ranges and northern Los Angeles County area are characterized by numerous geologically young faults. These faults can be classified as historically active, active, potentially active, or inactive, based on the following criteria (CGS, 2018):

- Faults that have generated earthquakes accompanied by surface rupture during historic time (approximately the last 200 years) and faults that exhibit aseismic fault creep are defined as Historically Active.
- Faults that show geologic evidence of movement within Holocene time (approximately the last 11,000 years) are defined as Active.
- Faults that show geologic evidence of movement during the Quaternary time (approximately the last 1.6 million years) are defined as Potentially Active.
- Faults that show direct geologic evidence of inactivity during all of Quaternary time or longer are classified as Inactive.

Although it is difficult to quantify the probability that an earthquake would occur on a specific fault, this classification is based on the assumption that if a fault has moved during the Holocene epoch, it is likely to produce earthquakes in the future. Blind thrust faults do not intersect the ground surface, and thus they are not classified as active or potentially active in the same manner as faults that are present at the earth's surface. Blind thrust faults are seismogenic structures and thus the activity classification of these faults is predominantly based on historic earthquakes and microseismic activity along the fault.

The North Area would be subject to ground shaking associated with earthquakes on faults of the San Andreas and Transverse Ranges fault systems. Active faults of the San Andreas system are predominantly strike-slip faults accommodating translational movement. The Transverse Ranges fault system consists primarily of blind, reverse, and thrust faults accommodating tectonic compressional stresses in the region. This combination of translational and compressional stresses gives rise to diffuse seismicity across the region.

The most significant faults in the North Area are faults of the San Andreas Fault Zone. The San Andreas Fault Zone is a 680-mile active right-lateral strike-slip complex of faults that has been responsible for many of the damaging earthquakes in southern California in historical times. The San Andreas Fault Zone is the longest active fault in California and represents a major plate boundary between the Pacific and North American plates. Historically, the San Andreas Fault has produced significant earthquakes that have caused surface rupture and damage in the project region.

Active and potentially active faults within 50 miles of the North Area that are significant potential seismic sources are presented in Table C.8-3. Data presented in this table include closest distance to project area

(approximate center of the SMM North Area), estimated earthquake magnitude, fault type and dip direction, and slip rate. Figure C.8-3 shows locations of significant active faults and historic earthquakes in the North Area and surrounding region.

Table C.8-3. Significant Regional Active and Potentially Active Faults

Name	Closest Distance to Project (miles) ¹	Estimated Maximum Earthquake Magnitude ²	Fault Type and Dip Direction	Slip Rate (mm/yr)
Malibu Coast	6.2	7.0	Left Lateral Reverse Oblique, 74° N	0.3
Santa Monica	9.7	7.3	Left Lateral Reverse Oblique, 51° N	2.6
Anacapa-Dume	9.9	7.2	Blind Thrust, 45° N	3.0
Palos Verdes	14.5	7.3	Right Lateral Strike Slip, 90°	3.0
Santa Susana	15.2	6.9	Reverse, 55° N	5.0
Oak Ridge	18.6	7.2	Reverse, 65° S	4.0
Hollywood	18.7	6.7	Left Lateral Reverse Oblique, 70° N	1.0
Sierra Madre	18.9	7.2	Reverse, 45° N	2.0
Northridge	19.0	6.9	Blind Thrust, 42° S	1.5
Newport Inglewood	20.2	7.5	Right Lateral Strike Slip, 90°	1.3
Pitas Point – Ventura	28.0	7.0	Reverse, 64° N	1.0
Channel Islands Thrust	31.4	7.3	Blind Thrust, 20° N	1.5
Santa Cruz Island	32.0	7.2	Right Lateral Strike Slip, 90°	1.0
Red Mountain	36.1	7.4	Reverse, 56° N	2.0
San Andreas	41.3	7.3	Right Lateral Strike Slip, 90°	29.0

1 - Fault distances and parameters obtained from USGS Earthquake Hazards Program, 2008 National Seismic Hazard Maps - Source Parameters website (USGS, 2008) and USGS and CGS Quaternary Fault and Fold Database of the United States, (USGS & CGS, 2018).

2 - Maximum Earthquake Magnitude – the maximum earthquake that appears capable of occurring under the presently known tectonic framework, magnitude listed is “Ellsworth-B” magnitude from USGS OF08-1128 (Documentation for the 2008 Update of the United States National Seismic Hazard Maps) unless otherwise noted.

Fault Rupture

Fault rupture is the surface displacement that occurs when movement on a fault deep within the earth breaks through to the surface. Fault rupture and displacement almost always follows preexisting faults, which are zones of weakness, however, not all earthquakes result in surface rupture (i.e., earthquakes that occur on blind thrusts do not result in surface fault rupture). Rupture may occur suddenly during an earthquake or slowly in the form of fault creep. In addition to damage caused by ground shaking from an earthquake, fault rupture is damaging to buildings and other structures due to the differential displacement and deformation of the ground surface that occurs from the fault offset leading to damage or collapse or structural failure of structures across this rupture zone. Perhaps the most important single factor to be considered in the seismic design of structures is to avoid fault traces and the potential ground surface displacement.

Although there are several active faults in the region, no known active faults cross the North Area. See Figure C.8-3 below.

Strong Ground Shaking

An earthquake is classified by the amount of energy released, which historically was quantified using the Richter scale. Seismologists now use the Moment Magnitude (M) scale because it provides a more accurate measurement of the size of major and great earthquakes. For earthquakes of less than M 7.0, the Moment and Richter Magnitude scales are nearly identical. For earthquake magnitudes greater than M 7.0, readings on the Moment Magnitude scale are slightly greater than a corresponding Richter Magnitude.

The intensity of the seismic shaking, or strong ground motion, during an earthquake is dependent on the distance between the North Area and the epicenter of the earthquake, the magnitude of the earthquake, and the geologic conditions underlying and surrounding the project area. Earthquakes occurring on faults closest to the North Area would most likely generate the largest ground motion.

The intensity of earthquake-induced ground motions can be described using ground accelerations, represented as a fraction of the acceleration of gravity (g). The CGS Probabilistic Seismic Hazards Ground Motion Interpolator website, using data from the CGS/USGS 2008 Probabilistic Seismic Hazard Assessment (PSHA) Maps, was used to estimate peak ground accelerations (PGAs) for the proposed Plan and CSD Update (CGS, 2018). PSHA Maps depict peak ground accelerations with a 2 percent probability of exceedance in 50 years, which corresponds to a return interval of 2,475 years for a maximum considered earthquake. Peak ground acceleration is the maximum acceleration experienced by a particle on the Earth's surface during the course of an earthquake, and the units of acceleration are most commonly measured in terms of fractions of g, the acceleration due to gravity (980 cm/sec²). Peak ground accelerations along the North Area range from about 0.65g to 0.77g, which corresponds to strong ground shaking (CGS, 2018).

A review of historic earthquake activity from 1898 to 2018 indicates that three significant earthquakes of magnitude M 6.0 or greater have occurred within 50 miles (80 kilometers) of the North Area (CGS, 2018; SCEDC, 2017).

The large earthquakes include the M 6.4 Long Beach Earthquake in 1933, which is mapped as having occurred approximately 3 miles south of Huntington Beach. This earthquake caused 120 deaths and extensive damage to 120 schools in the area, 70 of which were destroyed. One month after the Long Beach earthquake, the California State Legislature enacted the Field Act. The Field Act authorizes the Division of the State Architect to review and approve all public-school plans and specifications, and to furnish construction supervision. The Long Beach earthquake occurred on the Newport-Inglewood fault at a depth of 8 miles. The fault ruptured in the subsurface for approximately 9 miles.

The 1971 M 6.6 San Fernando earthquake caused property damage estimated at over \$500 million and killed 65 people. This earthquake occurred in the San Fernando Valley near Sylmar on the San Fernando fault zone, a thrust faulting zone, at a depth of 5.8 miles. The total surface rupture length was 11.8 miles and the maximum slip was 6.6 feet.

The 1994 M 6.7 Northridge earthquake centered approximately 1 mile south-southwest of Northridge, caused widespread damage. The Northridge earthquake occurred on the Northridge thrust, a blind thrust fault at a depth of 11.4 miles. Other area faults experienced triggered slip resulting in minor rupture from the main shock and from large aftershocks.

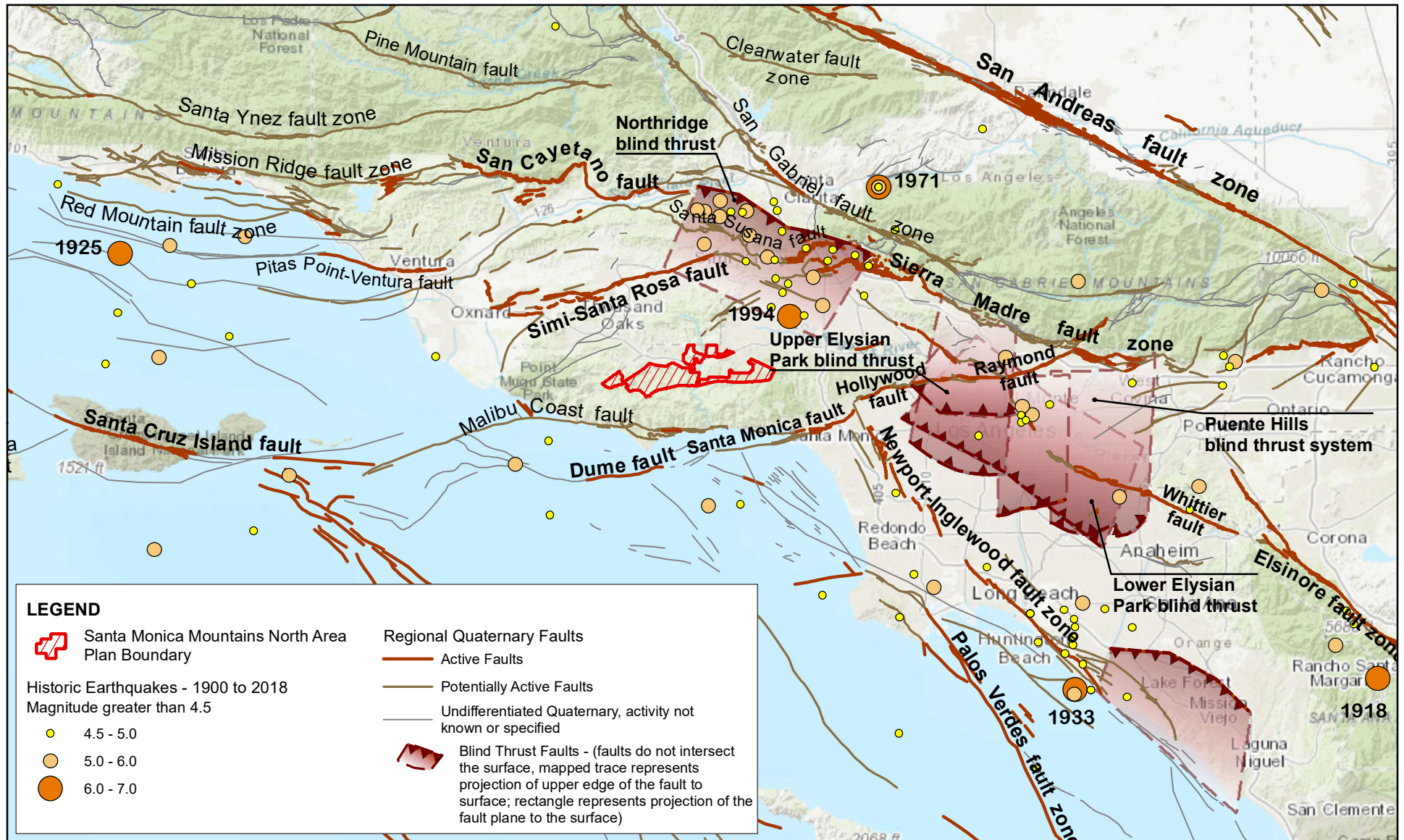


Figure C.8-3

Regional Quaternary Faults and Historic Earthquakes

Sources: Faults - U.S.G.S. and C.G.S., 2006, Quaternary fault and fold database for the United States; Earthquakes - USGS, 2018. USGS Earthquake Hazards Program, Earthquake Catalog.

Liquefaction

Liquefaction is the phenomenon in which saturated granular sediments temporarily lose their shear strength during periods of earthquake-induced strong ground shaking. The susceptibility of a site to liquefaction is a function of the depth, density, and water content of the granular sediments and the magnitude and frequency of earthquakes in the surrounding region. Saturated, unconsolidated silts, sands, and silty sands within 50 feet of the ground surface are most susceptible to liquefaction. Liquefaction-related phenomena include lateral spreading, ground oscillation, flow failures, loss of bearing strength, subsidence, and buoyancy effects (Youd and Perkins, 1978). In addition, densification of the soil resulting in vertical settlement of the ground can also occur.

In order to determine liquefaction susceptibility of a region, three major factors must be analyzed. These include: (a) the density and textural characteristics of the alluvial sediments; (b) the intensity and duration of ground shaking; and (c) the depth to groundwater. The recent alluvial sediments along stream channels within the North Area may be liquefiable due to high groundwater levels and loose to moderately dense sandy materials. Geological units that are generally susceptible to liquefaction in the North Area include Holocene to Late Pleistocene young alluvium and young alluvial fan deposits found on the Thousand Oaks, Calabasas, and Canoga Park Quadrangles (CGS, 2000; CGS, 1997a; CGS, 1997b).

Seismic Slope Instability

Other seismically-induced ground failures that may affect the North Area include ground cracking and seismically-induced landslides. Landslides triggered by earthquakes have been a significant cause of earthquake damage; in southern California, large earthquakes such as the 1971 San Fernando and 1994 Northridge earthquakes triggered landslides that were responsible for destroying or damaging numerous structures, blocking major transportation corridors, and damaging life-line infrastructure. Areas that are most susceptible to earthquake-induced landslides are steep slopes in poorly cemented or highly fractured rocks, areas underlain by loose, weak soils, and areas on or adjacent to existing landslide deposits.

As noted in the slope stability section, there are numerous mapped landslides and very steep slopes in the North Area that could be triggered by moderate to large earthquakes in the region.

C.8.1.7 Paleontological Setting

Almost the entire North Area is part of the Santa Monica Mountains National Recreation Area, a unit of the National Park System. Paleontological resources in the Santa Monica Mountains include isolated fossil specimens, fossil sites, and fossil bearing rock units. The paleontologic sensitivity of the North Area varies across the landscape depending on local geology as well as geomorphic factors (Table C.8-4). The geology and depositional history of different rock units, in turn, largely determines the potential for yielding scientifically or educationally significant fossil remains.

Well over 1,000 fossil localities have been recorded and in excess of a million specimens have been collected in Los Angeles County, making the region especially rich in fossil deposits. Eleven significant general fossil localities in Los Angeles County have been previously identified, two of which are in the Santa Monica Mountains as part of the Topanga Formation (County, 2014).

The oldest paleontologic resources of the North Area come from the Late Cretaceous Chatsworth formation. Ammonites, extinct mollusks related to the chambered nautilus, have been collected from this formation, as well as marine foraminifera, clams, snails, bryozoans, and shark teeth. A substantial portion of the Cenozoic period (the last 65,000,000 years), the Santa Monica Mountains area has been the site of marine deposition. There are a number of tertiary rock units in the mountains known to yield scientifically

significant paleontologic resources (e.g., the Modelo, Pico, and Topanga formations). The sediments of the Modelo formation contain microfossils, clams, bony fish, whales, and algae. Bryozoans, gastropods, sharks, and cetaceans have been recovered from fossil sites in the Pico Formation. The Topanga formation, a shallow-water, marine sandstone unit, has yielded bony fish, bivalves, and gastropods.

In contrast to marine sediments, terrestrial sediments often do not contain fossils. This is because they are normally deposited under subaerial conditions, an environment of deposition not conducive to fossil preservation. Extensive deposits of colluvium mantling the hills of the North Area fall into this low-sensitivity category, as well as the alluvium of the outwash fans issuing from the canyons. In contrast, fine-grained (clay to fine sand) valley fill deposits have yielded the remains of a diversity of extinct Pleistocene land mammals. Landslide deposits have not traditionally been associated with high paleontologic sensitivity. However, recent discoveries in southern California of quaternary-age fossil plants entombed at the base of landslides have provided important new information on the ecological history of the region and have been used to determine that this important phenomenon is distinctly episodic.

Table C.8-4. North Area Geological Formations and Paleontological Sensitivity

Rock Type/Formation	Sensitivity
Chatsworth Formation	High
Trabuco Formation	Low to High
Tuna Canyon Formation	High
Martinez (Coal Canyon) Formation	High
Sespe Formation	Low to High
Vaqueros Formation	High
Llajas Formation	High
Topanga Formation	High
Aquagene Tuffs of the Conejo Volcanics (correlative with the Zuma Formation)	Low to High
Calabasas Formation	High
Modelo Formation	High
Trancas Formation	High
Monterey Formation	High
Pico Formation	High
Plio-Pleistocene Marine Sediments	Low to High
Quaternary Landslide Deposits (Basal)	High
Colluvium (Hill Slope Deposits)	Low
Alluvial Fan Deposits	Low
Valley Fill Deposits	Low to High

C.8.2 Regulatory Setting

Federal

Clean Water Act. The Clean Water Act establishes the basic structure for regulating discharges of pollutants into the waters of the United States. The Act authorized the Public Health Service to prepare comprehensive programs for eliminating or reducing the pollution of interstate waters and tributaries and improving the sanitary condition of surface and underground waters with the goal of improvements to

and conservation of waters for public water supplies, propagation of fish and aquatic life, recreational purposes, and agricultural and industrial uses. New project construction in the SMMNA could disturb a surface area greater than one acre; therefore, individual projects would be required to obtain coverage under Clean Water Act regulations a National Pollution Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activity. Compliance with the NPDES would require that the applicant submit a Storm Water Pollution Prevention Plan (SWPPP).

International Building Code. The International Building Code (IBC) is published by the International Code Council (ICC), the scope of this code covers major aspects of construction and design of structures and buildings, except for three-story one- and two-family dwellings and town homes. The International Building Code has replaced the Uniform Building Code as the basis for the California Building Code and contains provisions for structural engineering design. The IBC addresses the design and installation of structures and building systems through requirements that emphasize performance. The IBC includes codes governing structural as well as fire- and life-safety provisions covering seismic, wind, accessibility, egress, occupancy, and roofs.

Paleontological Resources Preservation (PRP) Act of 2009

The PRPA was signed into law as part of the Omnibus Public Lands Management Act (OPLMA) of 2009. The OPLMA-PRP requires the Secretary of the Interior to manage and protect paleontological resources on federal land using scientific principles and expertise and requires federal agencies to develop appropriate plans for inventorying, monitoring, and the scientific and educational use of paleontological resources, in accordance with applicable agency laws, regulations, and policies. Where possible, these plans should emphasize interagency coordination and collaborative efforts with non-federal partners, the scientific community, and the general public. The OPLMA-PRP is the new authority for federal land managing agencies for permits to collect paleontological resources, as well as curation of these resources in an approved repository.

Antiquities Act of 1906

The Antiquities Act was the first law enacted to specifically establish that archaeological sites on public lands are important public resources, and it obligated federal agencies that manage public lands to preserve the scientific, commemorative, and cultural values of such sites. This act does not refer to paleontological resources specifically; however, the act does provide for the protection of “objects of antiquity” (understood to include paleontological resources) by various federal agencies not covered by the OPLMA-PRP.

State

California Building Code. The California Building Code, Title 24, Part 2 provides building codes and standards for design and construction of structures in California. The 2016 CBC is based on the 2015 International Building Code with the addition of more extensive structural seismic provisions. Chapter 16 of the CBC contains definitions of seismic sources and the procedure used to calculate seismic forces on structures.

Alquist-Priolo. The Alquist-Priolo Earthquake Fault Zoning Act of 1972, Public Resources Code (PRC) sections 2621–2630 (formerly the Special Studies Zoning Act) regulates development and construction of buildings intended for human occupancy to avoid the hazard of surface fault rupture. While this act does not specifically regulate transmission and telecommunication lines; it does help define areas where fault rupture is most likely to occur. This Act groups faults into categories of active, potentially active, and inactive. Historic and Holocene age faults are considered active, Late Quaternary and Quaternary age

faults are considered potentially active, and pre-Quaternary age faults are considered inactive. These classifications are qualified by the conditions that a fault must be shown to be “sufficiently active” and “well defined” by detailed site-specific geologic explorations in order to determine whether building setbacks should be established.

Seismic Hazard Mapping Act. The Seismic Hazards Mapping Act (the Act) of 1990 (Public Resources Code, Chapter 7.8, Division 2, sections 2690–2699.) directs the California Department of Conservation, Division of Mines and Geology [now called California Geological Survey (CGS)] to delineate Seismic Hazard Zones. The purpose of the Act is to reduce the threat to public health and safety and to minimize the loss of life and property by identifying and mitigating seismic hazards. Cities, counties, and State agencies are directed to use seismic hazard zone maps developed by CGS in their land-use planning and permitting processes. The Act requires that site-specific geotechnical investigations be performed prior to permitting most urban development projects within seismic hazard zones.

California Environmental Quality Act (CEQA)

This law encourages the protection of all aspects of the environment by requiring state and local agencies to prepare multidisciplinary analyses of the environmental impacts of a proposed project, and to make decisions based on the findings of those analyses. CEQA also takes into account the laws and procedures of local California jurisdictions.

CEQA includes in its definition of historical resources, “any object [or] site ...that has yielded or may be likely to yield information important in prehistory” (14 CCR 15064.5[3]), which is typically interpreted as including fossil materials and other paleontological resources. More specifically, destruction of a “unique paleontological resource or site or unique geologic feature” constitutes a significant impact under CEQA (State CEQA Guidelines Appendix G). CEQA does not provide an explicit definition of a “unique paleontological resource,” but a definition is implied by comparable language within the act relating to archeological resources: “The procedures, types of activities, persons, and public agencies required to comply with CEQA are defined in: Guidelines for the Implementation of CEQA, as amended March 29, 1999” (Title 14, Chapter 3, California Code of Regulations: 15000 et seq.).

Treatment of paleontological resources under CEQA is generally similar to treatment of cultural resources, requiring evaluation of resources in the project; assessment of potential impacts on significant or unique resources; and development of mitigation measures for potentially significant impacts, which may include avoidance, monitoring, or data recovery excavation.

California Public Resources Code

PRC 5097.5 affirms that no person shall willingly or knowingly excavate, remove, or otherwise destroy a vertebrate paleontological site or paleontological feature without the express permission of the overseeing public land agency. Section 5097.5 specifies that any unauthorized removal of paleontological remains is a misdemeanor. Under PRC 30244, any development that would adversely impact paleontological resources shall require reasonable mitigation. These regulations apply to projects located on land owned by or under the jurisdiction of the state or city, county, district, or other public agency.

California Penal Code

Section 622.5 sets the penalties for damage or removal of paleontological resources.

Local

Los Angeles County General Plan. The Safety Element of the Los Angeles County General Plan (2015) provides goals and policies to reduce impacts from seismic and geologic hazards and provide a safer environment. The two main policies relevant to the project are: minimize injury and loss of life, damage, and social, cultural, and economic impacts caused by earthquake hazards; and protect public safety and minimize the social and economic impacts from geologic hazards.

Safety Element

- *Policy S 1.1: Discourage development in Seismic Hazard and Alquist-Priolo Earthquake Fault Zones.*
- *Policy S 1.2: Prohibit the construction of most structures for human occupancy adjacent to active faults until a comprehensive fault study that addresses the potential for fault rupture has been completed.*
- *Policy S 1.3: Require developments to mitigate geotechnical hazards, such as soil instability and land-sliding in Hillside Management Areas through siting and development standards.*
- *Policy S 1.4: Support the retrofitting of unreinforced masonry structures to help reduce the risk of structural and human loss due to seismic hazards.*

Public Services and Facilities Element

- *Policy PS/F 4.1: Encourage the planning and continued development of efficient countywide sewer conveyance treatment systems.*
- *Policy PS/F 4.2: Support capital improvement plans to improve aging and deficient wastewater systems, particularly in areas where the General Plan encourages development, such as TODs.*
- *Policy PS/F 4.3: Ensure the proper design of sewage treatment and disposal facilities, especially in landslide, hillside, and other hazard areas.*
- *Policy PS/F 4.4: Evaluate the potential for treating stormwater runoff in wastewater management systems or through other similar systems and methods.*

Conservation and Natural Resources Element

- *Policy C/NR 13.5: Encourage required grading to be compatible with the existing terrain.*
- *Policy C/NR 13.8: Manage development in (Hillside Management Areas) HMAs to protect their natural and scenic character and minimize risks from natural hazards, such as fire, flood, erosion, and landslides.*
- *Policy C/NR 13.9: Consider the following in the design of a project that is located within an HMA, to the greatest extent feasible:*
 - *Public safety and the protection of hillside resources through the application of safety and conservation design standards;*
 - *Maintenance of large contiguous open areas that limit exposure to landslide, liquefaction and fire hazards and protect natural features, such as significant ridgelines, watercourses and SEAs.*
- *Policy C/NR 14.1: Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible.*
- *Policy C/NR 14.2: Support an inter-jurisdictional collaborative system that protects and enhances historic, cultural, and paleontological resources.*
- *Policy C/NR 14.5: Promote public awareness of historic, cultural, and paleontological resources.*
- *Policy C/NR 14.6: Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.*

Los Angeles County Code. The Los Angeles County (County) Building Code contains rules and regulations that govern activities that could result in soil erosion or slope instability. These rules and regulations within the County Grading Code Ordinance and Regulations, where provisions for excavation, grading, and earth-work construction have been established, permitting procedures are set forth, and plan approval and grading inspection protocols and procedures have been identified. The appendix also contains provisions for construction-related erosion control, including the preparation of cut-and-fill slopes and the implementation of erosion control measures such as check dams, cribbing, riprap, or other devices or methods. The ordinances also include seismic safety requirements for certain building types, such as older concrete tilt-up buildings and unreinforced masonry buildings. The stated goal of these ordinances is to promote public safety and welfare by reducing the risk of death or injury that could result from earthquake damage to certain types of older buildings during moderate or strong earthquakes. Based on the findings of required structural analyses, deficient buildings may need to be strengthened or demolished.

The Hillside Management Areas (HMA) Ordinance. The HMA Ordinance is a component of the General Plan, which was adopted by the Los Angeles County Board of Supervisors on October 6, 2015. The Hillside Management Areas Ordinance and the Hillside Design Guidelines implement County policies by ensuring that hillside development projects use sensitive and creative engineering, architectural, and landscaping site design techniques. Hillside Management Areas (HMAs) are defined as areas with 25% or greater natural slopes. The Hillside Design Guidelines are required for development in HMAs, unless exempted under the Ordinance's provisions. In hillside areas with less than 25% slope, use of the Guidelines is optional but encouraged. The Guidelines include specific and measurable design techniques that can be applied to residential, commercial, industrial, and other types of projects.

C.8.3 Thresholds of Significance and Methodology

C.8.3.1 Thresholds of Significance

In accordance with Appendix G of the State CEQA Guidelines, geology, soils, and paleontological impacts would be considered significant if the project would:

- Expose people or structures to 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.
- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.
- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction.
- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.
- Result in substantial soil erosion or the loss of topsoil.
- 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?
- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

- Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

C.8.3.2 Methodology

Geologic, soil, and seismic conditions were evaluated with respect to adverse effects implementation of the proposed Plan and CSD Update may have on local geology and soils, as well as the impact that specific geologic hazards may have future projects carried out under the proposed Plan and CSD Update. The methodology applied to assess probable impacts to and from geologic and soils conditions involves comparing actions included under the proposed Plan and CSD Update against the environmental setting presented in this section, with consideration to the significance criteria identified in Appendix G of the State CEQA Guidelines.

Paleontology is a multidisciplinary science that combines elements of geology, biology, chemistry, and physics in an effort to understand the history of life on earth. Paleontological resources, or fossils, are the evidence of once-living organisms preserved in the rock record. They include both the fossilized remains of ancient plants and animals and the traces thereof (e.g., trackways, imprints, burrows, etc.). In general, fossils are considered to be greater than 5,000 years old (middle Holocene) and are typically preserved in sedimentary rocks. Although rare, fossils can also be preserved in volcanic rocks and low-grade metamorphic rocks under certain conditions (Society of Vertebrate Paleontology [SVP], 2010).

Paleontological resources are not found in “soil” but are contained within the geologic deposits or bedrock that underlies the soil layer. Therefore, in order to ascertain whether or not a particular study area has the potential to contain significant fossil resources at the subsurface, it is necessary to review relevant scientific literature and geologic mapping to determine the geology and stratigraphy of the area. Further, to delineate the boundaries of an area of paleontological sensitivity, it is necessary to determine the extent of the entire geologic unit because paleontological sensitivity is not limited to surface exposures of fossil material.

Significant paleontological resources are defined as “identifiable” vertebrate fossils, uncommon invertebrate, plant, and trace fossils that provide taphonomic, taxonomic, phylogenetic, paleoecologic, stratigraphic, or biochronological data (SVP, 2010). These data are important because they are used to examine evolutionary relationships, provide insight on the development of and interaction between biological communities, establish time scales for geologic studies, and for many other scientific purposes (SVP, 2010).

Absent specific agency guidelines, most professional paleontologists in California adhere to guidelines set forth by SVP in “Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources” (SVP, 2010). These guidelines establish detailed protocols for the assessment of the paleontological resource potential (i.e., “sensitivity”) of a project area and outline measures to follow in order to mitigate adverse impacts to known or unknown fossil resources during project development. Using baseline information gathered during a paleontological resource assessment, the paleontological resource potential of the geologic unit(s) (or members thereof) underlying a project area can be assigned to one of four categories defined by SVP (2010). These categories include high, undetermined, low, and no potential. The criteria for each sensitivity classification, and the corresponding mitigation recommendations, are summarized in Table C.8-5 below.

Table C.8-5. Paleontological Sensitivity Ratings

Paleontological Resource Potential	Criteria for Establishing Sensitivity
High	Geologic units with high potential for paleontological resources are those that have proven to yield vertebrate or significant invertebrate, plant, or trace fossils in the past or are likely to contain new vertebrate materials, traces, or trackways. Rock units with high potential also may include those that contain datable organic remains older than late Holocene (e.g., animal nests or middens).
Undetermined	In some cases, available literature on a particular geologic unit will be scarce and a determination of whether or not it is fossiliferous or potentially fossiliferous will be difficult to make. Under these circumstances, further study is needed to determine the unit's paleontological resource potential (i.e., field survey or monitoring).
Low	Rocks units that have yielded few fossils in the past, based upon review of available literature and museum collections records. Geologic units of low potential also include those that yield fossils only on rare occasion and under unusual circumstances.
No	Rock units that are formed under or exposed to immense heat and pressure, such as high-grade metamorphic rocks and plutonic igneous rocks.

Adapted from SVP (2010).

C.8.4 Environmental Impacts and Mitigation Measures

Impact GEO-1: Implementation of the proposed North Area Plan and CSD Update could expose people or structures to potential substantial adverse effects from fault rupture. (No Impact)

The Malibu Coast Fault is the closest fault to the North Area, located 6.2 miles south. Although no active or potentially active faults cross or are in the immediate vicinity of the North Area; the Los Angeles General Plan Safety Element serve to mitigate potential substantial adverse effects from fault rupture. The Los Angeles General Plan Safety Element Policy S 1.1 discourages development in Seismic Hazard and Alquist-Priolo Earthquake Fault Zones. The Los Angeles General Plan Safety Element Policy S 1.2 prohibits the construction of most structures for human occupancy adjacent to active faults until a comprehensive fault study that addresses the potential for fault rupture has been completed. The proposed Plan and CSD Update includes policies that augment the policies of the General Plan in addressing protection from active faults. Proposed Policy SN-5 requires that new development avoid areas susceptible to seismic hazards (see Attachment C.8 at the end of this section). The implementation of the proposed Plan and CSD Update would not expose people or structures to surface rupture due to faulting; therefore, there would be no impact.

Impact GEO-2: Implementation of the proposed North Area Plan and CSD Update could expose people or structures to potential substantial adverse effects from strong seismic ground shaking. (Less than Significant Impact)

Moderate to strong ground shaking is expected to occur in the event of a large earthquake on any of the major faults in the region or on the faults near the North Area, with an estimated PGA of 0.65 to 0.77g (acceleration of gravity) for a two percent probability of exceedance in 50 years. While the shaking would be less from an earthquake that originates farther from the North Area, the effects from nearby or regional earthquakes could be damaging to North Area facilities.

It is likely that North Area components would be subjected to at least one moderate or larger earthquake occurring close enough to produce ground shaking at the North Area. Strong ground shaking could cause shearing, differential settlement, or heave of structures at the ground surface resulting in the weakening or collapse of these structures.

Future development in the North Area would be required to comply with current building and safety codes, the guidelines outlined in the Los Angeles County General Plan Safety Element and applicable policies and standards proposed in the Plan and CSD Update. Proposed policies and standards would prohibit construction of new structures in unstable geologic areas; new development in areas susceptible to seismic and non-seismic geologic hazards; and if the development area poses a risk to life and property due to safety hazards. Additionally, new development would be required to be sized and designed to minimize risks to life and property from geologic hazard as well as address erosion, geologic instability, or need for protective devices altering natural landform along bluffs and cliffs.

The Transfer of Development Credit Program (22.336.070 (W)) would mitigate the adverse cumulative effects of development in the Santa Monica Mountains by preventing an increase in the net amount of development. The program would encourage development in areas less constrained by small lot sizes, steep slopes, hazards and sensitive resources. This development standard would also require that for each new lot created or legalized, an existing qualifying lot(s) sufficient to provide one transfer of development credit must be retired.

While the potential for seismically induced ground shaking in the North Area is unavoidable, the proposed Plan and CSD Update would not cause or accelerate geologic hazards related to strong seismic ground shaking, which would expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death. Therefore, the implementation of the proposed Plan and CSD Update would result in a less than significant impact.

Impact GEO-3: Implementation of the proposed North Area Plan and CSD Update could expose people or structures to potential substantial adverse effects from seismic-related ground failure, including liquefaction. (Less than Significant Impact)

In the central North Area, steep slopes and existing landslides that may be susceptible to seismically triggered failure are widespread and abundant (CGS, 2001a). In the north central area, landslides are widespread in the tightly folded weaker members of the Modelo Formation (CGS, 1997b). At the eastern edge of the North Area, landslide deposits have been mapped in the mountainous terrain (CGS, 1997c). In the western North Area, landslides are less abundant on the slopes underlain by the Conejo Volcanics (CGS, 2002; CGS, 2000; CGS, 2001b).

Geologic units that are generally susceptible to liquefaction in the North Area include Holocene to Late Pleistocene young alluvium and young alluvial fan deposits (CGS, 2000; CGS, 1997a; CGS, 1997b). These geologic units in the North Area would remain susceptible to seismically induced slope failure and liquefaction in an event of a large earthquake along portions of the North Area and could damage existing facilities/structures.

Development standard 22.336.070 (W) Transfer of Development Credit Program serves to mitigate the adverse cumulative effects of development in the Santa Monica Mountains. This development standard would prevent an increase in the net amount of development that could occur and would encourage development in areas less constrained by small lot sizes, steep slopes, hazards and sensitive resources. Future development in the North Area would be required to comply with current building and safety

codes, the guidelines outlined in the Los Angeles County General Plan Safety Element, and the policies and standards of the proposed Plan and CSD Update.

Proposed policies of the Plan and CSD Update require consideration of geologic hazards and unstable soils when reviewing land development projects. While the potential for seismic-related ground failure, including liquefaction, in the North Area is unavoidable, the proposed Plan and CSD Update would not cause or accelerate geologic hazards related to seismic-related ground failure, including liquefaction, which would expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death. Therefore, the implementation of the proposed Plan and CSD Update would result in a less than significant impact.

Impact GEO-4: Implementation of the proposed North Area Plan and CSD Update could expose people or structures to potential substantial adverse effects from landslides. (Less than Significant Impact)

Numerous landslides have been mapped in the North Area. In addition, several ancient landslide complexes have been mapped in the Malibu Beach Quadrangle, outside the North Area. In the north central area, landslides are widespread in the tightly folded weaker members of the Modelo Formation (CGS, 1997b). At the eastern edge of the North Area, material is mapped as landslide deposits in the mountainous terrain (CGS, 1997c). In the western North Area, landslides are less abundant on the slopes underlain by the Conejo Volcanics (CGS, 2002; CGS, 2000; CGS, 2001b).

The Los Angeles County General Plan Safety Element Policy S 1.3 and Conservation and Natural Resources Element Policy C/NR 13.8 require developments to mitigate geotechnical hazards, such as soil instability, erosion, and landsliding in Hillside Management Areas through siting and development standards. The proposed Plan and CSD Update includes policies that augment the policies of the General Plan in addressing protection from landsliding. Proposed Policy SN-3 (see Attachment C.8) states that development on former landslide sites, unstable slopes and other geologic hazard areas would be permitted only if the applicant shows that the project provides an adequate factor of safety and this is confirmed by LA County Department of Public Works.

Development standard 22.336.070 (W) Transfer of Development Credit Program serves to mitigate the adverse cumulative effects of development in the Santa Monica Mountains. This development standard would prevent an increase in the net amount of development that could occur and would encourage development in areas less constrained by small lot sizes, steep slopes, hazards and sensitive resources. In addition, all new development in the North Area would be required to comply with current building and safety codes, the guidelines outlined in the Los Angeles County General Plan Safety Element and the proposed policies and standards of the Plan and CSD Update.

While the potential for landslides in the North Area is unavoidable, the proposed Plan and CSD Update would not cause or accelerate geologic hazards related to landslides, which would expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death. Therefore, the implementation of the proposed Plan and CSD Update would result in a less than significant impact.

Impact GEO-5: Implementation of the proposed North Area Plan and CSD Update could result in substantial soil erosion or the loss of topsoil. (Less than Significant Impact)

In the North Area, the values of erosion factor K (used by the NRCS in the Universal Soil Loss Equation) indicates the susceptibility of a soil to sheet and rill erosion has a wide range. Overall the susceptibility to sheet and rill erosion for the soils in the North Area is low.

Despite low susceptibility of the soils in the North Area to sheet and rill erosion, disturbed soil will be subject to erosion. Additionally, erosion of soil after a wildfire could result in substantial erosion, loss of top soil, or damage to North Area facilities. Excavation and grading during future development in the North Area could loosen soil and trigger or accelerate erosion. In addition, vegetation removal, increased saturation, and increased runoff from developed areas can contribute to slope instability.

Current regulations would require construction that would disturb a surface area greater than one acre obtain under the Clean Water Act regulations a National Pollution Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction Activity. Additionally, compliance with the NPDES would require that the applicant submit a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would require development and implementation of BMPs to identify and control erosion, which would reduce the potential for construction triggered erosion.

Future development in the North Area would be required to comply with current building and safety codes, and the guidelines outlined in the Los Angeles County General Plan Safety Element. The Los Angeles County General Plan Safety Element Policy S 1.3 requires developments to mitigate geotechnical hazards, such as soil instability in Hillside Management Areas through siting and development standards. In addition, proposed Policy SN-6 (see Attachment C.8) states that grading and brushing is prohibited in areas that have a slope of 50 percent or greater and grading is limited in areas with a slope of over 25 percent.

Development standard 22.336.070 (W) Transfer of Development Credit Program serves to mitigate the adverse cumulative effects of development in the Santa Monica Mountains. This development standard would prevent an increase in the net amount of development that could occur and would encourage development in areas less constrained by small lot sizes, steep slopes, hazards and sensitive resources.

Erosion impacts would be mitigated by following standard practices related to SWPPP and implementation of BMPs as well as the grading requirements outlined in the Development Standard 22.336.070 (I). This development standard requires a Conditional Use Permit for grading that exceeds 500 cubic yards, minimizing ground disturbance (new grading would need to conform to existing topography, creating stepped pads, clustering of structures and reduced building footprints), prohibition of grading during the rainy season unless it would serve to remediate hazardous geologic conditions that endanger public health and safety, use of BMPs to reduce erosion and runoff, and prohibition of grading on slopes steeper than 50 percent. While the potential for erosion in the North Area is unavoidable, the Plan and CSD Update would not cause or accelerate geologic hazards related to erosion or the loss of topsoil. Implementation of the Plan and CSD Update would reduce erosion impacts to less than significant.

Impact GEO-6: Implementation of the proposed North Area Plan and CSD Update could be located on expansive soil creating substantial risks to life or property. (Less than Significant Impact)

As noted earlier, the soils underlying the North Area reflect the underlying rock type (parent material), the extent of weathering of the rock, the degree of slope, and the degree of human modification. Potential hazards and impacts from soils include erosion, shrink-swell (expansive soils), and corrosion of steel and concrete. The shrink and swell potential for the soils underlying the North Area ranges from low to very high.

Proposed policies of the Plan and CSD Update would prohibit the following: construction of new structures in unstable geologic areas, new development in areas susceptible to seismic and non-seismic geologic hazards, and development if the area poses a risk to life and property due to safety hazards. Additionally, new development shall be sized and designed to minimize risks to life and property from geologic hazard

and shall not contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area that would require protective devices altering natural landform along bluffs and cliffs. These policies would be augmented by the General Plan policies. The Los Angeles County General Plan Safety Element Policy S 1.3 requires developments to mitigate geotechnical hazards, such as soil instability in Hillside Management Areas through siting and development standards.

While the potential for the substantial risks to life or property in the North Area is unavoidable, the proposed North Area Plan and CSD Update would not cause or accelerate geologic hazards related to expansive soil. Therefore, the implementation of the proposed Plan and CSD Update would result in a less than significant impact.

Impact GEO-7: Implementation of the proposed North Area Plan and CSD Update could have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. (No Impact)

A majority of the North Area is served by public sewers, although septic tanks serve most of the rural hillside areas. Future development in unsewered locations would require proper design and construction of onsite wastewater disposal systems meeting Los Angeles County Departments of Public Works and Health Services and the Regional Water Quality Control Board requirements. The proposed Plan and CSD Update would not remove or change goals, policies, or standards for wastewater facilities under current County or other agency requirements. Therefore, there would be no impact.

Impact PALEO-1: Implementation of the proposed North Area Plan and CSD Update would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (Less than Significant Impact with Mitigation)

The General Plan Programmatic EIR evaluated the potential for impacts to cultural resources, which included paleontological resources. The General Plan Programmatic EIR identified significant but mitigable impacts for paleontology. Mitigation Measure CULT-5 was adopted by the County when it certified the Programmatic EIR and adopted the General Plan. This measure is presented below.

CULT-5 Prior to the issuance of any grading permit, applicants shall provide written evidence to the County of Los Angeles that a County-certified paleontologist has been retained to observe grading activities greater than six feet in depth and salvage and catalogue paleontological resources as necessary. The paleontologist shall be present at the pre-grade conference, shall establish procedures for paleontologist resource surveillance, and shall establish, in cooperation with the applicant, procedures for temporarily halting or redirecting work to permit the sampling, identification, and evaluation of the artifacts as appropriate.

If the paleontological resources are found to be significant, the paleontologist observer shall determine appropriate actions, in cooperation with the project applicant, for exploration and/or salvage. Prior to the release of the grading bond the applicant shall obtain approval of the paleontologist's follow-up report from the County. The report shall include the period of inspection, an analysis of any artifacts found and the present repository of the artifacts. Applicant shall prepare excavated material to the point of identification.

Applicant shall offer excavated finds for curatorial purposes to the County of Los Angeles, or its designee, on a first refusal basis. These actions, as well as final mitigation and disposition of the resources, shall be subject to the approval of the County. Applicant shall pay curatorial fees if an applicable fee program has been adopted by the Board of Supervisors, and such fee program

is in effect at the time of presentation of the materials to the County or its designee, all in a manner meeting the approval of the County.

Unanticipated discoveries shall be evaluated for significance by a County-certified paleontologist. If the paleontological resources are found to be significant, then the project shall be required to perform data recovery, professional identification, radiocarbon dates as applicable, and other special studies; submit materials to the County of Los Angeles, or its designee, on a first refusal basis; and provide a comprehensive final report including appropriate records for the California Department of Parks and Recreation.

As shown on Figure C.8-1 (Project Area Geology), the North Area includes several geologic formations that could have a high sensitivity for paleontological resources. Of the formations shown on Table C.8-4 (North Area Geological Formations and Paleontological Sensitivity), the North Area includes the Tuna, Topanga, Calabasas, and Modelo Formations that all have the potential for high paleontological sensitivity. The area also includes the Sespe Formation that has a low to high sensitivity. Although the proposed Plan and CSD Update would not have a direct impact on paleontological resources, future development projects would have the potential to disturb subsurface soils and impact paleontological resources. Potential impacts to paleontological resources would be reduced to less than significant with implementation of Mitigation Measure CULT-5 from the General Plan Programmatic EIR.

Mitigation Measure

With the implementation of the Mitigation Measure CULT-5 identified in the General Plan Programmatic EIR, potential impacts to paleontological resources from implementation of the proposed Plan and CSD Update would be reduced to less than significant. The proposed Plan and CSD Update would not create new significant impacts to paleontological resources and would not substantially add to or increase identified impacts as analyzed in the General Plan Programmatic EIR. As such, the mitigation measure identified for the General Plan Programmatic EIR applies to the proposed Plan and CSD Update and no additional program-level mitigation is needed.

C.8.5 Cumulative Impact Analysis

Geologic and soils impacts, including seismic hazards are typically site-specific. The impacts of each past, present, and reasonably foreseeable project would be specific to the respective site and its users and would not be in common with or contribute to (or shared with, in an additive sense) the impacts on other sites. In addition, development of each site would be subject to site development and construction guidelines and standards (local, State, and federal) that are designed to protect public safety. In order to be cumulatively considerable, adverse geologic conditions would have to occur at the same time and in the same location as the same or similar conditions of the proposed project.

As discussed in Section C.8.1.6, Environmental Setting, Seismic Setting subsection, the proposed Plan and CSD Update would have no impact on the potential for surface rupture due to faulting. Therefore, there is no potential for the proposed Plan and CSD Update to contribute to cumulative impacts for surface rupture.

The proposed North Area Plan and CSD update would have no impact on the soils capable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available. Therefore, there is no potential for the proposed Plan and CSD Update to contribute to cumulative impacts for wastewater facilities.

Seismic impacts (such as ground shaking) from the numerous local and regional faults comprise an impact of the geologic environment on individual projects and would not introduce cumulatively considerable impacts. Impacts from unsuitable soils (expansive or corrosive soils) would also represent an impact on the environment of individual projects and would not be cumulatively considerable.

The proposed North Area Plan and CSD Update and related projects within the geographic scope of potential cumulative impacts results in less than significant impacts to geology and soils. Therefore, there would not be a cumulative impact related to geology and soils.

Potential impacts to paleontological resources from implementation of the proposed Plan and CSD Update would be reduced to less than significant with the implementation of the Mitigation Measure CULT-5 identified in the General Plan Programmatic EIR. Therefore, there is no potential for the proposed Plan and CSD Update to contribute to cumulative impacts for paleontological resources.

C.8.6 Level of Significance After Mitigation

Based on consideration of the environmental setting and current building and other regulations, this evaluation that impacts to geology and soils would have no impact or a less than significant impact. No mitigation measures are required for the proposed Plan and CSD Update.

The proposed Plan and CSD Update would have less than significant impacts with the implementation of GP Mitigation Measure CULT-5. No additional mitigation measures are needed.

Attachment C.8

Geology, Soils, and Paleontology Policies and Standards

(Appendix 1 includes all policies and standards)

Proposed North Area Plan Update

Conservation and Open Space Element

- **Policy CO-68:** Site and design new development to minimize the amount of grading and the alteration of natural landforms.
- **Policy CO-69:** Site and design new development to protect natural features and minimize removal of natural vegetation.
- **Policy CO-70:** Limit structure height to minimize impacts to scenic resources.
- **Policy CO-71:** Cut and fill grading may be balanced on-site where the grading does not substantially alter the existing topography and blends with the surrounding area. Export of excess soil may be required to preserve biotic, scenic, or other significant resources. Topsoil from graded areas shall be utilized for site landscaping where it does not substantially alter the existing topography and blends with the surrounding area.
- **Policy CO-72:** Ensure that development conforms to the natural landform and blends with the natural landscape in size, design, shape, materials, and colors. Building pads on sloping sites shall utilize split-level or stepped-pad designs that minimize impacts to scenic resources.
- **Policy CO-73:** Restrict development on slopes greater than 25 percent unless placement is biologically superior than alternative site.
- **Policy CO-74:** Site and design new development to minimize the height and length of manufactured cut and fill slopes, and minimize the height and length of retaining walls.
- **Policy CO-75:** Blend graded slopes with the natural contours of the land and utilize landform grading.
- **Policy CO-76:** Cluster structures on lots in hillside areas, including clustering with structures on adjoining lots, if clustering is shown to minimize site disturbance and grading. Development within a subdivision shall be clustered and utilize shared driveways.
- **Policy CO-77:** Require all cut and fill slopes and other disturbed areas to be landscaped and revegetated prior to the beginning of the rainy season utilizing native, drought-tolerant plant species that blend with existing natural vegetation and natural habitats of the surrounding area.
- **Policy CO-78:** Grading that is associated with roads, bridges, retaining walls, and other necessary access ways should follow the natural terrain and contours and avoid creating a significant visual scar.

Safety and Noise Element

- **Policy SN-1:** Assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along ridgelines, bluffs or cliffs.
- **Policy SN-2:** Size, design, and site new development to minimize risks to life and property from geologic hazard.

- **Policy SN-3:** Permit new development on former landslide sites, unstable slopes, and other geologic hazard areas only where there is substantial evidence, provided by the applicant and confirmed by the Los Angeles County Department of Public Works, that the project provides an adequate factor of safety.
- **Policy SN-4:** Prohibit new development in areas where it presents an extraordinary risk to life and property due to an existing or demonstrated potential public health and safety hazard.
- **Policy SN-5:** In the placement of new development, emphasize avoiding areas susceptible to seismic and non-seismic geologic hazards, even when engineering solutions are available.
- **Policy SN-6:** Prohibit grading and brushing in areas that have a slope of 50 percent or greater and limit grading in areas with a slope of over 25 percent.
- **Policy SN-7:** Prohibit the construction of new structures for human occupation in unstable geologic areas.
- **Policy SN-8:** Allow the remediation or stabilization of landslides or other slope instability that affect existing structures or that threaten public health or safety. Analyze alternative remediation or stabilization techniques to determine the least-environmentally-damaging alternative. Maximum feasible mitigation shall be incorporated into the project to minimize adverse impacts to natural resources.
- **Policy SN-9:** Prohibit land divisions, including lot line adjustments, unless all proposed parcels can be demonstrated to be safe from flooding, erosion, and geologic hazards and will provide a safe, legal, all-weather access road(s), which can be constructed consistent with all policies of this North Area Plan.

Proposed Community Standards District Update

22.336.070 Community-Wide Development Standards

- I. Grading
- R. Scenic Resource Areas
- Y. Vineyards
- W. Transfer of Development Credit Program

C.9 Hydrology and Water Resources

Introduction

This section is a summary of background information analyzing potential hydrology and water quality impacts that could result from implementation of the proposed Plan and CSD Update within the Santa Monica Mountains North Area. Information used to support this analysis was retrieved from Las Virgenes Municipal Water District's *2015 Urban Water Management Plan*, the California Department of Water Resources' *Groundwater Bulletin 118*, the existing Santa Monica Mountains North Area Plan, and other sources of published information, as cited in the analysis below.

Scoping Comments Received. During the scoping period for the EIR, written and verbal comments were received from agencies, organizations, and the public. These comments identified various substantive issues and concerns relevant to the EIR analysis for surface water, groundwater, flood hazard area, water quality, and water supply. The issues below summarize these comments. Appendix 2 includes all comments received during the scoping comment period.

- Comments express concern about increases to impervious areas and contributions of increased rates and amounts of runoff.
- Comments request analysis of watershed-wide impacts to runoff and water quality, including with respect to vineyard operations.
- Request for analysis of environmental impact of grapevines, and statements both in support of and in opposition to vineyards.

Public comments are addressed throughout this Draft EIR, within the context of CEQA requirements and the scope of analysis described in Section C.9.3. Appendix 2 of this EIR includes a summary of all comments received during the EIR scoping period.

C.9.1 Environmental Setting

The Santa Monica Mountains North Area spans approximately 30 square miles in unincorporated Los Angeles County. The North Area consists of five varying land types: urbanized areas, rural residential, ranches, vineyards, and open space. This planning area supports large blocks of undisturbed open space separating urban development along the US 101 Freeway from protected open space in the Santa Monica Mountains. Much of the Santa Monica Mountains area has slopes exceeding 25 percent, and the mountainous topography and limited road system are diagnostic features that have affected development in the North Area. Approximately 35 percent of the North Area consists of conservation and park lands with several of the residential communities occupying in or near these park lands or natural areas supporting biological resources. In addition, the North Area supports a wide variety of unique geologic and aquatic features.

The climate in the North Area is semi-arid, characterized by mild winters, warm summers, and moderate rainfall. Average monthly temperatures range from about 52 to 78 degrees Fahrenheit, with an

KEY FINDINGS

- Proposed Plan and CSD Update would require water quality protections, and supplement existing requirements of the Los Angeles Region RWQCB.
- No areawide flood control system of concrete channels in the North Area; existing drainage patterns would continue to be maintained.
- Proposed Plan goals/policies and CSD development standards would ensure that impacts to hydrology and water quality would be less than significant.

annual average temperature of 65 degrees. Most rainfall occurs between November and April, and averages 16.9 inches per year (LVMWD, 2016).

Surface Water

The California Department of Water Resources (DWR) delineates surface watersheds in California into 10 hydrologic regions. The North Area is in the South Coast Hydrologic Region (HR), a large coastal watershed in Southern California. The South Coast HR covers approximately 6.78 million acres and drains to the Pacific Ocean (DWR, 2003).

The National Hydrography Dataset named streams that flow within the North Area include the Potrero Valley Creek, Medea Creek, Las Virgenes Creek, Malibu Creek, Santa Maria Creek, and Garapito Creek. These creeks convey water across the two major watersheds within the North Area: the Santa Monica Bay Watershed and the Los Angeles River Watershed. Stormwater runoff in the North Area is conveyed via natural canyons and the surface water drainage network into Santa Monica Bay. Watersheds within the North Area feed the Pacific Ocean (via Santa Monica Bay), the Los Angeles River, and numerous riparian corridors.

Figure C.9-1 shows the major watersheds, surface waters, and surface water drainage network within and in the vicinity of the North Area.

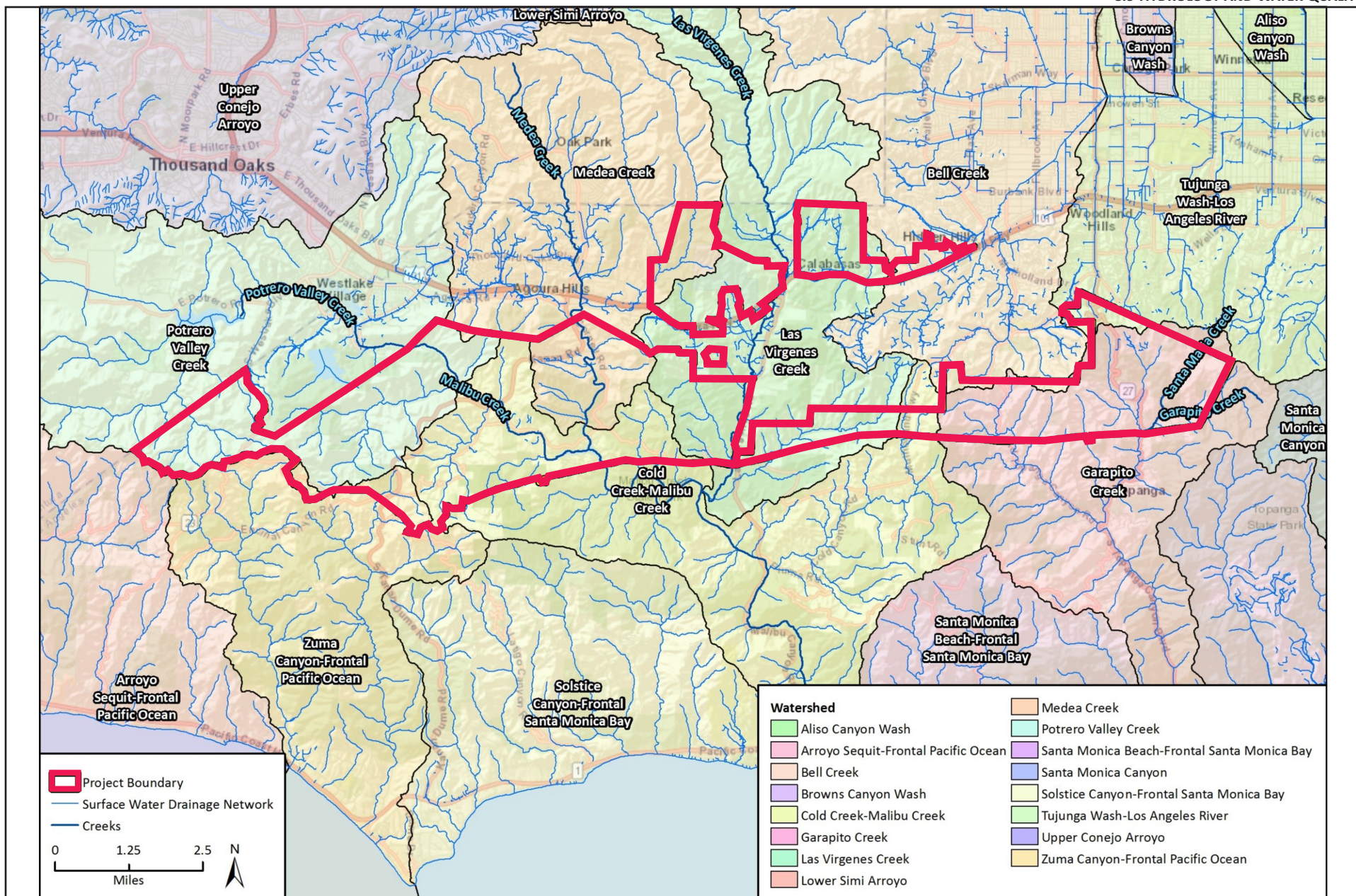
The majority of the North Area is in the Santa Monica Bay Watershed. The Santa Monica Bay Watershed, with 55 miles of coastline and beaches, covers 385 square miles and contains 27 subwatersheds that are separated into seven jurisdictions. Small portions of the northeastern corner of the North Area are located in the Los Angeles River Watershed, which encompasses approximately 834 square miles and includes downtown Los Angeles. The Los Angeles River Watershed has approximately 200 storm drain outlets that convey over 30 billion gallons of runoff to the Santa Monica Bay each year (City of Los Angeles Stormwater Program, 2018).

Groundwater

As shown on Figure C-9.2, the majority of the North Area does not directly overlie a DWR-delineated groundwater basin. A small portion of the North Area, located in Hidden Hills, overlies the San Fernando Valley Groundwater Basin. The section of the North Area that encompasses the Calabasas Landfill also shares a boundary with the Russell Valley Groundwater Basin.

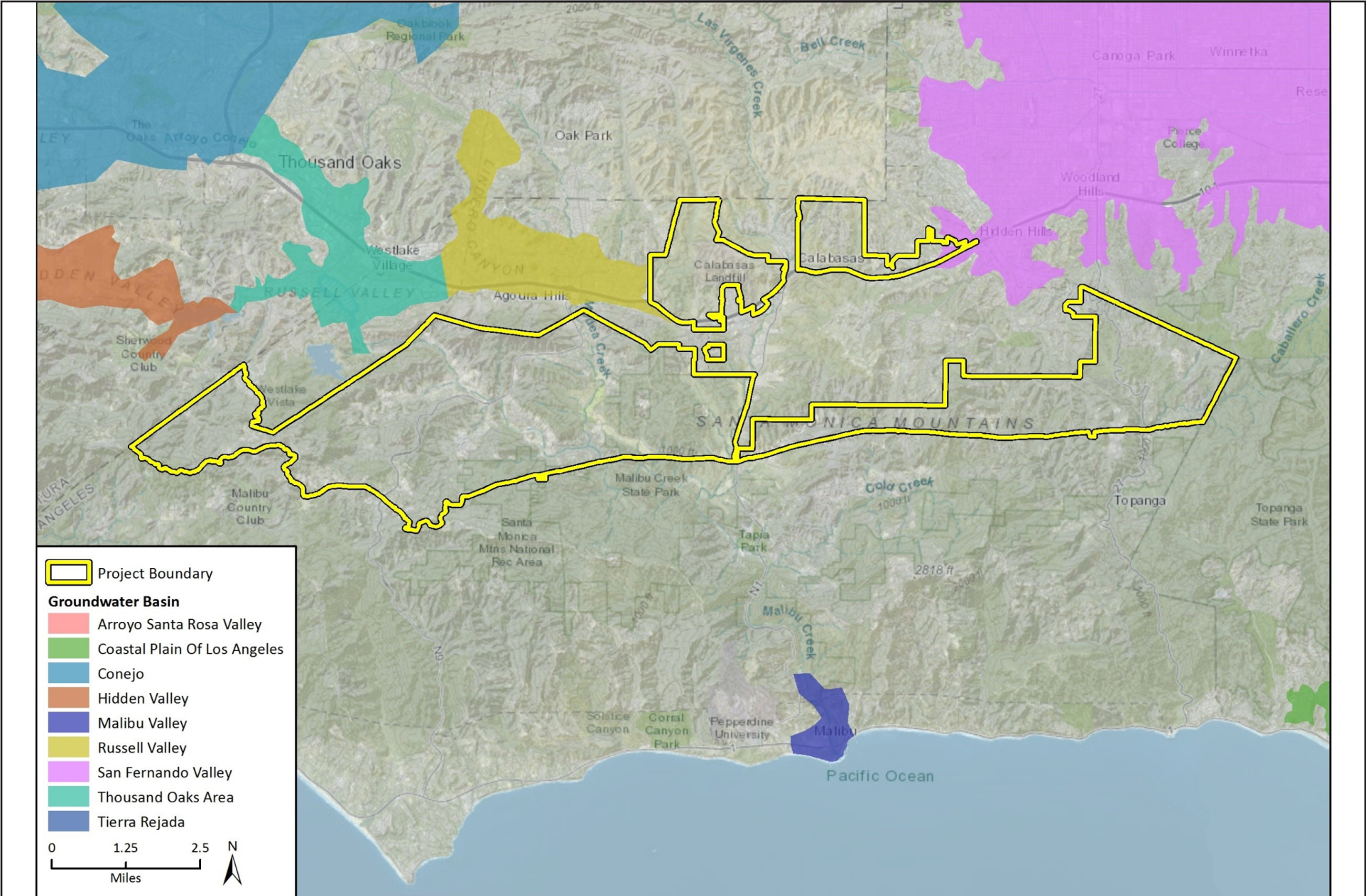
The San Fernando Valley Groundwater Basin extends approximately 226 square miles beneath the San Fernando Valley, Tujunga Valley, Browns Canyon, and the alluvial areas surrounding the Verdugo Mountains near La Crescenta and Eagle Rock. The average specific yield for deposits within the basin ranges from 14 to 22 percent with a total storage capacity of approximately 3,670,000 total acre-feet (AF). Groundwater recharge of the basin includes spreading of imported water and runoff occurring in the Pacoima, Tujunga, and Hansen Spreading Grounds. Runoff consists of natural streamflow from the surrounding mountains, precipitation falling on impervious areas, reclaimed wastewater, and industrial discharges. With respect to water quality in this groundwater basin, a series of studies have concluded the presence of volatile organic compounds (VOCs). In the western part of basin, elevated sulfate concentrations resulted in a dominant calcium sulfate-bicarbonate character (DWR, 2004).

The Russell Valley Groundwater Basin is a moderately small subterranean system situated in the geographic area of Russell Valley. This alluvial basin is bounded by semi-permeable rocks derived from the Santa Monica Mountains. Groundwater recharge is a primarily result of percolation from rainfall



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Additional data provided by USGS, 2018.

Figure C.9-1
Surface Water and Drainage



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Groundwater basin data provided by California Department of Water Resources: Bulletin 118 2016.

Figure C.9-2
Groundwater Basins

and irrigation runoff. The Las Virgenes Municipal Water District (LVMWD) estimates that the aquifer may have a total storage capacity of about 11,000 AF (2015) and that current groundwater levels indicate the basin is not in a state of overdraft. As a result, the decline of groundwater pumping practices in the area has increased groundwater levels over the past 20 or 30 years (LVMD, 2005). The Thousand Oaks Area Groundwater Basin, bounded by semi-permeable rocks of the Santa Monica Mountains, underlies a small valley between Lake Sherwood and Thousand Oaks in southeastern Ventura County and western Los Angeles County. Recharge to this basin primarily occurs through percolation of precipitation and stream flow. The total storage capacity is estimated around 130,000 AF (DWR, 2004). Groundwater in the basin is magnesium-calcium-sodium sulfate in character affecting the taste and quality characteristics below depths of 100 feet (DWR, 2004). The Thousand Oaks Area Basin is not adjudicated and DWR has not identified the Basin to be in an overdraft condition (DWR, 2004). Because the Thousand Oaks Area Groundwater Basin lacks a regional groundwater management plan, there are no defined legal pumping rights for LVMWD.

The Hidden Valley Groundwater Basin is another relatively minor system that underlies Hidden Valley in southwest Ventura County. This basin is bounded by the semi-permeable rocks of the Santa Monica Mountains. Swift groundwater recharges due to seasonal rains indicate that recharge derives mostly from percolation of precipitation to the valley and ephemeral streamflow. The groundwater storage capacity is currently undetermined (DWR, 2004).

Flood Hazard Areas

FEMA 100-Year Flood Hazard

The 100-year flood, or “base flood,” refers to the flood resulting from a storm event that has a probability of occurring once every 100 years, or a one percent chance of occurring in any given year. Areas mapped in the 100-year floodplain area subject to inundation during a 100-year storm event. These areas are defined by the Federal Emergency Management Agency (FEMA) and defined on Flood Rate Insurance Maps (FIRMs). Figure C.9-3 shows the flood hazard areas within and in the vicinity of the North Area. As shown on this figure, a small portion of the North Area is within the 100-year floodplain (shown as area with 1% annual chance flood hazard).

These flood areas are primarily located along the surface water features, including Potrero Valley Creek, Medea Creek, and Malibu Creek. The western portion of the North Area is in an Area of Undetermined Flood Hazard, in which there are possible but undetermined flood hazards, as no analysis of flood hazards has been conducted.

County Capital Flood Floodplain (County Floodway)

Capital Floods are produced by 50-year frequency storms (i.e., a two percent chance of occurring in any given year) falling within a saturated watershed. County Floodways are subject to Capital Floods and are immediately adjacent to water courses where floodwaters are deepest and fastest moving. Due to their hazardous nature, development in these areas are required to be carefully managed. Development is generally not allowed within the County Floodways unless engineering analysis demonstrates that flood hazards will not be increased on adjoining properties. Ideally, development in the County Floodways should be restricted to uses that do not interrupt the natural flow of the water (Los Angeles County, 2016).

Dam Inundation

Castaic Dam, Pyramid Dam, Palos Verdes Reservoir, Westlake Reservoir, and Lake Sherwood are all located in Los Angeles County. Westlake Reservoir and Lake Sherwood are both regulated by the State Division of Safety of Dams. The North Area is not located within a dam inundation area associated with these or any other existing dams.

Water Quality

Water quality in the North Area is governed by the Los Angeles Regional Water Quality Control Board (RWQCB), which sets water quality standards for the region in the Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties (Basin Plan). The Basin Plan identifies beneficial uses for surface water and groundwater and establishes water quality objectives to attain those beneficial uses. The identified beneficial uses and the water quality objectives to maintain or achieve those uses are together known as water quality standards. Table C.9-1 presents the beneficial uses for surface waters in the North Area.

Table C.9-1. Basin Plan Beneficial Uses

Waterbody	Beneficial Uses
Las Virgenes Creek	Municipal and Domestic Supply (MUN) ² , Warm Freshwater Habitat (WARM) ¹ , Cold Freshwater Habitat (COLD) ² , Wildlife Habitat (WILD) ¹ , Rare, Threatened, or Endangered Species (RARE) ¹ , Migration of Aquatic Organisms (MIGR) ² , Spawning, Reproduction, and/or Early Development (SPWN) ¹ , Wetland Habitat (WET) ¹
Malibu Creek	Municipal and Domestic Supply (MUN) ² , Warm Freshwater Habitat (WARM) ¹ , Cold Freshwater Habitat (COLD) ¹ , Wildlife Habitat (WILD) ¹ , Rare, Threatened, or Endangered Species (RARE) ¹ , Migration of Aquatic Organisms (MIGR) ¹ , Spawning, Reproduction, and/or Early Development (SPWN) ¹ , Wetland Habitat (WET) ¹
Medea Creek	Municipal and Domestic Supply (MUN) ² , Ground Water Recharge (GWR) ³ , Warm Freshwater Habitat (WARM) ³ , Cold Freshwater Habitat (COLD) ¹ , Wildlife Habitat (WILD) ¹ , Rare, Threatened, or Endangered Species (RARE) ¹ , Wetland Habitat (WET) ¹
Potrero Valley Creek	Municipal and Domestic Supply (MUN) ² , Ground Water Recharge (GWR) ³ , Warm Freshwater Habitat (WARM) ² , Wildlife Habitat (WILD) ¹

1 - Existing beneficial use

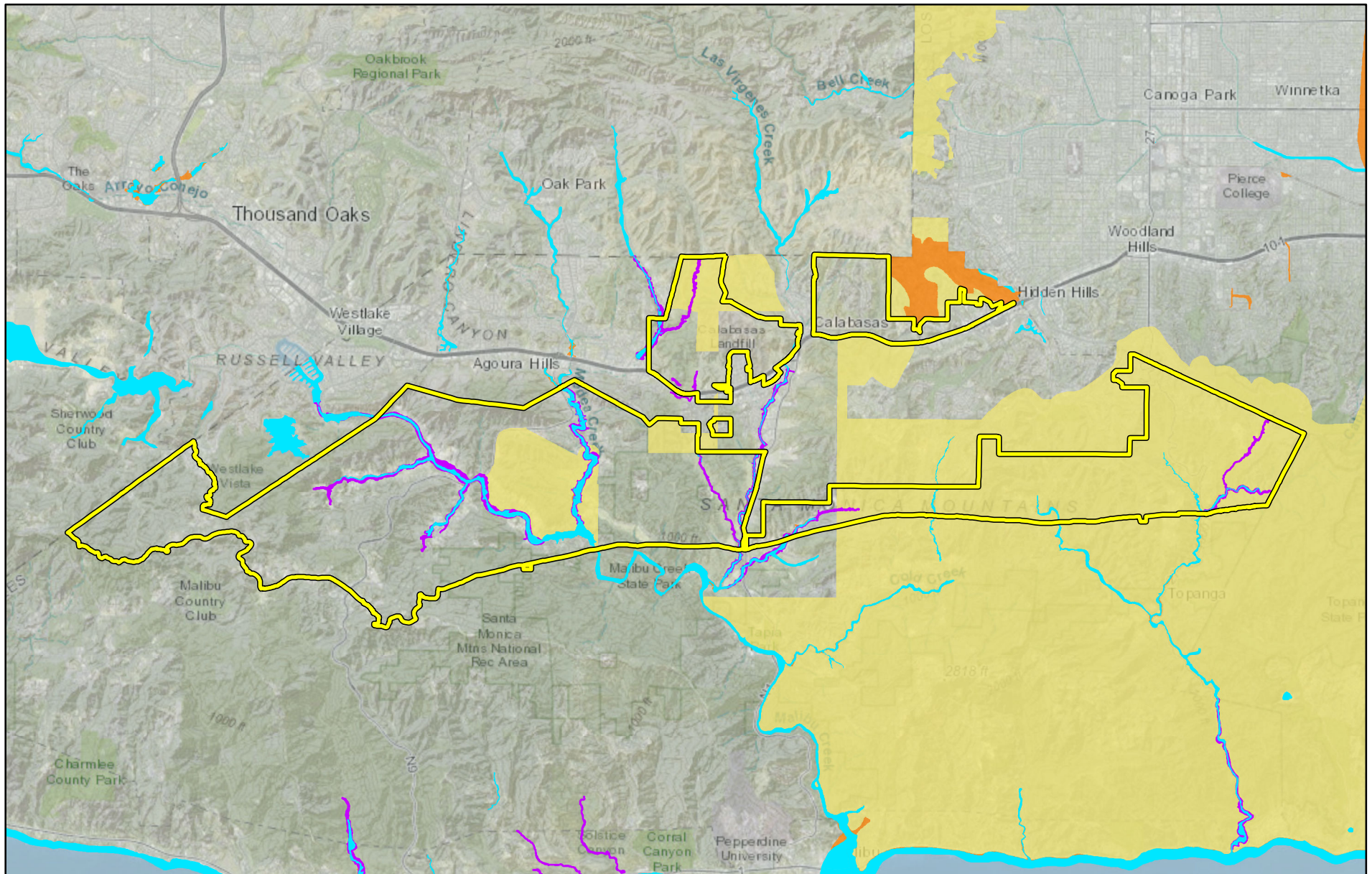
2 - Potential beneficial use

3 - Intermittent beneficial use

Source: Los Angeles RWQCB, 2011

The Clean Water Act (CWA) 303(d) list is a register of impaired and threatened waters, which the CWA requires all states to submit for Environmental Protection Agency approval. The list identifies all waters where the required pollution control measures have so far been unsuccessful in reaching or maintaining the required water quality standards. Waters that are listed are known as “impaired.” CWA Section 303(d) lists Las Virgenes Creek, Malibu Creek, and Medea Creek. The Basin Plan establishes Total Maximum Daily Loads (TMDLs) for each of these impairments (RWQCB, 2011).

The primary sources of pollution to surface and groundwater resources include stormwater runoff from developed areas, which can contain hydrocarbons, sediments, pesticides, herbicides, toxic metals, and coliform bacteria. Septic tanks can cause similar types of contamination. Illegal waste dumping can introduce contaminants such as gasoline, pesticides, herbicides and other harmful chemicals.



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Additional data provided by FEMA, 2018 and LA County 2020

- Project Boundary
- County Capital Flood Floodplain

FEMA Flood Hazard Zones

- 1% Annual Chance Flood Hazard
- Area of Undetermined Flood Hazard
- 0.2% Annual Chance Flood Hazard

Figure C.9-3

Flood Hazard Areas

Water Supply

The Los Angeles County Waterworks District 29 and LVMWD (Las Virgenes Municipal Water District) are the primary water purveyors in the North Area.

As depicted in Figure C.9-4, the North Area occupies two water district service areas: LVMWD and the Los Angeles County Waterworks District (WWD) 29. The North Area also directly borders the City of Los Angeles Department of Water and Power (LADWP). LVMWD currently depends on four sources: (1) imported potable water from the Metropolitan Water District of Southern California (MWDSC) and the Valley County Water District (VCWD); (2) recycled water from the Tapia Water Reclamation Facility (TWRP); (3) groundwater from the Thousand Oaks Area Basin; and (4) surface runoff into the Las Virgenes Reservoir.

Las Virgenes Municipal Water District meets the majority of its potable water demands with imported water from MWDSC, which is transported from northern California via the California State Water Project (SWP) (LVMWD, 2016). In addition, a minor portion (less than 1 percent) is purchased from Ventura County Waterworks Districts 8 and 17 (LVMWD, 2016). These supplies also originate primarily from the SWP. The source of SWP water is rain and snow from the Sierra Nevada, Cascade, and Coastal mountain ranges. The MWDSC tests and treats its water for microbial, organic, inorganic, and radioactive contaminants, as well as pesticides and herbicides. Imported SWP water is typically of high quality that meets federal and state water quality standards, although low levels of TDS, sulfate, hardness, iron and manganese may be present (LVMWD, 2016). No other water quality issues pertaining to recycled water have been identified to cause potential issues in the LVMWD service area.

The Los Angeles County Waterworks District 29 water service area consists of the City of Malibu and the unincorporated area of Topanga. District 29's main water supply is from West Basin Municipal Water District (West Basin), which is primarily imported from the Metropolitan Water District of Southern California. District 29 currently has a purchase agreement with West Basin for a maximum of 10,506 acre-feet per year (AFY) (LACWD, 2017). The newly-constructed City Civic Center Wastewater Treatment Facility (WWTF) provides additional recycled water and replaces four wastewater systems: Webster Elementary Onsite Treatment Wastewater System (OTWS), Our Lady of Malibu OTWS, Malibu Colony Shopping Center, and Malibu plant at Vista Pacifica Street. Treated water is planned to be injected into local groundwater basins or used for outdoor irrigation at high-demand periods. Furthermore, the District's service area is reluctant to depend on groundwater for future supplies, as it does not overlie a groundwater basin capable of yielding a sufficient supply of groundwater. District 29 does not have intentions of capturing stormwater runoff as an urban water source, however, stormwater and urban runoff continue being utilized for riparian habitats (LACWD, 2017).

C.9.2 Regulatory Setting

Development in the North Area is subject to various local, state, and federal regulations and permits regarding hydrology and water quality.

Federal

Clean Water Act

Congress enacted the Clean Water Act (CWA), formerly the Federal Water Pollution Control Act of 1972, with the intent of restoring and maintaining the chemical, physical, and biological integrity of

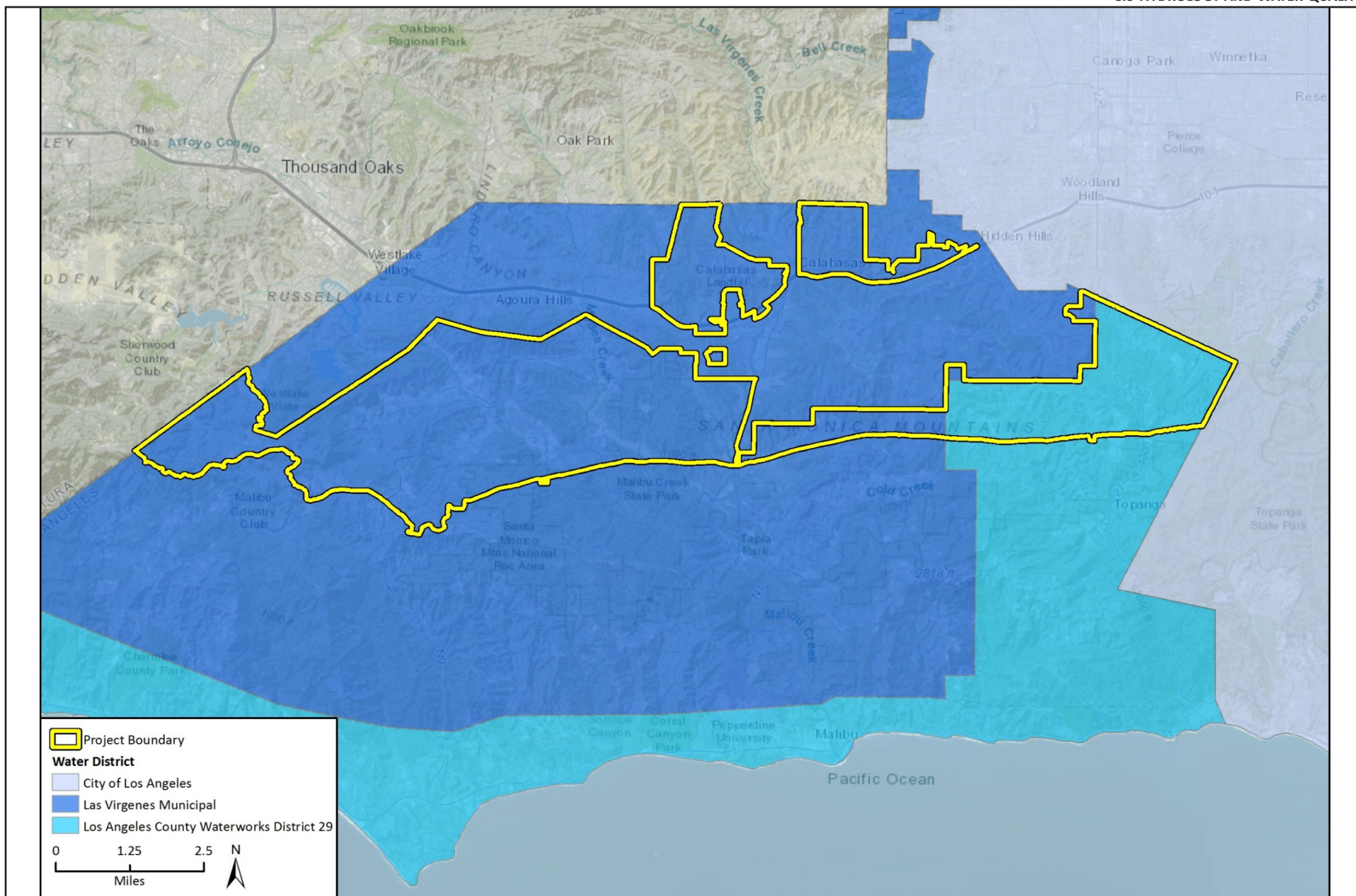


Figure C.9-4
Water District Boundaries

the waters of the United States. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and non-point source discharges to surface water. Those discharges are regulated by the National Pollution Discharge Elimination System (NPDES) permit process (CWA Section 402). NPDES permitting authority is administered by the California State Water Resources Control Board (SWRCB) and its nine RWQCBs. The North Area is within a region administered by the Los Angeles RWQCB.

Individual projects within the North Area that disturb more than one acre would be required to obtain NPDES coverage under the California General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit). The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP) describing Best Management Practices (BMP) the discharger would use to prevent and retain storm water runoff. The SWPPP must contain a visual monitoring program; a chemical monitoring program for “non-visible” pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the site discharges directly to a waterbody listed on the 303(d) list for sediment.

Section 401 of the CWA requires that any activity that would result in a discharge into waters of the U.S. be certified by the RWQCB. This certification ensures that the proposed activity does not violate State and/or federal water quality standards. Section 404 of the CWA authorizes the U.S. Army Corps of Engineers to regulate the discharge of dredged or fill material to the waters of the U.S. and adjacent wetlands. Discharges to waters of the U.S. must be avoided where possible and minimized and mitigated where avoidance is not possible. Section 303(d) of the CWA requires states to establish TMDLs for surface waters with identified water quality impairments; impaired waters in the North Area include Las Virgenes Creek, Malibu Creek, and Medea Creek, as described above in Section C.8.1.

National Flood Insurance Act/Flood Disaster Protection Act

The National Flood Insurance Act of 1968 made flood insurance available for the first time. The Flood Disaster Protection Act of 1973 made the purchase of flood insurance mandatory for the protection of property located in Special Flood Hazard Areas. These laws are relevant because they led to mapping of regulatory floodplains and to local management of floodplain areas according to guidelines that include prohibiting or restricting development in flood hazard zones.

State

California Porter Cologne Water Quality Control Act

The Porter Cologne Water Quality Control Act of 1967 requires the SWRCB and the nine RWQCBs to adopt water quality criteria to protect State waters. These criteria include the identification of beneficial uses, narrative and numerical water quality standards, and implementation procedures. The criteria for State waters within the North Area are contained in the Basin Plan (RWQCB, 2011). The Basin Plan protects designated beneficial uses of State waters through the issuance of Waste Discharge Requirements (WDRs) and through the development of TMDLs. Anyone proposing to discharge waste that could affect the quality of the waters of the State must make a report of the waste discharge to the RWQCB or SWRCB as appropriate, in compliance with Porter-Cologne.

California Streambed Alteration Agreement

Sections 1600 through 1616 of the California Fish and Game Code require that any entity that proposes an activity that would divert or obstruct the natural flow of any river, stream or lake; change or

use any material from the bed, channel, or bank of, any river, stream, or lake; or, deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake, must notify the California Department of Fish and Wildlife (CDFW). The CDFW would require a Lake or Streambed Alteration Agreement if the Department determines that the alteration may adversely affect fish and wildlife resources. The Agreement includes conditions necessary to protect those resources. The Agreement applies to any stream, including ephemeral streams and desert washes.

Sustainable Groundwater Management Act

In September 2014, California Governor Jerry Brown signed legislation requiring that California's critical groundwater resources be sustainably managed by local agencies. The Sustainable Groundwater Management Act (SGMA) gives local agencies the power to sustainably manage groundwater and requires Groundwater Sustainability Plans (GSPs) to be developed for medium- and high-priority groundwater basins. None of the groundwater basins in the vicinity of the North Area are designated as medium- or high-priority groundwater basins.

Regional

The standards for the development of hydrology and related drainage models for development in the area are contained in the latest edition of the Los Angeles County Hydrology Manual. The Hydrology Manual describes the methodologies to be utilized in the calculation of existing and proposed storm water runoff, based on soils types, density of development, flow path characteristics and time of concentration. The Hydrology Manual specifies the design event for which the facility under consideration must be designed (10-year, 25-year or 50-year frequency event). The Hydrology Manual contains multiple appendices that provide site-specific data Countywide on soil characteristics, runoff coefficients, intensity of rainfall versus storm duration, impermeability versus land use, as well as debris production classification.

The methodology contained in the Los Angeles County Hydrology Manual is supplemented by the City of Calabasas based on their knowledge of local conditions, as well as site-specific modeling requirements. These supplemental requirements are categorized according to the following: Detention- the City of Calabasas has a "no net increase" approach to development; and Time of Concentration- consultation with the City is required in order to ensure that the methodology for calculating peak flow and times of concentration are not misapplied (especially for projects under 10 acres).

The requirements for design and construction of storm drains and related facilities (debris and detention basins, inlet and outlet structures) are contained in the Los Angeles County Flood Control District's Design Manual (Hydraulic), Debris Basin Manual and Los Angeles County Sedimentation Manual. The methodologies contained in these Manuals are used by the County of Los Angeles for their review of storm drains and related interception and conveyance facilities intended for transfer to the County for ownership and maintenance.

Connections to County of Los Angeles storm drains are reviewed and approved by the County according to County of Los Angeles Design and Construction standards. In some locations, storm drains are privately owned and maintained by Homeowner's Associations (HOA's) under specific conditions with the project's approval. These conditions pertain to requirements for perpetual maintenance of the storm drain system, detention requirements and structural water quality mitigation measures, which are in turn incorporated into the project's Covenants, Conditions and Restrictions (CC&R's).

The Los Angeles County Municipal Code includes requirements for floodways. These sections are summarized below.

- Title 11, Chapter 11.60 Floodways, Water Surface Elevations, and Areas of Special Flood Hazards. This ordinance identifies areas designated as floodways in the County.
- Title 20, Section 20.94.040 Placing obstructions, refuse and contaminating substances in channels prohibited. Ordinance stating that it is unlawful to obstruct, place refuse or contaminate floodways.
- Title 26, Section 110.1 Flood Hazard. Governs construction in streams, flood plains, and floodways.

C.9.3 Thresholds of Significance and Methodology

Impact significance criteria were identified based upon review of the CEQA Guidelines Appendix G Checklist, as well as the County of Los Angeles' Environmental Document Reporting Procedures and Guidelines (1987). The thresholds listed below address each of the significance criteria identified in the CEQA Guidelines Appendix G Checklist as well as the County of Los Angeles' Environmental Document Reporting Procedures and Guidelines (1987), as relevant to hydrology and water quality. Therefore, impacts associated with hydrology and water quality would be considered significant if development facilitated by the proposed Plan and CSD Update would meet any of the criteria listed below.

- Potentially degrade surface or groundwater quality below standards established by the RWQCB for drinking water.
- Substantially interfere with groundwater recharge.
- Substantially alter the existing drainage pattern of the area such that substantial erosion or siltation occurs.
- Substantially alter the existing drainage pattern or substantially increase the rate or amount of surface runoff in a manner which results in flooding.
- Substantially add additional sources of polluted runoff to a surface water or groundwater body.
- Place housing within a 100-year floodplain, or otherwise expose people or structures to a significant risk of loss, injury or death involving flooding, including as a result of the failure of a levee or dam.

C.9.4 Environmental Impacts and Mitigation Measures

The proposed Plan and CSD Update does not include any physical development, but rather identifies land use policies and development standards for future development projects proposed in the North Area. The portions of the proposed Plan and CSD Update specific to this issue area of hydrology and water quality include new water quality and availability policies to protect watersheds from agricultural and equestrian activities (Conservation and Open Space Element), and new agricultural land use goals and policies to address agricultural use of water, as well as soil erosion and conservation of the natural resources (Land Use and Planning Element).

This analysis evaluates potential impacts to hydrology and water quality that may arise with implementation of the proposed Plan and CSD Update, if adopted by the County Board of Supervisors. The analysis in this EIR does not provide environmental review for future projects, but it can be used to tier future environmental analysis on future projects in the North Area; each project in the North Area, as applicable, will have a site-specific evaluation for consistency with CEQA and may require additional site-specific studies prior to receiving permits. Where more than one threshold of signifi-

cance is applicable to an impact discussion, the criteria are listed together, followed by the impact statement and analysis.

Impact HYD-1: Implementation of the proposed North Area Plan and CSD Update would violate water quality standards or waste discharge requirements, or otherwise substantially degrade water quality. (Less than Significant Impact)

Water quality standards and waste discharge requirements applicable to development in the North Area are discussed in Section C.9.2, Regulatory Setting. Water quality impacts from potential future development projects are directly related to specific site drainage patterns and stormwater runoff. Allowable land uses under the North Area Plan are shown on Figure C.10-2, SMMNAP Land Use Designations. As discussed throughout the land use analysis provided in Section C.10, the vast majority of the North Area would remain open space, which is consistent with the priorities of the proposed Plan and CSD Update, “to let the land dictate the type and intensity of use.” As such, new development in the North Area is expected to occur either in concentrated locations, or in very low-density areas. For either circumstance, development in the North Area would be subject to strict water quality regulations to protect the quality of localized and downstream water resources, including the Los Angeles River and the Santa Monica Bay. In addition, development in the North Area is subject to mitigation requirements of the NPDES Municipal Separate Storm Sewer System Discharge permit, described above in Section C.9.2. Regulations regarding stormwater mitigation have been adopted by the Los Angeles Region RWQCB and are implemented and enforced (with oversight by the RWQCB) by each city where applicable, or by the Los Angeles County Flood Control District for unincorporated areas.

Regulations under the federal Clean Water Act and the State require construction activity that disturbs greater than one acre, or that disturbs less than one acre but is part of a larger common plan of development, to comply with the NPDES State General Construction Permit. The NPDES State General Construction Permit requires the preparation of a SWPPP that specifies BMPs to control the discharge of pollutants, including but not limited to sediment. Discharge of pollutants from any point source is prohibited unless the discharge is in compliance with the NPDES permit. Non-point sources of pollutants are also regulated under NPDES permits, which address urban runoff that is directed to storm drains and/or natural drainages. The Los Angeles Region RWQCB’s water quality protections address ground disturbance that can lead to erosion or sedimentation and require stormwater BMPs to be implemented to the maximum extent practicable.

The Conservation and Open Space Element of the proposed North Area Plan Update identifies water quality policies under the section *Water Quality*, Goal CO-3 and Goal CO-4. These goals are noted below.

- **Goal CO-3:** *Maintain and restore biological productivity and water quality appropriate to maintain optimum populations of aquatic organisms and to protect human health.*
- **Goal CO-4:** *Protect watersheds from impacts due to development, recreational or agricultural uses.*

Applicable policies under these goals include CO-31 through CO-49 and policies CO-55 through CO-60 (see Attachment C.9 at the end of this section). The water quality policies are intended to supplement requirements of the Los Angeles Region RWQCB requirements. In addition, these policies would apply to all future development in the North Area. The CSD addresses these policies with development standards that protect resources and address BMPs for development projects. Compliance with these

comprehensive water quality protection measures would minimize or avoid potential water quality impacts of future developments, by ensuring the implementation of BMPs for water quality.

In addition, the proposed CSD Update identifies a number of development standards that are relevant to hydrology and water quality, as described below.

■ **Section 22.336.060: Biological Resource Standards. Item A, Biological Resources.** This section defines the following: (1) Habitat Categories; (2) Status of Habitat Categories; (3) Permitting Requirement; (4) Development Standards for Habitat Categories; (5) Nesting Birds; (6) Fencing and Walls; (7) Wireless Communication Facilities; (8) Mitigation Ratios; (9) Habitat Restoration; and (10) Habitat Impact Fees. Impacts to hydrology and water quality could affect habitat areas, permitting requirements, mitigation ratios, and restoration activities. Compliance with these development standards for biological resources would facilitate the maintenance and restoration of biological productivity and water quality appropriate to maintain optimum populations of aquatic organisms and to protect human health.

■ **Section 22.336.060: Biological Resource Standards. Item A.4.f, Streams** states the following:

Development shall be prohibited in streams, except where it has been demonstrated that there is no feasible less-environmentally-damaging alternative and where feasible mitigation measures have been provided to minimize adverse environmental effects. Such development shall be subject to mitigation fees, be consistent with Section 22.336.060, and be limited to the following uses; Necessary water supply projects; Flood protection where no other method for protecting existing structures in the floodplain is feasible. Compliance with this standard would facilitate the maintenance and restoration of biological productivity and water quality.

■ **Section 22.336.070: Community-Wide Development Standards. Item E, Equestrian Facilities.** This section defines the following: (1) area requirements for equestrian facilities; (2) small horse boarding requirements; (3) requirements to operation facilities under the development standards in place at the time of establishment; (4) requirements for any portion of a legal non-conforming equestrian facility undergoing an addition or expansion; (5) design requirements, ; and (6) Buffering standards for new and expanded animal containment facilities less than 100 feet from S1 habitat. Compliance with these development standards for equestrian facilities would minimize potentially adverse impacts associated with hydrology and water quality.

■ **Section 22.336.070: Community-Wide Development Standards. Item I, Grading.** This section details requirements and restrictions associated with grading activities throughout the North Area. Compliance with these development standards for grading would control erosion, sedimentation and runoff, which would reduce potentially adverse impacts from grading to surface water and water quality.

■ **Section 22.336.070: Community-Wide Development Standards. Item Y, Vineyards.** This section details requirements and restrictions associated with vineyard operations throughout the North Area. Vineyard standards were adopted and became effective on January 7, 2016. In accordance with these standards, operators of all existing vineyards must be in compliance with these standards by January 7, 2021.

Compliance with these development standards for vineyards would reduce potentially adverse impacts to surface water and water quality. Applicable requirements include: conserving water, reducing water loss to evaporation, deep percolation and runoff, removing leachate efficiently, and minimizing erosion from applied water; yearly preparation of a comprehensive water report that includes total water used at the vineyard throughout the year; an erosion control/water quality

plan that complies with CSD conditions and (2.a.v) plant permanent vegetation between vineyard crop rows for ground cover. The proposed CSD Update includes other specific vineyard practices that would be employed to minimize or avoid erosion and runoff, and associated water quality impacts.

Potential impacts to hydrology and water quality that are common to vineyard operations include drainage pattern alterations, redirection of flood flows, water quality considerations associated with sedimentation and hazardous materials, and water supply availability. As with other developments in the North Area, vineyard operators would be required to comply with the proposed Plan goals and policies and CSD development standards.

In conclusion, implementation of the proposed Plan and CSD Update would minimize or avoid potential impacts associated with the violation of a water quality permit or waste discharge requirement to occur by ensuring the implementation of a suite of BMPs specifically crafted to protect hydrology and water quality. No mitigation measures beyond the proposed policies of the Plan and development standards of the CSD would be necessary. Therefore, potential water quality impacts would be less than significant.

Impact HYD-2: Implementation of the proposed North Area Plan and CSD Update would not risk release of pollutants due to inundation from a flood, tsunami, or seiche event. (Less than Significant Impact)

The North Area is not located within the inundation area for any Los Angeles County dam and is not in an area subject to inundation by tsunami. There are limited areas of defined flood hazard within the North Area, associated with primary surface water features shown on Figure C.9-3. Areas of undefined flood hazard are also shown on Figure C.9-3; these areas may be subject to flood events associated with steep slopes common to the North Area.

Future development within the North Area may include the use and storage of potentially hazardous materials such as but not limited to vehicles fuels, oils, lubricants, and hydraulic fluids. If such materials are not handled or stored properly, or if an unanticipated leak or release should occur, it is possible that such materials may be released into flood flows, should inundation of the site be coincident to the accidental spill or release of hazardous materials. However, implementation of the policies and requirements identified in the proposed Plan and CSD Update would minimize or avoid the potential for such occurrences.

Policies CO-32, CO-33, CO-38, and CO-40 and associated development standards address the handling and storage of materials to protect water quality. Policy CO-32 specifically protects waters from non-point source pollution by minimizing the introduction of pollutants in runoff and minimizing increases in runoff rate and volume; Policy CO-32 further specifies that future development comply with NPDES Municipal Stormwater Permit's Low Impact Development (LID) Requirement to protect water quality from point and non-point source pollution. In addition, Policies CO-42, CO-47, and CO-48 restrict ground-disturbing activities to outside the rainy season, thereby minimizing the potential for storm events to transport constituents that affect water quality, including sediment and other pollutants.

The potential for pollutants to be released as a result of inundation from a flood would be minimal, therefore, impacts would be less than significant.

Impact HYD-3: Implementation of the proposed North Area Plan and CSD Update would not substantially decrease groundwater, interfere with groundwater recharge, or impede a sustainable groundwater management plan or water quality control plan. (Less than Significant Impact)

Groundwater resources may be affected directly or indirectly by future development in the North Area. Direct impacts could occur through pumping of groundwater supplies and indirect impacts could occur through altering the rates or locations of groundwater recharge from the surface. As discussed in Section C.9.1 and shown on Figure C.9-2, most of the North Area does not directly overlie a DWR-delineated groundwater basin and only a small portion of the North Area in Hidden Hills overlies the San Fernando Valley Groundwater Basin. Development activities not overlying a delineated groundwater basin could still affect groundwater resources, such as if perched groundwater or an unconfined aquifer area were to be encountered during ground-disturbing activities such as grading or excavation. However, implementation of policies included in the proposed Plan and CSD Update include restrictions on grading and minimize the introduction of impervious areas that could impede or redirect flood flows to affect groundwater infiltration. For example, Policy CO-35 specifically requires the minimization of impervious surfaces in new development, especially directly-connected impervious areas. Drainage pattern alterations would also be minimized for any development in the North Area, thereby minimizing the potential to affect groundwater infiltration and recharge. Drainage pattern alterations are addressed under Impact HYD-4.

Future development in the North Area would require a water supply during both temporary construction activities for uses such as dust abatement and for long-term operational activities and potable uses. As shown on Figure C.9-3, most of the North Area is in the service territory of the LVMWD (Las Virgenes Municipal Water District), while part of the eastern portion of the North Area (east of Old Topanga Canyon Road) is in the service territory of the Los Angeles County Waterworks District 29. Future development throughout most the North Area would be served by LVMWD, which presently supplies all potable and reclaimed water to the region except in the Waterworks District 29's region. Water, both potable and reclaimed, is distributed throughout the LVMWD and District 29 territories by a network of underground water mains of varying sizes. Prior to providing water main connection for new or expanded developments, the LVMWD and District 29, respectively, are responsible for ensuring water supply availability for such uses within their service territories; this is primarily done through long-term water supply planning conducted for the UWMPs. Future or expanded connections to the LVMWD system of water mains would be assessed on a project-specific basis and may be subject to individual CEQA analysis.

Las Virgenes Municipal Water District and Waterworks District 29 both receive State Water Project (SWP) water supply allocations, which are delivered to their service territories via the Metropolitan Water District of Southern California and are managed via implementation of Urban Water Management Plans (UWMPs) for their respective service territories. UWMPs are updated every five years or as needed, in order to assess water supply availability to the service territory area, and account for new development needs as they arise. Water supplies delivered throughout the area may vary depending on cyclical drought conditions; therefore, it is critical that individual developers coordinate with water providers to ensure water supply availability to the proposed developments. The water supply availability projections identified in the UWMPs include dry-weather contingency plans, so that water supply needs can be planned for and accommodated during cyclical drought years. Water service commitments by water service providers including LVMWD and District 29 are not provided where water supply reliability cannot be demonstrated.

Groundwater underlying the North Area provides a local source of water supplies, but due to its poor quality, it is solely used to augment supplies of the recycled water system. As such, LVMWD does not directly deliver local groundwater resources to water service customers in the North Area and LVMWD's provision of water service to present and future customers in the North Area would not deplete groundwater resources.

The Public Facilities Element of the proposed North Area Plan Update identifies water supply policies under Section C, *Water and Sewer Services*, Goal PF-1.

■ **Goal PF-1:** *Adequate water supplies and water and sewage disposal systems to support existing and future planned land uses.*

Policies of Goal PF-1 (see Attachment C.9 at the end of this section) would be implemented for any future development in the North Area. In addition, policies CO-51 through CO-54 from the Conservation and Open Space Element also address water supply.

Applicable North Area Plan policies would apply to all future development and would protect water supply availability throughout the region, including with respect to groundwater resources. For example, policies PF-1 and PF-2 require North Area developers to coordinate with LVMWD to ensure adequate water supply availability, while policy CO-51 prohibits new groundwater wells except under very specific conditions that do not result in adverse effects. Further, policy CO-54 prohibits the use of hauled water as a source of potable water for new development. These policies would ensure that development in the North Area occurs only within the limits of existing water supply availability to the area. Therefore, implementation of the proposed Plan and CSD Update would not conflict with a sustainable groundwater management plan, or other water supply management plan.

Compliance with comprehensive water supply protection measures in the proposed Plan and CSD Update would minimize or avoid potential water supply availability impacts for future developments. As noted above, LVMWD and District 29 deliver SWP water supply via Metropolitan throughout the North Area, within their respective service territories. Groundwater resources would not be substantially depleted, and no programmatic mitigation measures are needed, beyond the policies and development standards included in the proposed Plan and CSD Update. Therefore, potential impacts would be less than significant.

Impact HYD-4: Implementation of the proposed North Area Plan and CSD Update would not result in drainage pattern alterations that would cause substantial erosion, siltation, flooding on- or off-site, or polluted runoff. (Less than Significant Impact)

As discussed throughout this EIR, the proposed Plan and CSD Update does not directly include ground-disturbing activities. The update prioritizes open space protection and management and includes strict policies and development standards to avoid or minimize potentially adverse effects, including with respect to drainage pattern alteration, such as those listed under Impact HYD-1 and discussed herein. There is presently no areawide stormwater drainage system such as manmade channels designed to direct surface flows in the North Area; implementation of the proposed Plan and CSD Update would not introduce such a system. Rather, individual projects must comply with proposed policies of the Plan and proposed development standards of the CSD to protect resources, including with respect to drainage pattern alterations and low impact development (LID). Policy CO-32 requires that new development meet requirements for LID to protect resources including hydrology and water quality, and Policy CO-34 requires that LID project design preserve the natural hydrologic cycle and minimize increases in storm water or dry weather flows.

North Area development would not alter the course of a defined stream or river, including those identified on Figure C.9-2. Localized drainage pattern alterations would occur through the introduction of impervious services associated with improvements such as structure foundations and road surfacing. Potential hazards associated with localized drainage pattern alterations that may impede or redirect flood flows include erosion or siltation, increased rate or amount of surface runoff, and the exceedance of existing or planned stormwater conveyance features. However, development that would occur under the proposed Plan and CSD Update would be required to comply with numerous stringent water quality requirements discussed under Impact HYD-1 that also address drainage pattern alterations. For example, Policy CO-37 requires development to protect the absorption, purification, and retention functions of natural drainage systems, to complement and utilize existing drainage patterns and systems wherever possible, and to restore disturbed or degraded natural drainage systems where feasible.

In addition to the policies and standards noted above, County existing ordinances prohibit obstructions, debris, or contamination of the floodplains. County requirements restrict alternations to drainage courses to reduce public safety hazards. The County would evaluate each project considering any mapped flood hazard areas including FEMA floodplains and County Floodways (Figure C.9.3) and would evaluate a project's potential to increase flood hazards.

Drainage pattern alterations may also introduce polluted runoff resulting from ground disturbance or resulting from the introduction of new subsurface features, including septic systems, also referred to as onsite wastewater treatment systems (OWTS). The proposed Plan and CSD Update address the potential for failure of existing or future OWTS, which serve the majority of the Santa Monica Mountains area. The failure of an OWTS can affect water quality through the release of pollutants in the wastewater stream. Septic tank failures have been reported in older systems in the mountain areas and can result in environmental damage when failures occur. In order to address these issues in present and future developments, LVMWD collects fees for connection to existing and future trunk lines, encouraging connection to the sewer system rather than relying on OWTS. In addition, Policies CO-55 through CO-58 under Goals CO-3 and CO-4 from the Conservation and Open Space Element of the proposed North Area Plan include requirements for OWTS in order to prevent the discharge of polluted runoff and protect water quality. Policies CO-56 and CO-57 specifically limit implementation of OWTS unless unavoidable and in compliance with strict requirements to protect water quality.

The proposed CSD Update identifies a number of development standards that are relevant to hydrology and water quality, as described below.

- **Section 22.336.060: Biological Resource Standards. Item A, Biological Resources.** This section specifies development standards for biological resources that would facilitate the maintenance and restoration of biological productivity and water quality. These standards would maintain optimum populations of aquatic organisms and would serve to protect human health, as described above for Impact HYD--1.
- **Section 22.336.060: Biological Resource Standards. Item A.4, Development Standards for Habitat Categories,** (i) states: *Where new development is approved in habitat categories S2, S3, S4, or partially within S1 habitat, the maximum allowable building site area (BSA) shall be up to 15,000 square feet based on parcel size, or 25 percent of the parcel size, whichever is less. [...].*
- **Section 22.336.060: Biological Resource Standards. Item A.4.f, Streams.** This section is discussed above for Impact HYD-1 and provides stipulations for the types of activities that may occur in streams, thereby minimizing or avoiding potential impacts associated with drainage pattern alterations.

- **Section 22.336.070: Community-Wide Development Standards. Item E, Equestrian Facilities.** This section is discussed above for Impact HYD-1 and provides detailed requirements for equestrian facilities, including practices to avoid drainage pattern alterations.
- **Section 22.336.070: Community-Wide Development Standards. Item I, Grading.** This section is discussed above for Impact HYD-1 and includes requirements and restrictions associated with grading activities throughout the North Area. Compliance with these development standards for grading will facilitate the avoidance or minimization of potentially adverse impacts associated with drainage pattern alterations.
- **Section 22.336.070: Community-Wide Development Standards. Item Y, Vineyards.** This section is discussed above for Impact HYD-1 and includes numerous requirements and restrictions associated with vineyard operations throughout the North Area. Compliance with these development standards for vineyards would facilitate the avoidance or minimization of potentially adverse impacts associated with drainage pattern alterations.

Compliance with the development standards and drainage protection measures discussed above would minimize or avoid potential impacts from drainage pattern alterations for future developments. No mitigation measures beyond the proposed policies included in the Plan Update and proposed development standards in the CSD Update would be required. Potential impacts would be less than significant.

C.9.5 Cumulative Impact Analysis

A cumulative impact consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. This analysis focuses on whether the hydrology and water quality impacts of the proposed Plan and CSD Update are cumulatively considerable within the context of impacts caused by other past, present, or future projects.

As described in Section C.1.3, the area evaluated under the cumulative scenario for each environmental issue area varies because the nature and range of potential effects differ by resource or issue. For the issue area of hydrology and water quality, the geographic scope for the analysis of cumulative impacts is defined as the boundary of the watershed areas that encompass the North Area. These include the watersheds for the following drainages: Potrero Valley Creek, Medea Creek, Las Virgenes Creek, Malibu Creek, Santa Maria Creek, and Garapito Creek, all of which convey water across the Santa Monica Bay Watershed and the Los Angeles River Watershed to the Pacific Ocean, the Los Angeles River, and multiple riparian corridors. These watershed areas are shown in Figure C.9-1. The watershed boundaries define an appropriate extent of analysis for cumulative impacts to hydrology and water quality because this encompasses both upstream areas that contribute to existing conditions and downstream areas that may be affected should development result in impacts to hydrology and water quality.

In order for cumulative impacts to hydrology and water quality to occur, the implementation of future development under the proposed Plan and CSD Update would need to be coincident to implementation of one or more cumulative projects listed in Table C.1-1 and shown on Figure C.1-1. As shown, cumulative projects are primarily located within the Highway 101 corridor. The proposed project does not include specific development projects; however, future development under the proposed Plan and CSD Update is expected to be clustered and may therefore also occur within the Highway 101 corridor where cumulative projects are located. In addition, as discussed in Section B.2, the Woolsey Fire of 2018 damaged much of the North Area; this contributes to the cumulative

scenario for hydrology and water quality, particularly with respect for the potential for ground-disturbing activities to result in erosion and sedimentation that may affect water quality.

As discussed, implementation of the proposed Plan and CSD Update would not result in significant impacts to hydrology and water quality, and individual projects that occur under the proposed Plan and CSD Update are subject to individual CEQA review. All cumulative projects within the North Area would be subject to the policies and development standards discussed in Section C.9.4 and would be assessed on an individual basis where applicable. All such projects would be served by the same water providers as the North Area, including LVMWD and Los Angeles County Waterworks District 29, and would be subject to water supply availability restrictions on development, as discussed above in the impact analysis. Some of the cumulative projects identified in Table C.1-1 and Figure C.1-1 are located outside of the North Area and would therefore not be subject to the proposed Plan and CSD Update requirements described throughout this analysis. If hydrology and water quality impacts of those projects were to combine with impacts of projects within the North Area, cumulative impacts could occur. However, cumulative projects located outside of the North Area are largely downstream or outside of the watershed areas that define the cumulative scenario for the proposed project and would not have potential to combine with potential impacts of the proposed Plan and CSD Update. Potential cumulative impacts to hydrology and water quality would be less than significant.

C.9.6 Level of Significance After Mitigation

As discussed in Sections C.9.4 and C.9.5, compliance with existing laws and regulations, and implementation of the proposed Plan goals and policies and CSD development standards, would avoid or minimize potential impacts to hydrology and water quality to a less-than-significant level. No mitigation measures are proposed for the proposed Plan and CSD Update, and subsequently no secondary impacts resulting from the implementation of mitigation measures would occur. Potential impacts to hydrology and water quality would be less than significant.

Attachment C.9 Hydrology/Water Quality Policies and Standards

(Appendix 1 includes all policies and standards)

Proposed North Area Plan Update

Conservation and Open Space Element

- **Policy CO-31:** Support and participate in watershed-based planning efforts with the Regional Water Quality Control Board (RWQCB) and upstream and downstream cities.
- **Policy CO-32:** Site, design, and manage new development and improvements, including — but not limited to — landscaping, to protect waters from non-point source pollution by minimizing the introduction of pollutants in runoff and minimizing increases in runoff rate and volume. Review new development and improvements for potential degradation of water quality and ensure that they meet the requirements of the NPDES Municipal Stormwater Permit's Low Impact Development (LID) Requirement, included as part of the Local Implementation Program.
- **Policy CO-33:** To reduce runoff and erosion and provide long-term, post-construction water quality protection in all physical development, prioritize the use of Best Management Practices (BMPs) in the following order: 1) Site design BMPs, 2) Source control BMPs, 3) Treatment control BMPs. When the combination of site design and source control BMPs is not sufficient to protect water quality, require treatment control BMPs, in addition to site design and source control measures. Design, construct, and maintain any required treatment control BMPs (or suites of BMPs) so that they treat, infiltrate, or filter the amount of storm water runoff produced by all storms up to and including the 85th percentile, 24-hour storm event for volume-based BMPs, and/or the 85th percentile, 1- hour storm event (with an appropriate safety factor of 2 or greater) for flow-based BMPs.
- **Policy CO-34:** Prioritize the use of LID in project design to preserve the natural hydrologic cycle and minimize increases in storm water or dry weather flows.
- **Policy CO-35:** Minimize impervious surfaces in new development, especially directly-connected impervious areas. Require redevelopment projects to increase the area of pervious surfaces, where feasible.
- **Policy CO-36:** Infiltrate development runoff on-site, where feasible, to preserve or restore the natural hydrologic cycle and minimize increases in stormwater or dry weather flows.
- **Policy CO-37:** Require development to protect the absorption, purification, and retention functions of natural drainage systems that exist on the site. Where feasible, site and design development, including drainage, to complement and utilize existing drainage patterns and systems, conveying drainage from the developed area of the site in a non-erosive manner. Disturbed or degraded natural drainage systems should be restored where feasible.
- **Policy CO-38:** Protect water quality by limiting maximum potential build out in sensitive watersheds, including adjacent to the following waterways: Medea Creek; Palo Comado Canyon; Lindero Creek; Stokes Creek; Triunfo Creek; Cold Creek; Malibu Creek; Las Virgenes Canyon; Potrero Valley; and Lower Topanga Canyon.
- **Policy CO-39:** Cooperate with local and State transportation agencies to implement BMPs that promote infiltration of runoff from roads and highways and minimize urban runoff flows into streams and creeks.
- **Policy CO-40:** Manage the temporary storage of construction materials for public projects or landslide material on road shoulders using the most current BMPs to eliminate erosion into adjacent drainage

courses, to protect air and water quality, and to minimize the spread of invasive plant species. Ensure that landslide material is deposited in permitted landfills or sites with valid permits to accept fill.

- **Policy CO-41:** Limit grading, soil compaction and removal of locally-indigenous vegetation to the minimum footprint needed to create a building site, allow access, and provide fire protection for the proposed development. Monitor grading projects to ensure that grading conforms to approved plans.
- **Policy CO-42:** Revegetate prior to the rainy season areas disturbed by development activity. Use locally indigenous plant species outside of Fuel Modification Zone A and avoid non-native invasive species, balancing long-term slope stability and habitat restoration with reduced fuel loads for fire protection.
- **Policy CO-43:** Prevent the disposal of animal waste, wastewater, and any other byproducts of human, crop-based-agricultural or equestrian activities in or near any drainage course, or S1 habitat area.
- **Policy CO-44:** Require confined animal facilities and agricultural activities to utilize BMPs to minimize erosion and avoid sediment and pollutant impacts. For all development, require the ongoing maintenance of all design features used to mitigate stormwater runoff.
- **Policy CO-45:** The use of reclaimed water for any approved agricultural use is required where feasible.
- **Policy CO-46:** Ensure that animal containment facilities are sited and designed to manage, contain, and dispose of animal waste using the most effective BMPs to minimize waste introduced to surface runoff or groundwater.
- **Policy CO-47:** Prohibit non-emergency earthmoving operations during the rainy season (extending from October 15 to April 15). Approved grading shall not be commenced unless there is sufficient time to complete grading operations before the rainy season. If grading operations are not completed before the rainy season begins, grading shall be halted and temporary erosion control measures shall be put into place to minimize erosion until grading resumes after April 15, unless the County determines that completion of grading would be more protective of sensitive environmental resources and would minimize erosion and sedimentation. Erosion control measures shall be required for any ongoing grading project or any completed grading project that is still undeveloped.
- **Policy CO-48:** Grading during the rainy season may be permitted to remediate hazardous geologic conditions that endanger public health and safety.
- **Policy CO-49:** Minimize the land disturbance activities of construction (e.g., clearing, grading, and cut and- fill), especially in erosive areas (including steep slopes, unstable areas, and erosive soils), to avoid detrimental water quality impacts caused by increased erosion or sedimentation. Use soil stabilization BMPs on disturbed areas.¹
- **Policy CO-51:** Permit construction of new water wells only where they will not have significant adverse individual or cumulative impacts on groundwater, streams, or natural resources. For a well location in close proximity of a stream, drainage courses, and similar surface water conveyance, a groundwater assessment must be performed by a qualified professional to ensure surface water will not adversely impact groundwater quality.
- **Policy CO-52:** Access for geologic testing (or percolation or well testing) shall use existing roads or truck mounted drill rigs where feasible. Where there is no feasible access, a temporary access road may be permitted when it is designed to minimize length, width and total grading to only that necessary to accommodate required equipment. All such temporary roads shall be restored to the maximum extent feasible, through grading to original contours, revegetating with native plant species indigenous to the project site, and monitoring to ensure successful restoration. All percolation testing shall take place out of any future planned road access.

¹ Policy CO-50 purposely not included as it has to do with natural vegetation buffers.

- **Policy CO-53:** Use LID approaches in project design to preserve the natural hydrologic cycle and minimize increases in stormwater of dry weather flows.
- **Policy CO-54:** Prohibit the use of hauled water as a source of potable water for new development.
- **Policy CO-55:** Participate in the development and implementation of solutions to problems associated with OWTS and their impact on water quality.
- **Policy CO-56:** Prohibit development of rural areas where established standards by the County and RWQCB cannot be met, such that the cumulative effect of OWTS will negatively impact the environment, either by stream pollution or by contributing to the potential failure of unstable soils.
- **Policy CO-57:** In areas with constraints to OWTS, including but not limited to, substandard, antiquated subdivisions, and geologic hazard areas, the County Departments of Public Health and Public Works may permit innovative and alternative methods of wastewater treatment and disposal provided that installation, operation, and maintenance of such systems minimize impacts to public health, water quality and natural resources, and are acceptable to the County and to the RWQCB.
- **Policy CO-58:** Site new OWTS and require them to be designed so that impacts to sensitive environmental resources are minimized, including grading, site disturbance, and the introduction of increased amounts of water. Adequate setbacks and/or buffers shall be required to protect S1 habitat area and surface waters from lateral seepage from the sewage effluent dispersal systems and to protect the OWTS from flooding and inundation.
- **Policy CO-59:** Channelizations or other substantial alterations of streams shall be prohibited except for: (1) Necessary water supply projects where no feasible alternative exists; (2) Flood protection for existing development where there is no other feasible alternative, or (3) The improvement of fish and wildlife habitat. Any channelization or stream alteration permitted for one of these three purposes shall minimize the depletion of groundwater, and shall include maximum feasible mitigation measures to mitigate unavoidable impacts. Bioengineering alternatives shall be preferred for flood protection over "hard" solutions such as concrete or riprap channels.
- **Policy CO-60:** Alteration of natural streams for the purpose of creating stream road crossings shall be prohibited unless there is no other feasible alternative to provide access to public recreation areas or lawfully-established development on legal parcels, and the stream crossing is accomplished by bridging. Bridge columns shall be located outside streambeds and banks. Wherever possible, shared bridges shall be used for providing access to multiple home sites. Culverts may be utilized for the crossing of minor drainages lacking beds and banks and riparian vegetation and where the culvert is sized and designed to not restrict movement of fish or other aquatic wildlife. An in-stream road crossing, such as an "Arizona crossing", shall be modified to a soft-bottom crossing or replaced by a bridge, consistent with Fire Department requirements, when major maintenance or repair activities on the crossing are undertaken.

Public Facilities Element

- **Policy PF-1:** Coordinate the land development review process with the LVMWD to ensure that adequate water supplies and adequate water and sewer infrastructure are available to support existing and planned development.
- **Policy PF-2:** Minimize consumption of new water supplies through active water conservation programs and the use of reclaimed water - on site, wherever possible.
- **Policy PF-3:** Encourage tertiary treatment of wastewater, which will help to improve effluent quality, while expanding the potential uses for reclaimed water.
- **Policy PF-4:** Maximize the uses of reclaimed water and thereby reduce the need for exploiting domestic water supplies for purposes where potable water is not required.

- **Policy PF-5:** Require proposed development projects to gain approval of design and financial arrangements from the LVMWD (or Los Angeles County Water Works District) for the construction of water and sewer facilities prior to recordation of tract maps (or issuance of grading or building permits, if a tract map is not involved). Strictly enforce these conditions of approval.
- **Policy PF-6:** Require the use of reclaimed wastewater for golf courses, landscape irrigation, and other purposes, including the maintenance of public lands and fire breaks, where reclaimed water can be feasibly provided.
- **Policy PF-7:** Provide for the expansion of existing community sewer systems in areas of demonstrated need.
- **Policy PF-8:** Prohibit the construction of small “package” wastewater treatment plants, except in those specific areas where this is the desired long-term wastewater management solution
- **Policy PF-9:** In rural areas, avoid the build-out of clustered subdivisions where the cumulative effect of OWTS will negatively impact the environment, either by stream pollution or by contributing to the potential failure of unstable soils.

Proposed Community Standards District Update

22.336.060 Biological Resources Standards

- A. Biological Resources
 - A.4.i Maximum Building Site Area
 - A.4.f Streams

- B. Trees

22.336.070 Community-Wide Development Standards

- E. Equestrian Facilities
- I. Grading
- Y. Vineyards
- W. Transfer of Development Credit Program

C.10 Land Use and Recreation

Introduction

This section analyzes potential impacts related to land use and planning, agriculture and recreational resources associated with implementation of the proposed Plan and CSD Update.

Scoping Comments Received. During the scoping period for the EIR, written and verbal comments were received from agencies, organizations, and the public. These comments identified various substantive issues and concerns relevant to the EIR analysis for land use and recreation. The issues below summarize these comments. Appendix 2 includes all comments received during the scoping comment period.

- Request regulations similar to those the California Coastal Commission has on coastal side to preserve native vegetation.
- No new development, or only allow within existing small communities of Santa Monica Mountains and include building codes to prevent urbanization.
- New regulations should address hillside development.
- Concern with reduction in open space in North Area and impact to rural lifestyle.
- Do not allow more residential uses in the R-R zone.
- Request for review of federal law when analyzing impacts to recreation and private facilities in the Santa Monica Mountains.
- Request consideration of overnight camping in Backbone Trail.
- Request for analysis of vineyard tasting rooms in the Santa Monica Mountains Recreational Area.
- Request for analysis of equestrian uses.
- Comments in support and in opposition of grapevines and wineries.
- Request for analysis of environmental impact of grapevines.

KEY FINDINGS

- Proposed Plan and CSD Update is consistent with applicable land use plans, policies, and regulations.
- Proposed Plan and CSD Update would provide more focused policies and standards for development in the North Area.
- Parcels proposed to be rezoned from Agriculture to Open Space have not historically been used for agriculture.
- Proposed Plan goals/policies and CSD standards would ensure that impacts to land use, recreation and agriculture would be less than significant.

C.10.1 Environmental Setting

Regional Setting

The Santa Monica Mountains North Area is located in the western portion of Los Angeles County and includes privately-owned and publicly-owned lands. The North Area encompasses 32.3 square miles (20,684 acres) of land. To the north and west, the planning area borders Ventura County. To the east, it borders the San Fernando Valley and Westside Planning Areas. The Conejo Valley and adjacent areas are mostly cities, including the City of Agoura Hills, City of Calabasas, City of Hidden Hills, and City of Westlake Village. The southern half of the Santa Monica Mountains also consists of unincorporated County lands that are referred to as the Santa Monica Mountains Coastal Zone. This Zone extends approximately five

miles inland from the coastline and is subject to the County's Local Coastal Program (LCP). South of the County's Coastal Zone is the City of Malibu, which extends on average about one mile inland from the coastline (County of Los Angeles, 2014).

Land Use Characterization

Figure C.10-1, Existing Land Uses in the North Area, shows existing land uses throughout the North Area; most of these existing land uses are rural residential (low density) development, primarily clustered along the major North Area roads including, but not limited to, Highway 101, Topanga Canyon Road, Mulholland Highway, and Kanan Road. Two areas of high-density single-family residences are in the north-central portion of the North Area near the City of Calabasas, and the northeast portion of the North Area near Woodland Hills. A cluster of low density single-family residences is located just south of the City of Agoura Hills. In addition, three high-density mobile home courts are located in the North Area, two in the eastern portion and one in the western portion. Additionally, the Calabasas Landfill is located north of Highway 101 between Chesebro Road and Las Virgenes Road; and approximately 19 outdoor wedding and entertainment venues are located in the North Area; these venues are comprised of vineyards, ranches, public regional parks, private clubs, and private estates that are primarily clustered in the western portion of the North Area off Kanan Road and Mulholland Highway (see Figure C.11-2 [Outdoor Wedding and Entertainment Locations] in Section C.11 Noise).

Land uses within the North Area boundaries include open space, residential and rural residential, commercial, rural lands, and public and semi-public facilities. Table C.10-1 and Figure C.10-2 show the land use designations for the North Area, while Table C.10-2 and Figure C.10-3 show land use zones for the North Area. Land use designations provide guidance for how an area will be developed, i.e. designations guide the character of an area, commonly accomplished through density restrictions. Land use zones, via the County zoning code, then provide specific restrictions for what can and cannot be developed on a property. Table C.10-1 and Figure C.10-2 show that existing North Area Plan land use designations primarily consist of Mountain Lands (N5, N10, N20) and Open Space (OS, OS-P, OS-DR, OS-Water), while Table C.10-2 and Figure C.10-3 show that existing North Area Plan zoning primarily consists of Light Agricultural (A-1) and Open Space (O-S, O-S-P). The existing land uses shown on Figure C.10-1 are consistent with these designations and zones.

Table C.10-1. Existing North Area Land Use Designations

Land Use	Designation	Acres*
C – Commercial	C	120
CR – Commercial Recreation – Limited Intensity	CR	47
N1 – Rural Residential 1 (1 du/ac max)	N1	444
N2 – Rural Residential 2 (1 du/2 ac max)	N2	662
N5 – Mountain Lands 5 (1 du/5 ac max)	N5	1,956
N10 – Mountain Lands 10 (1 du/10 ac max)	N10	4,273
N20 – Mountain Lands 20 (1 du/20 ac max)	N20	5,509
OS – Open Space	OS	772
OS-DR – Open Space Deed Restricted	OS-DR	596
OS-P – Open Space-Parks	OS-P	4,741
OS-P – Open Space Water	OS-W	39
P – Public and Semi-Public Facilities	P	515

Table C.10-1. Existing North Area Land Use Designations

Land Use	Designation	Acres*
U2 – Residential 2 (2 du/ac max)	U2	251
U4 – Residential 4 (4 du/ac max)	U4	149
U8 – Residential 8 (8 du/ac max)	U8	26
Right of Way		584
Total	—	20,684

Source: County of Los Angeles, 2020.

*Numbers have been rounded.

Table C.10-2. Existing North Area Zoning

Zone	Designation	Acres*
Light Agricultural	A-1	10,857
Heavy Agricultural	A-2	845
Neighborhood Business	C-2	14
General Commercial	C-3	6
Commercial Manufacturing	C-M	5
Commercial Recreation	C-R	5
Commercial Planned Development	CPD	25
Institutional	IT	2
Light Manufacturing	M-1	56
Heavy Manufacturing	M-2	10
Manufacturing–Industrial Planned	MPD	16
Open Space	O-S	5,783
Single-Family Residence	R-1	1,022
Resort and Recreation	R-R	877
Residential Planned Development	RPD	577
Right of Way		584
Total	—	20,684

Source: County of Los Angeles, 2020.

*Numbers have been rounded.

Agriculture

California Department of Conservation Important Farmland Classifications

The Farmland Mapping and Monitoring Program (FMMP), administered by the California Department of Conservation (DOC), uses soil agricultural productivity information from the Natural Resources Conservation Service to construct maps illustrating the types of farmland in the area. Established in 1982, the FMMP serves to continue the Important Farmland mapping efforts begun in 1975 by the United States Department of Agriculture (USDA). The purpose was to create agriculture maps based on soil quality and land use across the nation.

The California DOC classifies lands into seven agriculture-related categories: Prime Farmland, Farmland of Statewide Importance (Statewide Farmland), Unique Farmland, Farmland of Local Importance (Local Farmland), Grazing Land, Urban and Built-up Land (Urban Land), and Other Land. The first four types listed above are collectively termed by the State as “Important Farmland.” The minimum mapping unit is 10 acres unless otherwise specified. Units of land smaller than 10 acres are incorporated into surrounding classifications. Each of the seven farmland types are provided below, based on California DOC’s *A Guide to the Farmland Mapping and Monitoring Program*.

- **Prime Farmland.** Prime Farmland is land with the best combination of physical and chemical features able to endure the long-term production of agricultural crops. The land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. The land must have been used for the production of irrigated crops at some time during the two update cycles (a cycle is equivalent to two years) prior to the mapping date.
- **Farmland of Statewide Importance.** Farmland of Statewide Importance is land similar to Prime Farmland, but with minor limitations, such as greater slopes or with less ability to hold and retain moisture. The land must have been used for the production of irrigated crops at some time during the two update cycles prior to the mapping date.
- **Unique Farmland.** Unique Farmland is land of lesser quality soils used for the production of the State’s leading agricultural crops. The land is usually irrigated, but may include non-irrigated orchards or vineyards, as found in some climatic zones in California. The land must have been cultivated at some time during the two update cycles prior to the mapping date.
- **Farmland of Local Importance.** Farmland of Local Importance is land of importance to the local agricultural economy, as determined by each county’s Board of Supervisors and a local advisory committee. Placer County farmland of local importance includes lands which do not qualify as Prime, Statewide, or Unique designation, but are currently irrigated crops or pasture or non-irrigated crops; lands that would meet the Prime or Statewide designation and have been improved for irrigation, but are now idle; and lands that currently support confined livestock, poultry operations and aquaculture.
- **Grazing Land.** Grazing Land is land on which the existing vegetation, whether grown naturally or through management, is suited to the grazing of livestock. The minimum mapping unit for the Grazing Land category is 40 acres.
- **Urban Land.** Urban and Built-up Land is occupied with structures with a building density of at least one unit to one-half acre. Uses may include but are not limited to, residential, industrial, commercial, construction, institutional, public administration purposes, railroad yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment plants, water control structures, and other development purposes. Highways, railroads, and other transportation facilities are mapped as part of this unit, if they are part of a surrounding urban area.
- **Other Land.** Other Land is land that is not included in any other mapping categories. The following uses are generally included: rural development, brush timber, government land, strip mines, borrow pits, and a variety of other rural land uses.

As designated by the California Department of Conservation’s Farmland Mapping and Monitoring Program, the North Area is mostly comprised of Other Land, as well as areas categorized as Urban and Built-Up Land (see Figure C.10-4). Small pockets of Unique Farmland are located in the southwestern portion of the North Area (DOC, 2016). Designated Grazing lands are located in the center of the North Area, near the intersection of Mulholland Highway and Las Virgenes Road. As mentioned above, agricultural activities

in the North Area include vineyards and wineries, which are primarily located on the west side of the North Area along Kanan Road and Mulholland Highway.

Williamson Act Lands

The only Williamson Act contracts in effect in Los Angeles County are on Santa Catalina Island (Los Angeles County, 2014). Therefore, no Williamson Act lands are located in the North Area.

Recreation

As discussed in the existing North Area Plan, the cornerstone of the North Area's recreation potential is in the existing federal, state and local parks and trails. Nearly the entire North Area is encompassed by the Santa Monica Mountains National Recreation Area, a unit of the National Park System, which offers public access to various parks and trails. Figure C.10-2 shows the locations of public and private open space in the North Area, which include regional parks, outdoor private venues, and a camp.

The County does not operate any regional park facilities in the North Area; however, the County, along with other public agencies, operates regional recreation trails throughout the North Area. The network of trails and routes include opportunities for riding, hiking, bicycling, and equestrian use. There are also private trails and unofficial trails established by years of public use. Scenic driving routes include three State-designated County Scenic Highways: Mulholland Highway, Malibu Canyon-Las Virgenes Road and Topanga Canyon Boulevard.

The trail system connects to the Rim of the Valley Trails, a state-designated corridor that links the parklands and open spaces encircling the Santa Fernando, La Crescenta, western San Gabriel, Simi and Conejo Valleys. (County of Los Angeles, 2000)

C.10.2 Regulatory Setting

Land Use and Planning

DRP is the lead agency for the proposed Plan and CSD Update and oversees implementation of the goals, policies and programs set forth by the County's 2015 General Plan. In addition, the State and regional agencies with roles in establishing and implementing land use policy in the Santa Monica Mountains are the Santa Monica Mountains Conservancy and the Southern California Association of Governments (SCAG). The proposed project is subject to State and regional land use regulatory plans and policies established by each of these agencies that affect land use planning in the North Area, which are discussed below.

Los Angeles County General Plan

The Los Angeles County General Plan, adopted in 2015, is a County-wide land use planning document that guides the long-term physical development and conservation of the unincorporated areas. The unincorporated area of Los Angeles County consists of approximately 2,650 square miles of land that is not under the jurisdiction of any of the County's 88 incorporated cities. Approximately one million people live throughout the County's unincorporated areas.

The following subsections discuss Part II, Chapter 5 of the General Plan, the Planning Areas Framework, and Part III, the General Plan Elements that apply to land use and planning, agriculture, and recreational resources.

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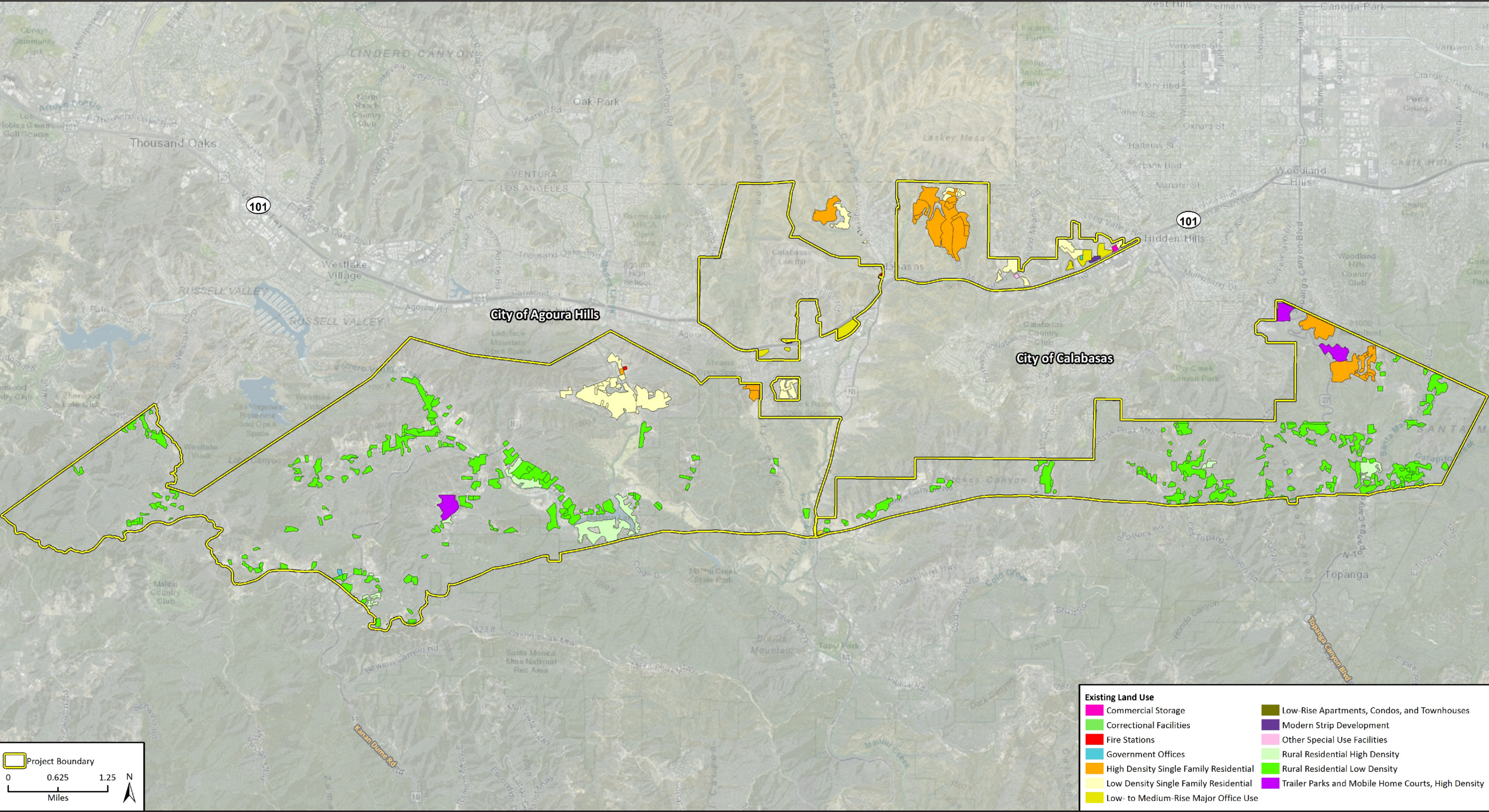


Figure C.10-1
Existing Land Uses in the North Area

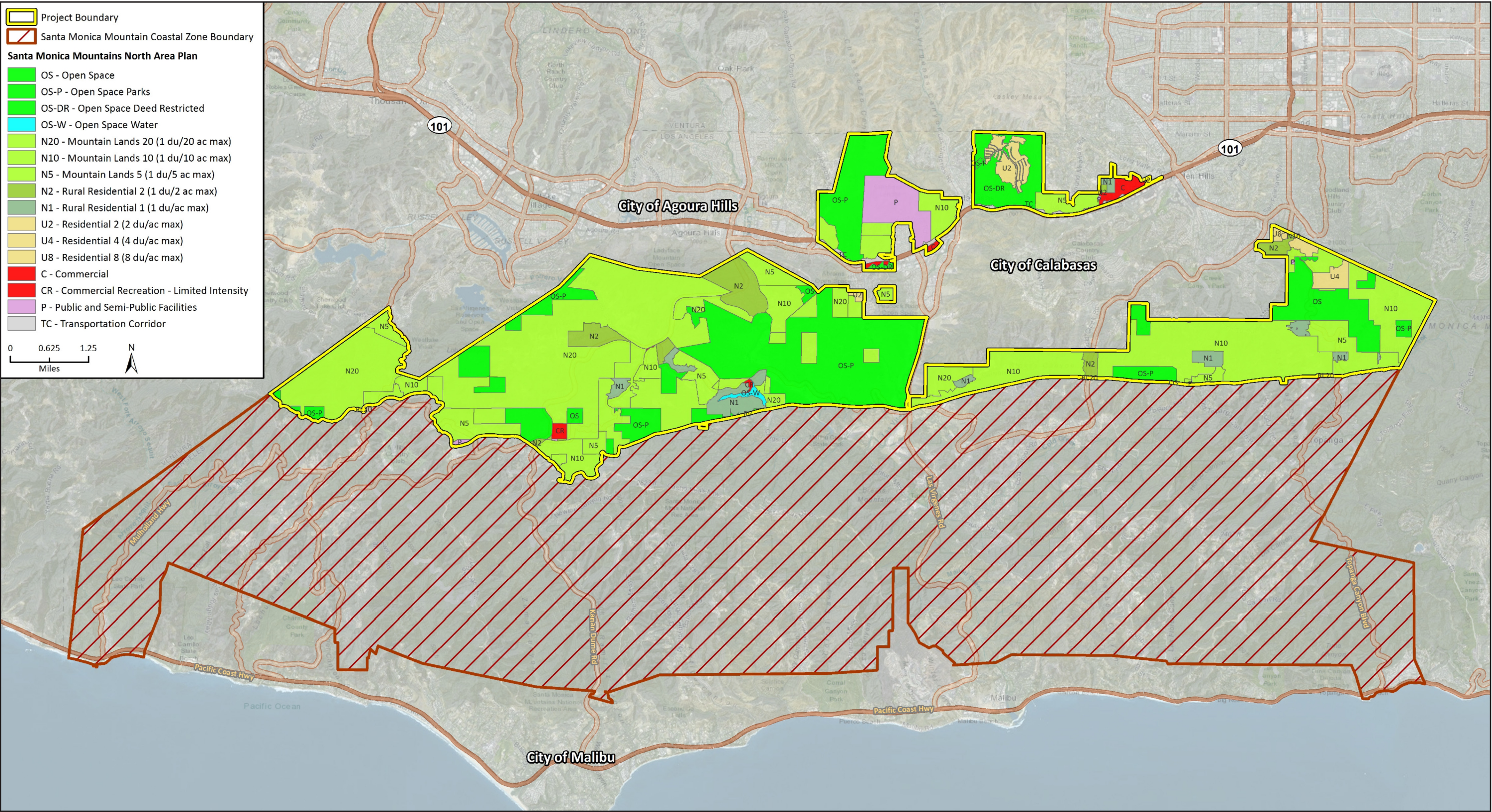


Figure C.10-2
North Area Plan Land Use Designations

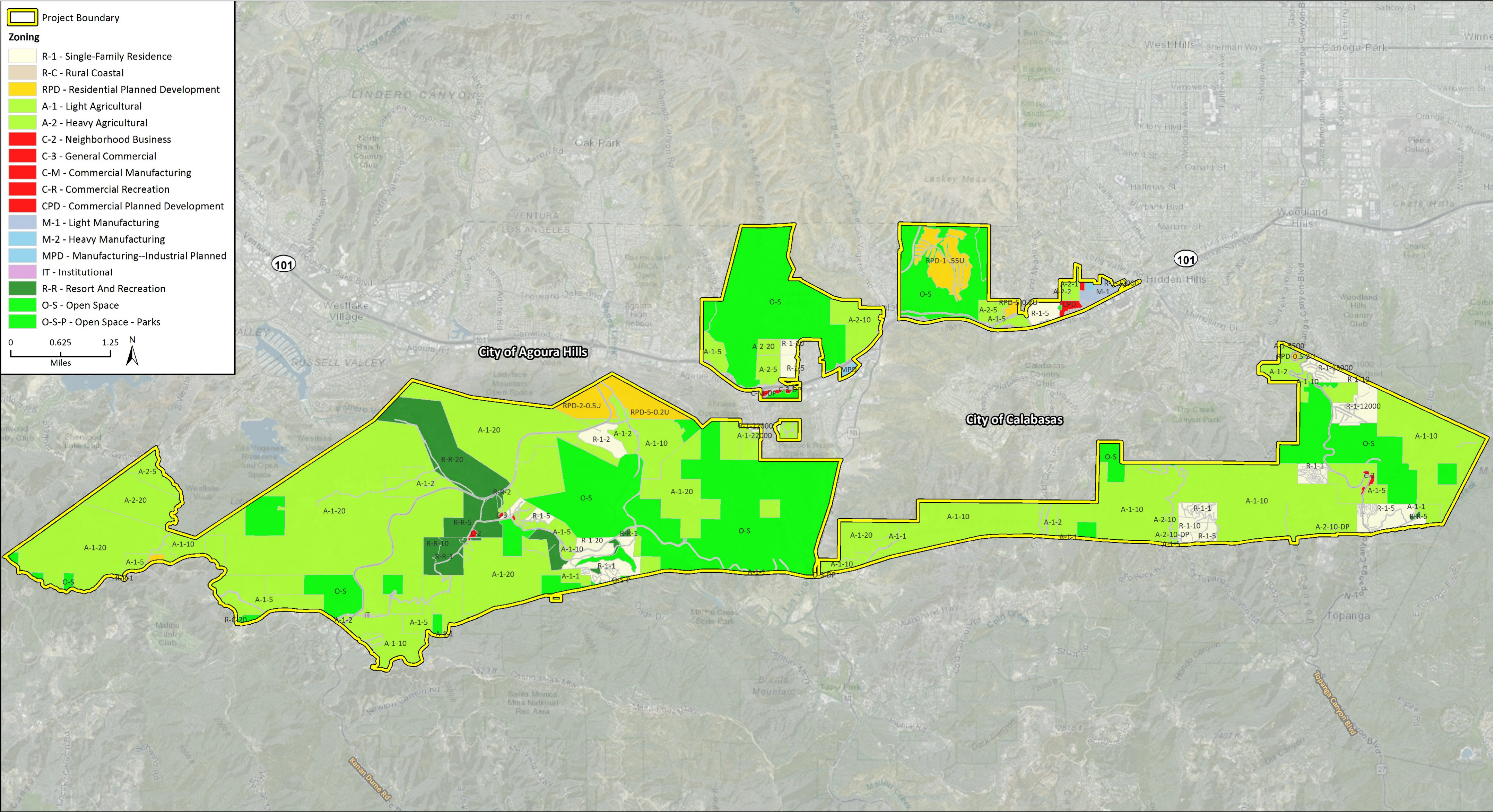
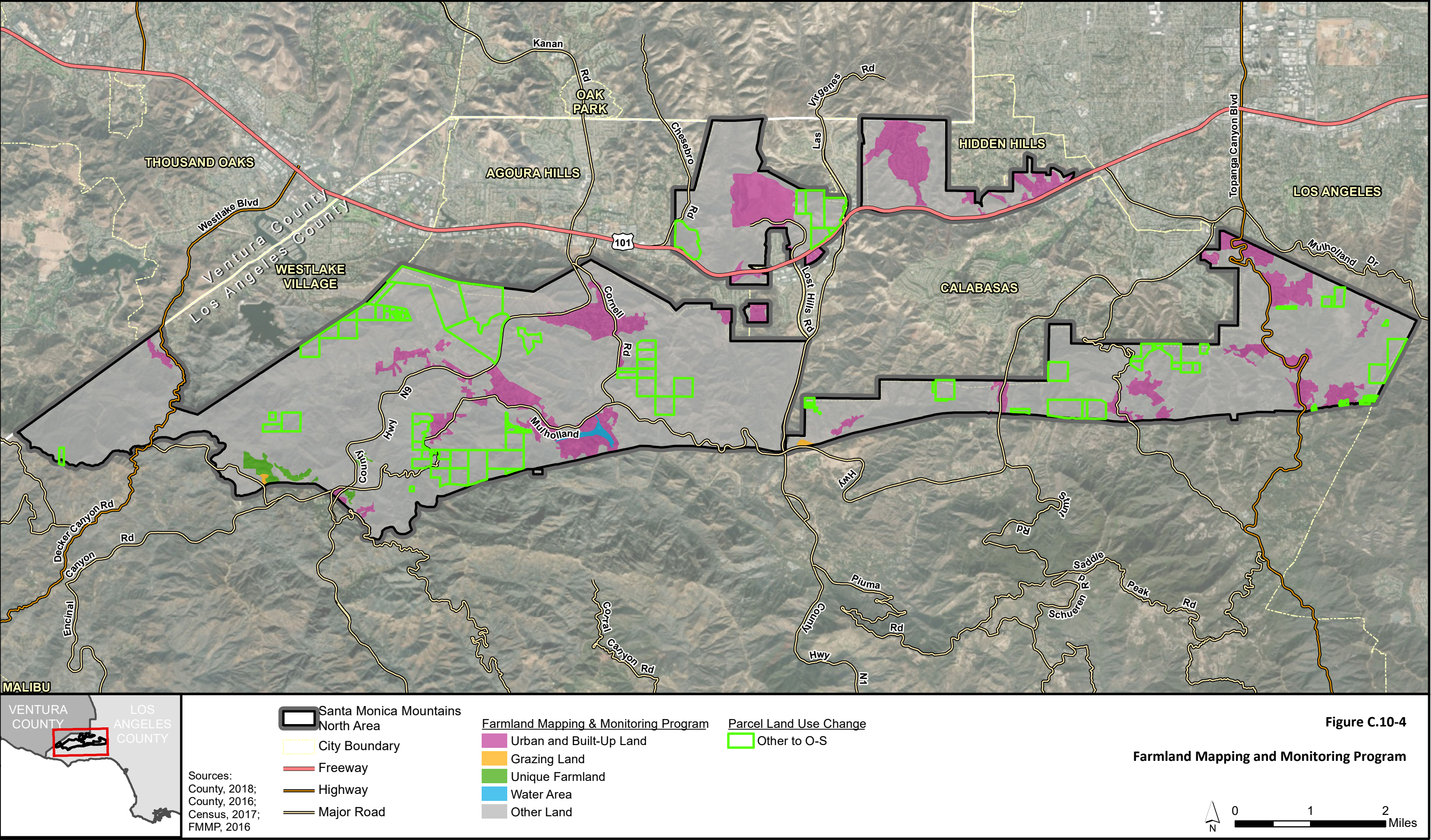


Figure C.10-3
Zoning Designations in the North Area



Santa Monica Mountains North Area Plan (North Area Plan). The County's 2015 General Plan organizes the dispersed unincorporated County lands into eleven planning areas to provide for the development of local plans that respond to the needs of communities through the Planning Areas Framework. All area and community plans are extensions of the General Plan and based on the framework established by the General Plan. The current North Area Plan was adopted in 2000, which includes goals, policies and implementation actions specific to the issues and needs of the Santa Monica Mountains and guides development in the Santa Monica Mountains Planning Area. The intent of the proposed project is to update the North Area Plan.

General Plan Land Use Element. The Land Use Element provides strategies and planning tools to facilitate and guide future development and revitalization efforts and designates the proposed general distribution, general location, and extent of land uses. The Land Use Element also includes goals and policies that apply to land use and development in the North Area, which are outlined below.

Goal LU 1: A General Plan that serves as the constitution for development, and a Land Use Policy Map that implements the General Plan's Goals, Policies and Guiding Principles.

Topic: General Plan Amendments

Policy LU 1.1: Support comprehensive updates to the General Plan, area plans, community plans, coastal land use plans and specific plans.

Goal LU 2: Community-based planning efforts that implement the General Plan and incorporate public input, and regional and community level collaboration.

Topic: Regional and Community-Based Planning Initiatives

Policy LU 2.1: Ensure that all community-based plans are consistent with the General Plan.

Policy LU 2.2: Ensure broad outreach, public participation, and opportunities for community input in community-based planning efforts.

Policy LU 2.3: Consult with and ensure that applicable County departments, adjacent cities and other stakeholders are involved in community-based planning efforts.

Policy LU 2.4: Coordinate with other local jurisdictions to develop compatible land uses.

Policy LU 2.5: Support and actively participate in inter-jurisdictional and regional planning efforts to help inform community-based planning efforts.

Policy LU 2.6: Consider the role of arts and culture in community-based planning efforts to celebrate and enhance community character.

Policy LU 2.7: Set priorities for Planning Area-specific issues, including transportation, housing, open space, and public safety as part of community-based planning efforts.

Policy LU 2.8: Coordinate with the Los Angeles County Department of Public Works and other infrastructure providers to analyze and assess infrastructure improvements that are necessary for plan implementation.

Policy LU 2.9: Utilize the General Plan Land Use Legend and the Hazard, Environmental and Resource Constraints Model to inform the development of land use policy maps.

Policy LU 2.10: Ensure consistency between land use policy and zoning by undergoing a comprehensive zoning consistency analysis that includes zoning map changes and Zoning Code amendments, as needed.

Policy LU 2.11: Update community-based plans on a regular basis.

Policy LU 2.12: Community-based plans and existing specific plans shall be updated, as needed, to reflect the General Plan Land Use Legend as part of a comprehensive area planning effort. An exception to this is for coastal land use plans, which are subject to the California Coastal Act and to review by the California Coastal Commission.

Goal LU 3: A development pattern that discourages sprawl, and protects and conserves areas with natural resources and SEAs.

Topic: Growth Management

Policy LU 3.1: Encourage the protection and conservation of areas with natural resources, and SEAs.

Policy LU 3.2: Discourage development in areas with high environmental resources and/or severe safety hazards.

Policy LU 3.3: Discourage development in undeveloped areas where infrastructure and public services do not exist, or where no major infrastructure projects are planned, such as state and/or federal highways.

Goal LU 6: Protected rural communities characterized by living in a non-urban or agricultural environment at low densities without typical urban services.

Topic: Rural Character

Policy LU 6.1: Protect rural communities from the encroachment of incompatible development that conflict with existing land use patterns and service standards.

Policy LU 6.2: Encourage land uses and developments that are compatible with the natural environment and landscape.

Policy LU 6.3: Encourage low density and low intensity development in rural areas that is compatible with rural community character, preserves open space, and conserves agricultural land.

Los Angeles County Municipal Code

Title 22, *Planning and Zoning*, of the County's Municipal Code is the Zoning Code for all properties in the unincorporated area of Los Angeles County. Title 22 establishes the zones, zone districts and zoning map, which are summarized below. The Zoning Code also establishes Special Management Areas, including Significant Ecological Areas and Hillside Management Areas that apply in portions of the North Area and are discussed below. (County of Los Angeles, 2019a)

Title 22 – Planning and Zoning. The purpose of the Zoning Code is to classify County lands and establish the area requirements including the density of land occupancy, and the necessary, proper, and comprehensive groupings and arrangements of the various industries, businesses, and population. All zones within the North Area are shown in Table C.10-1, below.

Significant Ecological Areas. The County recently adopted the amended Significant Ecological Areas ordinance, which ordinance took effect on January 16, 2020. Significant Ecological Areas (SEA) are areas with significant and irreplaceable biological resources. These areas are designated through the Los Angeles County General Plan and governed by its policies. The following is the purpose of the SEA ordinance, as stated in Chapter 22.102.010, *Significant Ecological Areas*, of the County's Municipal Code:

This Chapter establishes regulations to conserve the unique biological and physical diversity of the natural communities found within SEAs by requiring development to be designed to avoid and minimize impacts to SEA Resources. These requirements will help ensure the long-term survival of the SEAs and their connectivity to regional natural resources. This Chapter regulates development within SEAs by:

- A. Protecting the biodiversity, unique resources, and geological formations contained in SEAs from incompatible development, as specified in the Conservation and Natural Resources Element of the General Plan;*
- B. Ensuring that projects reduce the effects of habitat fragmentation and edge effects by providing additional technical review of existing resources, potential impacts, and required mitigations;*
- C. Ensuring that development within a SEA conserves biological diversity, habitat quality, and connectivity to sustain species populations and their ecosystem functions into the future; and*
- D. Directing development to be designed in a manner that considers and avoids impacts to SEA resources within the Los Angeles County region.

The development standards in the SEA ordinance do not apply to the Santa Monica Mountains North Area. As stated in Section 22.102.030, until the Santa Monica Mountains North Area Community Standards District is amended, development in SEAs in the North Area shall be regulated by the prior version of the SEA ordinance.

Hillside Management Areas. The Hillside Management Areas (HMA) ordinance is a component of the County's General Plan, adopted on October 6, 2015. The policies of the General Plan and North Area Plan seek to preserve significant natural features in hillside areas. The Hillside Management Areas ordinance and the Hillside Design Guidelines implement those policies by ensuring that hillside development projects use sensitive and creative engineering, architectural, and landscaping site design techniques. The following is the purpose of the HMAs, as stated Chapter 22.104, *Hillside Management Areas*, of the County's Municipal Code:

- A. This Chapter is established to ensure that development preserves and enhances the physical integrity and scenic value of Hillside Management Areas ("HMAs"), to provide open space, and to be compatible with and enhance community character. These goals are to be accomplished by:*
 - 1. Locating development outside of HMAs to the extent feasible;*
 - 2. Locating development in the portions of HMAs with the fewest hillside constraints; and*
 - 3. Using sensitive hillside design techniques tailored to the unique site characteristics.*
- B. This Chapter does not determine maximum allowable density or intensity for a proposed development. Maximum allowable density or maximum intensity for a proposed development shall be determined as set forth in the applicable area, community, neighborhood, or specific plan. Where there is no applicable area, community, neighborhood, or specific plan, the maximum density or intensity for a proposed development shall be determined using the methodology and parameters set forth by the Land Use Element of the General Plan.*

Southern California Association of Governments (SCAG) Plans

The North Area is in the planning area of SCAG, the metropolitan planning organization (MPO) for the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura and Imperial. The region encompasses a population exceeding 15 million persons in an area of more than 38,000 square miles. As the designated MPO, SCAG is mandated by the federal government to research and develop regional plans for transportation, growth management, hazardous waste management, and air quality. Also, as the MPO, SCAG administers the state-mandated Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), designed to address the regional impact of urban congestion.

Regional Comprehensive Plan. SCAG's Regional Comprehensive Plan (RCP) contains a general overview of federal, state, and regional plans applicable to the Southern California region and serves as a

comprehensive planning guide for future regional growth. The Guiding Principles of the RCP are as follows:

Improve mobility for all residents. Improve the efficiency of the transportation system by strategically adding new travel choices to enhance system connectivity in concert with land use decisions and environmental objectives.

Foster livability in all communities. Foster safe, healthy, walkable communities with diverse services, strong civic participation, affordable housing and equal distribution of environmental benefits.

Enable prosperity for all people. Promote economic vitality and new economies by providing housing, education, and job training opportunities for all people.

Promote sustainability for future generations. Promote a region where quality of life and economic prosperity for future generations are supported by the sustainable use of natural resources.

SCAG member agencies adopted the RCP in 2008 to set broad goals for the Southern California region and identify strategies for agencies at all levels of government to use in their decision making. It includes input from each of the 13 subregions that make up the Southern California region, which includes Los Angeles, Orange, San Bernardino, Riverside, Imperial, and Ventura counties.

SCAG's Regional Transportation Plan/Sustainable Communities Strategy. SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) provides the overall transportation and land use vision for Los Angeles, Orange, San Bernardino, Imperial, Riverside, and Ventura Counties (SCAG, 2016). The RTP portion of the RTP/SCS identifies priorities for transportation planning within the Southern California region, sets goals and policies, and identifies performance measures for transportation improvements to ensure that future projects are consistent with other planning goals for the area. The SCS portion of the RTP/SCS presents an overall land use concept for the region with increasing focus on densification of urban areas and development around transit stations, as well as an emphasis on use of transit and active transportation.

The RTP/SCS contains transportation projects to help more efficiently distribute population, housing, and employment growth, as well as a forecasted Land Development Category pattern of development described in detail in the SCS. The 2016 RTP/SCS outlines the mobility projects and sustainable planning project that have been achieved since the 2012 RTP/SCH. There were no regional transportation projects in the North Area. The closest regional transportation projects include the Metro Orange Line Extension, a four-mile northward extension of the Metro Orange Line from Canoga Station to the Chatsworth Station; the 2015 Las Virgenes-Malibu Council of Governments Multi-Jurisdictional Regional Bicycle Plan; and a regional bicycle master plan for five cities including Agoura Hills, Calabasas, Hidden Hills, Malibu, and Westlake Village (SCAG, 2020a). Based on the Project List appendix of the 2016 RTP/SCS, the projects in the North Area include, but are not limited to, road improvements, bike and pedestrian improvements, and street widening.

SCAG released the Proposed Final 2020-2045 RTP/SCS in March 2020, but it has not yet been approved. The core vision of this plan is to build upon and expand land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern (SCAG, 2020b). The 2020 RTP/SCS contains the following Federal Transportation Improvement Program (FTIP) projects in the vicinity of the North Area: bicycle and pedestrian improvements on Mulholland Highway and on Old Topanga Canyon Road; light synchronization and add an interconnect along Las Virgenes Road and synchronize Mulholland Highway and Old Topanga Road; safety study on Kanan Road between Thousand Oaks Boulevard and Cornell Way; and replacement of existing two-lane bridge with a four-lane bridge spanning approximately 280 feet and one turn lane at Lost Hills Road/U.S. 101 interchange. The 2020 RTP/SCS also includes the following strategic projects: widening of Topanga Canyon

Boulevard at Mulholland Drive to add a southbound right-turn lane and upgrade the traffic signal; addition of a northbound and southbound auxiliary lane on U.S. 101 at Valley Circle Boulevard; and improve the regional transit connection between Las Virgenes Area, Thousand Oaks, and San Fernando Valley along U.S. 101 corridor.

Agriculture

Los Angeles County General Plan – Conservation and Natural Resources Element

The County's General Plan includes Agricultural Resource Areas (ARAs) that consist of farmland identified by the California Department of Conservation through the Farmland Mapping & Monitoring Program (FMMP) and farms that have received permits from the County Agricultural Commissioner/Weights and Measures. Figure 9.5 (Agricultural Resource Areas Policy Map) of the County's General Plan shows that there are no ARAs in the Santa Monica Mountains or surrounding area. Nonetheless, as discussed in the *Environmental Setting*, there are vineyards located primarily along Kanan Road and Mulholland Highway. The FMMP-designated land includes small pockets of Unique Farmland located in the southwestern portion of the North Area and Grazing lands located in the center of the North Area, near the intersection of Mulholland Highway and Las Virgenes Road (DOC, 2016). As such, the following goals and policies apply to agricultural resources in the North Area.

Goal C/NR 8: Productive farmland that is protected for local food production, open space, public health, and the local economy.

Topic: Agricultural Resources

Policy C/NR 8.1: Protect ARAs, and other land identified as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance by the California Department of Conservation, from encroaching development and discourage incompatible adjacent land uses.

Policy C/NR 8.2: Discourage land uses in ARAs, and other land identified as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance by the California Department of Conservation, that are incompatible with agricultural activities.

Recreation

Los Angeles County General Plan

The County's General Plan includes Open Space Resource Areas, which refer to public and private lands and waters that are preserved in perpetuity or for long-term open space and recreational uses. Existing open space in the unincorporated areas include County parks and beaches, conservancy lands, state parklands, and federal lands. Open spaces can also include deed-restricted open space parcels and easements. The following goals and policies apply to open space resources in the North Area.

Goal C/NR 1: Open space areas that meet the diverse needs of Los Angeles County.

Topic: Open Space Preservation and Conservation of Natural Areas

Policy C/NR 1.1: Implement programs and policies that enforce the responsible stewardship and preservation of dedicated open space areas.

Policy C/NR 1.2: Protect and conserve natural resources, natural areas, and available open spaces.

Topic: Open Space Acquisition

Policy C/NR 1.4: Create, support and protect an established network of dedicated open space areas that provide regional connectivity, between the southwestern extent of the Tehachapi Mountains to

the Santa Monica Mountains, and from the southwestern extent of the Mojave Desert to Puente Hills and Chino Hills.

Public recreational areas may be complemented by appropriate commercial recreation uses such as lodging, camps, and equestrian facilities that maximize the resource-based recreational opportunities available. Examples of these uses include restaurants, general stores, bed and breakfast lodging, private recreation of a commercial nature including fish ponds, equestrian facilities, club houses connected to a private recreation use, and visitor-serving uses for visitors to the recreation areas of the Santa Monica Mountains.

C.10.3 Thresholds of Significance and Methodology

Impact significance criteria were identified based upon review of the CEQA Guidelines Appendix G Checklist, as well as the County of Los Angeles' Environmental Document Reporting Procedures and Guidelines (County of Los Angeles, 1987). The thresholds listed below address each of the significance criteria identified in the CEQA Guidelines Appendix G Checklist as well as the County of Los Angeles' Environmental Document Reporting Procedures and Guidelines, as relevant to land use and planning, agriculture, and recreation. Impacts would be significant if development facilitated by the proposed project would meet any of the criteria listed below.

The proposed Plan and CSD Update does not include any physical development, but rather identifies land use policies and development standards for future development projects proposed in the North Area. The portions of the proposed Plan and CSD Update specific to this issue area of land use, agriculture and recreation include consistency with applicable land use plans, policies and regulations; the conversion of agricultural lands; conflicts with agricultural zoning; the deterioration of recreational resources; and the environmental impacts associated with construction and expansion of recreational resources.

This analysis evaluates potential impacts to land use, agriculture and recreational resources that may arise with implementation of the proposed Plan and CSD Update, if adopted by the County Board of Supervisors. The analysis in this EIR does not provide environmental review for future projects, but it can be used to tier future environmental analysis on future projects in the North Area; each future development project in the North Area, as applicable, will have a site-specific evaluation for consistency with CEQA and may require additional site-specific studies prior to receiving permits. Where more than one threshold of significance is applicable to an impact discussion, the criteria are listed together, followed by the impact statement and analysis.

Land Use and Planning

According to Appendix G of the CEQA Guidelines, the effects related to land use would be significant if the proposed project would:

- Physically divide an established community; or
- 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.

Based on the County's Initial Study checklist the effects related to land use would be significant if the proposed project would be inconsistent with the following applicable land use criteria:

- Hillside Management Criteria
- SEA Conformance Criteria

The proposed Plan and CSD Update would result in a potentially significant land use impact if it would conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. Although the analysis that follows evaluates consistency with various regulatory policies, it should be noted that each individual agency ultimately has the discretion to determine consistency of the proposed Plan and CSD Update with the policies, plans, and/or programs that fall within that agency's purview.

Agriculture

Agricultural impacts would be significant if development facilitated by the proposed Plan and CSD Update would:

- 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.
- Conflict with existing zoning for agricultural use, or a Williamson Act contract.
- 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)).
- Result in the loss of forest land or conversion of forest land to non-forest use.
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

Recreation

Impacts to recreational resources would be significant if development facilitated by the Area Plan would:

- 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.
- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

C.10.4 Environmental Impacts and Mitigation Measures

Land Use and Planning

Impact LU-1: Implementation of the proposed North Area Plan and CSD Update would not divide an established community. (No Impact)

As described in Section C.10.1, Environmental Setting, most existing land uses in the North Area are rural residential (low density) development, primarily in the southern portions of the North Area along the major roads including, but not limited to, Highway 101, Topanga Canyon Road, Mulholland Highway and Kanan Road. Two areas of high-density single-family residences are located in the north central portion of the North Area near the City of Calabasas and in the northeast corner of the North Area near Woodland Hills. A cluster of low-density single-family residences lies in the portion of the North Area just south of the City of Agoura Hills and three mobile home courts are located in the North Area.

The proposed Plan and CSD Update does not propose any new highways, airports, railways, or other physical features that would physically divide an established community in the North Area. The proposed

Plan and CSD Update is intended to provide more focused policy for the regulation of development in the North Area and would not physically divide the community. Therefore, no impact would occur.

Impact LU-2: Implementation of the proposed North Area Plan and CSD Update would not conflict with applicable land use plans, policies, or regulations. (Less than Significant Impact)

The proposed Plan and CSD Update does not include physical development in the North Area, however it identifies land use policies and development standards for future development projects in the North Area. Table C.10-3 discusses the Project's consistency with applicable plans and regulations from the Land Use Element of the County's General Plan and applicable land use ordinances in the County's Municipal Code.

Table C.10-3. Policy Consistency Analysis

Policy	Consistency Analysis
Los Angeles County General Plan – Land Use Element	
Goal LU 1: <i>A General Plan that serves as the constitution for development, and a Land Use Policy Map that implements the General Plan's Goals, Policies and Guiding Principles.</i>	
<i>Topic: General Plan Amendments</i>	
Policy LU 1.1: Support comprehensive updates to the General Plan, area plans, community plans, coastal land use plans and specific plans.	Consistent: As discussed in Section B, Plan and CSD Update Description, the purposes of the proposed Plan and CSD Update are to strengthen existing environmental resource policies; identify policies and standards that will support the surrounding communities current rural and semi-rural lifestyle; and align with the policies and development standards in the 2014 Santa Monica Mountains Local Coastal Program to ensure consistency in land use regulations and environmental policies between the coastal zone and Santa Monica Mountains North Area. The proposed updates to the North Area Plan and CSD would be consistent with this policy.
Goal LU 2: <i>Community-based planning efforts that implement the General Plan and incorporate public input, and regional and community level collaboration.</i>	
<i>Topic: Regional and Community-Based Planning Initiatives</i>	
Policy LU 2.1: Ensure that all community-based plans are consistent with the General Plan.	Consistent: A purpose of this EIR is to assess the potential environmental impacts associated with the proposed Plan and CSD Update, which includes a consistency analysis with the County's General Plan. This EIR concludes that the proposed Plan and CSD Update would be consistent with the General Plan.
Policy LU 2.2: Ensure broad outreach, public participation, and opportunities for community input in community-based planning efforts.	Consistent: As discussed in Section B, Plan and CSD Update Description, members of the public including local homeowner's associations, members of the equestrian community, and various other community groups, and residents were invited to attend community and focused meetings to provide comments on the proposed updates. A summary of the community meetings and key milestones regarding the proposed Plan and CSD Update are highlighted below: <ul style="list-style-type: none"> ▪ April 19, 2017. Introductory kick-off meeting with local homeowners' groups. ▪ August 16, 2017. Community-wide meeting in the Santa Monica Mountains to identify community interest areas for possible regulations and to receive comments on current regulations. ▪ 2017-2018 (multiple dates). Met with small group of community stakeholders who would be affected by regulations on new interest areas to vet policies and get direction on how the regulations could be improved. ▪ October 1, 2018. Released the Draft Plan and CSD for public comment. ▪ October 25, 2018. Held community meeting to take comments on the Draft Plan and CSD released on October 1, 2018.

Table C.10-3. Policy Consistency Analysis

Policy	Consistency Analysis
	<ul style="list-style-type: none"> ▪ April 3, 2019. Held community meeting to take comments on the October 2018 version of the Draft Plan and CSD. (A scheduled meeting in November 14, 2018 was cancelled because of the Woolsey Fire.) ▪ October 2018 through April 2019. Comment period for the October 2018 version of the Draft Plan and CSD. The original comment period of October 1 through November 30 was extended due to the fire. ▪ August 29, 2019. DRP revised the Draft Plan and CSD based on the input received and released another version of the Plan and CSD for public comment. ▪ August 29 through September 30, 2019. Comment period for the August 29 version of the Draft Plan and CSD. ▪ September 19, 2019. DRP held a community meeting to take public comments on the August 29 version of the Draft Plan and CSD. <p>Therefore, the community planning process was conducted consistent with this policy.</p>
Policy LU 2.3: Consult with and ensure that applicable County departments, adjacent cities and other stakeholders are involved in community-based planning efforts.	<p>Consistent: Two outreach efforts were conducted, the first for the proposed Plan and CSD (this involved the community meetings listed above) and the second was outreach for CEQA document. For both efforts wide- spread noticing was conducted by direct mail, newspaper ads, and social media. As a result of the CEQA scoping and noticing associated with scoping, nine regional and local agencies and nine organizations provided comments. The following link to the County website provides all proposed Plan and CSD-related notices and documents: http://planning.lacounty.gov/smmnap. Therefore, the outreach efforts associated with the Plan and CSD Update are consistent with these policies.</p>
Policy LU 2.4: Coordinate with other local jurisdictions to develop compatible land uses.	
Policy LU 2.5: Support and actively participate in inter-jurisdictional and regional planning efforts to help inform community-based planning efforts.	
Policy LU 2.6: Consider the role of arts and culture in community-based planning efforts to celebrate and enhance community character.	
Policy LU 2.7: Set priorities for Planning Area-specific issues, including transportation, housing, open space, and public safety as part of community-based planning efforts.	<p>Consistent: The proposed North Area Plan Update includes the following elements:</p> <ul style="list-style-type: none"> ▪ Conservation and Open Space Element ▪ Safety and Noise Element ▪ Land Use Element ▪ Circulation Element ▪ Public Facilities Element <p>Each element outlines the goals and policies for land use throughout the North Area, which provide the basic policy framework for use by the public and governmental decision-makers for the regulation of uses and development. Therefore, the proposed North Area Plan Update sets priorities for specific issues that apply to the North Area and is consistent with this policy.</p>
Policy LU 2.8: Coordinate with the Los Angeles County Department of Public Works and other infrastructure providers to analyze and assess infrastructure improvements that are necessary for plan implementation.	<p>Consistent: County departments have been involved in the review of the ordinance; however, the proposed Plan and CSD Update do not include a buildout scenario that would not result in an increase in population that would generally trigger the need to improve public facilities or infrastructure. Therefore, analysis for infrastructure improvements are not necessary for implementation of the proposed Plan and CSD Update and there would be no conflict with this policy.</p>

Table C.10-3. Policy Consistency Analysis

Policy	Consistency Analysis
Policy LU 2.9: Utilize the General Plan Land Use Legend and the Hazard, Environmental and Resource Constraints Model to inform the development of land use policy maps.	Consistent: The proposed Plan and CSD Update includes revised maps to show the application of the General Plan Land Use Legend, changing the Mountain Lands (N20, N10, N5) and Rural Residential (N2, N1) designation of the Plan to the General Plan equivalent designation of Rural Land (RL20, RL10, RL5, RL2, RL1). Also, the Residential (U2, U4, U8) designation in the Plan has changed to the General Plan equivalent of Residential (H2, H4 H8). Proposed land use policy changes reflect changes in dedication and acquisition of open space. No residential density changes are proposed.
Policy LU 2.10: Ensure consistency between land use policy and zoning by undergoing a comprehensive zoning consistency analysis that includes zoning map changes and Zoning Code amendments, as needed.	Consistent: The proposed Plan and CSD Update addresses environmental concerns that have developed since adoption of the original North Area Plan in 2000. As shown in Table C.10-4, the proposed Plan and CSD Update includes zone changes to 132 parcels from Agricultural (A), Residential (R) to Open Space (OS) and Recreation. In addition, the CSD provides a framework focused on achieving specific policies in the North Area, including zoning principles and area-specific development standards. The updated regulations in the CSD Update include: expanded habitat and tree protection; equestrian standards; event facilities; standards for noise, scenic and visuals resource areas, outdoor lighting and grading, and access roads; and establish permitted uses and uses subject to permits in Light Agricultural and Heavy Agricultural zoned areas. The land use policy changes also reflect changes in dedication and acquisition of open space. As such, where land use designations were changed to open space, zoning was also changed for consistency.
Policy LU 2.11: Update community-based plans on a regular basis.	The proposed Plan and CSD Update maps are consistent with the General Plan. Revisions to the North Area maps were based on General Plan requirements as well as area-specific resources or constraints identified during preparation of the proposed Plan and CSD Update and this EIR.
Policy LU 2.12: Community-based plans and existing specific plans shall be updated, as needed, to reflect the General Plan Land Use Legend as part of a comprehensive area planning effort. An exception to this is for coastal land use plans, which are subject to the California Coastal Act and to review by the California Coastal Commission.	
Goal LU 3: <i>A development pattern that discourages sprawl, and protects and conserves areas with natural resources and SEAs.</i>	
Topic: <i>Growth Management</i>	
Policy LU 3.1: Encourage the protection and conservation of areas with natural resources, and SEAs.	Consistent: The proposed Plan and CSD Update include the following: expanded tree protections; habitat protection categories and policies/development standards to protect sensitive biological resources but allow for continued development within the North Area; an application review procedure including need for biological studies if development is in an area with sensitive biological resources; and policies/development standards for scenic resource areas, scenic routes, visual resources, significant ridgelines, outdoor lighting and grading, access roads, as examples. See Chapter 2, <i>Conservation and Open Space Element</i> , of the proposed Plan Update for details (Appendix 1 of this EIR). Therefore, the proposed Plan and CSD Update would be consistent with this policy.

Table C.10-3. Policy Consistency Analysis

Policy	Consistency Analysis
Policy LU 3.2: Discourage development in areas with high environmental resources and/or severe safety hazards.	<p>Consistent: As stated in the Land Use Element of the proposed Plan Update, the following are the guiding principles for managing land use and development:</p> <ul style="list-style-type: none"> ▪ Preserve public health, safety, and welfare; ▪ Preserve and protect significant environmental resources – including wildlife habitats and corridors, watersheds, drainages, and water quality; ▪ Recognize and avoid natural hazards; ▪ Protect distinct mountainous features including habitat, and scenic and visual qualities; ▪ Enhance recreational opportunities; ▪ Protect the integrity of existing rural communities; and ▪ Protect the unique cultural and social characteristics of the region’s rural residential communities. <p>In addition, the guiding principle under the Conservation and Open Space Element is that resource protection has priority over development. Implementation of the proposed Plan and CSD Update would discourage development in areas with environmental resources and safety hazards and would designate lands used for recreational uses as Open Space. Therefore, the proposed Plan and CSD Update would be consistent with this policy.</p>
Policy LU 3.3: Discourage development in undeveloped areas where infrastructure and public services do not exist, or where no major infrastructure projects are planned, such as state and/or federal highways.	<p>Consistent: Policy LU-1 of the proposed North Area Plan Update states that new development shall be directed and sited to existing developed areas able to accommodate it, or where such areas are not able to accommodate it, in other areas with adequate public services and where it would not have significant adverse effects on natural resources. Therefore, the proposed Plan and CSD Update would be consistent with this policy.</p>
<p>Goal LU 6: Protected rural communities characterized by living in a non-urban or agricultural environment at low densities without typical urban services.</p> <p><i>Topic: Rural Character</i></p>	
Policy LU 6.1: Protect rural communities from the encroachment of incompatible development that conflict with existing land use patterns and service standards.	<p>Consistent: Goal LU-2 of the Land Use Element includes several policies that include, but are not limited to the following: maintain a pattern of rural land use, provide separate “suburban” and “rural” standards for infrastructure and public services, protecting natural vegetation, natural environmental features, and streams through standards such as adequate development setbacks, and preserve the openness and scenic beauty of the area’s natural environment.</p> <p>As shown in Table C.10-4, land designated and zoned for Agriculture would change to Open Space land under the proposed Plan and CSD Update. Most of the areas encompassed by these changes are either dedicated lands, park lands, or dedicated lands for conservation. The intent of this component of the proposed Plan and CSD Update is to bring the existing uses of the land into conformance with the County’s land use regulations, which would not result in conflicts with any land use plan, policy, or regulation.</p>
Policy LU 6.2: Encourage land uses and developments that are compatible with the natural environment and landscape.	
Policy LU 6.3: Encourage low density and low intensity development in rural areas that is compatible with rural community character, preserves open space, and conserves agricultural land.	

Table C.10-3. Policy Consistency Analysis

Policy	Consistency Analysis
Los Angeles County Municipal Code	
<i>Significant Ecological Areas</i>	
<p>A Conditional Use Permit (Chapter 22.158) application is required to protect resources contained in Significant Ecological Areas as specified in the General Plan from incompatible development, which may result in or have the potential for environmental degradation. In extending protection to these environmentally sensitive areas, it is intended further to provide a process whereby the reconciliation of potential conflict within these areas may equitably occur. It is not the purpose to preclude development within these areas but to ensure, to the extent possible, that such development maintains and where possible enhances the remaining biotic resources of the Significant Ecological Areas, while allowing for limited controlled development therein.</p>	<p>Consistent: Section 22.336.040, <i>Applicability</i>, of the proposed CSD Update states that the Santa Monica Mountains North Area will remain within a designated Significant Ecological Area (SEA) as defined by the County General Plan and shall be regulated by the standards contained within the CSD. In addition, the proposed CSD Update requires a detailed biological assessment for parcels with S1 habitat and projects in S2 and S3 habitat that require discretionary approval. The County Biologist will conduct preliminary review of all development, regardless of whether the proposal must be considered by the Significant Ecological Areas Technical Advisory Committee (SEATAC). SEATAC serves as an expert advisory committee that assists the DRP in assessing a project's impact on SEA resources. Section 22.336.050, <i>Application and Review Procedures</i>, of the CSD Update outlines the rules and procedures for SEATAC review. Therefore, the proposed Plan and CSD Update would be consistent with this policy.</p>
<i>Hillside Management Areas</i>	
<p>A. 1. Locating development outside of HMAs to the extent feasible; 2. Locating development in the portions of HMAs with the fewest hillside constraints; and 3. Using sensitive hillside design techniques tailored to the unique site characteristics.</p> <p>B. This Chapter does not determine maximum allowable density or intensity for a proposed development. Maximum allowable density or maximum intensity for a proposed development shall be determined as set forth in the applicable area, community, neighborhood, or specific plan. Where there is no applicable area, community, neighborhood, or specific plan, the maximum density or intensity for a proposed development shall be determined using the methodology and parameters set forth by the Land Use Element of the General Plan.</p>	<p>Consistent: Chapter 2, <i>Conservation and Open Space Element</i>, of the proposed Plan Update, includes Goal CO-6, which seeks to retain the natural topographic character and vegetation of hillsides to the maximum extent possible and ensure that all development in such areas is sited and designed to provide maximum protection. This goal provides policies CO-68 through CO-78 that include but are not limited to the following: minimize grading and vegetation removal; require that development conforms to the natural landform and blends with the natural landscape in size, design, shape, materials, and colors; and restrict development on slopes greater than 25 percent unless placement is biologically superior than alternative site. Sections 22.336.070, <i>Community-Wide Development Standards</i>, and 22.336.090, <i>Area Specific Development Standards</i>, of the CSD Update include standards for hillside development to implement these policies. Therefore, the proposed Plan and CSD Update would be consistent with this policy.</p>

Sources: Los Angeles County, 2014; Los Angeles County, 2019.

SCAG's Regional Comprehensive Plan and 2016-2040 RTP/SCS.

SCAG's RCP contains a general overview of federal, state, and regional plans applicable to the Southern California region and serves as a comprehensive planning guide for future regional growth. As noted in the Regulatory Setting above, the Guiding Principles of the RCP aim to improve mobility for all residents; foster livability in all communities; enable prosperity for all people; and promote economic vitality and new economies by providing housing, education, and job training opportunities for all people (SCAG, 2008). Therefore, there are no policies that directly relate to land use policies in the Santa Monica Mountains and the proposed Plan and CSD Update would not conflict with SCAG's RCP.

SCAG's 2016-2040 RTP/SCS provides the overall transportation and land use vision for Los Angeles, Orange, San Bernardino, Imperial, Riverside, and Ventura Counties (SCAG, 2016). As stated in the Regulatory Setting, the RTP does not identify any regional transportation projects in the North Area. The closest regional RTP transportation projects include the Metro Orange Line Extension, a four-mile northward extension of the Metro Orange Line from Canoga Station to the Chatsworth Station that is approximately four miles north of the eastern boundary of the North Area, and the Las Virgenes-Malibu Council of Governments Multi-Jurisdictional Regional Bicycle Plan, which was adopted in 2015. These projects are not located in the North Area and would not result in direct conflicts with land use policies under the proposed Plan and CSD Update.

Based on the Project List appendix of the 2016 RTP/SCS, smaller projects in the North Area include, but are not limited to, road improvements such as bicycle and pedestrian pathways, and selective street widening. These projects would occur in existing roads and rights-of-way and would be required to comply with applicable policies under the proposed Plan and CSD Update that require any new development to be located in areas with adequate public services, where there would not be significant adverse effects on natural resources. In addition, under Section 22.336.070 (Street and Road Cross-Sections) of the Community-Wide Standards of the CSD Update, all streets and roads in the North Area shall be developed consistent with Figure 22.336-G: Standards for Street Width, except that depicted widths may be reduced by the Director of Public Works to minimize grading and alteration of the natural topography. Therefore, upon compliance with the applicable policies and standards, the projects under the RTP/SCS would not conflict with the proposed Plan and CSD Update.

Proposed Transfer of Development Credit Program.

Section 22.336.070 of the proposed CSD Update includes the development standards for the Transfer of Development Credit Program. As stated in the CSD Update, the North Area contains thousands of undeveloped private parcels that are undersized, have development constraints, or are in sensitive environmental areas. The intent of this program is as follows:

[T]o mitigate the adverse cumulative effects of development in the Santa Monica Mountains by preventing an increase in the net amount of development that could occur by encouraging development in areas less constrained by small lot sizes, steep slopes, hazards, and sensitive resources. For each new lot created or legalized, an existing qualifying lot(s) sufficient to provide one transfer of development credit must be retired.

The proposed CSD Update provides the requirements for lot retirements, the qualifying criteria, and the procedures for the application and retirement processes. This program would be applied to land division projects and would result in no net gain in the number of buildable lots. Because there would be no net increase in development, potential land use impacts would be less than significant.

Proposed Land Use and Zone Changes to Open Space

The proposed Plan and CSD Update would include land use and zone changes for 132 parcels that are currently designated for Agricultural, Recreation, and Residential land uses; Table C.10-4 provides details for the location of these parcels, including comparison of the existing and proposed land use designations and zoning (this is the same information provided in Table B-1 of the Plan and CSD Update Description). Under the proposed Plan and CSD Update, the General Plan land use designation would be changed to OS-C (Open Space Conservation), OS-PR (Open Space Parks and Recreation), or P (Public and Semi-Public); and the zoning would change to the Open Space (O-S) Zone. Despite the existing land use designations/zoning, most of the areas for which land use designation changes are proposed are either dedicated lands, park lands, or dedicated lands for conservation. Therefore, the intent of this component of the proposed Plan and CSD Update is to bring the existing uses of the land into conformance with the County's land use regulations, which would not result in conflicts with any land use plan, policy, or regulation. Potential impacts would be less than significant.

Proposed Development Standards for Vineyards

Section C.11 (Noise) of this EIR includes a list of businesses in the North Area that have served as wedding and entertainment venues (see Table C.11-3). The list includes vineyards some of which may be operating without County permits. As of January 7, 2021, all vineyards in the North Area would need to comply with County requirements. Section 22.336.070 (Community-Wide Development Standards) of the proposed CSD Update includes development standards for permitted, unpermitted and proposed vineyards. The standards include requirements associated with pest management, irrigation and water conservation, preservation of biological resources, erosion and runoff control, disposal of natural and hazardous waste, access roads, and specific requirements for vineyards that are conditionally approved. Compliance with these requirements would reduce the potential for impacting neighboring properties by establishing standards for operation and management of vineyards.

Table C.10-4. Parcels to Be Re-designated/Rezoned

Area/Facility	APN	Current		Proposed	
		Land Use	Zoning	Land Use	Zoning
Owner/Agent: National Park Service					
Castro Crest	4464-003-901	N20	A-1-20	OS-C	O-S
Castro Crest	4464-018-900	OS-P	A-1-10	OS-C	O-S
Castro Crest	4464-018-901	OS-P	A-1-20	OS-C	O-S
Castro Crest	4464-018-902	OS-P	A-1-20	OS-C	O-S
Castro Crest	4464-018-903	OS-P	A-1-20	OS-C	O-S
Castro Crest	4464-018-904	OS-P	A-1-20	OS-C	O-S
Castro Crest	4464-020-926	N20	A-1-20	OS-C	O-S
Owner/Agent: California State Parks					
Not Available	2063-008-905	OS-P	A-1-20	OS-C	O-S
Not Available	2063-008-906	OS-P	A-1-20	OS-C	O-S
Not Available	2063-008-908	OS-P	A-1-20	OS-C	O-S
Not Available	2063-012-919	OS-P	A-1-20	OS-C	O-S
Not Available	2063-012-920	OS-P	A-1-20	OS-C	O-S
Not Available	2063-012-921	OS-P	A-1-20	OS-C	O-S

Table C.10-4. Parcels to Be Re-designated/Rezoned

Area/Facility	APN	Current		Proposed	
		Land Use	Zoning	Land Use	Zoning
Not Available	2063-027-900	N20	A-1-20	OS-C	O-S
Not Available	2063-027-901	OS-P	A-1-20	OS-C	O-S
Owner/Agent: County of Los Angeles					
La Sierra–Hormel	2058-017-905	N10	A-1-10	OS-C	O-S
La Sierra–Hormel	2058-017-906	N10	A-1-10	OS-C	O-S
La Sierra–Polk Bros	2058-010-905	N10	R-R-10	OS-C	O-S
La Sierra–Polk Bros	2058-010-904	N10	R-R-10	OS-C	O-S
La Sierra–Polk Bros	2058-010-906	N10	R-R-10	OS-C	O-S
La Sierra–Polk Bros	2058-010-907	N10	R-R-10	OS-C	O-S
Calabasas to Cold Creek–Secret Valley–Hopp	4455-005-901	N10	A-1-10	OS-C	O-S
Owner/Agent: County of Los Angeles and Mountains Restoration Trust					
La Sierra - Varney	4464-017-012	N5	A-1-5	OS-PR	O-S
Owner/Agent: Mountains Recreation and Conservation Authority					
Zev Yaroslavsky Las Virgenes Highland Park	2052-011-905	N10	A-2-10	OS-PR	O-S
Zev Yaroslavsky Las Virgenes Highland Park	2052-011-906	N10	A-2-10	OS-PR	O-S
Zev Yaroslavsky Las Virgenes Highland Park	2052-011-907	N10	A-2-10	OS-PR	O-S
Zev Yaroslavsky Las Virgenes Highland Park	2052-012-906	N10	A-2-10	OS-PR	O-S
Zev Yaroslavsky Las Virgenes Highland Park	2052-012-907	N10	A-2-10	OS-PR	O-S
Triunfo Creek Park	2058-001-902	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-001-903	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-002-903	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-002-904	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-002-905	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-002-906	OS-P	A-1-20	OS-PR	O-S
Lobo Canyon	2058-012-903	OS-P	A-1-20	OS-C	O-S
Not Available	2058-012-905	N20	A-1-20	OS-C	O-S
Triunfo Creek Park	2058-025-900	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-025-901	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-025-902	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-025-903	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-025-904	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-025-905	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-025-906	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-025-907	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-025-908	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-025-909	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-025-910	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2058-025-911	OS-P	A-1-20	OS-PR	O-S
Triunfo Creek Park	2063-001-901	OS-P	R-R-20	OS-PR	O-S

Table C.10-4. Parcels to Be Re-designated/Rezoned

Area/Facility	APN	Current		Proposed	
		Land Use	Zoning	Land Use	Zoning
Triunfo Canyon–Balch	2063-004-900	N20	A-1-20	OS-C	O-S
Triunfo Canyon–Balch	2063-004-901	N20	A-1-20	OS-C	O-S
Triunfo Canyon–Balch	2063-004-902	N20	A-1-20	OS-C	O-S
La Palma	2063-008-904	OS-P	A-1-20	OS-C	O-S
Kanan Dume	2063-018-900	OS-P	A-1-20	OS-C	O-S
Summit Valley Ed Edelman Park	4434-004-907	N5	R-1-5	OS-PR	O-S
MGP South	4434-005-901	OS	A-1-10	OS-C	O-S
MGP South	4434-005-902	OS	A-1-10	OS-C	O-S
MGP South	4434-005-903	OS	A-1-10	OS-C	O-S
Santa Maria–Shewell	4434-007-900	N10	A-1-10	OS-C	O-S
Santa Maria–Shewell	4434-008-900	N10	A-1-10	OS-C	O-S
Yedvart Property	4434-009-903	N10	A-1-10	OS-C	O-S
Summit to Summit–Semet	4436-002-900	N10	A-1-10	OS-C	O-S
Summit to Summit–Semet	4436-002-901	N10	A-1-10	OS-C	O-S
Summit to Summit–Semet	4436-002-902	N10	A-1-10	OS-C	O-S
Summit to Summit–Semet	4436-003-900	N10	A-1-10	OS-C	O-S
Fritz & Alma Meier Natural Use Area	4436-005-901	OS-P	A-1-10	OS-PR	O-S
Summit to Summit–Semet	4436-023-900	N10	A-1-10	OS-C	O-S
Summit to Summit–Semet	4436-023-901	N10	A-1-10	OS-C	O-S
Summit to Summit–Semet	4436-023-902	N10	A-1-10	OS-C	O-S
Summit to Summit–Semet	4436-023-903	N10	A-1-10	OS-C	O-S
Summit to Summit–Semet	4436-024-900	N10	A-1-10	OS-C	O-S
Topanga Surplus–LA County	4442-006-900	N5	A-1-5	OS-C	O-S
Topanga Surplus–LA County	4442-006-901	N5	A-1-5	OS-C	O-S
Topanga Surplus–LA County	4442-007-901	N5	A-1-5	OS-C	O-S
Topanga	4442-007-903	N5	A-1-5	OS-C	O-S
Topanga	4442-007-904	N5	A-1-5	OS-C	O-S
Topanga Surplus–LA County	4442-008-901	N5	A-1-5	OS-C	O-S
Topanga Surplus–LA County	4442-008-902	N5	A-1-5	OS-C	O-S
Topanga Surplus–LA County	4442-008-904	N5	A-1-5	OS-C	O-S
Topanga Surplus–LA County	4442-008-905	N5	A-1-5	OS-C	O-S
Fritz & Alma Meier Natural Use Area	4455-008-903	OS-P	A-1-10	OS-PR	O-S
Fritz & Alma Meier Natural Use Area	4455-008-904	OS-P	A-1-10	OS-PR	O-S
Cold Creek–Community Plus	4455-008-906	N10	A-1-10	OS-C	O-S
Upper Stokes	4455-012-901	N10	A-1-10	OS-C	O-S
Upper Stokes	4455-012-902	N10	A-1-10	OS-C	O-S
Upper Stokes	4455-014-900	N10	A-1-10	OS-C	O-S
Stokes Canyon Las Virgenes	4455-027-908	N20	A-1-20	OS-C	O-S
Stokes Canyon Las Virgenes	4455-027-909	N20	A-1-20	OS-C	O-S

Table C.10-4. Parcels to Be Re-designated/Rezoned

Area/Facility	APN	Current		Proposed	
		Land Use	Zoning	Land Use	Zoning
Stokes Canyon Las Virgenes	4455-027-910	N20	A-1-20	OS-C	O-S
Stokes Canyon	4455-031-902	N20	A-1-20	OS-C	O-S
Stokes Canyon	4455-031-903	N20	A-1-20	OS-C	O-S
Stokes Canyon	4455-032-902	N20	A-1-20	OS-C	O-S
Stokes Canyon	4455-032-903	N20	A-1-20	OS-C	O-S
Stokes Canyon	4455-032-904	N20	A-1-20	OS-C	O-S
Stokes Canyon	4455-032-905	N20	A-1-20	OS-C	O-S
Stokes Canyon	4455-032-906	N20	A-1-20	OS-C	O-S
Stokes Canyon	4455-032-907	N20	A-1-20	OS-C	O-S
Stokes Canyon	4455-032-908	N20	A-1-20	OS-C	O-S
Stokes Canyon	4455-032-909	N20	A-1-20	OS-C	O-S
Stokes Canyon	4455-032-910	N20	A-1-20	OS-C	O-S
Vintage at Hidden Park Dedication	4464-023-900	N20	A-1-20	OS-C	O-S
Vintage at Hidden Park Dedication	4464-023-901	N20	A-1-20	OS-C	O-S
Vintage at Hidden Park Dedication	4464-023-902	N20	A-1-20	OS-C	O-S
Vintage at Hidden Park Dedication	4464-023-903	N20	A-1-20	OS-C	O-S
Vintage at Hidden Park Dedication	4464-023-904	N20	A-1-20	OS-C	O-S
Vintage at Hidden Park Dedication	4464-023-905	N20	A-1-20	OS-C	O-S
Vintage at Hidden Park Dedication	4464-023-906	N20	A-1-20	OS-C	O-S
Vintage at Hidden Park Dedication	4464-023-907	N20	A-1-20	OS-C	O-S
Malibu Creek – Phase II	4464-020-928	N20	A-1-20	OS-C	O-S
Fran Pavley Meadows	2052-009-901	N5	A-1-5	OS-C	O-S
Fran Pavley Meadows	2055-010-902	OS-P	A-1-5	OS-C	O-S
Liberty Canyon Wildlife Corridor Acquisition	2052-013-903	N5	A-2-5	OS-C	O-S
Ballard Mountain	2058-008-900	N20	A-1-20	OS-C	O-S
Rasmussen–Liberty Canyon	2063-048-902	N20	A-1-20	OS-C	O-S
Rasmussen–Liberty Canyon	2063-048-901	N5	A-1-5	OS-C	O-S
Rasmussen–Liberty Canyon	2063-048-900	N5	A-1-5	OS-C	O-S
Triangle Ranch Phase One	2063-036-900	N2	RPD-2-0.5U	OS-C	O-S
Triangle Ranch Phase One	2063-006--902	N5	RPD-2-0.5U	OS-C	O-S
Triangle Ranch Phase Two	2063-005-900	N2	RPD-2-0.5U	OS-C	O-S
Triangle Ranch Phase Three	2063-006-904	N5	RPD-2-0.5U	OS-C	O-S
Topanga Surplus- LA County	4441-009-900	N5	R-1-5	OS-C	O-S
Topanga Surplus- LA County	4441-009-902	N5	R-1-5	OS-C	O-S
Topanga Surplus- LA County	4442-009-902	N5	A-1-5	OS-C	O-S
Lebow	4472-007-912	OS-P	A-1-20	OS-C	O-S
Malibu Creek–Phase II	4464-020-932	N20	A-1-1	OS-C	O-S
Malibu Creek–Phase II	4464-020-934	N20	A-1-20	OS-C	O-S
Malibu Creek–Phase II	4464-020-929	N20	A-1-20	OS-C	O-S

Table C.10-4. Parcels to Be Re-designated/Rezoned

Area/Facility	APN	Current		Proposed	
		Land Use	Zoning	Land Use	Zoning
Not Available	4441-015-905	N5	R-1-5	OS-C	O-S
Not Available	4436-001-903	N10	A-1-10	OS-C	O-S
Not Available	4436-001-904	N10	A-1-10	OS-C	O-S
Not Available	4436-001-905	N10	A-1-10	OS-C	O-S
Owner/Agent: Santa Monica Mountains Conservancy					
Lobo Canyon	2058-012-902	OS-P	A-1-20	OS-C	O-S

Source: County of Los Angeles, 2019b.

Agriculture

Impact LU-3: Implementation of the proposed North Area Plan and CSD Update would not convert FMMP-designated Farmland to a non-agricultural use. (Less than Significant Impact)

Parcels that would be rezoned to OS-C (Open Space Conservation) or OS-PR (Open Space Parks and Recreation) under the proposed Plan and CSD Update have not historically been used for agricultural activities; rather, they are owned by agencies and have been used as open space or active recreation areas. In addition, as shown in Figure C.10-4, the proposed rezoning would not convert FMMP-designated lands to a non-agricultural use. There are no identified areas within a Rural Residential designation that are currently used for agricultural production or have an important farmland classification. Therefore, approval of the change in land use designation and rezoning would not result in the conversion of land that is actively used for agricultural production. Impacts would be less than significant.

Impact LU-4: Implementation of the proposed North Area Plan and CSD Update would not conflict with existing zoning for agricultural use, or a Williamson Act contract. (Less than Significant Impact)

As discussed under Impact LU-2, the proposed Plan and CSD Update would include land use and zone changes for 132 parcels that are currently designated for agriculture, as well as recreation and residential land uses. Despite the existing land use designations/zoning, most of the areas are either dedicated lands, park lands, or dedicated lands for conservation. Therefore, the intent of this component of the proposed Plan and CSD Update is to bring the existing uses of the land into conformance with the County's land use regulations, which would not result in conflicts with any land use plan, policy, or regulation. Impacts would be less than significant.

There are no lands under Williamson Act contracts in the North Area. Therefore, no conflicts with Williamson Act contracts would occur.

Impact LU-5: Implementation of the proposed North Area Plan and CSD Update would not conflict with existing zoning for, or cause rezoning of, forest land. (No Impact)

The only zone changes associated with the proposed Plan and CSD Update would be for land zoned for agricultural and residential land uses that would be rezoned to OS-C or OS-PR. No portion of the Plan area is designated forestland; however, a key provision of the proposed Plan and CSD Update is the preservation of sensitive habitats, which include woodlands. Therefore, no conflicts with existing zoning for forest land would occur.

Impact LU-6: Implementation of the proposed North Area Plan and CSD Update would not result in the loss of forest land or conversion of forest land to non-forest use. (Less than Significant Impact)

The North Area includes approximately 6,148 acres of open space lands managed by federal, state and regional agencies. Implementation of the proposed Plan and CSD Update (including General Plan Policy LU-1) would ensure that future development would be located within, contiguous with, or in close proximity to existing developed areas able to accommodate it, or in other areas with adequate public services and where it would not have significant adverse effects on natural resources; this includes the protection of forest lands. Section 22.336.070 of the proposed CSD Update includes the development standards for the Transfer of Development Credit Program. This program would be applied to land division projects and would result in no net gain in the number of buildable lots and would result in the conservation of lands with sensitive resources or development constraints (e.g. steep slopes). Further, as discussed in Section B, Plan and CSD Update Description, two of the purposes of the proposed Plan and CSD Update are to strengthen existing policies for preservation of environmental resources and identify policies and standards that support the surrounding communities current rural and semi-rural lifestyle. Therefore, implementation of the proposed Plan and CSD Update aims to minimize impacts associated with development in the North Area and potential impacts associated with the conversion of forest land would be less than significant.

Impact LU-7: Implementation of the proposed North Area Plan and CSD Update would not result in other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. (No Impact)

Aside from the potential impacts associated with the rezoning of agricultural lands (discussed under Impacts LU-3 and LU-4), implementation of the proposed Plan and CSD Update would not result in other changes to the existing environment that would result in the conversion of the agricultural or forest lands. In addition, the proposed Plan and CSD Update includes policies and development standards that require preservation of agricultural lands and open space. No impact would occur under this criterion.

Recreation

Impact LU-8: Implementation of the proposed North Area Plan and CSD Update could increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. (Less than Significant Impact)

The North Area includes 6,148 acres of land area designated as open space, which accounts for approximately 30 percent of the Plan Area. These lands are under the management of other government agencies such as the National Park Service, the California Department of Parks and Recreation, and the Santa Monica Mountains Conservancy, and non-government organizations such as the Mountains Restoration Trust.

The General Plan includes an estimated projected population for 2035 of 26,128 for the Santa Monica Planning Area. Population growth could result in increased use of recreational resources and opportunities within the North Area. Using the standard of six acres of regional parkland per 1,000 residents, as given in the Parks and Recreation Element of the General Plan, the existing 6,148 acres of public open space in the North Area would equate to approximately 235 acres per 1,000 residents (with the projected population growth). Even with the estimated projected growth, the available park space in the North Area would far exceed the County goal (County of Los Angeles, 2015). However, the proposed

North Area Plan Update would not result in increased growth in the North Area. The Plan does not identify a projected population growth and includes standards that would result in no net increase in buildable lots, which would reduce development in the North Area. Section 22.336.070 (Community-Wide Development Standards) of the proposed CSD Update includes the development standards for the Transfer of Development Credit Program. This program would be applied to land division projects and would result in the conservation of lands with sensitive resources or development constraints (e.g. steep slopes).

In addition, the following guiding principles of the proposed Plan and CSD Update would avoid potentially adverse impacts to recreation: to protect, expand, or enhance important recreational resources; distribute public facilities throughout an area so as to mitigate against the impacts of overcrowding or overuse by the public of any single area; provide safe and accessible bikeways on existing roadways; and coordinate with federal, State, and County park agencies, and other qualified public and private land conservation agencies to ensure that private land donations and/or public access dedications are accepted, developed, and managed for their intended use. Therefore, potential impacts from implementation of the proposed Plan and CSD Update to recreational resources and opportunities in the North Area would be less than significant.

Impact LU-9: Implementation of the proposed North Area Plan and CSD Update could include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. (Less than Significant Impact)

As shown in Table C.10-4, the proposed Plan and CSD Update would include changes in land use designations and zones for 132 parcels, from Agricultural, Recreation, and Residential land use designations, to Open Space (OS-C, OS-PR) designations, and Open Space (O-S) Zone. The County's Land Use Element states the purposes of the OS-C designation is the preservation of open space areas and scenic resource preservation in perpetuity; the OS-PR designation represents open space recreational uses such as regional and local parks and trails; and the County's O-S Zone provides for the preservation, maintenance, and enhancement of the recreational, natural, and environmental resources of this County as defined in the General Plan. As previously described, the land use designation provides guidance for the character of an area, while the land use zone specifies rules for how development occurs. This component of the proposed Plan and CSD Update is intended to bring the existing uses of the land (see Figure C.10-1) into conformance with the County's land use regulations (see Figures C.10-2 and C.10-3) and would not result in an expansion or construction of recreational facilities. Potential impacts associated with the changes in designations and zoning would be less than significant.

Regarding other public recreation areas in the North Area, Policies CO-1 to CO-12 (see Attachment C.10 at the end of this section) of the proposed North Area Plan Update are intended to protect recreational opportunities, and where feasible, expand or enhance resources of regional, State and national importance. Examples of some of these important policies that directly apply to preservation of recreation and open space are identified below.

- **Policy CO-5:** *Collaborate with public, non-profit, and private organizations to acquire and preserve available land for open space.*
- **Policy CO-7:** *When development conditions of approval set aside lands for open space, clearly define the land's intended open space functions and ensure that the management and use of such lands are consistent with those intended open space functions.*

- **Policy CO-8:** *Depict all public or private parcels set aside as open space through the recordation on title of conservation easements, open space easements and open space deed restrictions as Open Space on the Land Use Policy Map.*
- **Policy CO-10:** *Pursue a variety of methods to preserve open space, including fee-simple acquisition, purchase of development rights, land swaps, regulations, or development density and lot retirement incentives. For County, State, and federal funds that may be earmarked for open space, assign high priority to acquiring properties designated on the National Park Service's Land Protection Plan, and to parcels within S1 and S2 habitat areas.*
- **Policy CO-11:** *Implement legal protections, such as deed restrictions and dedication of open space easements, to ensure designated open space lands are preserved in perpetuity.*

In addition, as discussed in the Conservation Element of the Plan Update, public agencies are currently working to expand trails and associated facilities to accommodate future needs. Therefore, the proposed Plan and CSD Update could result in construction and expansion of public recreational areas and facilities. However, primary goals of the proposed Plan and CSD Update are to provide maximum public access and recreational opportunities for all people consistent with public safety needs while also protecting public rights, rights of private property owners, and natural resources from overuse.

The proposed Plan and CSD Update would also establish new requirements and development standards for equestrian facilities that seek to promote the equestrian culture in the Santa Monica Mountains while minimizing the environmental impacts these activities may have on the region. Section 22,336.070 (Community-Wide Development Standards) includes standards for equestrian facilities. These proposed standards would allow all legally established non-conforming equestrian facilities to continue operation, subject to compliance with specific Best Management Practices. In addition, new equestrian facilities and additions/expansions to existing equestrian facilities would be required to comply with requirements outlined in the proposed CSD Update. As such, the proposed Plan and CSD Update may create new opportunities for equestrian facilities. However, the policies and standards set forth by the proposed Plan and CSD Update would minimize potential adverse physical effects on the environment by requiring management and operation standards that control nuisance from these facilities such as management of animal waste and controlling runoff, as examples. Therefore, impacts associated with this criterion would be less than significant.

C.10.5 Cumulative Impact Analysis

A cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. This analysis focuses on whether the land uses, agriculture, and recreation impacts associated with the proposed Plan and CSD Update are cumulatively considerable within the context of impacts caused by other past, present, or future projects.

A description of the cumulative scenario for the proposed Plan and CSD Update is provided in Section C.1.3. Cumulative projects identified within this scenario are listed in Table C.1-1 and shown on Figure C.1-1. As described in Section C.1.3, the area evaluated under the cumulative scenario for each environmental issue area varies because the nature and range of potential effects differ by resource or issue. For the issue area of land use, the geographic scope for the analysis of cumulative impacts is primarily defined as the boundary of the North Area. Within this scope, two cumulative projects have been identified that may have potential to result in cumulative land use impacts with the proposed Plan and CSD Update:

- Liberty Canyon Wildlife Habitat Connectivity Project (Cumulative Project 6); and
- Craftsman's Corner Territory Annexation (Cumulative Project 14).

For the issue areas of agriculture and recreation, the geographic scope for the analysis of cumulative impacts is regional because recreation opportunities in the North Area attract users from throughout the region; therefore, the scope of analysis of cumulative impacts to recreation encompasses all of the cumulative projects listed in Table C.1-1 and shown on Figure C.1-1.

The proposed Plan and CSD Update does not include specific development projects; however, future development is expected to be clustered and may occur in the Highway 101 corridor, where cumulative projects are also clustered. In order for cumulative impacts to land use, agriculture, and recreation to occur, implementation of future development under the proposed Plan and CSD Update would need to coincide with implementation of one or more cumulative projects listed in Table C.1-1 and shown on Figure C.1-1. As discussed in the analysis in Section C.10.4, potential impacts of the proposed Plan and CSD Update to land use, agriculture, and recreation would be less than significant. The analysis below considers whether these less than significant impacts would have potential to combine with similar impacts of other projects in the cumulative scenario, resulting in cumulative impacts.

Land Use and Planning

Cumulative Project 6 includes establishment of a habitat corridor, and Cumulative Project 14 includes annexation of approximately 145 acres in the City of Calabasas and 12 acres in the City of Hidden Hills. Cumulative Project 6 is a vegetated overpass or underpass that will restore safe wildlife travel along an established corridor (Coastal Conservancy, 2015); this project would not result in divisions to established communities and would not conflict with implementation of the proposed Plan and CSD Update, which also improves the protection of open space. The community annexation is included in the analysis for the Final EIR for the 2030 General Plan, which found that the project is part of the citywide plan intended to provide for the orderly development of the community through the year 2030, and would not physically divide the community (City of Calabasas, 2008). The projects outside of the North Area Plan boundary are subject to the policies and land use analyses of their respective jurisdictions and would not result in policy inconsistencies with the proposed Plan and CSD. Moreover, land use and policy consistency impacts associated with individual projects would be addressed on a case-by-case basis to determine consistency with applicable plans and policies. Because projects are required to be consistent with plans and policies, significant cumulative land use impacts are not anticipated. Therefore, land use impacts would not be cumulatively considerable.

Agriculture

Cumulative Projects 6 and 14 are within the boundary of the North Area Plan. Development of these cumulative projects on agricultural or forest lands could result in conversions to non-agricultural or non-forest uses or conflict with existing zoning ordinance or agricultural designations. However, Cumulative Projects 6 and 14 were found to have less than significant impacts to agricultural resources in the environmental analysis of these projects by their respective governing agencies (City of Calabasas, 2008; Coastal Conservancy, 2015). The cumulative projects outside of the North Area Plan boundary are in urban areas and therefore, would not result in the conversion of agricultural lands to non-agricultural land uses. In addition, development projects are subject to the policies and standards set forth by each jurisdiction. Therefore, potential impacts to agricultural resources would not be cumulatively considerable.

Recreation

The recreation areas in the North Area attract users from throughout the region, so all of the cumulative projects identified in Table C.1-1 and Figure C.1-1 would have the potential to result in cumulative impacts with the proposed Plan and CSD Update that could potentially contribute to deterioration of recreational resources or opportunity, such as through the alteration of the visual landscape. It is anticipated that future development within the North Area would be clustered in areas where development already exists, including along the Highway 101 corridor, where cumulative projects identified in Table C.1-1 and Figure C.1-1 are also clustered. Recreational resources and opportunities are concentrated away from these development clusters, in the open space area that would be expanded and protected with the proposed Plan and CSD Update. Implementation of the proposed Plan and CSD Update would not result in significant adverse impacts to recreation, and instead would implement policies to protect, expand, or enhance important recreational resources and opportunities, including but not limited to open space. In particular, Cumulative Project 6 is a wildlife connectivity project that would facilitate safe crossing for wildlife, which would result in a positive impact to open space in the North Area. In addition, cumulative projects would be subject to development impact fees that would be used to mitigate potentially significant impacts to recreational resources and opportunities. Therefore, potential impacts to recreational resources would not be cumulatively considerable.

C.10.6 Level of Significance After Mitigation

As discussed in Sections C.10.4 and C.10.5, compliance with existing laws and regulations, and implementation of the proposed Plan and CSD Update policies and development standards, would avoid or minimize potential land use and planning impacts, and impacts to agricultural and recreation resources to a less-than-significant level. Therefore, no mitigation measures are needed, and subsequently no secondary impacts resulting from the implementation of mitigation measures would occur.

Attachment C.10

Land Use and Recreation Policies and Standards

(Appendix 1 includes all policies and standards)

Proposed North Area Plan Update

Land Use Element

- **Policy LU-1:** Direct and site new residential, commercial, or industrial to existing developed areas able to accommodate it, or where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on natural resources.
- **Policy LU-2:** Retain the area's natural setting, rural and semi-rural character, and scenic features.
- **Policy LU-3:** Maintain areas of diverse natural topography which provide, through the preservation of large undeveloped areas, long-range vistas of open ridgelines and mountain slopes.
- **Policy LU-4:** Prohibit development on Significant Ridgelines, following the CSD standards designed to protect ridgeline resources.
- **Policy LU-5:** Preserve the physical connections between open space areas, natural habitats, public parklands, and activity centers.
- **Policy LU-6:** Preserve ridgelines and open space areas that define and maintain the rural character of developed areas.
- **Policy LU-7:** Mitigate the impacts of permitted development on neighboring jurisdictions; impacts shall not be exported to other jurisdictions.
- **Policy LU-8:** Prohibit new industrial uses except on lots designated for such uses. Lawfully existing nonconforming industrial uses shall not be expanded.
- **Policy LU-9:** Prohibit the use of hauled water as a source of potable water or irrigation for new development or agricultural uses.
- **Policy LU-10:** Require that the extension of water, sewer, or utility infrastructure to serve development be located within legally existing roadways and road rights-of-way in a manner that avoids adverse impacts to natural resources to the maximum extent feasible. Such infrastructure shall be sized and otherwise designed to provide only for the approved development to avoid growth-inducing impacts.
- **Policy LU-11:** Permit land divisions outside existing developed areas only in areas with adequate public services, where they will not have significant adverse effects, either individually or cumulatively, on natural resources, and will not create parcels that would be smaller than the average size of surrounding parcels.
- **Policy LU-12:** Cluster development in land divisions, including building pads, if any, in order to minimize site disturbance, landform alteration, and removal of native vegetation, to minimize required fuel modification, and to maximize open space.
- **Policy LU-13:** Subsequent development on a parcel created through a land division shall conform to all provisions of the approved land division permit, including, but not limited to, the building site location, access road/driveway design, and grading design and volumes.
- **Policy LU-14:** Implement a Transfer of Development Credits (TDC) program that ensures that the individual and cumulative impacts of creating new lots within the Santa Monica Mountains North Area are minimized and mitigated through the retirement of an equivalent number of development credits from existing lots that meet the qualification criteria of the program.

- **Policy LU-15:** Identify Transfer of Development Credits sending areas within the Santa Monica Mountains North Area that contain high-priority biological resources, rural, scenic and agricultural resource areas, and Very High Fire Hazard Severity Zones (VHFHSZ). Identify potential Transfer of Development Credits receiving areas county-wide, such as Transit Oriented Developments, infill sites, vacant parcels, and underutilized sites in urban areas that promote sustainable development and climate change-related risk reduction.

Proposed Community Standards District Update

Section 22.336.040 Applicability

Section 22.336.050 Application and Review Procedures

Section 22.336.070 Community-Wide Development Standards

- F. Event Facilities
- U. Street and Road Cross-Sections
- W. Transfer of Development Credit Program
- Y. Vineyards

Section 22.336.080 Zone-Specific Development Standards

Section 22.336.090 Area-Specific Development Standards

C.11 Noise

This section describes the existing ambient noise in the North Area and the potential noise impacts that could result with implementation of the proposed North Area Plan and CSD Update to residents and other sensitive receptors. The noise measurements used in this section are drawn from the *Santa Monica Mountains North Area Plan and Community Standards Update Noise Technical Report* completed in October 2018. This technical study is provided in full as Appendix 5 of this EIR.

Scoping Comments Received. During the scoping period for the EIR, written and verbal comments were received from agencies, organizations, and the public. These comments identified various substantive issues and concerns relevant to the EIR analysis for noise. The issues below summarize these comments. Appendix 2 includes all comments received during the scoping comment period.

- Concern with current noise regulations and baseline ambient noise, request updated standards and reduce permitted increase to “2 dba or 2 ½ above ambient”.
- Concern with noise from events at vineyards including dance pavilions. Noise is heard from these venues every weekend and after 10 pm.
- Concern with additional noise pollution from nearby events and increased traffic.
- Do not allow amplified sound from 8 pm to 8 am for special events (e.g. weddings). Establish an efficient mechanism for issuing violations and enforcement of requirements.
- Concern with new FAA Los Angeles Airport Airline Metroplex routes and impact on noise and local wildlife in the North Area.

KEY FINDINGS

- North Area contains a large amount of rural and undeveloped lands, with low ambient noise. Transportation corridors are the primary noise source.
- Proposed amendments to the North Area Plan and CSD supplement and comply with the standards established in the County General Plan (GP) and Noise Ordinance.
- GP and Noise Ordinance establish allowable temporary and permanent noise levels within the North Area.
- Proposed North Area Plan policies and CSD standards establish new noise thresholds ensuring that temporary noise would not result in a substantial temporary increase in ambient noise.

C.11.1 Environmental Setting

General Information on Noise

The assessment of noise utilizes specialized terminology that is not typically used in everyday conversations. Therefore, to assist in understanding the subsequent analysis, Table C.11-1 provides definitions for technical terms used in this report.

The effects of noise on people can be grouped into three general categories:

- Subjective effects of annoyance, nuisance, and dissatisfaction;
- Interference with activities such as speech, sleep, and learning; and
- Physiological effects such as startling and hearing loss.

In most cases, noise sources produce effects in the first two categories. No satisfactory way exists to measure the subjective effects of noise, or to measure the corresponding reactions of annoyance and

dissatisfaction. This lack of a common standard is due primarily to the wide variation in individual thresholds of annoyance and habituation to noise. Thus, an important way of determining a person's subjective reaction to a new noise is by comparison with the normal ambient noise environment at a receptor location.

Ambient noise is generally considered low when below 50 dBA, moderate in the 50–65 dBA range, and high above 65 dBA (FTA, 2006). Although people often accept higher noise levels in urban residential and residential-commercial zones, high noise levels are nevertheless considered to be an annoyance and may affect public health. In general, the more the dBA level or tonal (frequency) variations of a noise exceed ambient conditions, the less acceptable the new noise will be, depending on each person's tolerance for noise. When comparing sound levels from similar sources (for example, changes in traffic noise levels), an increase of 3 dBA is considered to be a just-perceivable difference, 5 dBA is clearly perceivable, and 10 dBA is considered a doubling in perceived loudness. Figure C.11-1 illustrates typical noise levels for common sounds.

Table C.11-1. Summary of Acoustical Terms

Term	Definition
Decibel (dB)	A unit describing the amplitude of sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure, which is 20 micropascals (20 micronewtons per square meter).
A-Weighted Sound Level (dBA)	The sound level in decibels as measured on a sound level meter using the A-weighted filter network. The A-weighted filter de-emphasizes the very low and very high frequency components of sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise. All sound levels in this report are A-weighted.
Ambient Noise Level	The composite noise from all sources resulting in the existing normal level of environmental noise at a given location.
Equivalent Noise Level (Leq)	The average dBA level, on an equal energy basis, during the measurement period.
Maximum Noise Level (Lmax)	The maximum noise level during a sound measurement period.
Minimum Noise Level (Lmin)	The minimum noise level during a sound measurement period.
Percentile Noise Level (L90)	The noise level that occurs 90 percent of the time during the measurement period. Comparing the L90 level to the Leq is useful within urban environments. The greater the difference between these two metrics, the more ambient conditions represent noise sources that quickly peak and dissipate (like a vehicle pass by). When the Leq and L90 levels show less difference, ambient conditions contain noise sources with less fluctuation.

The land uses surrounding a receptor often dictate what ambient noise levels would be considered acceptable or unacceptable. Lower levels are expected in rural or suburban areas than what would be expected for urban areas, commercial, or industrial zones. Nighttime ambient levels in urban environments are typically seven decibels lower than the corresponding daytime levels. In rural areas away from roads and other human activity, the day-to-night difference can be considerably less. Areas with full-time human occupation that are subject to nighttime noise are often considered objectionable because of the likelihood of disrupting sleep. Noise levels above 45 dBA at night can result in the onset of sleep interference effects. At 70 dBA, sleep interference effects become considerable (USEPA, 1974).

Noise Source and Distance	A-Weighted Sound Level (dBA)	Subjective Impression
Civil defense siren (100 ft)	130	Pain threshold
Jet takeoff (200 ft)	120	
Rock music concert (50 ft)	110	
Pile driver (50 ft)	100	Very loud
Ambulance siren (100 ft)	90	
Diesel locomotive (25 ft)	85	Loud
Pneumatic drill (50 ft)	80	
Freeway (100 ft)	70	Moderately loud
Vacuum cleaner (10 ft)	60	
Light traffic (100 ft)	50	
Large transformer (200 ft)	40	Quiet
Soft whisper (5 ft)	30	Threshold of hearing

Source: USEPA 1974 and 1978

Figure C.11-1
Typical Sound Levels Measured
in the Environment and Industry

Sensitive Receptors

Noise sensitive land uses, or sensitive receptors, are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where individuals expect quiet to be an essential element of the location. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise and potential sleep disruptions. Additional land uses, such as parks, historic sites, cemeteries, and recreation areas, are also considered sensitive to exterior noise. Schools, places of worship, hotels, libraries, nursing homes, retirement residences, and other places where low interior noise levels are essential are also considered noise sensitive land uses/sensitive receptors. However, most noise sensitive land uses in the study area are residential.

A significant amount of land in the North Area is undeveloped, including land preserved as the Santa Monica Mountains National Recreation Area and areas within Malibu Creek and Topanga State Parks. Existing land uses include scattered single family residential and small-scale agricultural uses. These particular land uses are not heavily concentrated; rather, they are widely distributed and generally located in the small canyons and valleys that punctuate the mountains that cover most of the North Area. Notable exceptions include denser residential and commercial uses along the U.S. 101 freeway corridor.

Study Area: Overall North Area

The North Area is impacted by a multitude of noise sources. Mobile sources, especially vehicle traffic, are the most common and significant sources of noise in most communities and the predominant source of noise in the North Area. Major sources of transportation noise include a number of major roadways and the U.S. 101 that traverses the North Area. In addition, commercial and institutional land uses (i.e., schools, fire stations, utilities) throughout North Area generate stationary-source noise. A general description of mobile and stationary noise sources that create the ambient noise environmental of the North Area are discussed below.

Mobile Noise Sources. By far, the largest single source of community noise within Los Angeles County is the flow of traffic on major roadways. Motor vehicle noise is generated by engine vibrations, the interaction between tires and the road, and the exhaust system. Reducing the average motor vehicle speed reduces the noise exposure of receptors adjacent to the road. Each reduction of five miles per hour reduces noise by about 1.3 dBA. Table C.11-2 presents existing noise levels along several major travel routes through the North Area, as available. As traffic noise levels are directly influenced by traffic volumes, noise levels along the U.S. 101 freeway corridor through the North Area are expected to be greater than those shown for the several arterial roads shown in Table C.11-2.

Table C.11-2. Existing Traffic Noise Levels

Roadway	Segment	CNEL (dBA at 100-feet)
Kanan Dume Road	Triunfo Canyon Road to Mulholland Highway	65.1
Kanan Dume Road	Sierra Creek Road to Triunfo Canyon Road	67.5
Kanan Dume Road	Troutdale Drive to Sierra Creek Road	68.2
Kanan Dume Road	Cornell Road to Troutdale Drive	67.3
Las Virgenes Road	Mulholland Highway to Lost Hills Road	68.2
Topanga Canyon Road	At Old Topanga Canyon Road	63.5
Mulholland Highway	Kanan Road to Sierra Creek Road	56.2
Mulholland Highway	Sierra Creek Road to Troutdale Drive	55.8

Table C.11-2. Existing Traffic Noise Levels

Roadway	Segment	CNEL (dBA at 100-feet)
Mulholland Highway	Troutdale Drive to Lake Vista Drive	63.8
Mulholland Highway	Lake Vista Drive to Cornell Road	56.6
Mulholland Highway	Cornell Road to Udell Road	64.9
Mulholland Highway	Udell Road to Las Virgenes Road	55.7

Source: County of Los Angeles, 2014 (Table 5.15-16).

Aircraft overflights are another mobile noise source that also affect ambient noise conditions of the North Area. Aircraft noise is regulated by the Federal Aviation Administration (FAA), with the height of aircraft overflight generally affecting the overall noise level experienced on the surface. The FAA's Metroplex Project was approved and implemented in 2016 to allow for more direct and efficient routing of aircraft into and out of Southern California and its airports. The nearest airports to the North Area that were affected by Metroplex include the following:

- Santa Monica Airport: located approximately 10 miles southeast of the North Area Boundary.
- Burbank Airport: located approximately 13 miles northeast of the North Area Boundary.
- Los Angeles International Airport: located approximately 14 miles southeast of the North Area Boundary.
- Oxnard Airport: located approximately 19 miles west of the North Area Boundary.

The FAA's environmental analysis for the project calculated noise at more than 330,000 locations throughout the Metroplex study area. It showed that Metroplex would not result in any significant or reportable noise increases (compared to pre-Metroplex conditions) under the National Environmental Policy Act (FAA, 2018).

Stationary Noise Sources. Whereas mobile-source noise affects many receptors along an entire length of roadway, stationary noise sources affect only their immediate areas. Stationary sources of noises may occur from all types of land uses. Residential uses can generate noise from landscaping, maintenance activities, occupant activities, and air conditioning systems. Commercial uses can generate noise from heating, ventilation, air conditioning (HVAC) systems, loading docks and other sources. Noise generated by residential, commercial, and school uses is generally short and intermittent. Schools are considered noise-sensitive because of the necessity for quiet in the classroom to provide an adequate environment for learning. However, outdoor activities that occur on school campuses throughout the North Area can generate noticeable levels of noise. While it is preferable to have schools in residential areas to support the neighborhood, noise generated on both the weekdays (by physical education classes and sports programs) and weekends (by use of the fields by youth organizations) can elevate noise levels. Noise from stationary sources is regulated through the Los Angeles County Code of Ordinances (described in Section C.11.2).

Focused Study Area: Special Event Areas

Within the North Area, 19 special event locations have been identified where noise from outdoor event activities (such as weddings) can temporarily impact normal ambient noise conditions of adjacent residences. Four of these identified locations were selected for further study. The selection of this focused study area considered noise from these special event land use types to be of concern to residents within the North Area, with the selection of the study area and ambient noise measurement locations based on previous complaints and noise investigation studies. The special event locations were selected due to their ability to generate noise during outdoor events (weddings, parties, etc.) and were mapped for their distance to nearby residences (key sensitive receptors of concern with respect to nighttime noise). These event

locations are identified in Table C.11-3 and shown in Figure C.11-2. When considering these event locations, the following factors were considered to select four general focused study area locations where short-term ambient noise measurements would be conducted:

- Distance to nearest residential receptor.
- Land use type (wedding location, public park, etc.) and potential for nuisance noise outside normal hours.
- If roadways with significant traffic volumes were located adjacent to the event location and receptors, resulting in elevated ambient noise levels (which would mask event noise).
- Confirmation that outdoor wedding and event activities are advertised as available at the location.
- If the primary outdoor noise generating areas of the location could face adjacent residential receptors.

Table C.11-3. North Area Plan Boundary: Outdoor Wedding and Entertainment Locations

Map ID	Name and Location	Land Use Type	Distance to Nearest Residential Receptor ¹
1	Triunfo Creek Vineyards 2714 Triunfo Canyon Rd. Agoura Hills, 91301	Vineyard Wedding Venue	547 feet southwest
2	Malibu Wine Safaris 3211 Mulholland Hwy. Malibu, 90265	Vineyard Wedding Venue	549 feet west
3	Cielo Malibu Wines 31424 Mulholland Hwy. Malibu, 90265	Vineyard Wedding Venue	224 feet west
4	Semler Malibu Estate Wines 31727 Mulholland Hwy. Malibu, 90265	Vineyard Wedding Venue	1,738 feet southeast
5	Blackberry Creek Farm 1801 N Topanga Canyon Blvd. Topanga, 90290	Ranch/Farm Wedding Venue	353 feet east
6	Rocky Oaks Estates 340 Kanan Rd. Malibu, 90265	Private Estate Wedding Venue	832 feet west
7	Lobo Castle 31400 Lobo Canyon Rd. Agoura Hills, 91301	Private Estate Wedding Venue	215 feet east
8	Malibou Lake Mountain Club 29033 Lake Vista Dr. Agoura Hills, 91301	Private Club Wedding Venue	264 feet south
9	The 1909 1909 N Topanga Canyon Blvd. Topanga, 90290	Wedding Venue	228 feet west
10	The Mountain Mermaid 20421 Callon Dr. Topanga, 90290	Wedding Venue	102 feet west
11	SaddleRock Ranch 31727 Mulholland Hwy. Malibu, 90265	Vineyard Wedding Venue	1,012 feet east

Table C.11-3. North Area Plan Boundary: Outdoor Wedding and Entertainment Locations

Map ID	Name and Location	Land Use Type	Distance to Nearest Residential Receptor ¹
12	Paramount Ranch 2903 Cornell Rd. Agoura Hills, 91301	Regional Park Entertainment Venue	1,667 feet southeast
13	Peter Strauss Ranch 30000 Mulholland Hwy. Agoura Hills, 91301	Regional Park Entertainment Venue Wedding Venue	414 feet north
14	Sage Hill Ranch 4206 Cornell Rd. Agoura Hills, 91301	Vineyard Wedding Venue	174 feet west
15	Gates Canyon Park 25801 Thousand Oaks Blvd. Calabasas, 91302	Regional Park Entertainment Venue	533 feet west
16	Vasa Park 2854 Triunfo Canyon Rd. Agoura Hills, 91301	Regional Park Entertainment Venue	420 feet south
17	Camp Keystone 2854 Triunfo Canyon Rd. Agoura Hills, 91301	Summer Camp Entertainment Venue	906 feet northwest
18	Brookview Ranch 2972 Triunfo Canyon Rd. Agoura Hills, 91301	Wedding Venue	425 feet northwest and northeast
19	Oak Canyon Ranch 3272 Triunfo Canyon Rd. Agoura Hills, 91301	Wedding Venue Entertainment Venue	900 feet east

¹ - Distance was calculated using Google Earth from the center of the event location to the nearest confirmed residence (not assumed as part of the event location). Due to the aerial nature of this search, structures that did not appear habitable or present residential characteristics were not utilized.

Based on the above considerations, four general areas were selected for a focused study as subsets of the greater North Area, shown in Figure C.11-2. These four study areas include:

- Mulholland/Kanan Area, shown in Figure C.11-3.
- Triunfo Canyon Area, shown in Figure C.11-4.
- Malibou Lake Area, shown in Figure C.11-5.
- Topanga Canyon Area, shown in Figure C.11-6.

Ambient noise measurements were taken within these four study areas at nearby accessible public locations between the source (e.g. potential noise-generating venue) and receptor property line (e.g. where property lines meet, along a public roadway where the property lines meet, or at the receptor property line facing the source if property lines are not adjoined).

Ambient Noise Conditions

Short-term (one-hour) noise measurements were conducted between August 6 (Monday) through August 9 (Thursday), 2018 at two different times (i.e., 1 pm and 8 pm) for each day of the four-day period. These measurements represent typical daytime and evening ambient (background) noise conditions at residential receptor locations (near event locations) within the four study areas. The results of these measure

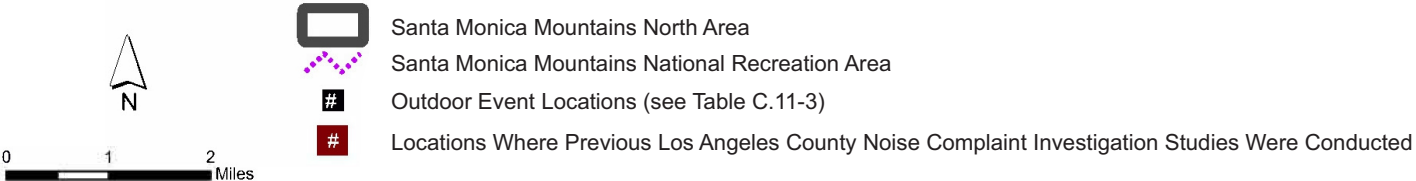
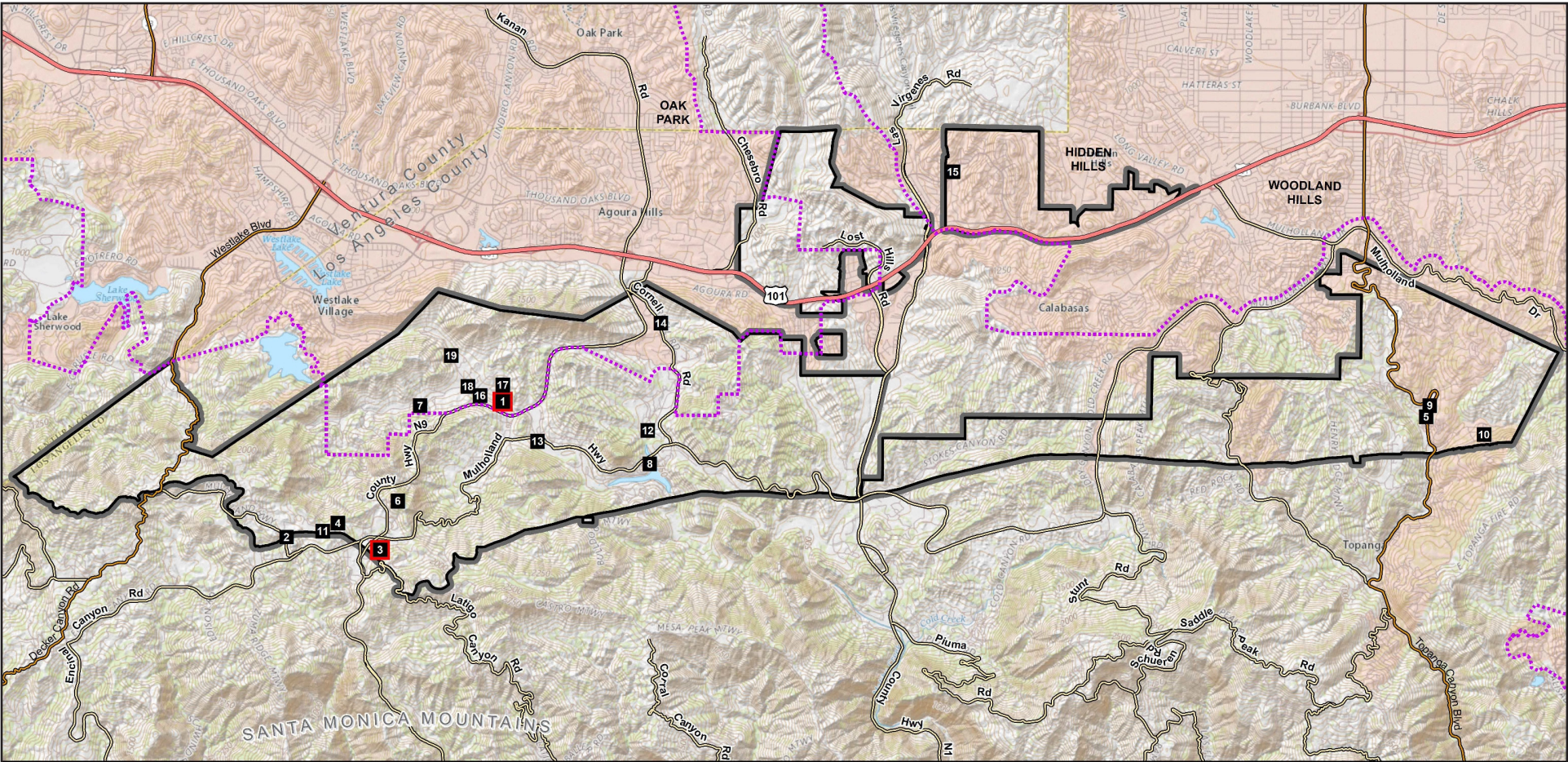


Figure C.11-2
North Area Plan Boundary:
Outdoor Wedding and Entertainment Locations

ments are provided in Table C.11-4 and their locations are shown in Figures C.11-3 through C.11-6. Additional details of these measurements are provided in Appendix 5 of this EIR.

As shown in Table C.11-4, measurement locations 1 and 2 show afternoon and evening average ambient noise levels (Leq) representative of rural areas. While, measurement locations 3 and 4 show slightly greater afternoon and evening average ambient noise levels (Leq), more representative of suburban areas. At all locations, the primary source of ambient noise was traffic on nearby roadways.

Table C.11-4. Ambient Noise Measurement Levels									
Location	Duration	Measured Ambient Level (dBA)					County Thresholds¹		Ambient Exceed Threshold?
		Lmin	Leq	Lmax	L90	L50	Lmax	L50	
1 – Mulholland/ Kanan Area	1:00 pm – 2:00 pm	31.9	50.9	84.6	32.2	33.7	70	50	Yes (Lmax)
	8:00 pm – 9:00 pm	32.1	41.1	57.7	33.1	36.0	70	50	No
2 – Triunfo Canyon Area	1:00 pm – 2:00 pm	32.1	43.7	69.7	33.7	37.5	70	50	No
	8:00 pm – 9:00 pm	31.8	46.9	67.8	32.4	47.3	70	50	No
3 – Malibou Lake Area	1:00 pm – 2:00 pm	38.8	51.4	70.3	42.8	45.7	70	50	Yes (Lmax)
	8:00 pm – 9:00 pm	31.9	50.8	80.1	36.5	40.5	70	50	Yes (Lmax)
4 – Topanga Canyon Area	1:00 pm – 2:00 pm	32.0	55.6	78.7	38.7	52.0	70	50	Yes (Both)
	8:00 pm – 9:00 pm	32.4	56.8	85.1	50.0	52.7	70	50	Yes (Both)

Notes: Additional details of these noise measurements are provided in Appendix 5 of this EIR.

1 - County Noise Ordinance Thresholds are provided below in Section C.11.2, Table C.11-5.

C.11.2 Regulatory Setting

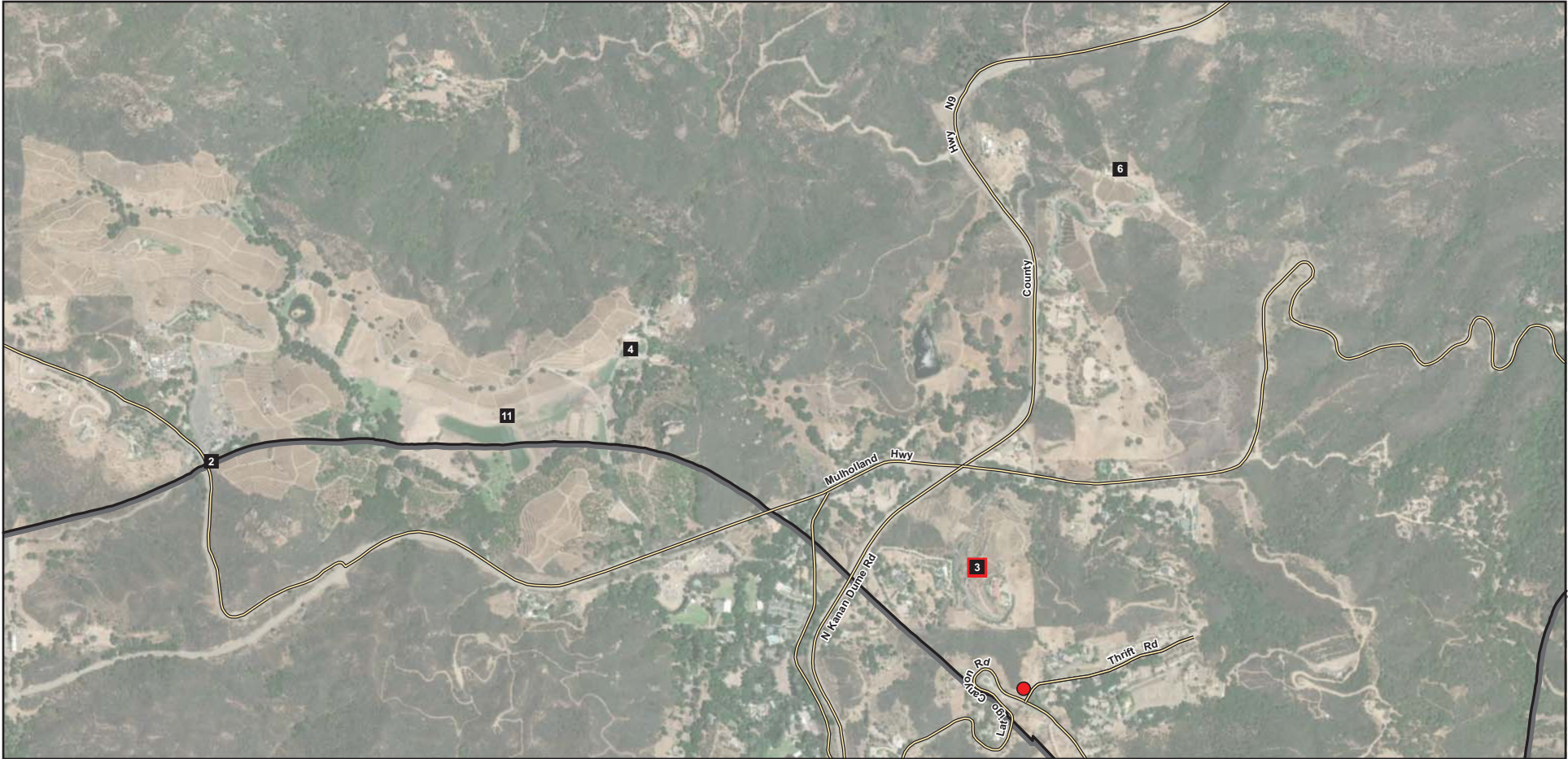
Applicable State Regulations

California Government Code Section 65302 encourages each local government entity to implement a noise element as part of its general plan. In addition, the California Governor’s Office of Planning and Research has developed guidelines for preparing noise elements, which include recommendations for evaluating the compatibility of various land uses as a function of community noise exposure. These recommendations have been incorporated into the applicable local plans and policies discussed below.

Applicable Local Regulations

The North Area is completely located within unincorporated County of Los Angeles lands. A number of provisions are included within the County of Los Angeles Municipal Code (Title 12 Environmental Protection) that relate to the prevention or mitigation of excessive noise. Many of these regulations pertain to regulating noise levels generated by specific uses (such as car wash equipment, HVAC systems, emergency signal devices, etc.) and from specific land uses (such as warehouses, oil and gas facilities, etc.). The identified applicable local regulations presented below are focused on key noise-related plans and policies that serve to establish limits for the overall outdoor noise level at a programmatic level, as presented within the County’s General Plan and Municipal Code.

Standardized noise limits are determined and monitored by the Los Angeles Department of Public Health (DPH). Title 12 of the County Code contains the County Noise Control Ordinance, which was adopted by the Board of Supervisors to control unnecessary, excessive and annoying noise. It declared that County policy was to “maintain quiet in those areas which exhibit low noise levels.”



500 0 500
Feet



Santa Monica Mountains North Area



Outdoor Event Locations (see Table C.11-3)

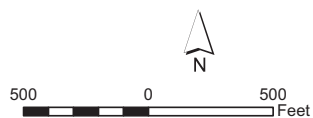


Locations Where Previous Los Angeles County Noise Complaint Investigation Studies Were Conducted



Ambient Noise Measurement Location

Figure C.11-3
Mullholland/Kanan Area







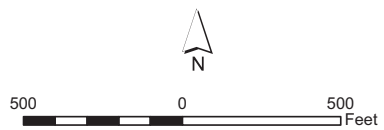
-  Santa Monica Mountains North Area
-  Outdoor Event Locations (see Table C.11-3)
-  Locations Where Previous Los Angeles County Noise Complaint Investigation Studies Were Conducted
-  Ambient Noise Measurement Location

Figure C.11-4
Triunfo Canyon Area



Figure C.11-5
Malibou Lake Area






-  Santa Monica Mountains North Area
-  Outdoor Event Locations (see Table C.11-3)
-  Ambient Noise Measurement Location

Figure C.11-6
Topanga Canyon Area

County of Los Angeles General Plan; Noise Element

Within the County of Los Angeles General Plan Noise Element, the following policy components are applicable to event noise within the North Area (County of Los Angeles, 2015):

- *Policy N1.1: Utilize land uses to buffer noise sensitive uses from sources of adverse noise impacts.*
- *Policy N1.2: Reduce exposure to noise impacts by promoting land use compatibility.*
- *Policy N1.3: Minimize impacts to noise sensitive land uses by ensuring adequate site design, acoustical construction, and use of barriers, berms, or additional engineering controls through Best Available Technologies (BAT).*

In addition to these policies, the County has adopted the following noise thresholds within their General Plan to develop exterior noise standards, as presented in Table C.11-5.

Table C.11-5. Exterior Noise Standards

Noise Zone	Receptor Type	Time Period	Threshold dBA (Noise Cannot Exceed)				Lmax (At No Time)
			L50 (30 Min/Hr.)	L25 (15 Min/Hr.)	L8.3 (5 Min/Hr.)	L1.7 (1 Min/Hr.)	
I	Sensitive	Anytime	45	50	55	60	65
II	Residential	10 pm to 7 am	45	50	55	60	65
		7 am to 10 pm	50	55	60	65	70
III	Commercial	10 pm to 7 am	55	60	65	70	75
		7 am to 10 pm	60	65	70	75	80
IV	Industrial	Anytime	70	75	80	85	90

Source: County of Los Angeles, 2015

County of Los Angeles Municipal Code; Section 12.08 Noise Regulations

The County of Los Angeles Municipal Code Section 12.08.390, Exterior Noise Standards, provides an enforceable regulation of the exterior noise level limits for operation of a facility/event established within the General Plan (County of Los Angeles, 2018). Therefore, the noise level thresholds established by Municipal Code Section 12.08.390 are identical to those presented in Table C.11-5 for the County of Los Angeles General Plan Noise Element.

C.11.3 Thresholds of Significance and Methodology

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would result in:

- Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.
- A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

The thresholds identified above are specific to the programmatic nature of this analysis under CEQA for the proposed Plan and CSD Update. Other criteria included within Appendix G of the CEQA Guidelines that pertain to potential noise impacts related to airports were found not applicable as the North Area does not contain any airports and the proposed Plan and CSD Update would have no effect on navigation of airspace or use of an airport facility. Additionally, the criterion included within Appendix G of the CEQA Guidelines pertaining to vibration is also not discussed because the proposed Plan and CSD Update does not include any plans or policies related to vibration.

C.11.4 Environmental Impacts and Mitigation Measures

Impact N-1: Implementation of the proposed North Area Plan and CSD Update would expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance. (Less than Significant Impact)

The existing North Area Plan is a component of the Los Angeles County General Plan; the proposed North Area Plan would replace the existing plan. Both the existing and proposed North Area Plan's primary role is to provide more focused policy for the regulation of development within the unincorporated area of the Santa Monica Mountains west of the City of Los Angeles and north of the Coastal Zone. The proposed updates to the existing North Area Plan include proposed Policies SN-10 through SN-15 (see below) within Chapter 3 (Safety and Noise Element) to refine the policies of the county-wide General Plan as it applies to this planning area.

- **Policy SN-10:** *Require development projects to demonstrate that: 1) no adverse noise effects on adjacent uses will occur from the project; 2) no adverse effects on the project will occur from adjacent influences; and 3) provisions of the County Noise Ordinance can be met by the project.*
- **Policy SN-11:** *Promote interior noise reduction of residential structures, including those within 600 feet of major and secondary highways.*
- **Policy SN-12:** *Ensure noise compatibility between differing uses in noise sensitive areas.*
- **Policy SN-13:** *Establish zones in which minimum noise coinciding with resort, recreation and special activities is allowed during specific times.*
- **Policy SN-14:** *Develop a plan for monitoring and enforcing noise where event facilities are located near sensitive receptors.*
- **Policy SN-15:** *Restrict the Development and use of private helicopter pads. Publicly owned and operated helicopter pads and stops may be allowed on public or private land where needed for emergency services, and consistent with all applicable policies of the North Area Plan. Locate new public helicopter pads to limit noise impacts on residential areas and public parklands.*

The proposed policies address mitigation and consideration of noise levels in future development. Therefore, the proposed amendments to the North Area Plan supplement the policies established in the General Plan and establish the allowable noise levels within the North Area. Implementation of the proposed Plan noise policies would have a less than significant impact.

The proposed updates to the existing CSD include revisions to Section 22.336.070 (Community-Wide Development Standards), which establish the enforceable noise limits within the planning area. As noted earlier, standardized noise limits are determined and monitored by the Los Angeles Department of Public Health (DPH). Title 12 of the County Code contains the County Noise Control Ordinance, which was adopted by the Board of Supervisors to control unnecessary, excessive and annoying noise. It declared

that County policy was to “maintain quiet in those areas which exhibit low noise levels.” The proposed update to the CSD designate specific levels of ambient or background noise allowable within the categories, or zones, defined within the proposed North Area Plan Update. The noise thresholds identified in Section 22.336.070 (Community-Wide Development Standards) of the proposed CSD Update are presented below:

- The daytime exterior noise level shall not exceed 45 dBA at a L90 measurement in any hour from 8:00 a.m. until 8:00 p.m. The nighttime exterior noise level shall not exceed 40 dBA at a L90 measurement in any hour from 8:00 p.m. until 8:00 a.m. Noise levels are considered a nuisance when they exceed these ambient noise levels when measured from the property line closest to the nearest residential receptor.
- Due to the existing above-average ambient noise conditions in the Topanga Canyon area, the daytime exterior noise level shall not exceed 50 dBA at a L90 measurement in any hour from 8:00 a.m. until 8:00 p.m. for the Topanga Canyon subarea. Noise levels are considered a nuisance when they exceed this ambient noise level when measured from the property line closest to the nearest residential receptor.

The County Health Officer is authorized to issue abatement notices and citations for a misdemeanor when these regulations are violated. Therefore, the proposed amendments to the CSD supplement the standards established in the noise ordinance and establish the allowable noise levels within the North Area. Implementation of the CSD noise standards would have a less than significant impact.

Impact N-2: Implementation of the proposed North Area Plan and CSD Update would result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without their implementation. (Less than Significant Impact)

As discussed in Section C.11.2 and presented in Table C.11-5, the County has adopted noise thresholds with respect to permanent exterior noise ambient level standards within their General Plan, as enforced through Los Angeles County Code of Ordinances Chapter 12.08 (Noise Control). These ambient thresholds are divided by receptor type into the categories shown in Table C.11-2. The Ordinance permits consideration of different levels of ambient or background noise within the categories, or zones. The County Health Officer is authorized to issue abatement notices and citations for a misdemeanor when these regulations are violated.

The proposed North Area Plan and CSD Update would not directly result in any activities that generate noise. Instead, they propose new policies and design guidelines to supplement the existing General Plan and Noise Ordinance to ensure noise-sensitive lands and land uses, wildlife habitats, and public lands that are shielded from excessive permanent noise. Proposed North Area Plan Policies SN-10, SN-11, and SN-15 (Attachment C.11 at the end of this section) are proposed to ensure future development projects demonstrate that: (1) no adverse noise effects on adjacent uses will occur from the project; (2) no adverse effects on the project will occur from adjacent influences; and (3) provisions of the County Noise Ordinance can be met by each future project.

In addition to applicable provisions of the County Code mentioned above, CEQA mandates that development projects requiring discretionary approval undergo separate project-level environmental review. The individual project’s contribution to permanent noise increases would be assessed at the time formal development plans/applications are submitted to the County for review and approval. Because the proposed Plan and CSD Update includes specific noise thresholds for the North Area and CEQA would require review of individual projects, implementation of the proposed Plan and CSD Update would result in less than significant impacts to ambient noise levels.

Impact N-3: Implementation of the proposed North Area Plan and CSD Update would result in a substantial temporary increase in ambient noise levels in the project vicinity above levels existing without their implementation. (Less than Significant Impact)

Temporary construction noise is regulated within Los Angeles County Noise Ordinance Section 12.08.440 (Construction Noise), which prohibits the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekday hours of 7:00 p.m. and 7:00 a.m., or anytime on Sundays or holidays, if the sound creates a noise disturbance across a residential or commercial real-property line, except for emergency work of public service utilities or by variance issued by the health officer. Additionally, Noise Ordinance Section 12.08.440 establishes maximum allowable noise levels during construction, which include a maximum daytime noise level of 75 dBA at single-family residential structures, 80 dBA at multi-family residential structures, and 85 dBA at commercial uses. The proposed North Area Plan and CSD Update would not directly result in any activities that generate noise. The proposed North Area Plan goals and policies and CSD design guidelines would not alter or affect the existing County Noise Ordinance regulations, which would remain in place for all construction activities that occur within the planning area.

The proposed North Area Plan and CSD Update includes a new threshold for temporary noise generated during special events occurring within the planning area. Per proposed Policy SN-13 (see above), special zones would be established to allow noise limits during specific times. Section 22.336.070 (L. Noise) includes corresponding development standards that address noise. These proposed thresholds would ensure that temporary noise from special events does not result in a substantial temporary increase in ambient noise levels in the project vicinity above levels existing without their implementation. Therefore, less than significant impacts would result from implementation of the proposed Plan and CSD Update.

C.11.5 Cumulative Impact Analysis

Cumulative projects identified in Table C.1-1 and shown in Figure C.1-1 would have the potential to result in a cumulative noise impact if they would, in combination with each other, create noise in excess of established standards. As discussed earlier, the proposed North Area Plan and CSD Update would not directly result in any physical change or directly cause the generation of noise. Instead, the proposed Plan and CSD Update would guide future growth and development to reduce such impacts. As noted earlier, the main noise source in the North Area comes from traffic noise. Each of the projects listed in Table C.1-1 would require analysis under CEQA and discretionary approval. Noise impacts from both stationary and mobile sources would be evaluated for the potential to exceed noise standards established by the governing agency's long-range plan policies and development standards, including the County's policies and standards (some of the cumulative projects are not within the jurisdiction of the County).

Future development in the North Area would be guided by existing General Plan policies and County standards; the proposed Plan and CSD Update would augment these existing policies/standards in the North Area to reduce or manage noise. Because future development would be required to comply with applicable goals, policies, and design standards, the implementation of the proposed Plan and CSD Update would not significantly contribute to noise impacts and would not result in cumulatively considerable impacts related noise. Therefore, cumulative noise impacts would be less than significant.

C.11.6 Level of Significance After Mitigation

The proposed Plan and CSD Update include policies and development standards that would reduce or manage noise within the North Area. These updates would augment the existing policies and standards of the General Plan and County zoning ordinance. The proposed Plan and CSD Update would not directly

create significant adverse impacts related to noise and indirect impacts of future development would be reduced through implementation of the proposed Plan and CSD Update policies and standards. Noise impacts would be less than significant, and no mitigation measures would be needed.

Attachment C.11

Noise Policies and Standards

(Appendix 1 includes all policies and standards)

Proposed North Area Plan Update

Safety and Noise Element

- **Policy SN-10:** Require development projects to demonstrate that: 1) no adverse noise effects on adjacent uses will occur from the project; 2) no adverse effects on the project will occur from adjacent influences; and 3) provisions of the County Noise Ordinance can be met by the project.
- **Policy SN-11:** Promote interior noise reduction of residential structures, including those within 600 feet of major and secondary highways.
- **Policy SN-12:** Ensure noise compatibility between differing uses in noise sensitive areas.
- **Policy SN-13:** Establish zones in which minimum noise coinciding with resort, recreation and special activities is allowed during specific times.
- **Policy SN-14:** Develop a plan for monitoring and enforcing noise where event facilities are located near sensitive receptors.
- **Policy SN-15:** Restrict the Development and use of private helicopter pads. Publicly owned and operated helicopter pads and stops may be allowed on public or private land where needed for emergency services, and consistent with all applicable policies of the North Area Plan. Locate new public helicopter pads to limit noise impacts on residential areas and public parklands.

Proposed Community Standards District Update

Section 22.336.070 Community-Wide Development Standards

- F. Event Facilities
 - 4. Development and Operational Standards
- L. Noise

C.12 Population and Housing

This section examines the existing population and housing conditions in the North Area and unincorporated areas of the greater Santa Monica Mountains Area, as provided in the County of Los Angeles (County) General Plan. The North Area demographics are examined against expected effects of the proposed Plan and CSD Update on population and housing. The discussion of population and housing is based on data from the County General Plan, which was adopted in October 2015. According to Section 15382 of the CEQA Guidelines, “An economic or social change by itself shall not be considered a significant impact on the environment.” Socioeconomic characteristics should be considered in an EIR only to the extent that they create adverse impacts on the physical environment. Therefore, the scope of this analysis is limited to population and housing and its potential to affect the environment.

Scoping Comments Received. During the scoping period for the EIR, written and verbal comments were received from agencies, organizations, and the public. These comments identified various substantive issues and concerns relevant to the EIR analysis for population and housing. The issues below summarize these comments. Appendix 2 includes all comments received during the scoping comment period.

- Review demographic and growth forecasts provided by Southern California Association of Governments (SCAG) Region Wide Forecast estimates.
- Concern with increased housing in Triunfo area; issue has gotten worse and County has not addressed.
- Commenter states new regulations should address hillside development, population, noise and traffic.

KEY FINDINGS

- The proposed North Area Plan would limit development of new housing and increase designation of lands to open space.
- The proposed Plan and CSD Update would be consistent with Year 2035 General Plan (GP) current and projected population and housing unit estimates.
- Proposed policies and development standards would result in less than significant population and housing impacts because policies and standards encourage no net increase in development and would not cause significant growth.

C.12.1 Environmental Setting

North Area

To determine potential impacts on population and housing, this analysis uses the existing and projection estimates identified in the County General Plan. Table C.12-1 presents both the existing and projected population and housing estimates from the County General Plan. The projection data represents estimates through the buildout year of 2035.

Population

Table C.12-1 summarizes the current and forecasted population for the Santa Monica Mountains Planning Area, which includes the North Area and a population projection for the

Table C.12-1. Population and Housing Units		
Santa Monica Mountains Planning Area ¹		North Area
GP Existing (2013)	GP 2035 Projection	GP 2035 Projection
Population		
21,757	26,128	9,399
Housing Units		
5,703	6,788	2,441

Source: County of Los Angeles, 2014.

¹ Santa Monica Mountains Planning Area includes both the North Area and the coastal portion of the County.

North Area. The County General Plan identified a population projection of 26,128 for the Santa Monica Mountains Planning Area and population projection at 9,399 persons for the North Area in 2035.

Housing

Table C.12-1 summarizes the current and forecasted housing units for the Santa Monica Mountains Planning Area and a projection of housing units for the North Area. The County General Plan identified a housing unit projection of 6,788 for the Santa Monica Mountains Planning Area and a housing unit projection of 2,441 for the North Area in 2035.

C.12.2 Regulatory Setting

Los Angeles County Housing Element

The Housing Element is one of seven mandatory elements of the County's General Plan. The Housing Element provides an overview of demographics, household, housing stock, economic, and regulatory factors affecting housing development and affordability within Los Angeles County. The Housing Element sets forth a series of goals and implementing policies to address a variety of housing issues, including identifying vacant and underutilized sites to accommodate the County's Regional Housing Needs Allocation (RHNA). The RHNA is a state-mandated number of units by income category for which a jurisdiction must identify adequate development potential. The Los Angeles County Housing Element, 2014–2021, identifies adequate sites. It was adopted by the County Board of Supervisors and certified by the California Department of Housing and Community Development on May 1, 2014. The Housing Element will guide housing development through 2021. This time frame applies to all housing elements in the SCAG region.

The following Los Angeles County General Plan policies and implementation programs are relevant to potential population and housing impacts:

Housing Element

- *Policy 1.1: Make available through land use planning and zoning an adequate inventory of vacant and underutilized sites to accommodate the County's Regional Housing Needs Assessment (RHNA) allocation.*
- *Policy 2.2: Encourage mixed use developments along major commercial and transportation corridors.*
- *Policy 3.1: Promote mixed income neighborhoods and a diversity of housing types throughout the unincorporated areas to increase housing choices for all economic segments of the population.*
- *Policy 6.2: Allocate federal and state resources toward the preservation of housing, particularly for low income households, near employment and transit.*

Land Use Element

- *Policy LU 5.1: Encourage a mix of residential land use designations and development regulations that accommodate various densities, building types and styles.*
- *Policy LU 5.10: Encourage employment opportunities and housing to be developed in proximity to one another.*

Regional Growth Management Policies: SCAG

SCAG is recognized by the state and federal governments as the regional planning agency for the six-county south coast region that includes Los Angeles County. The Regional Growth Forecast is used as a key guide for developing regional plans and strategies mandated by federal and state governments such as the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), the Program Environ-

mental Impact Report (PEIR) for the RTP/SCS, the Air Quality Management Plan (AQMP), the Federal Transportation Improvement Program (FTIP) and the Regional Housing Needs Assessment (RHNA). The Growth Forecast Appendix to 2016-2040 RTP/SCS is intended to provide more details on the development of the regional growth forecasts for 2016-2040 RTP/SCS (SCAG, 2015). Detailed growth forecasts by city and county are also provided within the RTP. SCAG RTP 2012 growth forecasts were utilized within the 2014 County of Los Angeles General Plan Housing Element.

C.12.3 Thresholds of Significance and Methodology

The analysis presented within this section assesses if the proposed Plan and CSD Update could significantly affect forecasts of the 2014 General Plan. Additionally, per Appendix G of the CEQA Guidelines, a project would have a significant effect on the environment if the project would:

- Induce substantial 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).
- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere or displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

C.12.4 Environmental Impacts and Mitigation Measures

Impact PH-1: The proposed North Area Plan and CSD Update could directly result in population growth in the North Area. (Less than Significant Impact)

The proposed North Area Plan and CSD Update does not estimate population growth, directly contribute to population growth, or directly contribute to the development of new or increased densities of housing or commercial development. Chapter 4 (Land Use Element) of the proposed North Area Plan directs the general location, type, character, and degree of future development within the North Area by integrating environmental resource management, public health and safety goals, and quality-of-life issues. The General Plan policies noted above and the proposed North Area Plan Update policies (see Attachment C.12 at the end of this section) would guide new residential or commercial development to be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it, or where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on natural resources. Future development complying with this policy would ensure that future growth within the planning area over a long period of time is consistent with population projections and does not constitute a significant adverse environmental impact.

The development standards of the proposed CSD Update would support these policies. Some of the standards presented in Section 22.336.060 (Community-Wide Development Standards) are summarized below.

- Biological resources standards would direct development away from sensitive biological resources and would limit maximum allowable building site area to 15,000 square feet based on parcel size.
- Scenic Resources standards would restrict development in areas with significant ridgelines and where significant grading would be required.
- Transfer of Development Credit Program would require retirement of lots meeting specific criteria for each legally created lot. The intent is to have no net increase in development. All land division applica-

tions would be required to participate in this program; the program recognizes that full buildout in the North Area would put unnecessary demands on available services and impact natural resources.

The proposed CSD standards would allow for controlled population and housing growth while protecting the unique resources of the North Area. These proposed standards would direct housing development to areas with available public services and buildable lots while furthering the goal of preserving the rural character of the North Area. The proposed standards would not significantly increase or decrease housing stock and instead attempt to keep the housing stock at a consistent level consistent with available public services and near existing developed areas.

The proposed North Area Plan includes land use policies that direct development to existing developed areas. In addition, the update includes the change in land use and zoning for properties currently used as open space (to retain as open space or recreation), which would limit development on these properties. Therefore, the North Area Plan goals and policies comply with the General Plan policies, while seeking to maintain a balance of jobs and housing. The jobs-housing balance is a general tool for analyzing where people work, where they live, and how efficiently they can travel between the two. The proposed North Area Plan would establish a balance between the natural and manufactured environments. This balance would be achieved through directing development into the most appropriate locations under conditions that protect the area's natural environment. The policies and standards in the proposed Plan and CSD Update would continue to ensure that housing is developed to maintain the rural character of the North Area. The intent would be to increase employment opportunities within the area but encourage greater housing growth within the developed areas adjacent to the North Area, leaving the planning area and Santa Monica Mountains landscape intact. This would help maintain an appropriate balance between population and housing.

The Woolsey Fire changed the landscape of the North Area by reducing the number of structures. The proposed CSD update includes measures that facilitate temporary housing for residents affected by a disaster and provides a set process for receiving approval for rebuilding of residential structures (Section 22.336.070 Community-Wide Standards). While some of these structures are in the process of being rebuilt, implementation of the proposed Plan and CSD Update would not impact or cause growth to be in conflict with the County General Plan. Measures such as the Transfer of Development Credit Program would require no net increase in buildable lots in the North Area. Therefore, less than significant impacts are anticipated.

Impact PH-2: Implementation of the proposed North Area Plan and CSD Update could not result in the displacement of people and/or housing. (No Impact)

The North Area is developed with a variety of land uses including residential, commercial, and open space. The proposed Plan and CSD Update would allow existing uses to continue even where new zoning and land use designations are proposed to be changed under the proposed Plan and CSD Update. Some housing is being rebuilt after having been destroyed by the Woolsey Fire, as noted above. None of the existing uses would be forced to be removed or relocated as a result of proposed North Area Plan or CSD implementation. Compliance with the proposed Plan and CSD Update would facilitate land use planning of the North Area consistent with General Plan goals and policies. Therefore, implementation of the proposed Plan and CSD Update would not displace people or housing and no significant impacts would occur.

C.12.5 Cumulative Impact Analysis

The cumulative projects identified in Table C.1-1 would have the potential to result in a significant cumulative impact if, directly or indirectly, the projects induce substantial population growth in excess of the

planned growth for the North Area. As shown in Table C.1-1, only cumulative projects 1 and 19 include residential development within, or in close proximity to, the North Area. All other projects are commercial or infrastructure. Each of the projects listed in Table C.1-1 require analysis under CEQA and discretionary approval by the County or respective city. These approvals must show compliance with projected population in long-range plans or the projects would not be approved without a plan amendment. Future development in the North Area and surrounding areas would be subject to goals, policies, and development standards within adopted long-range plans and zoning ordinances. As such, implementation of the proposed Plan and CSD Update in combination with the cumulative projects would not significantly impact population and housing in the North Area; cumulative population and housing impacts would be less than significant.

C.12.6 Level of Significance After Mitigation

No significant adverse impacts related to population and housing have been identified and, therefore, no mitigation measures are necessary. Cumulative population and housing impacts would be less than significant.

Attachment C.12

Population and Housing Policies and Standards

(Appendix 1 includes all policies and standards)

Proposed North Area Plan Update

Land Use Element

- **Policy LU-10:** Require that the extension of water, sewer, or utility infrastructure to serve development be located within legally existing roadways and road rights-of-way in a manner that avoids adverse impacts to natural resources to the maximum extent feasible. Such infrastructure shall be sized and otherwise designed to provide only for the approved development to avoid growth-inducing impacts.
- **Policy LU-11:** Permit land divisions outside existing developed areas only in areas with adequate public services, where they will not have significant adverse effects, either individually or cumulatively, on natural resources, and will not create parcels that would be smaller than the average size of surrounding parcels.
- **Policy LU-12:** Cluster development in land divisions, including building pads, if any, in order to minimize site disturbance, landform alteration, and removal of native vegetation, to minimize required fuel modification, and to maximize open space.
- **Policy LU-13:** Subsequent development on a parcel created through a land division shall conform to all provisions of the approved land division permit, including, but not limited to, the building site location, access road/driveway design, and grading design and volumes.
- **Policy LU-14:** Implement a Transfer of Development Credits (TDC) program that ensures that the individual and cumulative impacts of creating new lots within the Santa Monica Mountains North Area are minimized and mitigated through the retirement of an equivalent number of development credits from existing lots that meet the qualification criteria of the program.
- **Policy LU-15:** Identify Transfer of Development Credits sending areas within the Santa Monica Mountains North Area that contain high-priority biological resources, rural, scenic and agricultural resource areas, and Very High Fire Hazard Severity Zones (VHFHSZ). Identify potential Transfer of Development Credits receiving areas county-wide, such as Transit Oriented Developments, infill sites, vacant parcels, and underutilized sites in urban areas that promote sustainable development and climate change-related risk reduction.

Proposed Community Standards District Update

Section 22.336.060 Biological Resource Standards

- A. Biological Resources
 - A.4.i Maximum Building Site Area

Section 22.336.070 Community-Wide Development Standards

- O. Rebuilding after a Disaster
- R. Scenic Resource Areas
- W. Transfer of Development Credit Program

C.13 Public Services, Utilities, and Service Systems

This section describes effects on existing public services, utilities, and service systems that would be caused by implementing the policies in the Santa Monica Mountains North Area Plan and the development standards proposed in the Community Standards District (Plan and CSD) Update. The following discussion addresses existing environmental conditions in the affected area, identifies and analyzes environmental impacts for the proposed Plan and CSD Update, and as applicable recommends measures to reduce or avoid anticipated adverse impacts. In addition, existing laws and regulations relevant to existing public services, utilities, and service systems are described. In some cases, compliance with these existing laws and regulations would serve to reduce or avoid certain impacts that would otherwise occur.

Scoping Comments Received. During the scoping period for the EIR, written and verbal comments were received from agencies, organizations, and the public. These comments identified various substantive issues and concerns relevant to the EIR analysis for public services, utilities, and service systems. The issues below summarize these comments. Appendix 2 includes all comments received during the scoping comment period.

- On-site wastewater treatment regulation to encourage existing systems over new systems.
- Request Los Angeles County create formula to apply to new development that determines the initial and long-term maintenance costs to infrastructure.
- Protections for Malibu Canyon.
- Safety concerns – dance pavilions, fire lanes getting blocked, gang violence in the North Area.
- Concern with how large projects proposed in neighboring areas (e.g. City of Agoura Hills) will affect residents in the North Area.

KEY FINDINGS

- North Area includes established public services, utilities and service systems to address current and projected demand.
- Proposed Plan and CSD Update would not directly impact demand for these services and would not cause an increase in projected growth that could lead to potential impacts.
- Plan policies and CSD standards along with existing federal and state regulations would reduce potential for impacts to public services, utilities and service systems.

C.13.1 Environmental Setting

For the purposes of this analysis, the study area is defined as the North Area of the Santa Monica Mountains, approximately 32.3 square miles of unincorporated western Los Angeles County lands from the 101-freeway corridor south to the Coastal Zone boundary. The study area is bounded by local cities in Los Angeles County to the north, the City of Los Angeles to the east, Ventura County and the City of Westlake to the west, and the Santa Monica Mountains Coastal Zone and City of Malibu to the south. Figure B-1 in Section B includes the North Area boundary or proposed project area.

Public Services

Law Enforcement

Law enforcement services within the study area are primarily provided by the Los Angeles County Sheriff's Department (LASD), the largest sheriff's department in the nation. The LASD consists of 10 separate divisions, which cover approximately 4,084 square miles and a population of almost 10 million people

(LASD, 2018). The study area is served by the North Patrol Division, primarily out of the Malibu/Lost Hills Station, located at 27050 Agoura Road. The Malibu/Lost Hills Station is the primary facility serving the cities of Agoura Hills, Calabasas, Hidden Hills, Malibu, and Westlake Village as well as the unincorporated areas of Los Angeles County (including Chatsworth Lake Manor, Malibou Lake, Topanga, and West Hills) within the study area. According to the Los Angeles County Sheriff's Department, the Malibu/Lost Hills Station covers approximately 178.87 square miles and a population of 91,081 using a staff of 124 sworn officers, and 31 professional staff (LASD, 2017). According to the proposed North Area Plan Update, the average LASD response time to emergency incidents in the study area ranges from five to seven minutes, with the response times in parklands depending on remoteness (see Appendix 1). The California Highway Patrol (CHP) is responsible for providing traffic safety and service on the highways and freeways within unincorporated Los Angeles County. CHP also provides assistance to LASD when requested.

Fire Prevention and Suppression

Fire prevention and suppression services within the study area are primarily provided by the County of Los Angeles Fire Department (LACoFD). The LACoFD's 4,670 personnel provide fire protection services to 4,087,714 residents spread across 59 cities and all unincorporated communities in a 2,306 square mile service area (LACoFD, 2017). The LACoFD is divided into 9 separate divisions based on geographic region, with Division VII providing fire prevention and suppression services within the study area. LACoFD Station #65 is located within and provides support to the North Area, and nine other fire stations provide fire prevention services within approximately 2 miles of the North Area boundary (see Table C.13-1).

Table C.13-1. Los Angeles County Fire Stations

Los Angeles County Fire Station	City	Approx. Distance to SMMNAP (miles)
Within the North Area		
County Fire Station #65, Agoura	Agoura	0
Within Approximately 2 miles of the North Area Boundary		
County Fire Station #89, Agoura Hills	Agoura Hills	0.75
County Fire Station #125, Calabasas	Calabasas	0.01
County Fire Station #67, Calabasas	Calabasas	2.03
County Fire Station #68, Calabasas	Calabasas	0.10
County Fire Station #72, Battalion 5, Malibu	Malibu	1.14
County Fire Station #69, Topanga	Topanga	1.89
County Fire Station #144, Westlake Village	Westlake Village	0.73
Los Angeles Fire Department - Station 105 - Woodland Hills	Woodland Hills	2.14
Los Angeles Fire Department - Station 84 - Woodland Hills	Woodland Hills	1.53

Source: LACoFD, 2017.

In addition to fire prevention and suppression, LACoFD is also the primary provider of paramedic, life-guard, and fire inspection services within the study area. LACoFD also provides specialized services such as hazardous materials control, air rescue helicopter, air ambulance helicopter, and fire suppression helicopters. Helicopter response to heavy trauma incidents is available when street congestion and/or other factors preclude timely response by ground-based units.

American Medical Response (AMR) is the primary provider of ambulance services. The Ventura County Fire Department and the City of Los Angeles provide mutual aid within the area. In addition, the California

Department of Forestry and Fire Protection (CalFire) provides fire crews for severe and widespread fire emergencies.

Large portions of the study area have been mapped by CalFire and the County of Los Angeles Fire Department (LACoFD) as a Very High Fire Hazard Severity Zone, which is the most severe classification.

Emergency Health Care

There are no hospitals or medical centers located within the study area. Four hospitals and medical centers are located within 5 miles of the North Area, and serve the study area: Kaiser Permanente Woodland Hills, West Hills Hospital and Medical Center, Providence Tarzana Medical Center, and Encino Hospital medical Center (Table C.13-2).

Table C.13-2. Hospitals and Medical Centers

Name	Description	City	Approx. Distance to SMMNAP (miles)
Encino Hospital Medical Center	The medical center provides health education, hospital services and volunteer opportunities for people who live in Los Angeles County.	Encino	4.82
Providence Tarzana Medical Center	The medical center provides hospital services for people of all ages in Los Angeles.	Tarzana	3.33
West Hills Hospital and Medical Center	The facility provides hospital services for people of all ages in Los Angeles County.	West Hills	3.14
Kaiser Permanente - Woodland Hills Medical Center	The Medical Centers provides 24 Hour Emergency Services, Bereavement Support Groups, Health Education and Safe Havens for Abandoned Newborns.	Woodland Hills	1.96

Source: LA County, 2016 (GIS – LMS Data).

Schools

The study area is primarily served by the Las Virgenes Unified School District (LVUSD), the Los Angeles Unified School District (LAUSD), and the Santa Monica-Malibu Unified School District (SMMUSD). The LVUSD encompasses the central portion of the North Area, as well as much of the unincorporated Coastal Zone. A small area in the eastern portion of the North Area is within LAUSD boundaries. The Santa Monica-Malibu Unified School District includes a small portion of the western North Area. Table C.13-3 identifies the schools within the study area, and nearby schools serving residents of the study area.

Table C.13-3. Schools

School	City	District/County	Type	Approx. Distance to North Area (miles)
Within the North Area				
Ilan Ramon Day School	Agoura	Religious, Coeducational, K-5	Private and charter schools	0
Mesivta of Greater Los Angeles	Calabasas	Religious, Boys Only, 9-12	Private and charter schools	0
Alice C. Stelle Middle School	Calabasas	Las Virgenes Unified	Public middle schools	0

Table C.13-3. Schools

School	City	District/County	Type	Approx. Distance to North Area (miles)
Within 1.5 Miles of the North Area Boundary				
Mariposa School of Global Education	Agoura	Las Virgenes Unified	Public elementary schools	1.14
Sumac Elementary School	Agoura	Las Virgenes Unified	Public elementary schools	1.14
Willow Elementary School	Agoura	Las Virgenes Unified	Public elementary schools	1.20
Agoura High School	Agoura	Las Virgenes Unified	Public high schools	0.74
Indian Hills Continuation High School	Agoura	Las Virgenes Unified	Public high schools	0.74
Lindero Canyon Middle School	Agoura	Las Virgenes Unified	Public middle schools	1.41
Born Learners School	Agoura Hills	Non-religious, Coeducational, Preschool-K	Private and charter schools	0.35
Buttercup Pre-School	Agoura Hills	Las Virgenes Unified – Preschool	Public elementary schools	1.80
Viewpoint School	Calabasas	Non-religious, Coeducational, K-12	Private and charter schools	0.47
Round Meadow Elementary School	Calabasas	Las Virgenes Unified	Public elementary schools	0.01
Lupin Hill Elementary School	Calabasas	Las Virgenes Unified	Public elementary schools	0.25
Bay Laurel Elementary School	Calabasas	Las Virgenes Unified	Public elementary schools	0.79
Calabasas High School	Calabasas	Las Virgenes Unified	Public high schools	0.68
Arthur E. Wright Middle School	Calabasas	Las Virgenes Unified	Public middle schools	0.43
Topanga Elementary School Charter	Topanga	Los Angeles Unified	Private and charter schools	1.32
The Alexandria Academy	Westlake Village	Non-religious, Coeducational, 2-12	Private and charter schools	1.11
Oaks Christian School	Westlake Village	Religious, Coeducational, 5-12	Private and charter schools	1.11
Saint Jude the Apostle	Westlake Village	Religious, Coeducational, K-8	Private and charter schools	0.76
White Oak Elementary School	Westlake Village	Las Virgenes Unified	Public elementary schools	0.76
El Camino Real Charter High School	Woodland Hills	Los Angeles Unified	Private and charter schools	0.74
Calabash Charter Academy	Woodland Hills	Los Angeles Unified	Private and charter schools	0.67

Table C.13-3. Schools

School	City	District/County	Type	Approx. Distance to North Area (miles)
Serrania Avenue Charter for Enriched Studies	Woodland Hills	Los Angeles Unified	Private and charter schools	1.32
Woodland Hills Elementary School Charter for Enriched Studies	Woodland Hills	Los Angeles Unified	Private and charter schools	0.80
Elements Montessori	Woodland Hills	Non-religious, Coeducational, K-4	Private and charter schools	0.96
Louisville High School	Woodland Hills	Religious, Girls Only, 9-12	Private and charter schools	0.13
Chaparral Elementary School	Woodland Hills	Las Virgenes Unified	Public elementary schools	0.12

Source: LA County, 2016 (GIS – LMS Data).

Parks

There are multiple parks located within or near the study area including more than 7,400 acres of major public open spaces, approximately 35 percent of the planning area. Multiple agencies provide and maintain parks and recreational facilities within the planning area, including the National Park Service, the California Department of Parks and Recreation, Santa Monica Mountains Conservancy, local cities, and private organizations such as the Mountains Restoration Trust. The County of Los Angeles Department of Parks and Recreation does not currently operate any local or regional park facilities within the study area.

Parks located within or adjacent to the study area include those listed below in Table C.13-4. Also, refer to discussion of recreational land uses in Section C.10, Land Use and Recreation.

Table C.13-4. Parks and Recreation Facilities within or adjacent to the North Area

Park	Agency
Agoura Hills Open Space	City of Agoura Hills
Arroyo Sequit - Little Sycamore	Mountains Recreation and Conservation Authority
Calabasas Highlands Open Space	Mountains Recreation and Conservation Authority
Calabasas Peak Open Space	Santa Monica Mountains Conservancy
Calamigos Ranch	Private
Cheesebro and Palo Comado Canyons	National Park Service
Circle X Ranch	National Park Service
Cold Creek - Secret Valley	Mountains Recreation and Conservation Authority
Fritz & Alma Meier Natural Use Area	Mountains Recreation and Conservation Authority
Hennesy Property	National Park Service
King Gillette Ranch	National Park Service / Mountains Recreation and Conservation Authority
La Sierra Canyon Wetlands	Mountains Restoration Trust
Las Virgenes View Park	Mountains Recreation and Conservation Authority

Table C.13-4. Parks and Recreation Facilities within or adjacent to the North Area

Park	Agency
Lebow	Mountains Recreation and Conservation Authority
Liberty Canyon Open Space	Mountains Recreation and Conservation Authority
Malibu Creek Properties	National Park Service
Malibu Creek State Park	California Department of Parks and Recreation / Mountains Recreation and Conservation Authority
MRCA Calabasas Open Space	Mountains Recreation and Conservation Authority
Mulholland Gateway Park	Santa Monica Mountains Conservancy / Mountains Recreation and Conservation Authority
Old Agoura Park	City of Agoura Hills
Palo Comado Canyon	National Park Service
Paramount Ranch	National Park Service
Peter Strauss Ranch	National Park Service
Red Rock Canyon Park	Santa Monica Mountains Conservancy
Rocky Oaks	National Park Service
Santa Monica Mountains Conservancy Open Space	Santa Monica Mountains Conservancy
Santa Monica Mountains National Recreation Area	National Park Service
Shea Open Space - Las Virgenes	National Park Service
Summit Valley Edmund D. Edelman Park	Santa Monica Mountains Conservancy / Mountains Recreation and Conservation Authority
Top of Topanga Overlook	Santa Monica Mountains Conservancy
Topanga Canyon-Canyon Oaks Open Space	Santa Monica Mountains Conservancy
Topanga State Park	California Department of Parks and Recreation
Truinfo Creek Park	Mountains Recreation and Conservation Authority
Various unnamed sites	Mountains Recreation and Conservation Authority
Various unnamed sites	Santa Monica Mountains Conservancy
Upper Las Virgenes Open Space Preserve / Ahmanson Ranch	Santa Monica Mountains Conservancy / Mountains Recreation and Conservation Authority
Westlake Village SMMC Open Space	Santa Monica Mountains Conservancy
Westlake Vista	Mountains Recreation and Conservation Authority
Zev Yaroslavsky Las Virgenes Highlands Park	Mountains Recreation and Conservation Authority
Mountains Restoration Trust Parkland	Mountains Restoration Trust
Liberty Canyon - Silver Rock	Mountains Recreation and Conservation Authority
Truinfo Canyon Open Space	Mountains Recreation and Conservation Authority
Upper Stokes	Mountains Recreation and Conservation Authority

Source: LA County, 2016 (GIS – LMS Data).

Library Services

The County of Los Angeles Public Library is one of the largest public library systems in the United States. The library system is a special fund County department operating under the direction of the County Board of Supervisors. In fiscal year 2017–2018, library staff circulated over 10.8 million items to 2.4 million cardholders; answered 5.9 million reference questions; provided 26,447 programs to over 619,000 children, teens, and adults; and assisted the public with over 2.1 million internet sessions on the library’s public access computers. Supplementing the 4.7 million volume book collection, the library also offers magazines, newspapers, microfilm, government publications, specialized reference materials, magazines, audio-visual media, adult, teen and children programs, downloadable audio and e-books, and internet access, including WiFi. (LA County, 2018)

While no libraries are located within the study area, the nearest County libraries that serve residents living in the study area include the Westlake Village Library, the Agoura Hills Library, the Malibu Library, and the Topanga Library (see Figure C.13-1).

Utilities and Service Systems

Various easements for public utilities and access roads are located throughout study area and the greater Santa Monica Mountains Region. These include, but are not limited to, power lines, telephone lines, cell phone towers, fiber optic cables, pipelines, and associated support facilities.

Electricity

Electrical service within the study area is provided by Southern California Edison (SCE). Total electricity consumption in SCE’s service area were 100,398 gigawatt-hours (GWH) per year in 2012, and consumption is forecast to increase to between 107,929 GWH (low-demand scenario) to 118,193 GWH (high-demand scenario) in 2024 (CEC, 2013). One GWH is equivalent to one million kilowatt-hours.

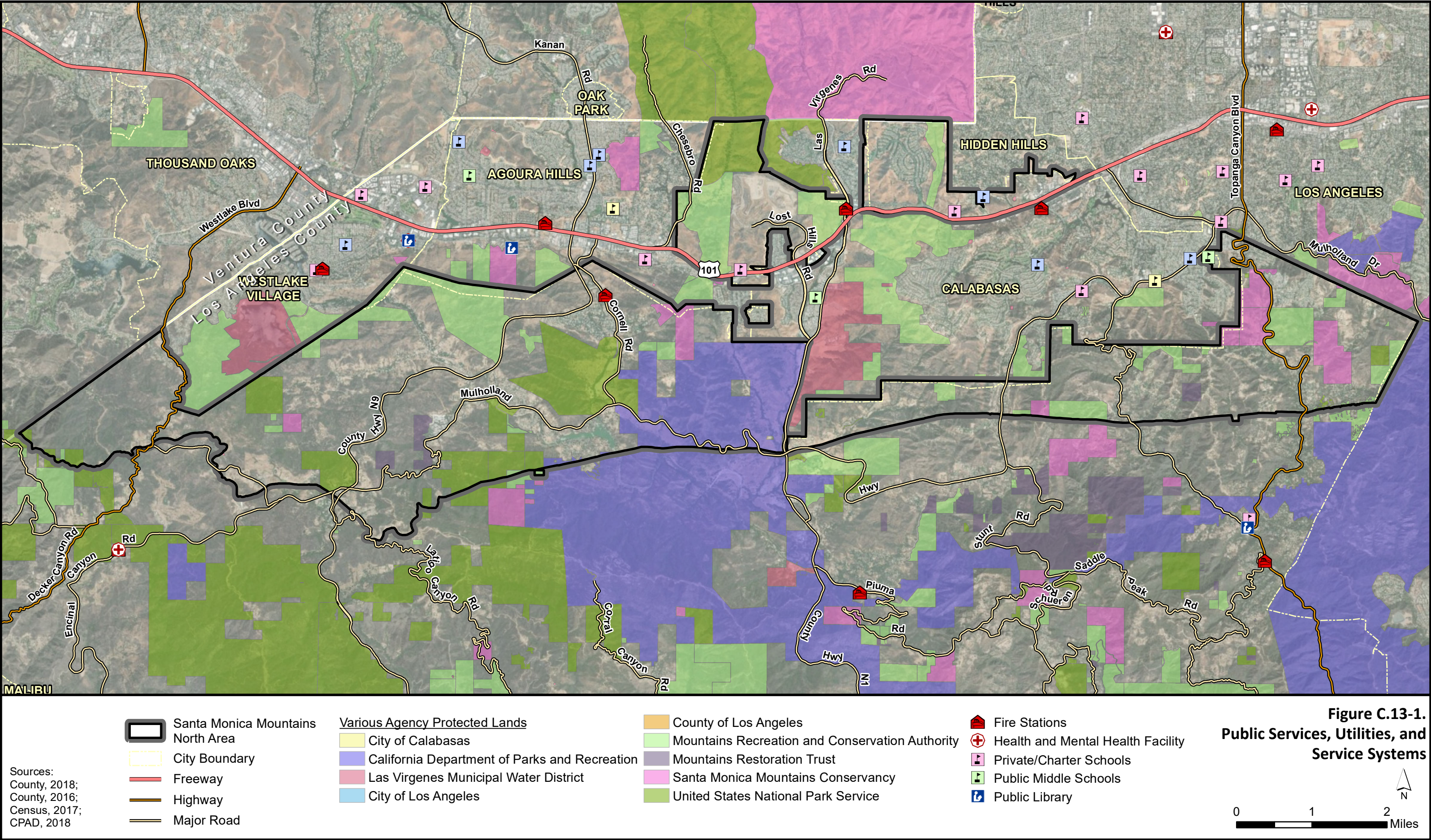
Natural Gas

Natural gas is provided to the study area through contracts with Southern California Gas (SoCalGas). SoCalGas projects total gas demand to decline annually at a rate of 0.74 percent, with residential demand declining at a rate of 1.4 percent from 2018 to 2035. The total projected decline is due to energy efficiency standards and programs, modest economic growth, renewable energy goals, decline in commercial and industrial demand, and conservation savings from Advanced Metering Infrastructure, while residential decline is mainly due to declining use per meter driven by aggressive energy efficiency goals. Declining use per meter offsets new meter growth in the SoCalGas Southern California service area. (SoCalGas, 2018)

Water Supply and Distribution Systems

The Las Virgenes Municipal Water District (LVMWD) is the primary supplier of potable and reclaimed water to the study area, with the exception of the area east of Old Topanga Canyon Road, which is served by the Los Angeles County Water Works District. Both potable and reclaimed water is distributed throughout the LVMWD by a network of underground water pipelines of varying size, with the central spine of the system roughly paralleling Highway 101. Wholesale water supply is provided to LVMWD through the allocation process by the Metropolitan Water District.

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As described in the Los Angeles County General Plan Update Draft EIR (County of Los Angeles, 2014), Integrated Regional Water Management (IRWM) is a collaborative effort to manage all aspects of water resources in a region. The study area is within the Greater Los Angeles County (GLAC) IRWM Region, North Santa Monica Bay Subregion. Table C.13-5 summarizes projected water supply and demand in the subregion and in the County as a whole, as presented in the Los Angeles County General Plan Update Draft EIR (County of Los Angeles, 2014).

Table C.13-5. Water Supply and Demand

Area	2015	2020	2025	2030	2035
North Santa Monica Bay Subregion Demand	42,218	39,701	40,771	44,427	42,782
Los Angeles County Total Demand	1,943,996	2,018,700	2,074,138	2,126,374	2,157,931
Los Angeles County Total Supplies	2,279,839	2,339,193	2,224,922	2,419,832	2,439,806
Residual Supplies	335,843	320,493	150,784	293,458	281,875

Source: County of Los Angeles, 2014.

Wastewater Treatment and Collection

In addition to providing the local water supply, the LVMWD is responsible for wastewater treatment and disposal services within the study area. Local feeders, maintained by the Los Angeles Consolidated Sewer Maintenance District, connect to LVMWD's main trunk lines. Wastewater is mainly gravity fed through LVMWD trunk lines to the Tapia Water Reclamation Facility, located at the base of the Malibu Creek Watershed, where the sewage receives tertiary treatment. While the majority of the study area is connected to sewers, septic systems serve most of the rural hillside areas. Historically, development within the hillside areas has been largely scattered, thus requiring the use of septic systems as a practical matter.

Solid Waste Management

Solid waste collection and hauling services within the study area are provided by private operators, such as Waste Management. All nonhazardous waste collected in the Calabasas Landfill Wasteshed can be disposed in the Calabasas Landfill. The landfill, which began operating in 1961, is owned by the County of Los Angeles and operated by the Sanitation Districts of Los Angeles County under a joint powers agreement. The landfill accepts waste from the Santa Monica Mountains area as well as Thousand Oaks and western portions of the City of Los Angeles including Brentwood, Encino, and Granada Hills. The landfill has sufficient permitted capacity to accommodate disposal in the North Area. The County has existing programs and facilities to process waste for recycling and for use in conversion technology (use of waste to convert to a beneficial product such as renewable energy or biofuel). These actions reduce the amount of solid waste that is sent to landfills (County of Los Angeles, 2020). Household Hazardous Waste within the study area is collected by the County of Los Angeles Department of Public Works, Environmental Programs Division.

Communication: Telephone, Mobile Phone, Cable, and Internet Services

A variety of telecommunications operators serve the study area, including but not limited to Spectrum (Charter Communications), Cox Communications, AT&T U-verse, and Verizon. As stated in the Los Angeles County General Plan Update Draft EIR, federal laws regulate the cable industry and while the County serves as the local franchise authority, it has no jurisdiction over the cost of service or channel lineup (County of Los Angeles, 2014).

C.13.2 Regulatory Setting

Federal

Clean Water Act

Wastewater treatment before effluent is discharged to Waters of the United States is required by the federal Clean Water Act (CWA), United States Code, Title 33, Sections 1251 et seq. The federal Clean Water Act is described in further detail in Sections C.4, Biological Resources, and C.9, Hydrology and Water Quality, of this EIR.

Safe Drinking Water Act

Passed in 1974 and amended in 1986 and 1996, the Safe Drinking Water Act (SDWA) gives the U.S. Environmental Protection Agency (USEPA) the authority to set drinking water standards. Drinking water standards apply to public water systems, which provide water for human consumption through at least 15 service connections, or regularly serve at least 25 individuals. There are two categories of drinking water standards, the National Primary Drinking Water Regulations (NPDWR) and the National Secondary Drinking Water Regulations (NSDWR). The NPDWR are legally enforceable standards that apply to public water systems. NPDWR standards protect drinking water quality by limiting the levels of specific contaminants that can adversely affect public health and are known or anticipated to occur in water.

State

California Health and Safety Code (Section 13000 et seq.)

State fire regulations are set forth in Section 13000 et seq. of the California Health and Safety Code, which include regulations concerning building standards (as also set forth in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and child care facility standards, and fire suppression training. The State Fire Marshal enforces these regulations and building standards in all State-owned buildings, State-occupied buildings, and State institutions throughout California.

California Code of Regulations (CCR) Title 24, Part 2 and Part 9

Part 2 of Title 24 of the CCR refers to the California Building Code, which contains complete regulations and general construction building standards of state adopting agencies, including administrative, fire and life safety, and field inspection provisions. Part 2 was updated in 2008 to reflect changes in the base document from the Uniform Building Code to the International Building Code. Part 9 refers to the California Fire Code, which contains fire-safety-related building standards referenced in other parts of Title 24. This Code is preassembled with the 2000 Uniform Fire Code of the Western Fire Chiefs Association. This Code was revised in January 2008 with a change in the base model/consensus code from the Uniform Fire Code series to the International Fire Code.

CCR Title 24, Part 6: Energy Efficiency Standards for Buildings

Title 24, Part 6, of the California Code of Regulations contains the CEC's Energy Efficiency Standards for Residential and Nonresidential Buildings. Title 24 was first established in 1978, in response to a legislative mandate to reduce California's energy consumption. Since that time, Title 24 has been updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods.

Title 20, California Code of Regulations, Sections 1601 et seq: Appliance Efficiency Regulations

The 2012 Appliance Efficiency Regulations (Title 20, CCR Sections 1601 through 1608) took effect February 13, 2013. The regulations include standards for both federally regulated appliances and non-federally regulated appliances.

California Public Resources Code (PRC) Sections 4201-4204

This section of the PRC was amended in 1982 to require the California Department of Forestry to classify all State Responsibility Areas (SRAs) into fire hazard severity zones. The purpose of this code is to provide classification of lands within SRAs in accordance with the severity of fire hazard present for the purpose of identifying measures to be used to retard the rate of spreading and to reduce the potential intensity of uncontrolled fires that threaten to destroy resources, life, or property. State Responsibility Area (SRA) Fire Safe Regulations (Title 14 Natural Resources, Department of Forestry and Fire Protection) constitute the basic wildland fire protection standards of the California Board of Forestry. They have been prepared and adopted for the purpose of establishing minimum wildfire protection standards in conjunction with building, construction, and development in SRAs. Title 14 mandates that the future design and construction of structures, subdivisions, and developments in an SRA provide for basic emergency access and perimeter wildfire protection measures.

Senate Bill 50

Senate Bill 50 ("SB 50," also known as Proposition 1A, codified in California Government Code Section 65995 et seq.) was enacted in 1988 to address how schools are financed and how development projects may be assessed for associated school impacts. SB 50 sets forth the "exclusive methods of considering and mitigating impacts on school facilities" resulting from any state or local planning and/or development project, regardless of whether its character is legislative, adjudicative, or both. (Govt. Code § 65996[a]). Section 65995 provides that "[t]he payment or satisfaction of a fee, charge, or other requirement levied or imposed pursuant to Section 17620 of the Education Code in the amount specified in Section 65995 ... are hereby deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving but not limited to, the planning, use, or development of real property, or any change in governmental organization... on the provision of adequate school facilities." (Govt. Code § 65995[h]). The reference in Section 65995(h) to fees "imposed pursuant to Section 17620 of the Education Code in the amount specified in Section 65995" is a reference to per-square-foot school fees that can be imposed by school districts on new residential, commercial, and industrial construction.

Porter-Cologne Water Quality Control Act

The 1969 Porter-Cologne Water Quality Control Act, codified in the California Water Code, authorizes the State Water Resources Control Board (SWRCB) to implement programs to control polluted discharges into State waters. This law essentially implements the requirements of the CWA. Pursuant to this law, the local Regional Water Quality Control Board (RWQCB) is required to establish the wastewater concentrations of a number of specific hazardous substances in treated wastewater discharge. The Porter-Cologne Water Quality Control Act is discussed further in Sections C.4, Biological Resources, and C.9, Hydrology and Water Quality, of this EIR.

Urban Water Management Planning Act

The Urban Water Management Planning Act of 1983, California Water Code Sections 10610 et seq., requires preparation of a plan that:

- Plans for water supply and assesses reliability of each source of water, over a 20-year period, in 5-year increments.
- Identifies and quantifies adequate water supplies, including recycled water, for existing and future demands, in normal, single-dry, and multiple-dry years.
- Implements conservation and the efficient use of urban water supplies. Significant new requirements for quantified demand reductions have been added by the Water Conservation Act of 2009 (Senate Bill 7 of Special Extended Session 7 (SBX7-7)), which amends the act and adds new water conservation provisions to the Water Code.

20x2020 Water Conservation Plan

The 20x2020 Water Conservation Plan, issued by the Department of Water Resources (DWR) in 2010 pursuant to SBX7-7, established a water conservation target of 20 percent reduction in water use by 2020 compared to 2005 baseline use (DWR, 2018).

Senate Bills 610 and 221: Water Supply Assessments

To assist water suppliers, cities, and counties in integrating water and land use planning, the State passed Senate Bill (SB) 610 (Chapter 643, Statutes of 2001) and SB 221 (Chapter 642, Statutes of 2001), effective January 1, 2002. SB 610 and SB 221 improve the link between information of water-supply availability and certain land use decisions made by cities and counties. SB 610 and SB 221 are companion measures that promote more collaborative planning between local water suppliers and cities and counties. Both statutes require detailed information regarding water availability to be provided to local jurisdiction decision makers prior to approval of specified large development projects. This detailed information must be included in the administrative record as the evidentiary basis for an approval action by an agency. The statutes recognize local control and decision making regarding the availability of water for projects and the approval of projects. Under SB 610, water supply assessments (WSA) must be furnished to local governments for inclusion in any environmental documentation for certain projects subject to CEQA, as defined in Water Code Section 10912[a]. Under SB 221, approval by a city or county of certain residential subdivisions requires an affirmative verification of sufficient water supply. SB 221 ensures collaboration on finding needed water supplies to serve new large subdivisions before construction begins.

California Water Code Sections 10610 et seq.: Urban Water Management Planning Act

The Urban Water Management Planning Act states that every urban water supplier that provides water to 3,000 or more customers or provides over 3,000 acre-feet (af) of water annually should make every effort to ensure the appropriate level of reliability in its water service to meet the needs of its various categories of customers during normal, dry, and multiple dry years. Both SB 610 and SB 221 identify the urban water management plan (UWMP) as a planning document that can be used by a water supplier to meet the standards in both statutes. Thorough and complete UWMPs are foundations for water suppliers to fulfill the specific requirements of these two statutes, and they are important source documents for cities and counties as they update their general plans. Conversely, general plans are source documents as water suppliers update the UWMPs. These planning documents are linked, and their accuracy and usefulness are interdependent (DWR, 2018).

Assembly Bill 939: Integrated Solid Waste Management Act of 1989

Assembly Bill 939 (Integrated Solid Waste Management Act of 1989; Public Resources Code 40050 et seq.) established an integrated waste-management system that focused on source reduction, recycling, composting, and land disposal of waste. AB 939 required every California city and county to divert 50

percent of its waste from landfills by the year 2000. Compliance with AB 939 is measured in part by comparing solid waste disposal rates for a jurisdiction with target disposal rates. Actual rates at or below target rates are consistent with AB 939. AB 939 also requires California counties to show 15 years of disposal capacity for all jurisdictions in the county or show a plan to transform or divert its waste.

Assembly Bill 341 (2011)

Assembly Bill 341 (Chapter 476, Statutes of 2011) increased the statewide solid waste diversion goal to 75 percent by 2020. The law also mandates recycling for commercial and multifamily residential land uses as well as schools and school districts.

2013 California Green Building Standards Code

Section 5.408 of the 2013 California Green Building Standards Code (Title 24, California Code of Regulations, Part 11) requires that at least 50 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse.

Assembly Bill 1890 (1996)

The California Public Utilities Commission (CPUC) regulates investor-owned electric power and natural gas utility companies in the State of California. Assembly Bill 1890, enacted in 1996, deregulated the power generation industry, allowing customers to purchase electricity on the open market. Under deregulation, the production and distribution of power that was under the control of investor-owned utilities (e.g., Southern California Edison) was decoupled. All new construction in the State of California is subject to the energy conservation standards set forth in Title 24, Part 6, Article 2 of the California Administrative Code. These are prescriptive standards that establish maximum energy consumption levels for the heating and cooling of new buildings. The utilization of alternative energy applications in development projects, while encouraged, is not required as a condition of approval. Such applications may include installation of photovoltaic solar panels, active solar water heating systems, or integrated pool deck water heating systems, all of which serve to displace consumption of conventional energy sources (i.e., electricity and natural gas). Incentives, primarily in the form of state and federal tax credits, as well as reduced energy bills, provide a favorable basis.

Assembly Bill 1826 (2014)

Assembly Bill 1826 (2014) requires certain businesses to set up recycling services for recyclables and organic waste. These laws also require the County to implement a commercial solid waste recycling program and an organic waste recycling program that is designed specifically to divert commercial solid waste and organic waste generated by businesses. Failure to comply may subject the city or county to fines of up to \$10,000 per day.

California Public Utilities Commission

CPUC General Order 112E, which is based on the Federal Department of Transportation Guidelines contained in Part 192 of the Federal Code of Regulations, specifies a variety of design, construction, inspection and notification requirements. The CPUC conducts annual audits of pipeline operations to ensure compliance with these safety standards. In addition, safety programs are in place in companies such as SoCal Gas that reduce the risk of gas distribution fires by improving welds on the larger diameter (24- to 30-inch) pipelines and replacing old distribution pipes with flexible plastic pipes. According to SoCal Gas, high-pressure gas mains are common in developed areas throughout the country, and gas lines are inspected regularly and must comply with CPUC mandated safety requirements (SoCalGas, 2018).

California Energy Commission

The California Energy Commission (CEC) was created as the State's principal energy planning organization in 1974, in order to meet the energy challenges facing the state in response to the 1973 oil embargo. The CEC is charged with six basic responsibilities when designing state energy policy:

- Forecasting statewide electricity needs;
- Licensing power plants to meet those needs;
- Promoting energy conservation and efficiency measures;
- Developing renewable energy resources and alternative energy technologies;
- Promoting research, development and demonstration; and
- Planning for and directing state response to energy emergencies.

Local

County of Los Angeles Fire Department (LACoFD)

County programs for wildland fire prevention include the adoption of the State Fire Code for regulations and standards to be applied toward new development in "hazardous fire areas." Fire prevention items addressed in the County Fire Code include provision of fire apparatus access roads, adequate road widths, all-weather access requirement, fire flow requirement, fire hydrant spacing, and clearance of brush around structures located in hillside areas that are considered primary wildland fire risk areas. For areas located within the Very High Fire Hazard Severity Zone (VHFHSZ), County Fire Code Sections 325.2.1.2, 328.10, 1117.2.1, and 4908.1 require completion and approval of a land development plan and fuel modification plan. Appendices B and C of the County Fire Code specify that for single-family dwellings located on a lot of one acre or more in a VHFHSZ, the minimum fire flow must be 1,000 gallons per minute for a duration of two hours, and hydrants must be spaced not more than 600 feet apart and serviced from a public water system. The LACoFD Fuel Modification Unit provides guidelines on creating a defensible space for effective fire protection in newly constructed and/or remodeled homes. Fuel modification zones are strategically placed strips of land where combustible native or ornamental vegetation has been modified or replaced with drought-tolerant, low-fuel-volume plants, creating a buffer to areas of natural vegetation surrounding the perimeter of a single-family dwelling. A fuel modification plan identifies specific zones within a property, which are subject to fuel modification. Plans vary in complexity, and fuel modification distances are estimated based on the fire history, the amount and type of vegetation, the arrangement of the fuels, topography, local weather patterns, and construction, design and placement of structures. The plan must also include an irrigation plan, a landscape plan, zone delineation for setbacks, irrigation, and thinning, and the identification of responsible parties for the plan's installation and maintenance.

Developer Fees

In response to increasing demands for new facilities, equipment, and staffing created by new development, the County has implemented a Developer Fee Program to fund the purchase of fire station sites, the construction of new stations, and the funding of certain capital equipment in the high-growth areas of Los Angeles County. The developer fees, which are currently \$0.9705 per square foot of new development in the Malibu/Santa Monica Mountains Area, are paid to the Consolidated Fire Protection District of Los Angeles County (Fire District) (LACoFD, 2019). This Fire District developer fee is adjusted annually and is charged on all new development, including residential buildings, new detached residential accessory structures, new commercial buildings, and new additions over 2,000 square feet prior to building permit issuance.

Library Facilities Mitigation Fees

Under Section 22.246.060 of the County's Zoning Code, the County applies a library facilities mitigation fee to new residential developments in the unincorporated areas. This fee is intended to mitigate the significant adverse impacts of increased residential development on the Library system. The library facilities mitigation fee is based on the estimated cost of providing the projected library facility needs in each library planning area. The study area is within Planning Area 7, Santa Monica Mountains, and the current fee is \$912 per dwelling unit.

The mitigation fee in each planning area is reviewed annually by the County Librarian, in consultation with the County Auditor-Controller, and is adjusted every July 1. According to the Zoning Code, no adjustment shall increase or decrease the fee to an amount more or less than the amount necessary to recover the cost of providing applicable library facilities and services.

The provisions of the Library Facilities Mitigation Fee Ordinance are applicable to residential projects only. All library facility mitigation fees received by the County are deposited into a special library capital facilities fund (one for each library planning area) and expended solely for the purposes for which the fees were collected.

Green Building Program

In 2008, Los Angeles County adopted the Green Building Program, which included the Drought-Tolerant Landscaping, Green Building, and Low Impact Development Ordinances (the Ordinances), and created an Implementation Task Force and Technical Manual. In November 2013, in response to the mandates set forth in CALGreen (2010 California Green Building Standards Code), the Board of Supervisors adopted the Los Angeles County Green Building Standards Code (Title 31). The County recently adopted the Green Building Standards, which follow the 2019 California Green Building Standards Code (Title 31).

Construction and Demolition Debris Recycling and Reuse Ordinance

The County Board of Supervisors adopted the Construction and Demolition Debris Recycling and Reuse Ordinance on January 4, 2005. The Ordinance added Chapter 20.87 to the Los Angeles County Code, which requires projects in the unincorporated areas to recycle or reuse debris. Its purpose is to increase the diversion of construction and demolition debris from disposal facilities and will assist the County in meeting the State of California's waste reduction mandate.

Construction, demolition, and grading projects in the unincorporated County areas are required to recycle or reuse a minimum of 65 percent of the construction and demolition debris generated by weight per the Green Building Standards Code of the Los Angeles County Code. A Recycling and Reuse Plan must be submitted to and approved by Public Works, Environmental Programs Division, before a construction, demolition, or grading permit may be issued (County of Los Angeles, 2020).

Los Angeles Countywide Siting Element

The California Integrated Waste Management Act of 1989 (also known as AB 939), requires each county to prepare a countywide siting element that describes how the county and the cities within the county plan to manage the disposal of their solid waste for a 15-year planning period. In 1997, the County prepared the Los Angeles Countywide Siting Element (Siting Element) that estimates the amount of solid wastes generated in Los Angeles County and proposes various diversion and alternate disposal options. The Siting Elements is a long-term planning document that describes how the County and the cities within the County plan to manage the disposal of their solid waste for a 15-year planning period. The Siting

Element identifies Los Angeles County Public Works as the responsible agency to develop plans and strategies to manage and coordinate the solid waste generated in the unincorporated areas and to address the disposal needs of Los Angeles County. In addition, the Siting Element contains goals and policies on a variety of solid waste management issues. The County will continue to meet its disposal capacity needs by implementing enhanced waste reduction and diversion programs and greater resource recovery efforts.

The Siting Element is currently being revised and updated. The updated draft Siting Element, which has not yet been adopted, describes each of the existing and planned solid waste disposal and management sites available for use by jurisdictions in Los Angeles County, and offers goals, policies, and strategies through which current and future solid waste management infrastructure needs can be met in a comprehensive and environmentally sustainable manner.

C.13.3 Thresholds of Significance and Methodology

Public Services

In accordance with Appendix G of the CEQA Guidelines, impacts to public services would be considered significant if development facilitated by the proposed Plan and CSD Update would:

- 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:
 - Fire protection,
 - Police protection,
 - Schools,
 - Parks, or
 - Other public facilities.

Utilities and Service Systems

In accordance with Appendix G of the CEQA Guidelines, impacts to utilities and service systems would be considered significant if development facilitated by the proposed Plan and CSD Update would:

- 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.
- Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.
- Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.
- 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.
- Conflict with federal, state, and local management and reduction statutes and regulations related to solid waste.

C.13.4 Environmental Impacts and Mitigation Measures

Impact PS-1: Implementation of the proposed North Area Plan and CSD Update would adversely impact the environment due to the provision or alteration of governmental facilities to maintain acceptable service ratios, response times, or other performance objectives. (Less than Significant Impact)

The proposed North Area Plan and CSD Update would not directly affect service ratios, response times, or other performance objectives of public services. However, future development would depend on the availability of public services in the North Area. Implementation of the proposed Plan and CSD Update would not adversely increase or change growth projections for the North Area, which would create a demand for more or new services. The Update is consistent with the growth projections analyzed in the County General Plan and would not directly or indirectly increase the demand on public services from the levels already analyzed and addressed in the General Plan.

As described in Section C.13.1, Environmental Setting, existing public services within the North Area include fire prevention and suppression, emergency health care, law enforcement, schools, parks, and library services. Most of these services are provided by their respective County of Los Angeles departments and districts, as well as private, state, and federal agencies. Future development within the North Area may incrementally increase demand on public services. However, these increases would occur gradually as normal growth and would not suddenly severely impact demand on public services. Each public service provider would comply with relevant policies regarding responding to normal growth within the North Area. The proposed Plan and CSD Update would encourage development that complies with laws, policies, programs, and regulations such as the California Health and Safety Code (Section 13000 et seq.); CCR Title 24, Part 2 and Part 9; PRC Sections 4201-4204; Senate Bill 50; the County Fire Code; a Developer Fee Program; and the library facilities mitigation fee. Compliance with these policies would improve funding for public services and in the long-term, address safety from natural disasters such as fires.

Emergency access in the North Area is difficult in some areas, with response times ranging between 15 to 20 minutes in areas like Topanga Canyon and up to 30 minutes in extremely remote locations. The Consolidated Fire Protection District (CFPD), part of the Los Angeles County Fire Department, plans to build a fire station between Calabasas Highlands and Old Topanga in the future. The CFPD supplements service with helicopter crews to reach extremely remote emergency incidents. Proposed North Area Plan policies PF-17 through PF-19 and PF-22 are proposed to ensure adequate emergency services that would reduce the need for expanded fire response services.

- **Policy PF-17:** *Require, where appropriate, on-site fire suppression systems for all new development to reduce the dependence on Fire Department equipment and personnel.*
- **Policy PF-18:** *Limit the length of private access roads to reduce the amount of time necessary for the Fire Department to reach residences and to minimize risks to firefighters.*
- **Policy PF-19:** *Require clearly visible address signs during the day and night for easy identification during emergencies.*
- **Policy PF- 22:** *Limit the exposure of first responders, residents, and structures to fire risk within Very High Fire Hazard Severity Zones (VHFHSZ) and in the Fire Hazard Severity Zones (FHSZs) of the wildland-urban interface.*

Section 22.336.070 (Community-Wide Development Standards) of the proposed CSD Update provides standards regarding helicopter infrastructure for emergency services. While all privately-owned heliports,

helistops, helipads, and landing strips are prohibited in the North Area, only publicly owned or operated helipads and helistops are allowed for emergency services. This proposed standard would allow for emergency helicopter facilities for public purposes and, therefore, would not impact the ability to provide emergency services.

In the event that fire hazards are exacerbated by protected tree species, emergency tree removals would be required to protect the public. Emergency tree removals would be conducted when a protected tree has been damaged or destroyed by natural disasters or disease and poses an immediate threat to public safety due to its proximity to an existing structure or access way. A licensed forester with the County Fire Department – Forestry Division would be responsible for determining the risk of danger from a particular tree. This standard (22.336.060, Biological Resource Standards) in the proposed CSD Update would provide additional protections from potential wildfire hazards by allowing for emergency removal of trees that pose a threat to infrastructure such as utility lines.

The Sheriff's average response time to emergency incidents in the area ranges from five to seven minutes, and longer for more remote locations, which pose challenges to law enforcement. Future development would be required to examine the potential increase in demand for police services in conjunction with subsequent environmental review. Proposed policies PF-23 to PF 25 would encourage continued coordination with the Sheriff's Department and CHP as part of the CEQA environmental review process; support programs such as Neighborhood Watch to eliminate crime; and support efforts to eliminate street racing activities.

- **Policy PF-23:** *Continue to consult and coordinate with the Sheriff's Department and CHP as part of the environmental review process for projects subject to CEQA.*
- **Policy PF-24:** *Support existing programs such as Neighborhood Watch and encourage expanded or new programs that focus on the elimination of crime, such as anti-graffiti programs.*
- **Policy PF-25:** *Support efforts to eliminate street racing activities, including the seizure and forfeiture of vehicles used in speed contests or in exhibitions of speed, to address the nuisance and unsafe conditions created by the use of vehicles in such activities.*

As described in C.13.1, schools in the North Area are within the following districts: LVUSD, LAUSD, or SMMUSD. School facilities may need to expand to accommodate projected population growth. Compliance with proposed Plan policies would ensure that public school facilities are adequate to meet projected growth. These policies require payment of mitigation impact fees, flexibility in mitigating impacts, and cooperation in joint use facilities such as schools/parks.

The proposed Plan and CSD Update proposes policies that would encourage adequate growth of public services to accommodate expected population growth in the North Area while also balancing the goal of minimizing environmental impacts. Development standards in the proposed CSD Update provide guidance on exceptions to development and protective measures if the actions benefit public safety. The proposed Plan and CSD Update would not directly cause environmental impacts to public services and indirect impacts of future development would be within expected growth projections.

Section 22.336.070 of the proposed CSD Update includes the development standards for the Transfer of Development Credit Program. The standards include lot retirements, qualifying criteria, and procedures for the application and retirement processes. This program would be applied to land division projects and would result in no net gain in the number of buildable lots. Because there would be no net increase in development, the proposed Plan and CSD Update would not adversely impact the environment due to the provision or alteration of governmental facilities and potential impacts would be less than significant.

Impact US-1: Implementation of the proposed North Area Plan and CSD Update would result in the relocation or construction of utilities such as water facilities, electricity, natural gas, and telecommunications, which could cause adverse environmental effects. (Less than Significant Impact)

The proposed Plan and CSD Update would not directly impact the relocation or construction of utilities. However, future development allowed by the proposed Plan and CSD Update may require relocation or construction of new utilities. Such development would typically include commercial, residential, and open space/recreation facilities that could be connected to existing utilities. Proposed policies and standards in the Plan and CSD Update would ensure that future development would be located within or near existing developed areas or other areas with adequate public services, and that such development would be consistent with local, regional, and state goals and policies. The proposed CSD Update's community standards encourages clustering development to minimize impacts to the natural environment while minimizing site disturbance. Clustering new development would preserve hillsides and open spaces but may require extension of existing sewer lines because of the size of clustered lots. The cost per unit for providing local sewage collection facilities may increase for these developments due to the relatively long distances that sewer lines would need to be extended to connect to the LVMWD's trunk sewer system. However, if a new project requires relocation or construction of new utilities, proposed North Area Plan Policy LU-10 would require the extension of water, sewer, or other utility infrastructure to be located within legally existing rights-of-way that avoids adverse impacts to natural resources to the maximum extent feasible. Such infrastructure would be sized and designed to provide only for the approved development to avoid growth-inducing impacts. Construction of new major utilities would be discouraged, and construction of small "package" wastewater treatment plants would be prohibited where feasible. Therefore, impacts to the environment resulting in relocation or construction of new utilities would be less than significant.

Impact US-2: Implementation of the proposed North Area Plan and CSD Update would result in insufficient water supplies to serve reasonably foreseeable future development during normal, dry, and multiple dry years. (Less than Significant Impact)

As discussed in Section C.13.2, several laws such as the Urban Water Management Planning Act, Senate Bills 610 and 221, and California Water Code Sections 10610 et seq. require plans for sufficient water supply. These regulations require or encourage water suppliers, cities, and counties to assess water supply, implement conservation plans, and ensure adequate water for customers. The County would require future development to comply with these policies. Water supply allocations to the LVMWD are received from the Metropolitan Water District. According to the proposed North Area Plan Update, supplies vary depending on cyclical drought conditions.

Because the proposed North Area Plan and CSD Update does not directly involve constructing any new development, it would not directly result in excessive water use or result in insufficient water supplies. However, future projects resulting from the implementation of the proposed Plan and CSD Update may require substantial water consumption. Proposed North Area Plan policies PF-1 through PF-4 and PF-6 are proposed to ensure that: (1) future development projects receive adequate water supplies and infrastructure; (2) consumption of new water supplies is minimized through the use of reclaimed water; (3) the use of reclaimed water is expanded through tertiary treatment of wastewater; (4) the uses of reclaimed water is maximized; and (5) reclaimed wastewater is used for irrigation.

- **Policy PF-1:** *Coordinate the land development review process with the LVMWD to ensure that adequate water supplies and adequate water and sewer infrastructure are available to support existing and planned development.*

- **Policy PF-2:** *Minimize consumption of new water supplies through active water conservation programs and the use of reclaimed water – on site, wherever possible.*
- **Policy PF-3:** *Encourage tertiary treatment of wastewater, which will help to improve effluent quality, while expanding the potential uses for reclaimed water.*
- **Policy PF-4:** *Maximize the uses of reclaimed water and thereby reduce the need for exploiting domestic water supplies for purposes where potable water is not required.*
- **Policy PF-6:** *Require the use of reclaimed wastewater for golf courses, landscape irrigation, and other purposes, including the maintenance of public lands and fire breaks, where reclaimed water can be feasibly provided.*

Viticulture is a common land use in the North Area. The CSD Update would continue to regulate and guide viticulture practices, particularly irrigation. Section 22.336.070 (Community-Wide Development Standards) of the CSD Update states that vineyards shall conserve water and reduce water loss through practices. Water conservation strategies include the use of drip-irrigation micro-sprinklers or similar non-aeration watering systems that include irrigation scheduling, efficient application and transport of irrigation water, management of drainage water, and use of rain barrels or reclaimed water where feasible. These irrigation practices would substantially reduce reliance on and impacts to the public water supply.

These policies and development standards would minimize wasteful water use and maximize and encourage sustainable reclaimed wastewater use and water-conserving irrigation techniques. These policies, combined with the laws and regulatory guidelines in Section C.13.2, would ensure short-term and long-term water supplies in the North Area. The proposed Plan and CSD Update would have a less-than-significant impact on water supply in the North Area.

Impact US-3: Implementation of the proposed North Area Plan and CSD Update would result in a determination by the wastewater treatment provider which serves or may serve related projects that it has inadequate capacity to serve future projected demand in addition to the provider's existing commitments. (Less than Significant Impact)

Implementation of the proposed Plan and CSD Update would encourage sustainable development that complies with existing and future relevant goals and policies regarding wastewater treatment. The proposed Plan and CSD Update would not directly result in any development that would exceed the wastewater treatment capacity of any provider. It is also unlikely that future development, in accordance with the proposed Plan and CSD Update, would exceed this capacity because wastewater treatment would be the responsibility of the LVMWD, which would comply with all relevant wastewater treatment policies and laws.

According to the proposed North Area Plan Update, although most development in the North Area is already connected to sewers, septic systems serve most of the rural hillside areas. Older septic systems may experience failures that can impair water quality. To address the potential for these failures, the LVMWD collects fees for connection to existing and future trunk lines, encouraging connection to the sewer system rather than relying on onsite wastewater treatment systems. Once connected to the LVMWD trunk lines, the LVMWD would remain responsible for maintaining adequate capacity to serve the community's wastewater treatment needs.

The proposed Plan and CSD Update policies would encourage clustered development to limit impacts to the environment from sprawl. As described in Section 22.336.070 (Community-Wide Development

Standards) of the CSD Update, the Transfer of Development Credit Program would prevent an increase in the net amount of development that could occur in the North Area. It would encourage clustered development, thus preventing development from occurring in extremely remote areas that would require expanded wastewater infrastructure that would strain existing systems.

Sustainable development would reduce impacts to the environment resulting from expanded wastewater treatment demand. Proposed Plan and CSD Update policies aim to maintain adequate water supplies and water and sewage disposal systems to support existing and future planned land uses. The wastewater treatment provider is expected to maintain adequate capacity to serve future projected demand. Therefore, impacts would be less than significant.

Impact US-4: Implementation of the proposed North Area Plan and CSD Update would not generate solid waste that may exceed waste standards or capacity of local infrastructure, or impair the attainment of solid waste reduction goals. (No Impact)

Implementation of the proposed Plan and CSD Update would not include any physical development. Proposed Plan policies would support the goal of ensuring adequate solid waste services to meet existing and future demands without degrading the quality of the natural environment. Policies would require all new buildings to have proper facilities for solid waste storage; prohibit land uses that would generate large volumes of solid waste; require proper handling and disposal of hazardous materials in compliance with regulations; and support recycling and reducing waste. Future development in the North Area would be required to comply with all relevant waste standards and policies. Therefore, the proposed Plan and CSD Update would not exceed waste standards or capacity of local infrastructure. No impact is expected.

Impact US-5: Implementation of the proposed North Area Plan and CSD Update would not conflict with federal, state, or local management and reduction statutes and regulations related to solid waste. (No impact)

Section C.13.2, Regulatory Setting discusses federal, state, and local regulations regarding managing solid waste and recycled material. These laws include Assembly Bill 939 (Integrated Solid Waste Management Act of 1989 or AB 939) and Assembly Bill 341 (Chapter 476, Statutes of 2011). As required by AB 939, the County of Los Angeles prepared the Siting Element that outlines how the County and its cities plan to manage the disposal of solid waste during a 15-year planning period. Thus, the County is responsible for all current and future waste management issues and meeting its own waste reduction goals. The current Siting Element describes the existing and planned solid waste disposal and management sites available for use by jurisdictions in Los Angeles County. The updates include new goals, policies, and strategies to sustainably manage current and future solid waste. Also, the County would require future development to follow all applicable federal, state, and local regulations regarding solid waste, including the policies and development standards of the proposed Plan and CSD Update. Implementation of the proposed Plan and CSD Update would not result in a conflict with existing federal, state, or local solid waste regulations.

C.13.5 Cumulative Impact Analysis

Cumulative impacts consist of impacts that are created as a result of the combination of the project evaluated in the EIR together with other projects proposed in or near the North Area. This analysis focuses on whether the proposed Plan and CSD Update would cause cumulatively considerable impacts on public services, utilities, and service systems within the context of other past, present, or future projects. Cumulative projects, shown on Figure C.1-1 and listed in Table C.1-1, would have the potential to increase

urbanization in the North Area, thus increasing the resident and visitor demand for such public services, utilities, and service systems.

Cumulative projects include a variety of specific plans, building projects, road projects, residential and commercial development, and restoration activities. The implementation of the proposed Plan and CSD Update would not have a direct cumulative impact on public services, utilities, and service systems. Indirect cumulative impacts could result from future development that would be allowed under the proposed Plan and CSD update, if adopted.

Because most of these projects are outside of the boundaries of the North Area, they would not be subject to proposed Plan and CSD policies and development standards. While the proposed residential projects may contribute to population growth and increase demand on public services, utilities, and service systems, these projects would be in established areas of development that would be subject to the same regulatory requirements outlined in Section C.13.2 (Regulatory Setting). Compliance with these regulations would minimize the potential for damaging effects to the environment from increased demand on public services and utilities. The proposed Plan and CSD Update would allow for future development to be advanced within the identified projected growth in the General Plan. Local agencies (i.e. cities and counties) with jurisdiction over the identified cumulative projects would also use existing long-range plans and identified projected growth to decide on the cumulative projects. As such, the proposed Plan and CSD Update would have a less-than-significant cumulative impact to public services, utilities, and service systems because the Update and existing long-range plans require the consideration of the availability of these services when deciding on a potential project.

C.13.6 Level of Significance After Mitigation

The proposed Plan and CSD Update would have no impact or a less-than-significant impact on public services, utilities, and service systems. No mitigation measures are required.

Attachment C.13

Public Services Policies and Standards

(Appendix 1 includes all policies and standards)

Proposed North Area Plan Update

Land Use Element

- **Policy LU-12:** Cluster development in land divisions, including building pads, if any, in order to minimize site disturbance, landform alteration, and removal of native vegetation, to minimize required fuel modification, and to maximize open space.

Public Facilities Element

- **Policy PF-1:** Coordinate the land development review process with the LVMWD to ensure that adequate water supplies and adequate water and sewer infrastructure are available to support existing and planned development.
- **Policy PF-2:** Minimize consumption of new water supplies through active water conservation programs and the use of reclaimed water – on site, wherever possible.
- **Policy PF-3:** Encourage tertiary treatment of wastewater, which will help to improve effluent quality, while expanding the potential uses for reclaimed water.
- **Policy PF-4:** Maximize the uses of reclaimed water and thereby reduce the need for exploiting domestic water supplies for purposes where potable water is not required.
- **Policy PF-6:** Require the use of reclaimed wastewater for golf courses, landscape irrigation, and other purposes, including the maintenance of public lands and fire breaks, where reclaimed water can be feasibly provided.
- **Policy PF-17:** Require, where appropriate, on-site fire suppression systems for all new development to reduce the dependence on Fire Department equipment and personnel.
- **Policy PF-18:** Limit the length of private access roads to reduce the amount of time necessary for the Fire Department to reach residences and to minimize risks to firefighters.
- **Policy PF-19:** Require clearly visible address signs during the day and night for easy identification during emergencies.
- **Policy PF- 22:** Limit the exposure of first responders, residents, and structures to fire risk within Very High Fire Hazard Severity Zones (VHFHSZ) and in the Fire Hazard Severity Zones (FHSZs) of the wildland-urban interface.
- **Policy PF-23:** Continue to consult and coordinate with the Sheriff's Department and CHP as part of the environmental review process for projects subject to CEQA.
- **Policy PF-24:** Support existing programs such as Neighborhood Watch and encourage expanded or new programs that focus on the elimination of crime, such as anti-graffiti programs.
- **Policy PF-25:** Support efforts to eliminate street racing activities, including the seizure and forfeiture of vehicles used in speed contests or in exhibitions of speed, to address the nuisance and unsafe conditions created by the use of vehicles in such activities.

Proposed Community Standards District Update

Section 22.336.060 Biological Resource Standards

- B. Trees

Section 22.336.070 Community-Wide Development Standards

- A. Prohibited Uses
- W. Transfer of Development Credit Program
- Y. Vineyards

C.14 Transportation and Traffic

This section addresses existing transportation and circulation conditions in the areas affected by the proposed North Area Plan and CSD Update, identifies and analyzes potential impacts to these resources, and considers need for mitigation measures to reduce or avoid impacts anticipated from implementation of the proposed Plan and CSD Update. In addition, applicable plans and policies relevant to traffic and transportation of the North Area are described. Compliance with applicable jurisdictional roadway performance standards would serve to reduce or avoid certain impacts that might otherwise occur with the implementation of the proposed Plan and CSD Update.

Scoping Comments Received. During the scoping period for the EIR, written and verbal comments were received from agencies, organizations, and the public. These comments identified various substantive issues and concerns relevant to the EIR analysis for transportation and traffic. The issues below summarize these comments. Appendix 2 includes all comments received during the scoping comment period.

- Incorporate multi-modal and complete streets transportation elements to promote alternative car use.
- Recommend planning for improvement of alternative transportation such as transit stops, bus bays, etc. to accommodate traffic flow.
- Provide safe connectivity for pedestrians and bicycles.
- Request evaluation of future development for access problems, VMT (Vehicle Miles Traveled) and service needs.
- Request for addition of scope or binding regulation for limiting traffic in area.
- Consider new housing developments (Agoura Road and Kanan Road), new hotel, events and nearby facilities (e.g. weddings Triunfo Canyon), and retail vendors on Kanan Road in traffic evaluation.
- Request traffic study be completed during the weekend due to additional traffic from event facilities.
- Traffic interferes with public access to beach through Topanga, Las Virgenes Road, and Kanan Road.
- Request for mitigation to address entry/exit points in North Area in case of an emergency.
- Concern with excessive speeding near wildlife crossings and equestrians.
- Concern with collisions and traffic from Las Virgenes and Malibu Canyon, commenter suggests consideration of toll road.
- Concern with car crashes due to street racing on Piuma Road.

KEY FINDINGS

- Rural roads through the Santa Monica Mountains have become commuter routes connecting U.S. 101 freeway and Pacific Coast Highway (beach communities) because of serious traffic congestion on 101 freeway through the San Fernando Valley and along 405 freeway through the Sepulveda Pass.
- Proposed North Area Plan and CSD would guide future use and development of the transportation system consistent with the area's rural and scenic quality, while maintaining efficiency and capacity for planned growth.
- Proposed North Area Plan goals/policies and CSD standards are consistent with adopted General Plan policies, plans, or programs related to performance and safety of the circulation system.

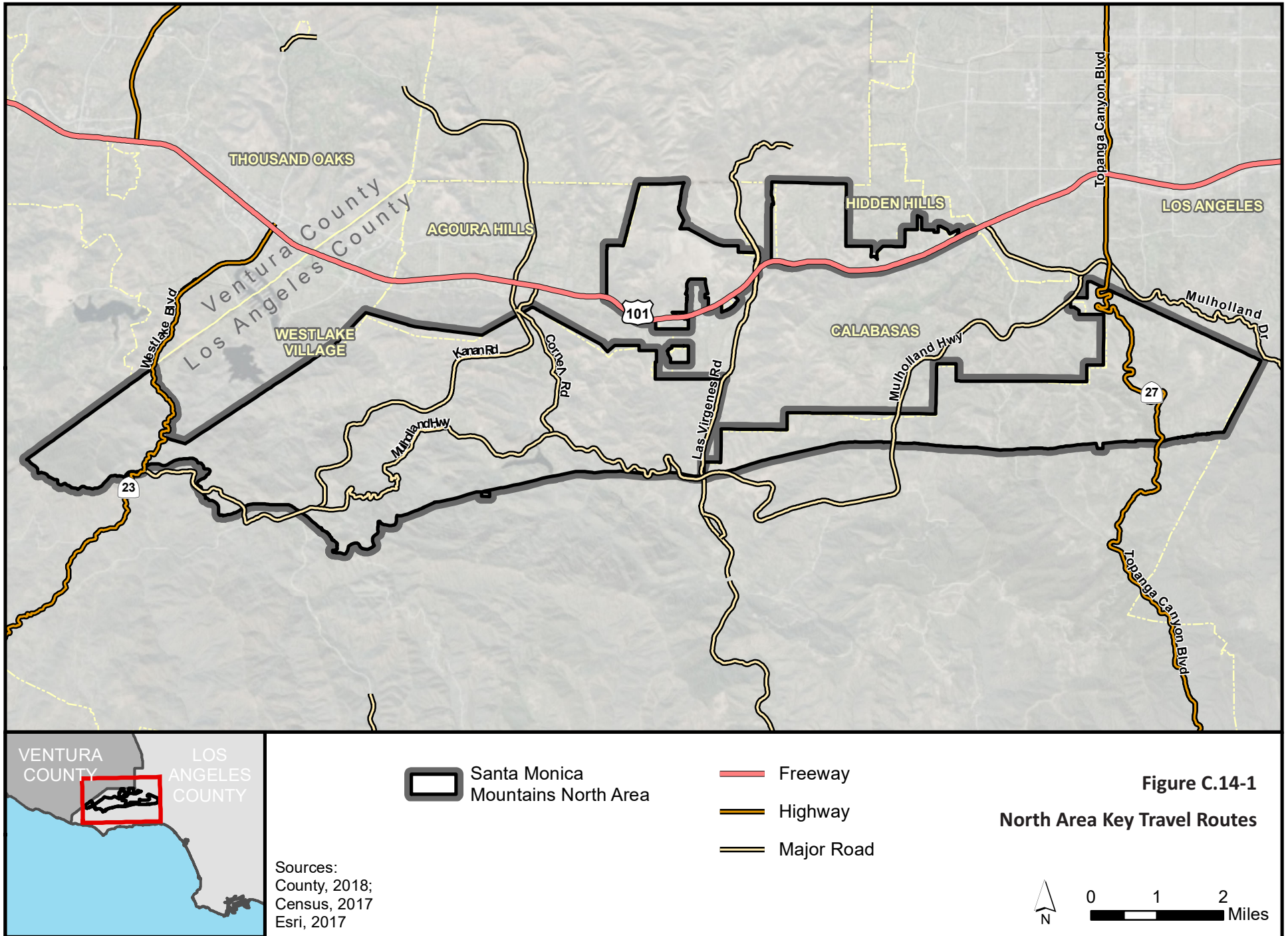
C.14.1 Environmental Setting

Existing Freeway and Roadway Operating Conditions

The area of study for this analysis is defined as the key regional and local roadway network serving the North Area. Regional roadways include freeways providing access to the North Area, while key local roadways are those providing central access through the North Area and those that have freeway connections. The North Area generates 167,122 daily trips, 2,424,947 daily vehicle miles travelled (VMT), 68,105 daily vehicle hours travelled (VHT), and 4,000 daily truck trips (County of Los Angeles, 2014). There are no key arterials that pass through the unincorporated areas; however, the Santa Monica Mountains North Area is served by portions of the US-101 Freeway.

Key travel routes serving the North Area are shown in Figure C.14-1 and are described below.

- **U.S. Highway 101 (U.S. 101)** is a freeway travelling east-west through the North Area, providing regional access to the City of Los Angeles and Ventura County. Several local roads connect to U.S. 101 via on/off ramps in the North Area, which are discussed below. Through the North Area, U.S. 101 is a 12-lane divided freeway. The most recently published average daily traffic (ADT) data for U.S. 101 in the North Area indicates volumes ranging between 228,000 at Topanga Canyon Boulevard to 162,000 at Kanan Road (Caltrans, 2016).
- **Topanga Canyon Boulevard** south of U.S. 101 through the North Area is a two- to four-lane arterial roadway connecting to Pacific Coast Highway. It provides on/off ramps to U.S. 101, providing regional access to the North Area. This roadway is under the jurisdiction of Caltrans and is also referred to as State Route 27. A 2.5-mile stretch between post mile marker 1 to 3.5, of Topanga Canyon Boulevard is a designated State Scenic Highway. The most recently published ADT data for Topanga Canyon Boulevard in the North Area indicates volumes ranging between 32,000 south of Ventura Boulevard to 26,000 north of Mulholland Drive (Caltrans, 2016).
- **Westlake Boulevard** provides access from U.S. 101 to the westernmost portions of the North Area. Through the North Area, this roadway is a two-lane arterial roadway connecting to Pacific Coast Highway. This roadway is under the jurisdiction of Caltrans and is also referred to as State Route 23. The most recently published ADT data for Westlake Boulevard in the North Area indicates volumes of 2,100 north of Mulholland Highway (Caltrans, 2016).
- **Las Virgenes Road** is a north-south roadway that extends between U.S. 101 to the north through the North Area where it connects with Mulholland Highway. Near U.S. 101, Las Virgenes Road is four-lanes, eventually merging to two-lanes before intersecting with Mulholland Highway. While this segment mostly serves residences in the North Area, it connects with Pacific Coast Highway at its southern terminus, providing coastal access. It provides on/off ramps to U.S. 101, providing regional access to the North Area.
- **Cornell Road** is a north-south arterial road that extends between Kanan Road to the north and Mulholland Highway to the south. Cornell Road is two-lanes and serves residential uses and provides access to several recreational locations (including Paramount Ranch).
- **Kanan Road** (also known as County Highway N9) is a four-lane highway extending northeast-southwest, connecting with U.S. 101 to the north and Pacific Coast Highway terminus to the south. It provides on/off ramps to U.S. 101, providing regional access to the North Area. It also provides regional access across the Santa Monica Mountains into the Malibu area and provides coastal access.



- **Mulholland Highway** is a two-lane arterial which extends southeast from Pacific Coast Highway to Topanga Canyon Boulevard. Mulholland Highway starts as a north-south route just west of the City of Malibu limit, then continues east to Calabasas Highlands. It connects major areas of state and local parks, as well as providing access to residential and agricultural uses within the North Area. Mulholland Highway is a designated State Scenic Highway.

Existing Roadway Level of Service

The “Level of Service” (LOS) concept is used as an indicator of operating conditions on roadways using a lettering system. LOS categorizes traffic conditions according to a range extending from A to F, where LOS A represents the best traffic flow conditions and LOS F represents poor conditions. In other words, LOS A indicates free-flowing traffic and LOS F indicates substantial congestion with stop-and-go traffic and long delays at intersections. Table C.14-1 presents LOS descriptions and associated delays for roadway segments.

Table C.14-1. Relationship Between Volume/Capacity Values and Levels of Service

LOS	V/C Value
A	0.00 to 0.60
B	0.61 to 0.70
C	0.71 to 0.80
D	0.81 to 0.90
E	0.91 to 1.00
F	> 1.00

Table C.14-2 provides the key travel routes serving the North Area and the LOS characteristics for these roadway and freeway segments.

Table C.14-2. Study Area Roadway Segments – Existing Operating Conditions

Roadway Segment	Lanes	Volume (ADT)	V/C ¹	LOS
U.S. 101 at Topanga Canyon Blvd.	8 Lanes	228,000	0.99	E
U.S. 101 at Kanan Rd.	8 Lanes	162,000	0.70	B
Topanga Canyon Blvd. S/O Ventura Blvd.	2 Lanes	32,000	0.83	D
Topanga Canyon Blvd. at Mulholland Drive	2 Lanes	26,000	0.68	B
Westlake Blvd. at Mulholland Highway	2 Lanes	2,100	0.05	A
Las Virgenes Rd. N/O Mulholland Highway	2 Lanes	22,625	0.59	A
Las Virgenes Rd. S/O Mulholland Highway	2 Lanes	20,823	0.54	A
Cornell Rd. N/O Mulholland Highway	2 Lanes	2,499	0.07	A
Kanan Rd. N/O Troutdale Dr.	2 Lanes	11,974	0.31	A
Kanan Rd. W/O (southbound) Troutdale Dr.	2 Lanes	13,793	0.36	A
Kanan Rd. N/O Mulholland Highway	2 Lanes	18,482	0.48	A
Kanan Rd. S/O Mulholland Highway	2 Lanes	16,010	0.42	A
Mulholland Hwy. E/O Westlake Boulevard	2 Lanes	616	0.02	A
Mulholland Hwy. E/O Kanan Rd.	2 Lanes	2,210	0.06	A
Mulholland Hwy. W/O Kanan Rd.	2 Lanes	7,077	0.18	A
Mulholland Hwy. E/O Las Virgenes Rd.	2 Lanes	2,287	0.06	A
Mulholland Hwy. W/O Las Virgenes Rd.	2 Lanes	2,180	0.06	A

Table C.14-2. Study Area Roadway Segments – Existing Operating Conditions

Roadway Segment	Lanes	Volume (ADT)	V/C ¹	LOS
Mulholland Hwy. E/O Cornell Rd.	2 Lanes	1,468	0.04	A
Mulholland Hwy. W/O Cornell Rd.	2 Lanes	1,264	0.03	A

¹ Assumes an ADT capacity of 1,200 per hour, per lane, for freeways. Assumes a capacity of 800 per hour, per lane, for local roadways.

Notes: Most recent local roadway counts available were utilized. When local roadway counts were available for similar dates, the highest volume is presented.
Source: Caltrans, 2016; Los Angeles County, 2020; FHWA, 2016

Roadway Safety

During public scoping, concerns were raised regarding speeding and collision rates on roads within the North Area. A number of roads through the North Area provide scenic views, minimal stop signals, and winding roadway features that result in vehicle trips oriented around recreation-based trips versus destination-based trips. The following identifies total vehicle collisions on key roadways within the North Area boundary, which include U.S. 101, Topanga Canyon Boulevard, Westlake Boulevard, Las Virgenes Road, Kanan Road, and Mulholland Highway (CHP, 2020):

- **2017:** 81 total collisions, of which 39 included injuries with no fatalities.
- **2018:** 63 total collisions, of which 32 included injuries with no fatalities.
- **2019:** 82 total collisions, of which 40 included injuries with no fatalities.

When considering the above annual statistics, total accidents on these roads are considered low compared to daily traffic volumes. It is acknowledged that the North Area contains local roadways that attract recreational-based vehicle trips primarily to enjoy scenery, winding roads, and infrequent stops. This makes a number of roadways and travel routes within the North Area unique compared to urban roads within the County.

Existing Bicycle and Transit Facilities

As an adopted regional planning document, the Bicycle Master Plan guides various bicycle-friendly policies and programs to promote bicycle ridership amongst users of all ages and skill sets within the County. The Bicycle Master Plan proposes approximately 831 miles of new bikeways throughout the County for implementation through 2032. A number of study area roadway segments are designated as existing or proposed bikeway facilities, as follows (County of Los Angeles, 2012):

- **Agoura Road:** Existing Class II Bicycle Facility (provides a striped lane for one-way bike travel on a street or highway)
- **Kanan Road, Cornell Road, Las Virgenes Road, Lakeview Drive, and Mulholland Highway:** Proposed Class III Bicycle Routes (provides for shared use with vehicles).

In addition to these designated and proposed bicycle routes, a number of rural canyon roads through the North Area provide scenic views, minimal stop signals, and winding/hill roadway features that result in frequent cyclists using both travel lanes and road shoulders.

Transit or bus services along local study area roadways are limited within the North Area. Metro route 161 follows the U.S. 101 corridor along Agoura Road through the North Area (Metro, 2018). Additionally, the County of Los Angeles operates the Topanga Beach Bus that travels over Topanga Canyon Boulevard (with stops within the North Area boundary) connecting the San Fernando Valley to beach locations (County of Los Angeles, 2018).

C.14.2 Regulatory Setting

Caltrans

Within the Guide for the Preparation of Traffic Impact Studies (TIS), the following criteria are a starting point in determining when a TIS for a project is needed (Caltrans, 2002):

1. Generates over 100 peak hour trips assigned to a State highway facility.
2. Generates 50 to 100 peak hour trips assigned to a State highway facility and affected State highway facilities are experiencing noticeable delay (i.e., approaching unstable traffic flow conditions — LOS “C” or “D”).
3. Generates 1 to 49 peak hour trips assigned to a State highway facility and affected State highway facilities are experiencing significant delay (i.e., unstable or forced traffic flow conditions — LOS “E” or “F”).

The “Level of Service” (LOS) concept is used as an indicator of operating conditions on roadways and at intersections using a lettering system. LOS categorizes traffic conditions according to a range extending from A to F, where LOS A represents the best traffic flow conditions and LOS F represents poor conditions. In other words, LOS A indicates free-flowing traffic, and LOS F indicates substantial congestion with stop-and-go traffic and long delays at intersections.

As stated in the California Department of Transportation’s (Caltrans) Guide for the Preparation of Traffic Impact Studies, a TIS may be as simple as providing a traffic count to as complex as a microscopic simulation (Caltrans, 2002). The appropriate level of study is determined by the particulars of a project, the prevailing highway conditions, and the forecasted traffic. The programmatic traffic analysis provided within this section is considered consistent with the Guide for the Preparation of Traffic Impact Studies.

Southern California Association of Governments (SCAG)

On April 7, 2016, SCAG’s Regional Council adopted the 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy (2016 RTP/SCS). The 2016 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental and public health goals while closely integrating land use and transportation (SCAG, 2016). The County of Los Angeles was a cooperating agency with SCAG as part of the 2016 RTP/SCS, providing SCAG with estimated growth plans for the unincorporated areas of the County. The overall regional growth estimated by SCAG within the 2016 RTP/SCS was utilized to generate traffic projections for the SCAG region and a resulting plan for investing in the existing transportation system to maintain and extend its life and utility, including planning for and encouraging multimodal transportation. The traffic projections and goals developed by SCAG for the 2016 RTP/SCS were utilized by the County of Los Angeles when developing the goals and policies of the County’s General Plan Mobility Element (which is described below).

SCAG released the Proposed Final 2020-2045 RTP/SCS in March 2020, but it has not yet been approved. The core vision of this plan is to build upon and expand land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern (SCAG, 2020b). The 2020 RTP/SCS contains the following Federal Transportation Improvement Program (FTIP) projects in the vicinity of the North Area: bicycle and pedestrian improvements on Mulholland Highway and on Old Topanga Canyon Road; light synchronization and add an interconnect along Las Virgenes Road and synchronize Mulholland Highway and Old Topanga Road; safety study on Kanan Road between Thousand Oaks Boulevard and Cornell Way; and replacement of existing two-lane bridge with a

four-lane bridge spanning approximately 280 feet and one turn lane at Lost Hills Road/U.S. 101 interchange. The 2020 RTP/SCS also includes the following strategic projects: widening of Topanga Canyon Boulevard at Mulholland Drive to add a southbound right-turn lane and upgrade the traffic signal; addition of a northbound and southbound auxiliary lane on U.S. 101 at Valley Circle Boulevard; and improve the regional transit connection between Las Virgenes Area, Thousand Oaks, and San Fernando Valley along U.S. 101 corridor.

County of Los Angeles General Plan, Mobility Element

The General Plan Mobility Element provides an overview of the transportation infrastructure and strategies for developing an efficient and multimodal transportation network. The Element assesses the challenges and constraints of the Los Angeles County transportation system and offers policy guidance to reach the County's long-term mobility goals and establishes goals/policies for the roadway and bikeway systems in the unincorporated areas of the County. The following is a list of applicable goals and policies that are intended to reduce potentially significant adverse effects concerning transportation and traffic (County of Los Angeles, 2015):

Goal M 1: Street designs that incorporate the needs of all users.

- *Policy M 1.1: Provide for the accommodation of all users, including pedestrians, motorists, bicyclists, equestrians, users of public transit, seniors, children, and persons with disabilities when requiring or planning for new, or retrofitting existing, transportation corridors/networks whenever appropriate and feasible.*
- *Policy M 1.2: Ensure that streets are safe for sensitive users, such as seniors and children.*
- *Policy M 1.3: Utilize industry standard rating systems to assess sustainability and effectiveness of street systems for all users.*

Goal M 2: Interconnected and safe bicycle- and pedestrian-friendly streets, sidewalks, paths and trails that promote active transportation and transit use.

- *Policy M 2.1: Provide transportation corridors/networks that accommodate pedestrians, equestrians and bicyclists, and reduce motor vehicle accidents through a context-sensitive process that addresses the unique characteristics of urban, suburban, and rural communities whenever appropriate and feasible.*
- *Policy M 2.2: Accommodate pedestrians and bicyclists, and reduce motor vehicle accidents by implementing the following street designs, whenever appropriate and feasible:*
 - *Lane width reductions to 10 or 11 feet in low speed environments with a low volume of heavy vehicles.*
 - *Wider lanes may still be required for lanes adjacent to the curb, and where buses and trucks are expected.*
 - *Low-speed designs.*
 - *Access management practices developed through a community-driven process.*
 - *Back in angle parking at locations that have available roadway width and bike lanes, where appropriate.*
- *Policy M 2.3: Accommodate pedestrians and bicyclists, and reduce motor vehicle accidents by implementing the following intersection designs, whenever appropriate and feasible:*
 - *Right angle intersections that reduce intersection skew.*
 - *Smaller corner radii to reduce crossing distances and slow turning vehicles.*

- *Traffic calming measures, such as bulb-outs, sharrows, medians, roundabouts, and narrowing or reducing the number of lanes (road diets) on streets.*
 - *Crossings at all legs of an intersection.*
 - *Shorter crossing distances for pedestrians.*
 - *Right-turn channelization islands. Sharper angles of slip lanes may also be utilized.*
 - *Signal progression at speeds that support the target speed of the corridor.*
 - *Pedestrian push buttons when pedestrian signals are not automatically recalled.*
 - *Walk interval on recall for short crossings.*
 - *Left-turn phasing.*
 - *Prohibit right turn on red.*
 - *Signs to remind drivers to yield to pedestrians.*
- **Policy M 2.4: Ensure a comfortable walking environment for pedestrians by implementing the following, whenever appropriate and feasible:**
- *Designs that limit dead-end streets and dead-end sidewalks.*
 - *Adequate lighting on pedestrian paths, particularly around building entrances and exits, and transit stops.*
 - *Designs for curb ramps, which are pedestrian friendly and compliant with the American Disability Act (ADA).*
 - *Perpendicular curb ramps at locations where it is feasible.*
 - *Pedestrian walking speed based on the latest standard for signal timing. Slower speeds should be used when appropriate (i.e., near senior housing, rehabilitation centers, etc.)*
 - *Approved devices to extend the pedestrian clearance times at signalized intersections.*
 - *Accessible Pedestrian Signals (APS) at signalized intersections.*
 - *Pedestrian crossings at signalized intersections without double or triple left or right turn lanes.*
 - *Pedestrian signal heads, countdown pedestrian heads, pedestrian phasing and leading pedestrian intervals at signalized intersections.*
 - *Exclusive pedestrian phases (pedestrian scrambles) where turning volume conflicts with very high pedestrian volumes.*
 - *Advance stop lines at signalized intersections.*
 - *Pedestrian Hybrid Beacons.*
 - *Medians or crossing islands to divide long crossings.*
 - *High visibility crosswalks.*
 - *Pedestrian signage.*
 - *Advanced yield lines for uncontrolled crosswalks.*
 - *Rectangular Rapid Flashing Beacon or other similar approved technology at locations of high pedestrian traffic.*
 - *Safe and convenient crossing locations at transit stations and transit stops located at safe intersections.*
- **Policy M 2.5: Ensure a comfortable bicycling environment by implementing the following, whenever appropriate and feasible:**
- *Bicycle signal heads at intersections.*
 - *Bicycle signal detection at all signalized intersections.*
 - *Wayfinding signage.*
 - *Road diet techniques, such as lane narrowing, lane removal, and parking removal/restriction.*
 - *Appropriate lighting on all bikeways, including those in rural areas.*

- *Designs, or other similar features, such as: shoulder bikeways, cycle tracks, contra flow bike lanes, shared use paths, buffered bike lanes, raised bike lanes, and bicycle boulevards.*
- *Policy M 2.6: Encourage the implementation of future designs concepts that promote active transportation, whenever available and feasible.*
- *Policy M 2.7: Require sidewalks, trails and bikeways to accommodate the existing and projected volume of pedestrian, equestrian and bicycle activity, considering both the paved width and the unobstructed width available for walking.*
- *Policy M 2.8: Connect trails and pedestrian and bicycle paths to schools, public transportation, major employment centers, shopping centers, government buildings, residential neighborhoods, and other destinations.*
- *Policy M 2.9: Encourage the planting of trees along streets and other forms of landscaping to enliven streetscapes by blending natural features with built features.*
- *Policy M 2.10: Encourage the provision of amenities, such as benches, shelters, secure bicycle storage, and street furniture, and comfortable, safe waiting areas near transit stops.*
- *Policy M 2.11: In urban and suburban areas, promote the continuity of streets and sidewalks through design features, such as limiting mid-block curb cuts, encouraging access through side streets or alleys, and promoting shorter block lengths.*

Goal M 3: *Streets that incorporate innovative designs.*

- *Policy M 3.1: Facilitate safe roadway designs that protect users, preserve state and federal funding, and provide reasonable protection from liability.*
- *Policy M 3.2: Consider innovative designs when part of an accepted standard, or when properly vetted through an appropriate engineering/design review, in compliance with all state and federal laws.*
- *Policy M 3.3: Complete the following studies prior to the implementation of innovative design concepts:*
 - *An analysis of the current and future context of the community and neighborhood in which they are proposed;*
 - *A balanced assessment of the needs of all users and travel modes (i.e., pedestrian, bicycle, transit, vehicular, and equestrian, where appropriate);*
 - *A technical assessment of the operational and safety characteristics for each mode; and*
 - *A consistency check with transportation network plans, including the Highway Plan, Bicycle Master Plan, and Community Pedestrian Plans.*

Goal M 4: *An efficient multimodal transportation system that serves the needs of all residents.*

- *Policy M 4.1: Expand transportation options that reduce automobile dependence.*
- *Policy M 4.2: Expand shuttle services to connect major transit centers to community points of interest.*
- *Policy M 4.3: Maintain transit services within the unincorporated areas that are affordable, timely, cost effective, and responsive to growth patterns and community input.*
- *Policy M 4.4: Ensure expanded mobility and increase transit access for underserved transit users, such as seniors, students, low income households, and persons with disabilities.*

- *Policy M 4.5: Encourage continuous, direct routes through a connected system of streets, with small blocks and minimal dead ends (cul-de-sacs), as feasible.*
- *Policy M 4.6: Support alternative LOS standards that account for a multimodal transportation system.*
- *Policy M 4.7: Maintain a minimum LOS D, where feasible; however, allow LOS below D on a case by case basis in order to further other General Plan goals and policies, such as those related to environmental protection, infill development, and active transportation.*
- *Policy M 4.8: Provide and maintain appropriate signage for streets, roads and transit.*
- *Policy M 4.9: Ensure the participation of all potentially affected communities in the transportation planning and decision-making process.*
- *Policy M 4.10: Support the linkage of regional and community-level transportation systems, including multimodal networks.*
- *Policy M 4.11: Improve the efficiency of the public transportation system with bus lanes, signal prioritization, and connections to the larger regional transportation network.*
- *Policy M 4.12: Work with adjacent jurisdictions to ensure connectivity and the creation of an integrated regional network.*
- *Policy M 4.13: Coordinate with adjacent jurisdictions in the review of land development projects near jurisdictional borders to ensure appropriate roadway transitions and multimodal connectivity.*
- *Policy M 4.14: Coordinate with Caltrans on mobility and land use decisions that may affect state transportation facilities.*
- *Policy M 4.15: Reduce vehicle trips through the use of mobility management practices, such as the reduction of parking requirements, employer/institution-based transit passes, regional carpooling programs, and telecommuting.*
- *Policy M 4.16: Promote mobility management practices, including incentives to change transit behavior and using technologies, to reduce VMTs.*

Goal M 5: *Land use planning and transportation management that facilitates the use of transit.*

- *Policy M 5.1: Facilitate transit-oriented land uses and pedestrian-oriented design to encourage transit ridership.*
- *Policy M 5.2: Implement parking strategies that facilitate transit use and reduce automobile dependence.*
- *Policy M 5.3: Maintain transportation right-of-way corridors for future transportation uses, including bikeways, or new passenger rail or bus services.*
- *Policy M 5.4: Support and pursue funding for the construction, maintenance and improvement of roadway, public transit, and equestrian, pedestrian and bicycle transportation systems.*
- *Policy M 5.5: Encourage financing programs, such as congestion pricing, bonding, increasing parking costs, fair share programs for each community, to implement local and state transportation systems and facilities.*

C.14.3 Thresholds of Significance and Methodology

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would result in:

- Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit;
- Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways;
- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);
- Result in inadequate emergency access; or
- Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

The thresholds identified above are specific to the programmatic nature of this analysis under CEQA for the proposed Plan and CSD Update. Other criteria included within Appendix G of the CEQA Guidelines that pertain to potential impacts related to changes in air traffic patterns were found not applicable as the North Area does not contain any airports and the proposed Plan and CSD Update would have no effect on navigation of airspace or use of an airport facility.

C.14.4 Environmental Impacts and Mitigation Measures

Impact T-1: Implementation of the proposed North Area Plan and CSD Update would conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system. (Less than Significant Impact)

Because of serious traffic congestion problems on U.S. 101 through the San Fernando Valley and along I-405 through the Sepulveda Pass, a number of rural roads through the Santa Monica Mountains area have become commuter routes connecting U.S. 101 and Pacific Coast Highway (beach communities). This has created traffic congestion from both periodic recreational visitors and weekday commuters. Much of this congestion is due to through-traffic beginning and ending outside the planning area. Significant additional carrying capacity is needed on area roadways and highways to move traffic at desirable levels of service; however, to provide all such additional capacity in the North Area would be environmentally destructive and disruptive to existing residential neighborhoods and rural communities. Transportation planning within the planning area cannot be expected to entirely resolve the problems that exist.

As discussed in the proposed North Area Plan, Policies CI-1 through CI-14 (see Attachment C.14 at the end of this section) guide future use and development of the transportation system consistent with the area's rural and scenic quality, while maintaining efficiency and capacity for planned growth. The physical and environmental characteristics of the Santa Monica Mountains have largely precluded major improvements to the road network and the construction of additional roads. As stated in the proposed North Area Plan, the Plan *"...seeks to improve circulation in and through the planning area, while protecting the environment, through transportation system management techniques. These tools focus on improvements within the existing right-of-way to make links and intersections operate more efficiently.*

Computerized signalization at intersections and synchronization of signals along a link can result in more efficient traffic movement. The flow of traffic can be improved by reducing interruptions to flow, such as controlling access to links from private driveways. Turn-out pockets and special purpose lane additions are other options available to make the existing system work more efficiently."

The proposed Plan and CSD Update would not include any physical development. Since the goals and policies identified within the RTP/SCS are primarily focused on physical development, the majority of the RTP/SCS is not applicable to the proposed North Area Plan and CSD Update. As noted in the regulatory setting, the Proposed Final 2020-2045 RTP/SCS identifies several projects in the vicinity of the North Area. Overall, the RTP/SCS (and the projects identified within) are a long-range visioning plan that balances future mobility (including transportation safety) and housing needs with economic, environmental and public health goals while closely integrating land use and transportation. Similarly, the proposed North Area Plan and CSD Update are intended to balance future transportation needs and development within the North Area, while ensuring potential environmental impacts are avoided or reduced. Due to their similarities with the overall goal/vision of the RTP/SCS, the proposed North Area Plan and CSD Update would not conflict with this plan.

Because the proposed Plan and CSD Update includes policies and development standards that encourage the enhancement of the roadway system by guiding future development, the Update would have less than significant impacts on transportation and traffic. For future projects, the County would require compliance with updated policies and standards and would evaluate a project's effect on the traffic circulation system and vehicle miles travelled (VMT) during application review.

Impact T-2: Implementation of the proposed North Area Plan and CSD Update would substantially increase roadway hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). (Less than Significant Impact)

As discussed under Impact T-1, some rural roads through the North Area have become commuter routes. Traffic congestion from both periodic recreational visitors and weekday commuters can create potentially serious safety problems. In response to this travel pattern, the Circulation Element of the proposed North Area Plan supports developing an effective and safe circulation policy for the Santa Monica Mountains. Proposed North Area Plan Policies CI-15 through CI-22 (see Attachment C.14) would address a roadway network that accommodates projected traffic growth while protecting environmental resources and existing neighborhoods. In addition, Section 22.336.070 (Community-Wide Standards) would require roadway, parking, and lighting standards that would reduce roadway hazards and improve circulation.

Hazards due to roadway design features would be evaluated on a project-by-project basis as future development within the planning area occurs. All new highways and upgrades would be planned, designed and built to County standards. Additionally, existing ordinances and the proposed CSD include design guidelines to promote new roads and transportation facilities be built to specific standards that have been set by the County. These include ensuring improvements to the transportation network and providing safe and efficient travel. The County periodically monitors traffic accident patterns and physical conditions of the existing street system in the North Area; repairing and improving roadways as needed. Additionally, the County applies consistent standards for street design to promote travel safety. It accomplishes this through ordinances and standards by designating roadways based on their functional classification, adopting consistent standard street cross sections, coordinating circulation plans of new development projects within the same area or close to each other, and adopting consistent standards for pavement width. Within residential neighborhoods, the County continues to promote safety, as applicable during transportation planning and on specific projects, through traffic-calming devices, shorter block length,

and other considerations. Where possible, local street patterns are designed to create logical and understandable travel paths for users and discourage cut-through traffic for safety. The proposed Plan and CSD Update would have less than significant impacts on roadway hazards or incompatible uses because the policies and development standards further safety of roadways and would be considered and applied on future development projects to reduce roadway hazards.

Impact T-3: Implementation of the proposed North Area Plan and CSD Update would result in inadequate emergency access. (Less than Significant Impact)

The proposed Plan and CSD Update would not include any physical development that could result in inadequate emergency access, although proposed policies and standards would require consideration of emergency access on projects proposed in the North Area. The proposed North Area Plan Update includes Policy LU-53 that requires evacuation routes for residents.

- **Policy LU-53:** *Ensure the necessary evacuation routes during emergencies can be accessed by residents and visitors to the North Area.*

The CSD Update requires sufficient roadway access and identifies roadway standards for land development and emergency access. In addition, the General Plan includes development standards that require adequate emergency and/or secondary access, two points of ingress and egress for most subdivisions, visible street name signage, and directional signage to freeways at key intersections to assist in emergency evacuation operations. The County would consider a project's adherence with applicable goals and policies of both the proposed North Area Plan and the existing General Plan when evaluating specific project applications. The proposed Plan and CSD Update would have less than significant impacts related to emergency access because the policies and standards identify additional measures that need to be addressed in the North Area to ensure adequate emergency access in the North Area.

Impact T-4: Implementation of the proposed North Area Plan and CSD Update would conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., public transportation routes, bicycle routes). (Less than Significant Impact)

The proposed North Area Plan supports alternative modes of transportation, including walking and bicycling, to reduce roadway congestion and total vehicle miles traveled. Policies CI-23 through CI-31 (see Attachment C.14) would promote the use of alternative modes of transportation. Additionally, a number of CSD design standards would help ensure the safety and mobility of pedestrians and bicyclists. As discussed in Section 22.336.100 (Modification of Development Standards) of the proposed CSD Update: *The use, development of land, and application of development standards, when considered on the basis of the suitability of the site for the particular use or development intended, is so arranged as to avoid traffic congestion, provide for the safety and convenience of bicyclists and pedestrians, including children, senior citizens, and persons with disabilities, insure the protection of public health, safety and general welfare, prevent adverse effects on neighboring property and is in conformity with good zoning practice.* Generally, this standard would require that any changes to a development standard must continue to meet the requirements are quoted above.

The proposed Plan and CSD Update, in conjunction with the General Plan and existing ordinances, would provide safe and convenient access to safe transit, bikeways, and walkways, consider the safety and convenience of pedestrians and cyclists in the design and development of transportation systems, provide safe pedestrian connections across barriers, such as major traffic corridors, drainage and flood control facilities, and grade separations, adopt consistent standards for implementation of Americans with

Disabilities Act requirements and in the development review process prioritize direct pedestrian access between building entrances, sidewalks and transit stops.

The 2012 Bicycle Master Plan (Bicycle Master Plan) was adopted by the County Board of Supervisors on March 13, 2012. This Master Plan proposes approximately 831 miles of new bikeways throughout Los Angeles County and includes bicycle-friendly policies and programs to promote bicycle ridership. It also addresses alternative transportation programs, increased ridership on public transit, mass transit as an alternative to automobile travel, development of rail transit or exclusive bus lanes in high-demand corridors, and research and development of new transportation technologies. The Master Plan also contains many programs and policies that would mitigate potential hazards or barriers for bicyclists.

The proposed Plan and CSD Update would be consistent with adopted policies, plans, or programs supporting alternative transportation; implementation of the Update would result in less-than-significant impacts.

C.14.5 Cumulative Impact Analysis

Cumulative projects, identified in Table C.1-1 and shown in Figure C.1-1, would have the potential to result in a cumulative traffic impact if they would, in combination with each other, create new traffic volumes in excess of established standards and reduce the effectiveness and safety of the North Area transportation system. As discussed earlier, the proposed Plan and CSD Update would not directly result in any physical change or directly contribute new traffic volumes. Instead, the Update would guide future growth and development to reduce traffic-related impacts. Vehicle trips associated with the cumulative projects would likely impact U.S. 101 Freeway and not localized roadways within the North Area (due to their proximity to U.S. 101 Freeway; most cumulative projects would be infill commercial uses). Each cumulative project would require a separate CEQA analysis and review and decision by the local agency with jurisdiction over the project (i.e. County of Los Angeles or adjacent city). Therefore, traffic impacts would be evaluated for the potential to exceed established roadway performance standards within adopted land use plans and zoning ordinances. The proposed Plan and CSD Update would not contribute to transportation and traffic impacts and would have less than significant cumulative impacts.

C.14.6 Level of Significance After Mitigation

No significant adverse impacts related to transportation and traffic have been identified. Because transportation and traffic impacts would be less than significant, no mitigation measures are necessary.

Attachment C.14

Transportation and Traffic Policies and Standards

(Appendix 1 includes all policies and standards)

Proposed North Area Plan Update

Circulation Element

- **Policy CI-1:** Maximize the capacity and operational efficiency of highways consistent with environmental protection and neighborhood preservation, without widening roadways to increase capacity.
- **Policy CI-2:** Require all roadway maintenance and improvements to be accomplished in a manner protective of adjacent, streams, drainage courses, wildlife corridors, and other sensitive areas that may be impacted by such activity. Where feasible, roadway improvement projects should include drainage improvements to reduce erosion and polluted runoff.
- **Policy CI-3:** Expand roadway system capacity only where environmental resources (habitats/linkages, viewsheds, trails, etc.), residential neighborhoods, and rural communities are adequately protected. Roadway widening to increase capacity shall be prohibited.
- **Policy CI-4:** Prohibit the practice of side casting surplus fill material from road construction, maintenance, or repair. In emergencies, public agencies may temporarily store excess cut material on graded surfaces within rights-of-way using the most current BMPs to eliminate erosion into adjacent drainage courses. Ensure that landslide material is deposited in permitted landfills or sites with valid permits to accept fill.
- **Policy CI-5:** Where appropriate, increase the capacity of existing major and secondary highways through the application of transportation system management technology within established rights-of-way and roadway widths by:
 - Minimizing the number of driveway access points by consolidating driveways and exploring other options to reduce uncontrolled access;
 - Minimizing or eliminating conflicting turning movements on links or at intersections;
 - Restricting on-street parking during peak travel periods where such restrictions will not adversely impact public access to parks; and
 - Employing traffic signal synchronization technology.
- **Policy CI-6:** Improve roadway efficiency and highway access through redesign of road intersections and establishment of periodic passing, turnout, and acceleration/deceleration lanes, where appropriate.
- **Policy CI-7:** Emphasize other transportation system management solutions, including improved public transit and non-motorized transportation, such as bicycles.
- **Policy CI-8:** Ensure that all recreational easements and other recreational resources are protected during and after roadway construction, maintenance, and repair.
- **Policy CI-9:** Maintain appropriate rural and mountain road standards, consistent with public safety requirements, for the rural portions of the Santa Monica Mountains. Require the use of the rural cross section as the default standard in the North Area.
- **Policy CI-10:** Encourage the routing of through-traffic onto highways and designated arterial streets, while discouraging through-traffic in residential neighborhoods.

- **Policy CI-11:** Analyze and require mitigation of the traffic impacts from projects that generate substantial amounts of “off-peak” traffic, in addition to the traditional roadway capacity analysis.
- **Policy CI-12:** Limit the requirement for curbs, gutters, sidewalks, and streetlights to urban/suburban areas, unless required by public safety considerations.
- **Policy CI-13:** Allow road and driveway improvements only where they provide legal access to: 1) existing, lawfully-developed parcels; or 2) legal parcels with all required permits.
- **Policy CI-14:** Support Caltrans efforts to improve traffic flow and safety on Pacific Coast Highway, the 101 Freeway, the 405 Freeway, and on other State routes.
- **Policy CI-15:** Maintain, and potentially enhance, the concentration of business and commercial uses in existing locations that continue to serve the local communities and reduce the length of vehicle trips.
- **Policy CI-16:** Provide opportunities, such as park-and-ride lots, for local residents to car- or bus-pool to work thereby reducing the number of single-occupant vehicle trips.
- **Policy CI-17:** Provide opportunities, such as centralized learning centers with computer access, to reduce the need to commute long distances to colleges and universities.
- **Policy CI-18:** Improve roadways as appropriate to accommodate planned development and anticipated increases in recreational activities. Curbs, gutters, and sidewalks should only be used where deemed necessary for the safety of pedestrian and vehicular traffic by the Department of Public Works.
- **Policy CI-19:** Limit the density and intensity of development in rural and mountainous areas to a level that can be accommodated by existing road capacity and without creating significant adverse impacts. Avoid any development in rural and mountainous areas that would require roadway widening to increase capacity. Road widening shall be allowed to protect public safety.
- **Policy CI-20:** Analyze the traffic impacts of a proposed development by considering the project’s system-wide effects, including effects on transportation alternatives and the potential for bottlenecks in the area’s roadway system.
- **Policy CI-21:** Require each new development causing cumulative circulation impacts to construct or fund its fair share of any necessary circulation system improvements or additions.
- **Policy CI-22:** Where funding sources prove inadequate, establish assessment districts, impact fees and/or other equitable funding mechanisms to augment roadway funds.
- **Policy CI-23:** Encourage transportation alternatives, including public transit service, staging areas, and park-and-ride lots, both within the region and from metropolitan Los Angeles to the area’s major parks and recreation areas.
- **Policy CI-24:** The extension of public transit facilities and services, including shuttle programs, to maximize public access and recreation opportunities shall be encouraged, where feasible.
- **Policy CI-25:** Encourage the use of locally-based contractors, service providers, and laborers rather than those that need to travel long distances to work sites in the North Area Plan area.
- **Policy CI-26:** Assist local employers in transporting employees from homes and worksites in the Santa Monica Mountains, thereby reducing the need for additional vehicle trips.
- **Policy CI-27:** Work with surrounding cities and transit service providers to offer commuter bus services between inland communities and coastal cities.

- **Policy CI-28:** Require new development to provide for public transportation needs on existing roadways, where appropriate, when acquisition and improvement activities occur. Cooperate with adjacent jurisdictions to develop and incorporate this and other public transit-friendly design features into new projects and other discretionary project applications.
- **Policy CI-29:** Incorporate bike lanes and/or bike use signage into local road designs wherever feasible and safe.
- **Policy CI-30:** Ensure that improvements to any roadway or trail containing a bikeway and/or trail do not adversely affect the provision of bicycle or trail use.
- **Policy CI-31:** Support the region-wide expansion of alternative transportation methods, including rail lines, transit ways, bike paths, and rapid bus systems, where consistent with the policies of this North Area Plan.

Proposed Community Standards District Update

Section 22.336.070 Community-Wide Development Standards

- F. Event Facilities
- M. Outdoor Lighting
- U. Street and Road Cross-Sections

Section 22.336.100 Modification of Specific CSD Standards

C.15 Wildland Fire and Hazards

This section describes effects on wildfire prevention and suppression and hazardous materials that would be caused by implementation of the proposed North Area Plan and CSD Update. The following discussion addresses existing environmental conditions in the North Area and recommends measures to reduce or avoid adverse impacts anticipated from implementation of the proposed Plan and CSD Update. In addition, existing laws and regulations relevant to wildfire prevention and suppression are described. In some cases, compliance with these existing laws and regulations would serve to reduce or avoid certain impacts.

Scoping Comments Received. During the scoping period for the EIR, written and verbal comments were received from agencies, organizations, and the public. These comments identified various substantive issues and concerns relevant to the EIR analysis for wildland fire and hazards. The issues below summarize these comments. Appendix 2 includes all comments received during the scoping comment period.

- Concern over plan-related adverse effect on biological resources, fuel modification, the ability of private property owners to defend against wildfires, and fire insurance rates.
- Request mandating fire safe California native horticultural practices for new development.
- Concern over increased wildfire danger related to vineyards, future development, smoking, uneducated visitors, and street racing.

C.15.1 Environmental Setting

C.15.1.1 Wildland Fire

Overview, Climate, Topography and Vegetation

The North Area is located along the north side of the Santa Monica Mountains which parallel the Pacific Coast of southern California in Ventura and Los Angeles Counties. The topography is hilly and characterized by rugged terrain and steep hillsides particularly in the western and southern areas. The area has a Mediterranean climate characterized by warm, dry summers and cool winters with approximately 86 percent of the precipitation falling from October through March. Average annual precipitation at nearby Thousand Oaks is 14.7 inches (WRCC, 2018). The natural airflow for the Santa Monica Mountains most of the year creates night and morning downward flows of air from the mountains. During the summer the Catalina eddy penetrates the mountains to a considerable distance with cool, moist marine air. The summer fog line extends up to the coastal ridges and to a considerable distance into the canyons. In late September through December and occasionally later the area is characterized by strong north to

KEY FINDINGS

- The North Area is classified as a Very High Fire Hazard Severity Zone. More than 225 fires have occurred since 1925, most recently the Woolsey Fire which burned more than 96,000 acres.
- Fire risk is exacerbated by the area topography, vegetation, prevailing winds and development.
- Proposed Plan and CSD Update includes policies intended to reduce and mitigate risk of wildfire.
- Adherence to proposed Plan and CSD Update policies, County General Plan and federal, state and local regulations would minimize the risk of wildfire in North Area.
- Hazardous materials contamination in North Area is minor and being addressed under existing regulations.
- Proposed Plan and CSD Update includes policies intended to reduce risk of hazardous materials contamination.
- Adherence to proposed Plan and CSD Update policies, County General Plan and federal, state and local regulations would minimize the risk of hazardous materials contamination in North Area.

northeasterly winds locally known as Santa Ana winds. As they descend to lower elevations these winds become hot, dry and gusty (Radtke et al., 1982).

Major natural vegetation types found in the North Area include chaparral, coastal sage scrub, oak woodland, annual grassland, riparian woodland, and riparian scrub. There are also some agricultural areas, disturbed areas, exotic vegetation, and developed areas (Aspen, 2018). Chaparral and coastal sage scrub predominate.

Fire Factors

The four most important factors that influence the potential for fire in the Santa Monica Mountains are land use, vegetation, topography and climate (Radtke et al., 1982).

Almost every fire in recorded history in the Santa Monica Mountains was accidentally or deliberately set by man (Radtke et al., 1982). Of the acres burned by known ignition sources between 1982 and 2008, 72% are due to arson and 19% due to arcing power lines. Most unintentionally started fires such as those due to vehicles, campfires, mechanical equipment use, and prescribed burning are small and contribute little to the annual area burned (LACFD, 2013). Natural fires caused by lightning are rare due to the winter seasonality of precipitation events (LACFD, 2013) which are also out of phase with the Santa Ana winds. The increasing development and human use of the area, particularly along transportation routes, has resulted in most fires being started along access routes through the area (Radtke et al., 1982).

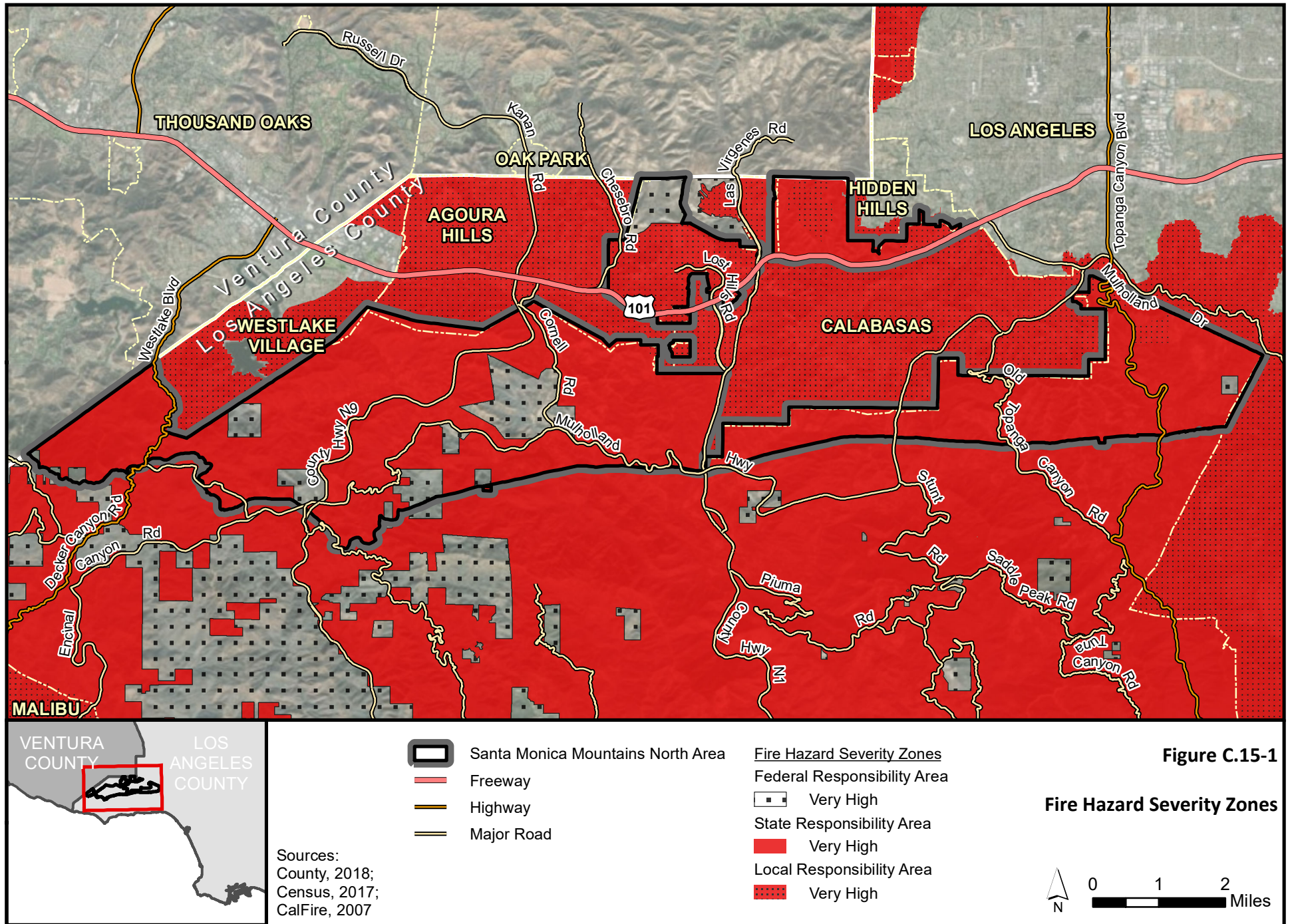
Coastal sage scrub and chaparral are highly-susceptible to fire depending on the age of the plant community, climatic factors (season, wind, previous drought) and topography. Between the years 2000 to 2008, 95% of land in Southern California burned by wildfires was in chaparral and coastal sage scrub (LACFD, 2013). Coastal sage scrub consists of drought deciduous, short-lived shrubs that can burn again within 7-10 years after a previous burn (Radtke et al., 1982). South-slope chaparral can become highly flammable within 15-20 years (Radtke et al., 1982). Except in periods of extreme drought or dry Santa Ana winds, north-slope chaparral generally does not become highly flammable for at least 20-25 years (Radtke et al., 1982), but the flammability of this community can be increased by adjacent fires in other communities.

The steep topography of much of the North Area can contribute to the rapid spread of fires that start near the toe of the slope. Canyons that run generally parallel to the prevailing direction of the Santa Ana winds could channel fires lengthwise along the canyon to spread out along the ridges (Radtke et al., 1982).

Wind and fuel moisture (related to climate) are the two most important elements affecting fire behavior (Radtke et al., 1982). In the Santa Monica Mountains sharp ridge lines produce significant turbulence, especially during Santa Ana winds. Wind eddies at the rims of steep canyons can rotate and result in strong upslope winds that are opposite to the direction of the winds blowing over the rim. Southwest-trending Santa Ana winds can push fire in a southwestern direction up the inland mountain slopes especially in steep terrain and areas with substantial flammable materials or vegetation (heavy fuel loading) (Radtke et al., 1982).

In summary, due to the nearby presence of development and access routes, fire-prone vegetation, steep topography, and the presence of Santa Ana winds in the fall after dry summers, the North Area is at high risk of fire. Most of the area is classified by the State of California (Figure C.15-1) as a Very High Fire Hazard Severity Zone. Note that federal and local responsibility areas are not classified in Figure C.15-1. Those areas are adjacent to and similar to the high fire hazard areas and would have similar wildfire risk.

Climate change is expected to increase the risk of fires in the Southern California coastal ecosystems in the future (McGinnis et al., 2009). The fire season begins in early May after the winter rains cease and



grasslands begin to dry. The season extends to the end of fall and perhaps even later depending on the onset of winter rains and the presence of Santa Ana Winds.

Fire History

The North Area has experienced numerous fires in the past. Figure C.15-2 shows the known fire frequency (CalFire, 2019) up to the year 2018 (the first recorded fire in the area was in 1925). Figure C.15-3 provides similar information as Figure C.15-2, which presents fire data as mean fire return interval. As shown in Figure C.15-3, some areas in the North Area, mainly in the Calabasas area, have burned once every 13 to 19 years on average. Other areas of the North Area have burned once every 24 to 94 years, on average.

There were 100 recorded fires in the North Area between 1925 and 2018, burning a total of 57,306 acres. Table C.15-1 provides a summary of number of fires and area burned by decade.

Table C.15-1. North Area Fire Summary

Decade	Number of Fires	Total Area Burned, in Acres
1925-1930	3	1,979
1931-1940	4	1,625
1941-1950	4	2,983
1951-1960	10	5,945
1961-1970	10	7,713
1971-1980	18	10,262
1981-1990	15	10,272
1991-2000	3	1,622
2001-2010	12	314
2011-2018	21	14,591

The total area burned increased from 1925 to the 1970s and 1980s then decreased substantially in the 1990s and 2000s. The years 2011 to 2018 were the highest due to the Woolsey Fire, which burned 14,456 acres in the North Area in 2018. Without the Woolsey Fire, only 135 acres burned from 2011 to 2018.

Most fires are now quickly controlled while they are still small, but fires that start during extreme fire weather in the fall can burn fiercely, spread rapidly, and get very large before they can be stopped. All the largest fires in recent history, which burn more land than all the smaller fires combined, have occurred during Santa Ana wind events in the fall (NPS, 2018b).

Woolsey Fire Incident Report

Section B.2 (General Environmental Setting) includes a description of the Woolsey Fire and the devastation it caused to the Santa Monica Mountains, including the North Area. As demonstrated in Table C.15-1 (above), the Woolsey Fire resulted in the highest number of acres burned since 1925. The fire began on November 8, 2018 and was contained on November 21, 2018. The response to the fire was multi-jurisdictional and required the services of Los Angeles County Fire, Ventura County Fire, and Los Angeles City Fire.

In the aftermath of the fire, the County prepared the After Action Review of the Woolsey Fire Incident (November 2019) to document the response to the fire and provide recommendations for improvement. As documented in the report, residents were frustrated with the response to the Woolsey Fire. *“Residents prior experience and expectations regarding the agencies’ capability to successfully confront a fast-moving*

wildfire were abruptly reset by the many obstacles present.” At the time the Woolsey Fire developed, the Camp Fire and Hill Fire consumed a portion of the fire-fighting resources (CITYGATE, 2019). The fire affected thousands of residents and caused significant personal, business, and economic losses (CITYGATE, 2019). The After Action Review was developed by reviewing background reports, conducting agency and community interviews, and conducting multiple community meetings to gather input on the Woolsey Fire response. The report includes recognitions, needed improvements, agency-action recommendations, and near-term next steps.

On November 19, 2019, the County Board of Supervisors accepted the After Action Review of the Woolsey Fire Incident Report. As part of this decision, the Board approved consultant support to assist the County with implementing report recommendations (CITYGATE, 2020).

Fire Protection

Wildland fires in the North Area are suppressed by the Los Angeles County Fire Department with support from the State of California, National Park Service (NPS), California Department of Parks and Recreation, and the Mountains Recreation and Conservation Authority (NPS, 2006). The Los Angeles County Fire Department (LACFD) has ten fire stations in the area of the Santa Monica Mountains (LACFD, 2013). The Mountains Recreation and Conservation Authority has four areas where fire engines are pre-deployed, and cooperates with the LACFD, California Department of Parks and Recreation, and NPS to prevent and protect against wildfire (LACFD, 2013). Figure C.15-1 shows areas of local (Los Angeles County Fire Department), state (State of California - CAL FIRE) and federal (NPS) responsibility.

Landslides/Debris Flows

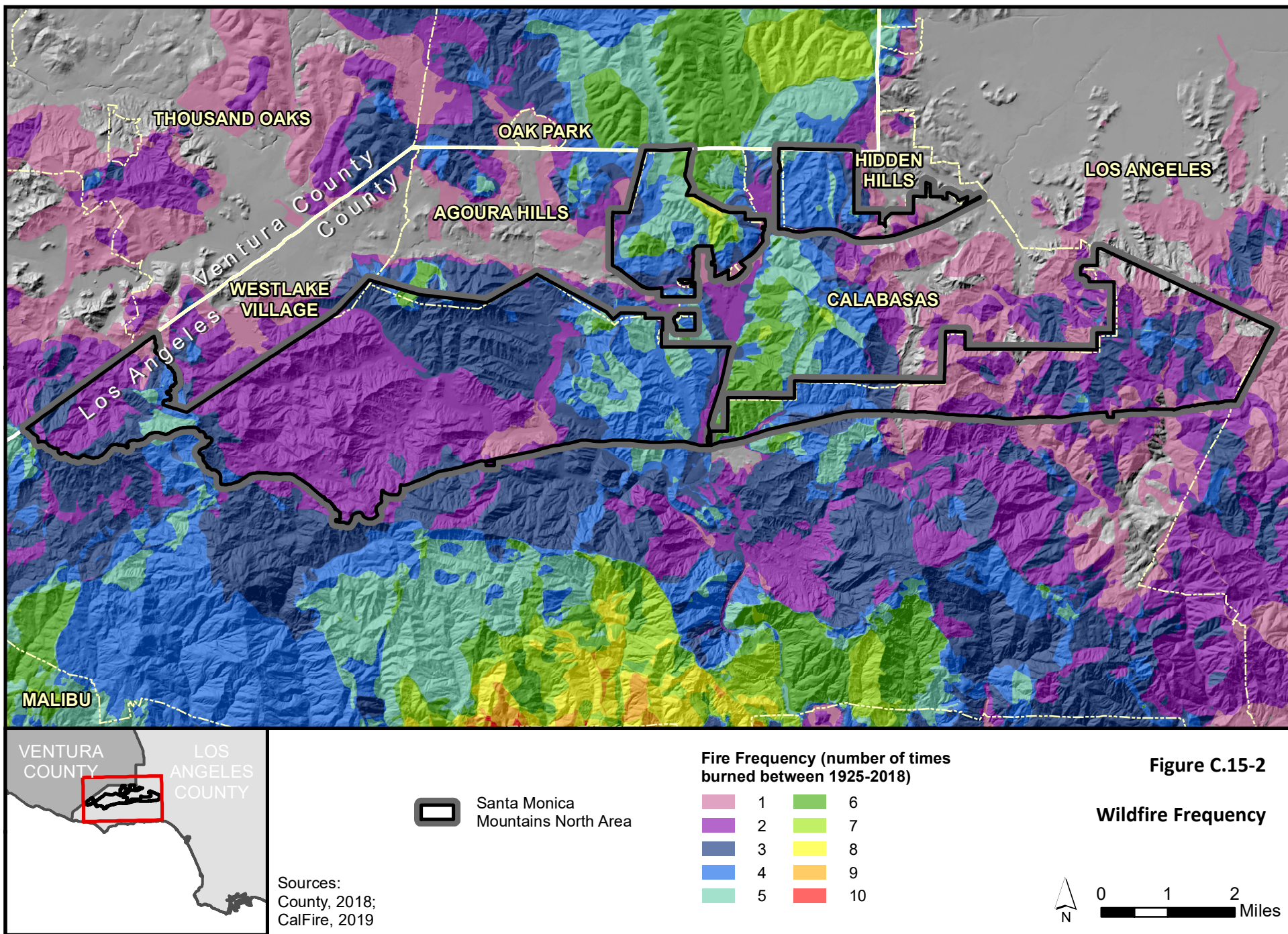
Steep, recently burned areas, which could occur in the North Area after a wildfire, are especially susceptible to debris flows following rains. Wildfire-induced debris flows are common in the coastal mountains of Southern California and have resulted in catastrophic destruction and loss of life, most recently in the Montecito area of Santa Barbara County following the Thomas Fire.

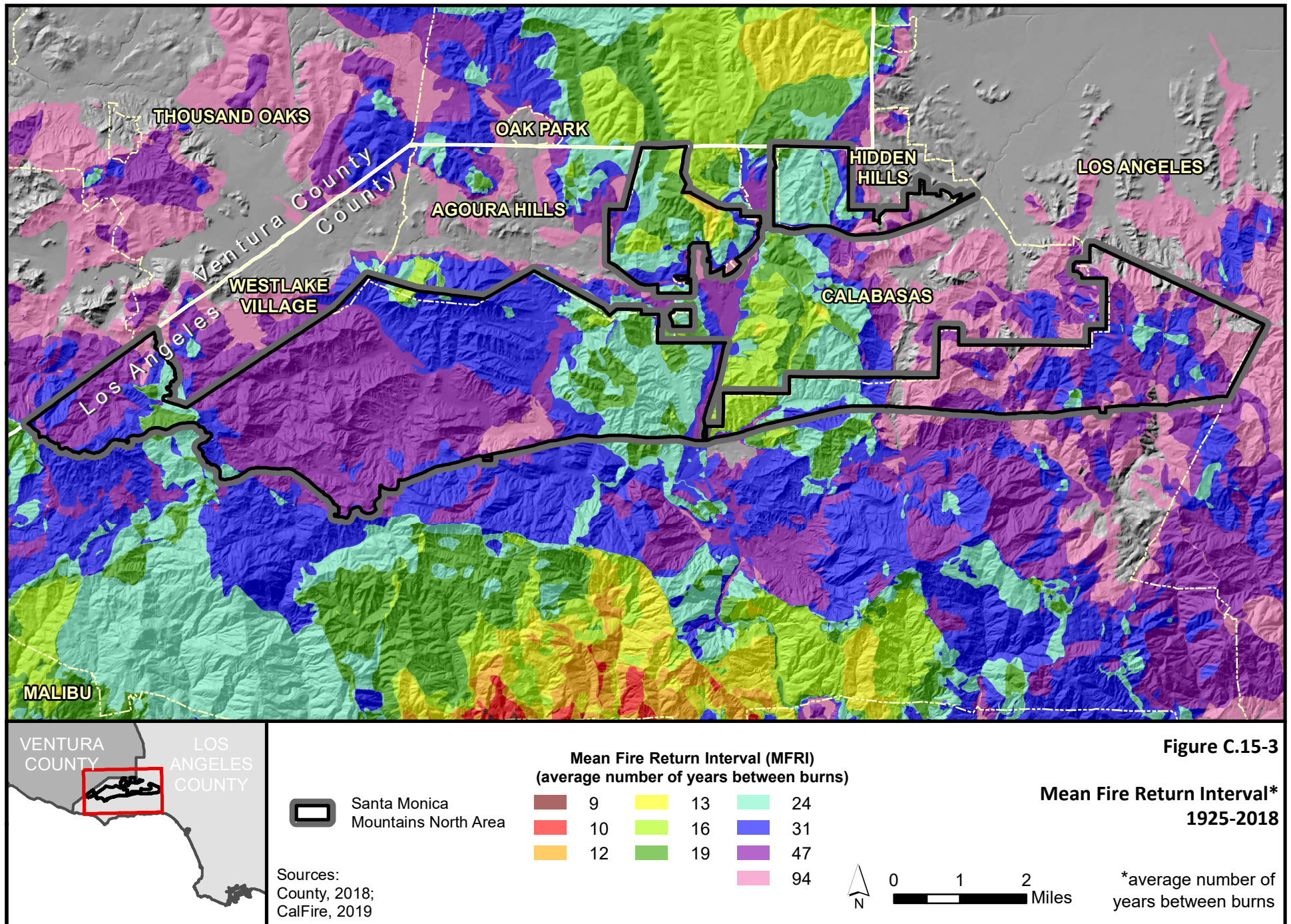
C.15.1.2 Hazardous Materials

Population growth and industrialization within and primarily in the area surrounding the North Area have increased the potential for the use, storage and disposal of hazardous materials. Industrial, agricultural, and household contaminants have the potential to enter local surface waters, or groundwater. Pesticides associated with vineyards in the area have been mentioned as a potential concern related to environmental contamination, as have rodenticides. Many of these pollutants are known to pose risks for people, wildlife including aquatic resources, and the surrounding environment.

The hazardous materials sites listed in several databases were researched to document known present and past hazardous material storage, generation or spill sites within the North Area. These include:

- EPA NPL (National Priorities List): The United States Environmental Protection Agency lists all contaminated sites under the US EPA’s Superfund program.
- EPA RCRIS (RCRAInfo): The Resource Conservation and Recovery Act Information System is a national inventory of hazardous waste handlers, generators, transporters and disposers.
- EnviroStor. EnviroStor is the California Department of Toxic Substances Control’s (DTSC) data management system for tracking cleanup, permitting, enforcement and investigation efforts at hazardous waste facilities and sites with known contamination. This site contains the DTSC Cortese List information required by Government Code §65962.5.





- GeoTracker. GeoTracker is a data management system by the California State Water Resources Control Board for sites that impact or have the potential to impact water quality in California, with emphasis on groundwater. GeoTracker contains records for sites that require cleanup, such as Leaking Underground Storage Tank (LUST) Sites, Department of Defense Sites, and Cleanup Program Sites. GeoTracker also contains records for various unregulated projects as well as permitted facilities including: Irrigated Lands, Oil and Gas production, operating Permitted USTs, and Land Disposal Sites.

A search of the EPA NPL (EPA, 2018a) revealed no superfund sites within the North Area. An EPA RCRIS (EPA, 2018b) search revealed one large-quantity hazardous material generator (generating 1,000 kilograms per month or more of hazardous waste or more than 1 kilogram per month of acutely hazardous waste), and one small-quantity generator (100 to 999 kilograms per month of hazardous waste) within the North Area. Both are in that portion of the Santa Monica Mountains north of the 101 Freeway near Hidden Hills. The RCRA database revealed a number of additional small and large-quantity generators along the 101 Freeway just outside the North Area boundary.

Table C.15-2 provides a summary of the data from the EnviroStor database. There are three sites within the North Area, two of which are at least ten years old. One was referred to another agency for permitting.

Table C.15-2. EnviroStor Cleanup Program Sites Within the North Area

Site	Action	Status	Status Year
School	Site investigation	No Action Required	2000
Housing Project	Voluntary cleanup	Inactive – Needs Evaluation	2008
Electronics	Permit	Refer: Other Agency	

Source: DTSC, 2018

Table C.15-3 provides a summary of the data from the State Water Resources Quality Control Board's GeoTracker database. There were a total of 12 sites, most of which were LUST (Leaking Underground Storage Tank) sites that were cleaned up. All but two have been completed with cases closed. The other two are currently operating. Areas potentially affected include soils, aquifers and local surface waters as indicated in Table C.15-3.

Table C.15-3. Geotracker Sites Within the North Area

Site	Action	Status	Status Year	Pollutant	Potential Area Contaminated	Potential Surface Waters Contaminated
Gas Station	LUST Cleanup Site	Completed – Case Closed	1993	Diesel	Soil	Santa Monica Bay – Malibu Creek – Triunfo Canyon
Fire Station	LUST Cleanup Site	Completed – Case Closed	2001	Gasoline	Under Investigation	Santa Monica Bay – Malibu Creek – Triunfo Canyon
Hotel	LUST Cleanup Site	Completed – Case Closed	2001	Diesel	Soil	Santa Monica Bay – Malibu Creek – Russell Valley
University	LUST Cleanup Site	Completed – Case Closed	1996	Aviation Fuel	Soil	Santa Monica Bay – Malibu Creek – Las Virgenes Canyon

Table C.15-3. Geotracker Sites Within the North Area

Site	Action	Status	Status Year	Pollutant	Potential Area Contaminated	Potential Surface Waters Contaminated
Microwave Site	Cleanup Program Site	Open – Site Assessment	2013	Tetrachloroethylene (PCE), Trichloroethylene (TCE), Total Petroleum Hydrocarbons (TPH)	Aquifer used for drinking water supply, Soil	Los Angeles River – San Fernando – Bull Canyon
Landfill	Land Disposal Site	Open – Operating	2016			Santa Monica Bay – Malibu Creek – Lindero Canyon
Gas Station	LUST Cleanup Site	Completed – Case Closed	1996	Gasoline	Aquifer used for drinking water supply	Los Angeles River – San Fernando – Bull Canyon
Fire Station	LUST Cleanup Site	Completed – Case Closed	2014			Santa Monica Bay – Malibu Creek – Las Virgenes Canyon
Road Yard	LUST Cleanup Site	Completed – Case Closed	2008	Gasoline	Aquifer used for drinking water supply	Santa Monica Bay – Malibu Creek – Triunfo Canyon
Gas Station	LUST Cleanup Site	Completed – Case Closed	1998	Gasoline	Aquifer used for drinking water supply	Los Angeles River – San Fernando – Bull Canyon
Tentative Tract	Cleanup Program Site	Completed – Case Closed	2003			Santa Monica Bay – Malibu Creek – Las Virgenes Canyon
Summer Camp	LUST Cleanup Site	Completed – Case Closed	2002	Other Solvent or Non-Petroleum Hydrocarbon	Soil	Santa Monica Bay – Topanga – Topanga Canyon

Source: SWRCB, 2018a.

Scoping comments raised concerns about pesticide use, particularly with regard to local vineyards. CalEnviroScreen (OEHHA, 2018) ranks pesticide use by census tract. A review of the census tracts associated with the North Area revealed pesticide use ranging from 0.024 to 0.888 pounds per square mile for the years 2014 to 2016. The area generally ranges from the 12th to 38th percentile of pesticide use, meaning that the pesticide use of the area is higher than 12% to 38% of the census tracts in California. All the pesticide use is classified as agricultural, which would include but not be limited to vineyards.

The California State Water Resources Control Board lists water bodies as impaired by pollutants under Section 303(d) of the Clean Water Act (SWRCB, 2018b). These water bodies include Lindero Creek, Medea Creek, Palo Comado Creek, Triunfo Canyon Creek, Malibu Creek, Las Virgenes Creek and Stokes Creek. None of the listed pollutants for these creeks included pesticides, though sedimentation/siltation is listed as an impairment for several, which could be related to land disturbance, including agricultural activities.

C.15.1.3 Emergency Response Plans

The Los Angeles County Operational Area Emergency Response Plan maintained by the Los County Office of Emergency Management (OEM) describes the planned response of the County Operational Area to emergencies associated with natural and man-made disasters and technological incidents. This plan also provides an overview of operational concepts, identifies components of the County's Emergency Management Organization, and describes responsibilities of the federal, state and local agencies for protecting

life and property. OEM leads and coordinates disaster plans and disaster preparedness exercises for all areas of Los Angeles County including cities. In addition, the Los Angeles County Community Emergency Response Team, comprised of local residents trained in emergency response and coordinated by the Los Angeles County Fire Department, are deployed as needed during emergencies.

Local emergency preparedness plans and emergency response operations have also been prepared by nearby local cities (Agoura Hills, Calabasas, City of Los Angeles) and by the National Park Service for lands owned by the National Park Service.

C.15.2 Regulatory Setting

C.15.2.1 Wildland Fire

This section describes the regulatory setting for wildland fire. Due to the fact that nearly 20 percent of all wildland fires in the Santa Monica Mountains are caused by power lines, fire-related regulations involving power lines are included.

C.15.2.1.1 Federal

Federal Energy Regulatory Commission

The Federal Energy Regulatory Commission (FERC) requires utilities to adopt and maintain minimum clearance standards between vegetation and transmission voltage power lines. These clearances vary depending on voltage. In most cases, however, the minimum clearances required in state regulations (California Public Utilities Commission General Order 95) are greater than the federal requirement.

Federal Wildland Fire Management Policy

The Federal Wildland Fire Management Policy was developed in 1995 and updated in 2001 by the National Wildfire Coordinating Group, a federal multi-agency group that establishes consistent and coordinated fire management policy across multiple federal jurisdictions. An important component of the Federal Wildland Fire Management Policy is the acknowledgement of the essential role of fire in maintaining natural ecosystems.

National Fire Plan

The National Fire Plan is a Presidential Directive passed in 2000 as a response to severe wildland fires that had burned throughout the United States. The National Fire Plan focuses on reducing fire impacts on rural communities and assurance for sufficient firefighting capacity in the future. The plan is a long-term commitment based on cooperation and communication among federal agencies, states, local governments, tribes, and interested publics. There are five key areas addressed under the National Fire Plan including: firefighting and preparedness, rehabilitation and restoration, hazardous fuels reduction, community assistance, and accountability.

International Fire Code

Created by the International Code Council, the International Fire Code addresses a wide array of conditions hazardous to life and property including fire, explosions, and hazardous materials handling or usage. The International Fire Code places an emphasis on prescriptive and performance-based approaches to fire prevention and fire protection systems. Updated every 3 years, the International Fire Code uses a hazards classification system to determine the appropriate measures to be incorporated to protect life and property (often these measures include construction standards and specialized equipment). The International

Fire Code uses a permit system (based on hazard classification) to ensure that required measures are instituted.

North American Electric Reliability Corporation (NERC) Standards

The NERC is a nonprofit corporation comprising 10 regional reliability councils. The overarching goal of NERC is to ensure the reliability of the bulk power system in North America. To achieve its goal, the NERC develops and enforces reliability standards, monitors the bulk power systems, and educates, trains, and certifies industry personnel. NERC developed a transmission vegetation management program that is applicable to all transmission lines operated at 200 kV and above to lower voltage lines designated by the Regional Reliability Organization as critical to the reliability of the electric system in the region. The plan, which became effective on April 7, 2006, establishes requirements of the formal transmission vegetation management program, which include identifying and documenting clearances between vegetation and any overhead, ungrounded supply conductors, while taking into consideration transmission line voltage, the effects of ambient temperature on conductor sag under maximum design loading, fire risk, line terrain and elevation, and the effects of wind velocities on conductor sway.

Institute of Electrical and Electronics Engineers Standard 516-2003

The Institute of Electrical and Electronics Engineers is a leading authority in setting standards for the electric power industry. Standard 516-2003, Guide for Maintenance Methods on Energized Power Lines, establishes minimum vegetation-to-conductor clearances to maintain electrical integrity of the electrical system.

C.15.2.1.2 State

California Fire Code

The California Fire Code is contained within Chapter 9 of Title 24 of the California Code of Regulations (CCR). The California Fire Code regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. Similar to the International Fire Code, the California Fire Code and the California Building Code use a hazards classification system to determine the appropriate measures to incorporate to protect life and property.

California Health and Safety Code

State fire regulations are established in Section 13000 of the California Health and Safety Code. This section establishes building standards, fire protection device equipment standards, high-rise building and childcare facility standards, interagency support protocols, and emergency procedures. Also, Section 13027 states that the state fire marshal shall notify industrial establishments and property owners having equipment for fire protective purposes of the changes necessary to bring their equipment into conformity with and shall render them such assistance as may be available in converting their equipment to, standard requirements.

California Fire Plan

The California Fire Plan is the statewide plan for reducing the risk of wildfire by placing emphasis on fire prevention through means such as fuel reduction, zoning restrictions, and fire safety requirements. The Fire Plan seeks to reduce firefighting costs and property losses, increase firefighter safety, and contribute to ecosystem health.

California Public Utilities Commission (CPUC) General Order 95: Rules for Overhead Electric Line Construction

General Order (GO) 95 is the key standard governing the design, construction, operation, and maintenance of overhead electric lines in the State. It was adopted in 1941 and updated most recently in 2006. GO 95 includes safety standards for overhead electric lines, including minimum distances for conductor spacing, minimum conductor ground clearance, standards for calculating maximum sag, electric line inspection requirements, and vegetation clearance requirements.

Rule 31.2, Inspection of Lines, requires that lines be inspected frequently and thoroughly for the purpose of ensuring that they are in good condition, and that lines temporarily out of service be inspected and maintained in such condition as not to create a hazard.

Public Resources Code 4291

Public Resources Code 4291 provides that a person who owns, leases, controls, operates, or maintains a building or structure in, upon, or adjoining a mountainous area, forest-covered lands, brush-covered lands, grass-covered lands, or land that is covered with flammable material, shall at all times maintain defensible space of 100 feet from each side and from the front and rear of the structure, but not beyond the property line.

California Department of Forestry and Fire Protection

California Department of Forestry and Fire Protection (CAL FIRE) is responsible for reducing wildfire-related impacts and enhancing California's resources. CAL FIRE responds to all types of emergencies including wildland fires and residential/commercial structure fires. This agency is responsible for the protection of approximately 31 million acres of private land within the state and, at the local level, is responsible for inspecting defensible space around private residences. CAL FIRE is the responsible agency for enforcing California fire safety codes included in the California Code of Regulations and California Public Resources Codes.

C.15.2.1.3 Local

Los Angeles County Code of Ordinances Title 32

Title 32 is the fire code for Los Angeles County. In addition to fire-related regulations regarding structures, Section 326 includes regulations regarding activities in hazardous wildland fire areas. The purpose of this section is to provide necessary safeguards to prevent the occurrence of fires and to control the spread of fires which might be caused by recreational, commercial, industrial, or other activities carried on in hazardous fire areas.

Los Angeles County Fire Department Fire Hazard Reduction Programs

The Los Angeles County Fire Department Fire Hazard Reduction Programs include brush clearance inspection, fuel modification and vegetation management for the reduction of fire risk. These programs are primarily oriented toward owners of property in Very High Fire Hazard Severity Zones, such as the Santa Monica Mountains North Area.

Los Angeles County General Plan

The Safety Element of the Los Angeles County General Plan describes fire hazard zones and a variety of regulatory programs and standards to reduce fire hazards. These include vegetation management, pre-

fire management and planning, the fuel modification program, and brush clearance inspection program. The General Plan describes responsibility for implementing the California Fire Plan in Los Angeles County. The General Plan also describes a series of County regulations related to fire prevention.

Santa Monica Mountains North Area Plan

The Santa Monica Mountains North Area Plan, adopted in October 2000, includes policies intended to minimize the potential for loss of life, physical injury, property damage, economic loss and social dislocation due to wildland fires. These policies are currently being used to review development in the North Area and would be replaced by the proposed Plan and CSD Update, when adopted.

Other Local Plans

The Santa Monica Mountains National Recreation Area (SMMNRA), which includes a portion of the North Area, has a Fire Management Plan that guides management of wildland fire, prescribed fire, and hazard fuel reduction within the National Recreation Area. The National Park Service is responsible for wildland fire protection on all SMMNRA land. The SMMNRA Fire Management Plan states that wildfire will not be used as a resource management strategy within the SMMNRA, which means that all fires are suppressed (LACFD, 2013). In addition, the Santa Monica Mountains Community Wildfire Protection Plan, to which the LACFD adheres, is formed by a group of 27 collaborator agencies including the California Department of Parks and Recreation, City of Calabasas, Las Virgenes Federation of Homeowners Association, National Park Service, National Resource Conservation Service, Santa Monica Mountains Conservancy, the Santa Monica Mountains Fire Safe Alliance, and other organizations. The Santa Monica Mountains Community Wildfire Protection Plan focuses primarily on residential areas of the Santa Monica Mountains (LACFD, 2013).

C.15.2.2 Hazards

C.15.2.2.1 Federal

Federal Toxic Substances Control Act/Resource Conservation and Recovery Act/Hazardous and Solid Waste Act

The Federal Toxic Substances Control Act of 1976 and the Resource Conservation and Recovery Act of 1976 (RCRA) established an EPA-administered program to regulate the generation, transport, treatment, storage, and disposal of hazardous waste. The RCRA was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the “cradle to grave” system of regulating hazardous waste.

Emergency Planning Community Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act (EPCRA) of 1986 addressed concerns regarding environmental and safety hazards posed by the storage and handling of toxic chemicals. EPCRA imposed requirements for emergency planning and "Community Right-to-Know" reporting on hazardous and toxic chemicals. The Community Right-to-Know provisions help increase the public's knowledge and access to information on chemicals at individual facilities, their uses, and releases into the environment. States and communities can use the information to improve chemical safety and protect public health and the environment.

U.S. Department of Transportation

The U.S. Department of Transportation (DOT) regulates the interstate transport of hazardous materials and wastes through implementation of the Hazardous Materials Transportation Act (HMTA). The

provisions of the HMTA contain requirements for hazardous materials shipments and packaging and contain guidelines for the marking, manifesting, labeling, packaging, placarding, and spill reporting.

C.15.2.2.2 State

California Health and Safety Code

The California Department of Toxic Substances Control (DTSC), a department of the California Environmental Protection Agency, is the primary agency in the State for regulating hazardous waste, cleaning up existing contamination, and finding ways to reduce the amount of hazardous waste produced in California. DTSC regulates hazardous waste primarily under the authority of the Federal RCRA and the California Health and Safety Code (primarily Division 20, Chapters 6.5 through 10.6, and CCR Title 22, Division 4.5).

Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (California Health and Safety Code, Division 20, Chapter 6.11, Sections 25404–25404.9) consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities of the environmental and emergency response programs and provides authority to the Certified Unified Program Agency (CUPA). The CUPA is designed to protect public health and the environment from accidental releases and improper handling, storage, transportation, and disposal of hazardous materials and wastes. This is accomplished via inspections, emergency response, enforcement, and mitigation oversight. The CUPA for the North Area is the Los Angeles County Fire Department.

Hazardous Materials Release Response Plans and Inventory Act of 1985

The Hazardous Materials Release Response Plans and Inventory Act, also known as the Business Plan Act, requires businesses using hazardous materials to prepare a plan that describes their facilities, inventories, emergency response plans, and training programs. Hazardous materials are defined as unsafe, raw, or unused materials that are part of a process or manufacturing step. They are not considered hazardous waste. Health concerns pertaining to the release of hazardous materials, however, are similar to those relating to hazardous waste.

Hazardous Waste Control Act

The Hazardous Waste Control Act (HWCA) created the State hazardous waste management program, which is similar to, but more stringent than, the federal RCRA program. The Act is implemented by regulations contained in Title 26 of the California Code of Regulations, which describes the following required aspects for the proper management of hazardous waste:

- Identification and classification;
- Generation and transportation;
- Design and permitting of recycling, treatment, storage, and disposal facilities;
- Treatment standards;
- Operation of facilities and staff training; and
- Closure of facilities and liability requirements.

These regulations list more than 800 materials that may be hazardous and establish criteria for identifying, packaging, and disposing of such waste. Under the HWCA and Title 26, the generator of hazardous waste must complete a manifest that accompanies the waste from generator to transporter to the ultimate disposal location. Copies of the manifest must be filed with DTSC.

Safe Drinking Water and Toxic Enforcement Act of 1986

In 1986, California voters approved an initiative to address their growing concerns about exposure to toxic chemicals. That initiative became the Safe Drinking Water and Toxic Enforcement Act of 1986, better known by its original name of Proposition 65. Proposition 65 requires the State to publish a list of chemicals known to cause cancer or birth defects or other reproductive harm. This list, which must be updated at least once a year, has grown to include approximately 800 chemicals since it was first published in 1987.

Proposition 65 requires businesses to notify Californians about significant amounts of chemicals in the products they purchase, in their homes or workplaces, or that are released into the environment. By providing this information, Proposition 65 enables Californians to make informed decisions about protecting themselves from exposure to these chemicals. Proposition 65 also prohibits California businesses from knowingly discharging significant amounts of listed chemicals into sources of drinking water.

California State Water Resources Control Board

The California State Water Resources Control Board (SWRCB) and its nine regional boards develop and enforces water quality objectives and implementation plans that protect beneficial uses of the State's waters. The North Area is located within the jurisdiction of the Los Angeles Regional Water Quality Control Board (RWQCB), the primary regulatory agency for stormwater discharges and for sites that impact or have the potential to impact the quality of surface or groundwater.

California Office of Emergency Services

The California Office of Emergency Services (OES) is responsible for establishing and managing statewide standards for business and area plans relating to the handling and release, or threatened release, of hazardous materials. Basic information on hazardous materials handled, used, stored, or disposed of (including location, type, quantity, and the health risks) must be made available to firefighters, public safety officers, and regulatory agencies, and must be included in business plans in order to prevent or mitigate the damage to health and safety from the release of hazardous materials into the workplace and environment.

California Occupational Safety and Health Administration

The California Occupational Safety and Health Administration (Cal/OSHA) is the primary agency responsible for worker safety in the handling and use of chemicals in the workplace. The Cal/OSHA standards are generally more stringent than federal regulations and specify requirements for employee training, availability of safety equipment, accident-prevention programs, and hazardous substance exposure warnings.

California Highway Patrol

A valid Hazardous Materials Transportation License, issued by the California Highway Patrol (CHP), is required by the laws and regulations of State of California Vehicle Code Section 3200.5 for transportation of either:

- Hazardous materials shipments for which the display of placards is required by State regulations; or
- Hazardous materials shipments of more than 500 pounds, which would require placards if shipping greater amounts in the same manner.

Additional requirements on the transportation of explosives, inhalation hazards, and radioactive materials are enforced by the CHP under the authority of the State Vehicle Code. Transportation of explosives generally requires consistency with additional rules and regulations for routing, safe stopping distances, and inspection stops.

California Accidental Release Prevention Program.

The California Accidental Release Prevention Program (CalARP) was implemented on January 1, 1997 to prevent accidental releases of substances that can cause serious harm to the public and the environment, to minimize the damage if releases do occur, and to satisfy community right-to-know laws (see EPCRA above). Businesses that handle more than a threshold quantity of a regulated substance listed in the regulations are required to develop a Risk Management Plan containing safety information, hazard review, operating procedures, training requirements, maintenance requirements, compliance audits and incident investigation procedures. The CalARP program is implemented at the local government level by the CUPAs, which in this case is the Los Angeles County fire Department.

C.15.3 Thresholds of Significance and Methodology

Wildland Fire

The significance of potential wildland fire impacts were determined based on relevant CEQA Guidelines, Appendix G. Using these thresholds, the proposed Plan and CSD Update would have a significant impact related to wildland fire if it were to:

- Substantially impair an adopted emergency response plan or emergency evacuation plan;
- 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;
- Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or,
- 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.

Hazards and Hazardous Materials

The significance of potential hazards and hazardous materials impacts were determined based on relevant CEQA Guidelines, Appendix G. Using these thresholds, the proposed Plan and CSD Update would have a significant impact related to hazards and hazardous materials if it were to:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
- 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;
- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;
- 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;

- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, resulting in a safety hazard or excessive noise for people residing or working in the project area;
- Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan; or,
- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

C.15.4 Environmental Impacts and Mitigation Measures

The scope of this assessment is at a programmatic level rather than a project-specific level; thus, this analysis of wildland fire and hazards and hazardous materials impacts is discussed qualitatively. Project-level analyses are not required at this program level; however, development contemplated in the North Area would require subsequent project-by-project analysis to determine individual project impacts, significance, any project-specific mitigation, and any subsequent discretionary permits or coordination with resource agencies that may be required.

C.15.4.1 Wildland Fire

Impact WF-1: The proposed North Area Plan and CSD Update would substantially impair an adopted emergency response plan or emergency evacuation plan. (Less than Significant Impact)

The proposed Plan and CSD Update would not include any physical development that could result in impairing an adopted emergency response or emergency evacuation plan. Proposed Plan policies and CSD standards would require consideration of emergency access for proposed development projects, which would facilitate implementation of emergency plans. For example, Section 22.336.070 (Community Wide Development Standards) of the proposed CSD Update requires rural inns to submit an evacuation/emergency plan for approval by the Fire and Sheriff Departments. No development permits for rural inns would be issued without an approved evacuation/emergency plan. In addition, proposed policies and standards address the need for adequate police, fire and paramedic services to meet existing and future demand and provide a safe and secure environment in the North Area. Policies PF-16 to PF 26 (see Attachment C.15 at the end of this section) require adequate public services to respond to emergencies and to allow for emergency access during an emergency. The proposed CSD Update would require permitted event facilities to have an evacuation plan approved by the Los Angeles County Fire Department and Sheriff. This standard would ensure that event organizers are prepared for potential emergency situations and respond with timely emergency services and organized protocols.

Future development in the North Area would also not impair implementation of emergency plans. The County would consider a project's adherence with applicable goals and policies of both the proposed North Area Plan and the General Plan when evaluating specific project applications. The proposed Plan and CSD Update would have less than significant impacts related to emergency plans because the policies and standards identify measures that need to be addressed to ensure that emergency response times and excavation plans would not be impaired in the North Area.

The proposed Plan and CSD Update would have beneficial effects for implementation of emergency response plans and emergency evacuation plans in the North Area. Therefore, impacts to emergency response plans and emergency evacuation plans would be less than significant.

Impact WF-2: Due to slope, prevailing winds, and other factors, the proposed North Area Plan and CSD Update would exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. (Less than Significant Impact)

Future development would have the potential to increase the wildfire risk as well as place additional people and structures in areas that are prone to wildfire, and to expose occupants to pollutant concentrations resulting from wildfire. The proposed Plan and CSD Update recognizes this in the Guiding Principles and in the goal of the Fire Hazards Section which is to avoid or minimize the potential for loss of life, physical injury, environmental disruption, property damage, economic loss, and social disruption due to wildland fires. Consequent to these principles and goals, the proposed Plan and CSD Update calls for maintaining open space in its natural condition to protect public health and safety and identifies many policies intended to reduce and mitigate the risk and effect of wildfires. Policies SN-16 to SN-30 of the Safety and Noise Element; Policies LU-12, LU-23, LU-26, LU-33, LU-41 and LU-45 of the Land Use Element; Policies PF-15 to PF-23 of the Public Facilities Element; and Policies CO-9, CO-21, CO-41, CO-42 and CO-63 of the Conservation and Open Space Element all address measures to reduce the potential for wildfires in the North Area (see Attachment C.15 for policies). Section 22.336.070 of the proposed CSD Update would create a transfer of development credit program to mitigate the adverse cumulative effects of development in the Santa Monica Mountains by preventing an increase in the net amount of development that could occur, and by encouraging development in areas less constrained by small lot sizes, steep slopes, hazards, and sensitive resources. In addition, 22.336.060 (A.4.i) of the proposed CSD Update would limit building site area to limit grading, protect natural resources, and reduce need for retaining feature such as walls.

In addition, the Los Angeles County Fire Department has regulatory programs and standards for vegetation management, pre-fire management and planning, fuel modification, and brush clearance. The Los Angeles County Fire Department and the County Department of Public Works enforce fire and building codes related to development in Very High Fire Hazard Severity Zones. The Fire Department has access requirements for single family residential uses built in these zones, with access for all other uses on a case-by-case basis. Fuel modification plans are required for projects within Very High Fire Hazard Severity Zones. The CSD Update guides development to meet the standards of the Los Angeles County Fire Department. Examples include minimum size requirements for bridges, turnaround areas for adequate emergency personnel access, and fuel modification standards. Compliance with the County Fire Department's regulations would help reduce wildfire hazards and obstructions to timely response by the fire department.

Existing Los Angeles County fire regulations combined with proposed Plan and CSD Update policies and standards address requirements for fuel modification, open space in certain areas highly prone to fire, clustering of development to reduce the perimeter of exposure between development and natural areas, and facilitation of fire response and suppression efforts to minimize the potential for future wildfires in the North Area as development occurs. Consequently, the proposed Plan and CSD Update would have a less than significant impact on exacerbating wildfire risk.

Impact WF-3: The proposed North Area Plan and CSD Update would 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 Impact)

The proposed Plan and CSD Update would not create new development or new infrastructure such as roads, fuel breaks, emergency water sources and utility lines, which could exacerbate fire risk and result

in temporary or ongoing impacts to the environment. However, future development may require new infrastructure. The Los Angeles County General Plan has policies intended to minimize the need for new infrastructure. These General Plan policies include:

- **Policy LU-3.3:** *Discourage development in undeveloped areas where infrastructure and public services do not exist, or where no major infrastructure projects are planned, such as state and/or federal highways.*
- **Policy C/NR-12.3:** *Encourage distributed systems that use existing infrastructure and reduce environmental impacts.*
- **Policy S-3.6:** *Ensure adequate infrastructure, including ingress, egress, and peak load water supply availability for all projects located in Fire Hazard Severity Zones.*

Additionally, the proposed Plan and CSD Update includes policies that would limit the extent of new infrastructure including those related to protection of habitat and open spaces. These policies are included in Attachment C.15 and include Policies CO-9, SN-22, SN-25, SN-26, LU-12, LU-23, and PF-15 to PF 23. The CSD Update's Biological Resource Standards and Community-Wide Development Standards (22.336.060) encourage avoidance of certain habitats, limiting development in streams, limiting access roads, limiting maximum building area, and clustering of new development to minimize impacts to natural habitat areas while also reducing the need to substantially expand infrastructure.

Adherence to both the General Plan and proposed Plan and CSD Update policies would result in new development being clustered where possible and leaving high-hazard areas protected. These measures would reduce or in some cases eliminate the need for installation or maintenance of new infrastructure. Consequently, the proposed Plan and CSD Update would have a less than significant impact on the installation or maintenance of associated infrastructure that may exacerbate fire risk.

Impact WF-4: The proposed North Area Plan and CSD Update would 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 Impact)

The North Area is currently and naturally subject to a high risk of wildfire. Removal of vegetation could result in exposed soil conditions that would increase runoff rates, soil erosion, and soil instability during and following rainfall events. This could adversely affect existing development as well as new development. The proposed Plan and CSD Update includes policies (see impacts WF-1 to WF-3 and Attachment C.15) which, through clustering new development, reducing the risk of wildfire and reducing development on open space areas, would minimize the potential for wildfire-related flooding or debris flows from affecting new development. The proposed CSD Update includes Biological Resource Standards (22.336.060) and Community-Wide Development Standards (22.336.060) that discourage development in areas with slopes of 25 percent or greater, encourage avoidance of certain habitats, limit development in streams, limit access roads, limit maximum building area, clustering of new development, minimize grading and limit vegetation clearance. Because fires may spread quickly in sloped areas, these standards would reduce the risk of wildfire damage to development sited in these hazardous areas. In addition, the Los Angeles County Department of Public Works requires new development to account for the potential burning of watersheds with a tributary to the development, and corresponding construction of debris basins or drainage channels sized to account for the "bulking" of flood flows from these areas. The policies of the proposed Plan and CSD Update, in combination with the County requirements for design of downstream drainages in areas that may burn, mean the potential exposure of new development to burn-related flooding or landslides would be minimal. The proposed Plan and CSD Update would have a less than significant impact on downslope or downstream flooding or landslides.

C.15.4.2 Hazards and Hazardous Materials

Impact HM-1: The proposed North Area Plan and CSD Update would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. (Less than Significant Impact)

The North Area includes commercial, residential, and open space land uses. Existing businesses such as gas stations, dry cleaners, vineyards, and other agricultural uses could use and transport hazardous materials (e.g. fuels, poisons, lubricants, solvents, pesticides, and paints). These hazardous materials have the potential to cause health effects, damage property, or contaminate soils, water or air if not managed properly. In addition, the North Area includes major transportation corridors (e.g. US 101 Freeway) through which hazardous materials could be transported, though these materials could be carried on any of the area roads. There is one landfill in the North Area and no hazardous waste sites. Most known existing hazardous materials sites are clean-up sites for underground storage tanks (Table C.15-3).

Implementation of the proposed Plan and CSD Update would allow local-serving commercial land uses, vineyards, and other land uses that may transport, use, and dispose of hazardous materials. While implementation of the proposed Plan and CSD Update would not include any physical development, it would allow for future development that meets proposed plan policies and CSD development standards. Specific policies include Policies PF-28, SN-41, SN-42, SN-43, and SN-44, which all address hazardous materials and waste. The update to the CSD also includes specific requirements for managing potentially hazardous materials in vineyards; vineyard requirements were incorporated in the North Area CSD in 2015 and are included in the CSD Update.

■ **Section 22.336.070 (Y) Vineyards**

- *To the extent feasible, the vineyard shall use Integrated Pest Management (IPM) techniques to prevent and control pests in a manner that avoids harm to other organisms, air, soil, and water quality.*
- *Runoff from the vineyard shall be diverted, with a berm or other such measure, around the vineyard's storage or disposal area for waste, crop residues, waste by-products, fertilizers, oils, soil amendments, and any other agricultural products or materials utilized in the planting and growing of crops, to prevent contamination of surface waters.*
- *Waste and waste byproducts from the vineyard must be contained, and if feasible, reused on the area on which crops are grown until disposed of in a manner that does not negatively impact natural resource. Waste, compost, oils, chemicals, manure, fertilizers, and other similar materials for the vineyard shall be stored: (1) in a sealed area, either inside a structure or in a covered container with an impervious bottom surface; and (2) at least 200 feet away from any stream/natural drainage course, or any underground water source used for human consumption.*
- *The vineyard's total amount of hazardous materials used, stored, and/or generated shall be monitored, tracked, and recorded.*

In addition, to County requirements, any future development would need to comply with federal, state and local hazardous materials regulations that require strict adherence to specific guidelines regarding the generation, use, transportation, management, and disposal of hazardous materials (Section C.15.2.2). The proposed Plan and CSD Update would not significantly increase hazards to the public or the environment through the routine transport, use, or disposal of hazardous materials, therefore, impacts would be less than significant.

Impact HM-2: The proposed North Area Plan and CSD Update would 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 Impact)

The North Area includes existing businesses such as gas stations, dry cleaners, vineyards, and other agricultural uses that could use and transport hazardous materials (e.g. fuels, poisons, lubricants, solvents, pesticides, and paints). These hazardous materials have the potential to cause health effects, damage property, or contaminate soils, water or air if not managed properly. In addition, the North Area includes major transportation corridors (e.g. US 101 Freeway) through which hazardous materials could be transported. As noted in Impact HM-1, proposed Plan policies and CSD development standards require proper management of hazardous materials. Future development under the proposed Plan and CSD Update would be required to meet these policies and standards. Further, federal, state and local regulations described in Section C.15.2.2 require strict measures regarding the generation, handling and use of hazardous materials such that upsets would be minimized, as well as clean-up of areas contaminated by spills. With these regulations, along with the updated policies and standards identified in Impact HM-1, the proposed Plan and CSD Update would not create a significant hazard to the public or the environment regarding the release of hazardous materials.

Impact HM-3: The proposed North Area Plan and CSD Update would 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 Impact)

Table C.13-3 of this EIR identifies the schools within the North Area and schools approximately 1.5 miles of the North Area boundary; three schools are located within the North Area and more than 20 schools are located within 1.5 miles of the North Area boundary. The proposed Plan and CSD Update would not directly cause hazardous emissions or handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Future development projects would be evaluated for their compliance with existing hazardous materials and waste regulations and adopted North Area Plan policies and CSD standards. Therefore, the proposed Plan and CSD Update would result in a less than significant impact.

Impact HM-4: The proposed North Area Plan and CSD Update would 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)

Table C.15-2 lists the hazardous materials sites compiled pursuant to Government Code Section 65962.5 and Table C.15-3 lists other similar sites. Of the sites listed in Table C.15-2, one is a site investigation with no action required, one is a voluntary clean-up at a housing project, and one is a permitted action. All but one of the other sites (Table C.15-3) are clean-up sites most of which have been completed. There is one active Class III landfill in the North Area (Calabasas Landfill).

The proposed Plan and CSD Update would not include physical development and would not include locating a project on a site that is listed as a hazardous materials site. Future development would be required to comply with land use siting policies and standards of the County General Plan and proposed North Area Plan and CSD Update. In addition, identifying whether a specific property is considered a hazardous materials/waste site is required under existing environmental and land use requirements when reviewing a project development application. As such, the proposed Plan and CSD Update would not create a significant hazard to the public or environment (no impact).

Impact HM-5: The proposed North Area Plan and CSD Update, if located within an airport land use plan, or where such a plan has not been adopted within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area. (No Impact)

The project is not within an airport land use plan, nor is it within two miles of a public or public use airport. There is no existing safety hazard or excessive noise impact related to airports in the North Area. The proposed Plan and CSD Update would have no impact on an airport land use plan. In addition, the proposed North Area Plan and CSD Update would prohibit helipads and landing strips (as defined in Title 22, and any site or facility that is used for the takeoff and landing of aircraft) in the North Area, except for emergency services.

Impact HM-6: The proposed North Area Plan and CSD Update would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. (Less than Significant Impact)

While the proposed Plan and CSD Update would allow for continued development of the North Area, none of the policies or standards would impair implementation or interfere with adopted emergency response plans or evacuation plans. The development standards for Event Facilities and Vineyards require preparation of an Evacuation Plan, which must be approved by the County Fire Department and the Sheriff. This would reduce the potential for Evacuation Plans for specific projects and events from conflicting with adopted countywide or regionwide emergency response or evacuation plans. In addition, proposed policies and standards require input from other County departments to support review of individual projects and to identify access and safety issues that could interfere with emergency evacuations (e.g. site access and circulation). The proposed Plan and CSD Update would have a less than significant impact for this issue.

Impact HM-7: The proposed North Area Plan and CSD Update would expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. (Less than Significant Impact)

The North Area is within a Very High Fire Hazard Severity Zone. Future development in the North Area may expose people and structures to a risk of loss, injury or death involving wildland fires. The proposed Plan and CSD Update has the goal of avoiding or minimizing the potential for loss of life, physical injury, environmental disruption, property damage, economic loss, and social disruption due to wildland fires and has therefore a series of policies outlined in the discussion under Impact WF-2 to mitigate the risk and effect of wildfires. Existing Los Angeles County fire regulations, plus proposed Plan and CSD Update policies and standards, would minimize the exposure of people or property to future wildfires in the area as development occurs. These policies/standards include requirements for fuel modification, open space in certain areas highly prone to fire, clustering of development to reduce the perimeter of exposure between development and natural areas, and facilitation of fire response and suppression efforts. Consequently, the proposed Plan and CSD Update would have a less than significant impact on exposing people and structures to wildland fires.

C.15.5 Cumulative Impact Analysis

For the purposes of this analysis, the cumulative impacts study area includes those projects listed in Table C.1-1, all of which are in the same area and are subject to the same hazards. The cumulative projects

consist of a mixture of specific plans, building projects, road projects, residential and commercial development, and restoration.

Cumulative projects would have a significant wildfire impact if combined. The projects would create a significant increase in wildfire risk, significantly interfere with emergency response plans or require significant increases in infrastructure. Most of the cumulative projects are outside the North Area and therefore would not be subject to the proposed Plan and CSD Update policies/standards described in the impact section. However, these projects are all in established areas of development with established infrastructure and would be subject to the same regulatory requirements outlined in Section C.15.2. Existing regulations provide substantial protections against suppression measures for wildfires. The cumulative projects are in the same Very High Fire Hazard Severity Zone and would be subject to the same fire risks as future development in the North Area. None of the cumulative projects are expected to impair an adopted emergency response plan or emergency evacuation plan. Most would have the same potential to exacerbate wildfire risks and expose people to pollutants or harm due to wildfire as development in the North Area. Cumulative projects in the North Area would be subject to the Los Angeles County General Plan, which discourages development that requires new infrastructure and public services. The proposed Plan and CSD Update would have less than significant cumulative wildfire-related impacts.

Generally, hazardous materials use would be more prevalent for commercial or industrial land uses. Hazardous material use or hazardous emissions would be cumulatively significant when the combined activities of individual industrial or commercial businesses that use, transport, or dispose of hazardous materials result in hazardous conditions. Cumulative impacts may also occur when multiple development projects disrupt existing hazardous materials sites in adjacent areas.

Cumulative projects and all future development under the proposed Plan and CSD Update would be required to comply with applicable federal, state and local regulations related to hazardous materials. Therefore, the proposed Plan and CSD Update would have less than significant impacts related to transport, use and disposal of hazardous materials.

C.15.6 Level of Significance After Mitigation

The updates to the North Area Plan and CSD would include policies and standards protecting against wildfires and hazardous materials/waste contamination. Implementation of the proposed Plan and CSD Update would result in less-than-significant impacts related to wildfire and hazardous materials. No mitigation is required.

Attachment C.15

Wildland Fire Policies and Standards

(Appendix 1 includes all policies and standards)

Proposed North Area Plan Update

Conservation and Open Space Element

- **Policy CO-9:** Require that any new development or improvement is sited and designed so required fuel modification or brush clearance does not encroach into dedicated open space or parkland.
- **Policy CO-21:** Use primarily locally indigenous plant species in landscape areas within Fuel Modification Zones A and B of structure(s) requiring fuel modification. Non-locally indigenous plants and gardens that are not invasive may be allowed within the building site area and in Fuel Modification Zones A and B, with associated irrigation, provided that the species are consistent with Fire Department requirements and all efforts are made to conserve water. Invasive plants are strictly prohibited. The removal or trimming, thinning or other reduction of natural vegetation, including locally indigenous vegetation, is prohibited except when required for construction of an approved development and/or for compliance with fuel modification requirements for approved or lawfully existing development. Los Angeles County will work with organizations, homeowners, and park agencies on educational programs to reduce the spread of invasive plant species within the Santa Monica Mountains.
- **Policy CO-41:** Limit grading, soil compaction and removal of locally indigenous vegetation to the minimum footprint needed to create a building site, allow access, and provide fire protection for the proposed development. Monitor grading projects to ensure that grading conforms to approved plans.
- **Policy CO-42:** Revegetate prior to the rainy season areas disturbed by development activity. Use locally indigenous plant species outside of Fuel Modification Zone A and prohibit non-native invasive species, balancing long-term slope stability and habitat restoration with reduced fuel loads for fire protection.
- **Policy CO-63:** Work with agencies including County Fire and County Agricultural Commissioner to ensure proper fire buffers through brush clearance and fuel modification in new and infill development.

Safety and Noise Element

- **Policy SN-22:** Require that development sites and structures: be located off ridgelines and other dangerous topographic features such as chimneys, steep draws, and saddles; be adjacent to existing development perimeters; be located close to public roads; and, avoid over-long driveways.
- **Policy SN-24:** Limit fuel modification to the minimum area necessary and utilize those programs that are most appropriate to the development site, including such strategies as preserving fire-resistant locally-indigenous species instead of completely removing vegetation.
- **Policy SN-25:** Prohibit development in areas with insufficient access, water pressure, fire flows, or other accepted means for adequate fire protection.
- **Policy SN-26:** Locate structures along a certified all-weather accessible road, which in some cases may consist of permeable surfaces, in a manner that provides firefighters adequate vehicle turnaround space on private properties. Where feasible, require that new development be accessed from existing roads.
- **Policy SN-27:** Require that property owners adhere to the approved fuel modification plan for their property and ensure that Fire Department personnel adhere to the approved fuel modification plan during annual field inspections for fuel modification or brush clearance.

- **Policy SN-28:** Allow wildfire burn areas to revegetate naturally, except where re-seeding is necessary to minimize risks to public health or safety. Where necessary, utilize a mix of locally-indigenous native plant seeds collected in a similar habitat within the Santa Monica Mountains.
- **Policy SN-29:** Discourage high density and intensity development within Very High Fire Hazard Severity Zones (VHFHSZ). Direct development to areas less at-risk for fire and climate change-related hazards.
- **Policy SN-30:** Consider climate change implications in fire hazard reduction planning for the wildland-urban interface and Fire Hazard Severity Zones (FHSZs).
- **Policy SN-40:** Prohibit new facilities that handle large amounts of hazardous and toxic materials.
- **Policy SN-41:** Monitor through conditional approvals businesses handling, using, or storing more than threshold amounts of hazardous or toxic materials. Hazardous or toxic wastes may only be stored on a commercial site temporarily and must be disposed of as soon as possible.
- **Policy SN-42:** Prohibit hazardous waste disposal facilities within the Santa Monica Mountains, due to the area's sensitive seismic and geologic characteristics.
- **Policy SN-43:** Protect the area's residents, workers, and visitors from the risks inherent in the transport, distribution, use, and storage of hazardous materials and hazardous wastes, recognizing that the use of these materials is necessary in many parts of society.
- **Policy SN-44:** Undertake more community-level hazardous waste drop-off events in the Santa Monica Mountains, and sponsor more community recycling centers.

Land Use Element

- **Policy LU-12:** Cluster development in land divisions, including building pads, if any, in order to minimize site disturbance, landform alteration, and removal of native vegetation, to minimize required fuel modification, and to maximize open space.
- **Policy LU-23:** Cluster and concentrate development in one building site area on parcels to facilitate fire protection and to preserve and minimize impacts to natural resources and the area of disturbance.
- **Policy LU-26:** Site and design development so as to: protect life and property; protect public lands, S1 and S2 habitat areas, dedicated open space, streams, scenic resources, public views, and other natural features and resources; maximize open space areas; and, minimize the overall vegetation clearance needed for fire protection.
- **Policy LU-33:** Require all new commercial and institutional development to minimize adverse impacts on adjacent properties through careful use of arrangement of buildings, architectural design, and types of uses proposed. These impacts include, but are not limited to: noise, odors, fuel modification, maintenance of community character, and views.
- **Policy LU-41:** Limit the siting of confined animal facilities and the maximum number of livestock permitted on a site to that appropriate to parcel size, slope, proximity to sensitive habitat areas, and other unique site characteristics and constraints. Facilities should be constructed of non-flammable materials and be clustered to the maximum extent feasible to minimize area disturbed and fuel modification.
- **Policy LU-45:** New agricultural uses should be sited in already disturbed areas, in the approved building site area, and/or in Fuel Modification Zones A or B and are not permitted on slopes greater than 3:1.

Public Facilities Element

- **Policy PF-15:** Continue to consult and coordinate with the Fire Department as part of the project review process.
- **Policy PF-16:** Review new development for adequate water supply and pressure, fire hydrants, and access to structures by firefighting equipment and personnel.
- **Policy PF-17:** Require, where appropriate, on-site fire suppression systems for all new development to reduce the dependence on Fire Department equipment and personnel.
- **Policy PF-18:** Limit the length of private access roads to reduce the amount of time necessary for the Fire Department to reach residences and to minimize risks to firefighters.
- **Policy PF-19:** Require clearly visible address signs during the day and night for easy identification during emergencies.
- **Policy PF-20:** Facilitate the formation of volunteer fire departments and EMS providers.
- **Policy PF-21:** Encourage clustering of development to provide for more localized and effective fire protection measures such as consolidated fuel modification and brush clearance, fire break maintenance, firefighting equipment access, and water service.
- **Policy PF-22:** Limit the exposure of first responders, residents, and structures to fire risk within Very High Fire Hazard Severity Zones (VHFHSZ) and in the Fire Hazard Severity Zones (FHSZs) of the wildland-urban interface.
- **Policy PF-23:** Continue to consult and coordinate with the Sheriff's Department and CHP as part of the environmental review process for projects subject to CEQA.
- **Policy PF-24:** Support existing programs such as Neighborhood Watch and encourage expanded or new programs that focus on the elimination of crime, such as anti-graffiti programs.
- **Policy PF-25:** Support efforts to eliminate street racing activities, including the seizure and forfeiture of vehicles used in speed contests or in exhibitions of speed, to address the nuisance and unsafe conditions created by the use of vehicles in such activities.
- **Policy PF-28:** Require commercial and industrial uses that use hazardous materials to demonstrate proper transport, storage, and disposal of such materials in accordance with all local, State, and federal regulations.

Proposed Community Standards District Update

22.336.060 Biological Resource Standards

- A. Biological Resources
 - A.4.i Maximum Building Site Area and A.4.f Streams

22.336.070 Community-Wide Development Standards

- W. Transfer of Development Credit Program.
- V. Temporary Events
- X. Vegetation Clearance
- Y. Vineyards

D. Alternatives

This section describes the alternatives to the proposed Plan and CSD Update for the Santa Monica Mountains North Area, the alternatives screening process, and the environmental effects of alternatives retained for analysis. The intent of this section is to document (1) the range of alternatives that have been selected and evaluated; (2) the approach used by the County in screening the feasibility of these alternatives according to guidelines established under the California Environmental Quality Act (CEQA); (3) the results of the alternatives screening; and (4) the environmental impacts of each alternative relative to the proposed project or program (proposed Plan and CSD Update).

This section is organized as follows:

- Section D.1 summarizes CEQA requirements related to alternatives;
- Section D.2 describes the process used to define alternatives to the proposed project;
- Section D.3 describes the alternatives retained for analysis, including the No Project Alternative (CEQA Guidelines §15126.6(e)), and presents impact analysis by discipline for each of these alternatives;
- Section D.4 describes the alternatives that were considered, but eliminated from detailed evaluation; and
- Section D.5 presents the comparison of alternatives and identifies the Environmentally Superior Alternative (CEQA Guidelines §15126.6(d)).

D.1 CEQA Requirements for Alternatives

An important aspect of Environmental Impact Report (EIR) preparation is the identification and assessment of reasonable alternatives that have the potential to avoid or minimize the impacts of a proposed project or program. The CEQA Guidelines require consideration of the No Project Alternative (Section 15126.6(e)) and selection of a reasonable range of alternatives (Section 15126.6(d)). The EIR must adequately assess these alternatives to allow for a comparative analysis for consideration by decision makers. The CEQA Guidelines (Section 15126.6(a)) state that:

An EIR shall describe a reasonable range of alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.

The key applicable provisions of the CEQA Guidelines (Section 15126.6) pertaining to the analysis of alternatives are summarized as follows:

- The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the objectives or would be more costly.
- The “no project” alternative shall be evaluated along with its impact. The “no project” analysis shall discuss the existing conditions at the time the notice of preparation is published, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.
- The range of alternatives required in an EIR is governed by a “rule of reason”; therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice between the alternatives and

the proposed project. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.

- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

D.1.1 Consistency with Program Objectives

The CEQA Guidelines require the consideration of alternatives capable of eliminating or reducing significant environmental effects even though they may "impede to some degree the attainment of project objectives or would be more costly" (Section 15126.6(b)). The primary objectives of the proposed Plan and CSD Update include:

- Strengthen existing environmental resource policies;
- Identify policies and standards that will support the surrounding communities current rural and semi-rural lifestyle; and
- Align with the policies and development standards in the 2015 Santa Monica Mountains Local Coastal Program (LCP) to ensure consistency in land use regulations and environmental policies between the Coastal Zone and Santa Monica Mountains North Area.

In addition, CEQA Guidelines Section 15126.6(f)) states that in determining the range of alternatives to be evaluated in the EIR, factors that may be considered when addressing the feasibility of alternatives are general plan consistency, other regulatory limitations, and jurisdictional boundaries, as examples.

D.1.2 Potential to Eliminate Significant Environmental Effects

As noted above, CEQA requires that to be fully considered in an EIR, an alternative must have the potential to *"avoid or substantially lessen any of the significant effects of the project"* (CEQA Guidelines Section 15126.6(a)). If an alternative was identified that clearly does not provide potential overall environmental advantage as compared to the proposed project, it was eliminated from further consideration unless the County determined that the alternative should be analyzed because it addresses a concern identified during the scoping process. Additionally, as noted in the CEQA Guidelines (Section 15126.6 [d]), the significant effects of the alternatives shall be discussed, but in less detail than the significant effects of the proposed project. Because the proposed Plan and CSD Update does not include any physical development, this analysis worked to identify alternatives that could achieve the same or similar results to the policies and development standards of the proposed Plan and CSD Update.

D.2 Alternatives Evaluation Process

Several factors were considered in determining the range of alternatives to be analyzed in this Program EIR. The alternatives were identified through consideration of the following:

- Does the alternative accomplish all or most of the basic objectives of the proposed program?
- Is the alternative potentially feasible?
- Does the alternative avoid or substantially lessen any significant effects of the proposed program (including consideration of whether the alternative itself could create significant effects potentially greater than those of the proposed program)?

In developing a range of alternatives for the project, the County considered the public scoping and other comments received on the proposed update and EIR as well as the potential impacts identified in the EIR analysis. Five alternatives were identified and assessed for consistency with the program objectives, feasibility, and potential to eliminate significant impacts of the proposed project. Based on a careful evaluation of alternatives, three alternatives were determined as feasible, partially met program objectives, and further reduced potential for impacts. The other two alternatives would not achieve the program objectives and, therefore, were eliminated from further consideration.

The alternatives retained for analysis are summarized below. Section D.3.1 provides a discussion of each of these alternatives.

- **Alternative 1: No Project/Existing North Area Plan and CSD.** This alternative would result in no change to the current North Area Plan and CSD. CEQA requires consideration of this alternative.
- **Alternative 2: Reduced Density.** This alternative would shift all Rural Land and Residential land use designations down to the next lower land use designation to reduce the overall density allowed on properties. This alternative would further reduce potential for impacting structures in a wildfire or other disaster.
- **Alternative 3: Adopt SEA Ordinance Review Process.** This alternative would replace the biological resources review process and development standards in the proposed CSD Update with the process and standards of the recently adopted updated SEA ordinance that became effective in January 2020. This alternative would provide another option for protecting biological resources in the North Area.

The alternatives considered but eliminated from further analysis are summarized below. Section D.4. provides a discussion of these alternatives and the rationale for eliminating these alternatives from further consideration in this EIR.

- **Mitigation Fee Alternative** – This alternative was developed to further reduce potential for significant impacts to biological resources in the North Area.
- **Adopt Santa Monica Mountains LCP to North Area Alternative.** This alternative would adopt the LCP policies and standards to the North Area.

Consistent with Section 15126.6(e) of the CEQA Guidelines, the alternatives analysis includes consideration of the No Project Alternative. The analysis of the No Project Alternative must discuss existing conditions as they occurred at the time that the Notice of Preparation (NOP) was published (August 1, 2018 for the proposed project), as well as “what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services” (CEQA Guidelines Section 15126.6 [e][2]). However, it should be noted that the Woolsey Fire, which burned in November 2018 over most of the North Area, resulted in substantial fire damage. Where appropriate, post-fire conditions are also considered in the assessment of existing conditions and expected future impacts of the No Project Alternative. The requirements also specify that “[i]f disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this ‘no project’ consequence should be discussed” (CEQA Guidelines Section 15126.6 [e][3][B]). The “No Project Alternative” identified for the proposed project is the continued implementation of the existing Santa Monica Mountains North Area Plan and Community Standards District (see Sections B.4.1, Background on Existing North Area Plan, and B.5.1, Background on Existing North Area CSD).

D.3 Alternatives Retained for Analysis

This section describes and evaluates the alternatives that meet or partially meet the CEQA criteria defined in Section D.1 and thus have been retained for the EIR's alternatives analysis. A description of those alternatives that did not meet CEQA's criteria for further evaluation is provided in Section D.4, with an explanation as to why alternatives were eliminated from further consideration. The "Environmentally Superior Alternative" is addressed in Section D.5. No other alternatives meeting the CEQA criteria defined in Section D.1 have been identified.

D.3.1 Alternative 1: No Project/Existing North Area Plan and CSD

Description

Alternative 1 is the CEQA-required No Project Alternative. Under Alternative 1, the County would continue to implement the existing Santa Monica Mountains North Area Plan and Community Standards District (see Sections B.4.1, Background on Existing North Area Plan, and B.5.1, Background on Existing North Area CSD). The existing Santa Monica Mountains North Area Plan, adopted in October 2000, would remain in effect, and no updates to the Plan goals and policies would occur. The existing North Area CSD was adopted in October 2002, and amended in 2005, 2007, 2010, and 2015; the existing CSD would remain in effect, as amended, and no updates to the CSD goals and policies would occur. Under Alternative 1, the Plan and CSD would not be updated to adopt habitat protection categories and associated development standards, updated equestrian standards, expanded tree protections, added regulations addressing special events and short-term rentals, updated noise regulations, or any of the other policies and standards described in Section B, Project Description (and presented in Appendix 1).

Objectives

Alternative 1 would not meet or would partially meet the program objectives. Under this alternative, the policies of the existing North Area Plan and CSD would remain in effect and would continue to guide future development without meeting the new program objectives. The program objectives are listed below with a notation on whether Alternative 1 meets, partially meets, or does not meet the program objective.

Alternative 1: No Project/Existing North Area Plan and CSD			
Objectives (summarized)	Meets Objective	Partially Meets Objective	Does Not Meet Objective
Strengthen existing environmental resource policies.			■
Identify policies/standards that support rural/semi-rural lifestyle.		■	
Align policies/standards with SMM LCP to ensure consistency in regulations and policies between the Coastal Zone and SMMNA.			■

Impact Analysis by Discipline

Aesthetics

The existing plan and CSD includes policies and development standards regarding protection of visual resources and ridgelines in the North Area. While the existing policies and standards provide protection of visual resources, implementation of the No Project Alternative could result in impacts greater than the proposed project because the update would provide greater protection of visual resources in the North

Area. The No Project Alternative would not include the revised policies and standards for scenic resource areas, scenic routes, visual resources, and outdoor lighting that were tailored in the proposed Plan and CSD Update to address or respond to current land uses in the North Area. Therefore, for this issue area, the impacts would be greater than the proposed project under the No Project Alternative.

Air Quality

The existing North Area Plan and CSD do not specifically address air quality because policies and standards addressing air quality are covered in the County's General Plan and existing ordinances as well as regional and state air quality regulations. The proposed Plan and CSD Update would also look to the General Plan for policies and standards that address air quality. Therefore, implementation of the No Project Alternative would have the same impacts to those associated with the implementation of the proposed North Area Plan and CSD Update. Future development and associated air quality impacts in the North Area would be similar to the proposed project under this alternative.

Biological Resources

The existing Plan and CSD includes policies and development standards that address biological resources including the identification of the five Significant Ecological Areas (SEAs) noted below:

- SEA No. 3A (Buffer) – Zuma Canyon
- SEA No. 3B (Buffer) – Zuma Canyon
- SEA No. 4 – Upper La Sierra Canyon
- SEA No. 6 – Las Virgenes
- SEA No. 12 – Palo Comado Canyon

The individual SEAs noted above were consolidated and expanded with the adoption of the General Plan in 2015. The SEA in this planning area (North Area) is now known as the Santa Monica Mountains SEA. This change aside, the existing plan policies provide for protection of open space and wildfire habitat areas. Policies also address protection of oak and sycamore trees and tree communities. Most of the development standards related to biological resources are in the context of vineyards instead of specific standards to protect sensitive resources.

In contrast, the proposed project (Plan and CSD Update) would include expanded policies and development standards to protect biological resources. Four habitat categories have been mapped in the North Area and based on these habitat categories, the Plan and CSD Update provides a process for review of future development projects. The proposed project would limit the intensities of development in the North Area based on the following four habitat categories:

- S1: Habitat of limited distribution, particular rarity, or important habitat function. Development shall be sited as far away from S1 habitat as possible.
- S2: Intact, but broadly distributed habitat. Development may occur in areas with S2 habitat provided avoidance and minimization measures are implemented.
- S3: Disturbed, non-native, and cleared habitat. Development will be less restricted in areas with S3 habitat.
- S4: Developed and agricultural lands. Development is least restricted in areas with S4 habitat.

Because the proposed project would provide better protection of biological resources in the North Area, the No Project Alternative would have the potential for greater impacts to biological resources than the proposed project (Plan and CSD Update).

Greenhouse Gas Emissions

The existing North Area Plan and CSD does not specifically address greenhouse gas emissions because policies and standards addressing this issue are covered in the County's General Plan, Community Climate Action Plan, and the Countywide Sustainability Plan as well as regional and state regulations. The proposed Plan and CSD Update would also look to the General Plan for policies and standards that address greenhouse gas emissions. Under the No Project Alternative, the County would guide future development in a similar way as the proposed updates. All future projects would require compliance with relevant laws and policies regarding greenhouse gas emissions. Therefore, implementation of the No Project Alternative would have the same impacts to those associated with the implementation of the proposed North Area Plan and CSD Update.

Cultural and Tribal Cultural Resources

The existing North Area Plan and CSD do not specifically address cultural resources because policies and standards addressing this issue are covered in the County's General Plan and existing ordinances as well as regional and state regulations. Tribal cultural resources are not covered in the existing Plan and CSD. However, protections for these resources under the current Plan would remain stringent as future projects would still be required to comply with all current applicable laws including compliance with AB 52 (tribal consultation).

The proposed Plan and CSD Update contains policies regarding cultural and tribal cultural resources, which all support the goal of preserving the area's rich and diverse archaeological, paleontological, and historic cultural resources. The proposed Plan policies address protection of cultural resources and compliance with AB 52 (tribal consultation). There are no development standards for this issue as it was covered in the County's General Plan and ordinance.

The No Project Alternative will result in similar impacts to cultural and tribal resources as the proposed Plan and CSD Update because the requirements for protection of these resources are mandated by state law and the County General Plan. In addition, consistent with AB 52 tribal consultation requirements, the County currently reaches out to tribes for input on projects and will continue to do so on future projects.

Energy

The existing North Area Plan and CSD does not directly address energy efficiency or renewable energy, other than not allowing wind energy and requiring restrictions to solar energy in scenic resources areas. Energy is discussed in the Los Angeles Countywide Sustainability Plan, Community Climate Action Plan, and Los Angeles County General Plan. Future development in the North Area would continue to follow standards outlined in these plans and comply with federal and state regulations. The proposed Plan and CSD would also look to the General Plan for policies and standards addressing energy. The County would guide future projects under the No Project Alternative in a similar way as the proposed updates. Therefore, implementation of this alternative would have the same impacts to those associated with the implementation of the proposed Plan and CSD Update.

Geology, Soils, and Paleontological Resources

The No Project Alternative includes policies that discourage new development in areas deemed susceptible to seismic and non-seismic hazards. The proposed Plan and CSD Update would include similar policies to protect future development from seismic and non-seismic geologic activities. The overall intent of policies in either the existing or proposed Plan and CSD would be to avoid development on unstable

geologic soils. For these issue areas, the No Project Alternative would have similar impacts to those associated with the implementation of the proposed Plan and CSD Update.

Hydrology and Water Resources

The existing Plan and CSD includes policies and development standards that protect water resources in the North Area. In addition, compliance with the County's NPDES Municipal Stormwater Permit and stormwater management program as well as compliance with best management practices (BMPs) would be required on future projects. The proposed Plan and CSD Update would include similar requirements to address and mitigate potential impacts to water resources.

Updated requirements would continue to address specific land uses such as vineyard and agricultural management operations. The CSD Update includes protective measures for water resources relating to streams and wetlands. The new Equestrian Facilities standards include requiring a 100-foot setback of storage of manure, fertilizer, and other chemicals from riparian areas and drainage courses. Therefore, the No Project Alternative would have greater impacts on water quality as the proposed Plan and CSD Update.

Land Use and Recreation

The No Project Alternative would continue to guide development that conforms to existing environmental standards. The natural setting of the North Area would be retained as much as possible by preserving open spaces and applying development standards to avoid sprawl, limiting development in geologically hazardous areas, and preventing obstruction of scenic vistas. However, the No Project Alternative would not include the added policies and standards that are in the proposed Plan and CSD Update that would regulate event facilities, manage equestrian uses, and reduce noise in the North Area. Under the existing Plan and CSD, equestrian activities and use of event facilities would continue to impact North Area residents. Furthermore, the No Project Alternative would not include the Transfer of Development Credit Program introduced in the CSD Update that would reduce impacts by imposing a limit on a net increase in density. Implementation of the No Project Alternative would allow for a gradual increase in density of development over time.

Additionally, the No Project Alternative would not include the change in the land use designation and zoning for the parcels under the jurisdiction of conservation agencies and organizations. These parcels are currently open space or parkland and the change in land use and zoning would bring these parcels into conformance with the current land use. Under the No Project Alternative, these parcels would continue to be in nonconformance with the existing use of these lands and would have greater impact on land use and recreation than the proposed Plan and CSD Update.

Noise

The existing Plan includes policies that address noise hazards and management of noise in the North Area. Implementation of the No Project Alternative would not include the updated policies and identified development standards in the proposed Plan and CSD Update. The noise standards in the proposed update were based on a noise study of the North Area in September 2018 that evaluated baseline (i.e., existing) noise and noise generated during live events such as outdoor weddings and parties. The noise thresholds in the proposed Plan and CSD Update were identified to mitigate noise from existing and future land uses and prevent activities that cause noise levels that exceed existing levels. Without these specific measures, the implementation of the No Project Alternative would result in greater noise impacts to the North Area.

Population and Housing

The existing Plan and CSD would prioritize land use designations that are consistent with the North Area's relatively natural and rural setting and would continue to encourage retaining, preserving, and enhancing existing rural communities and low intensity uses. As a result, the No Project Alternative would guide developments that would marginally increase the area's population and need for new housing. The proposed Plan and CSD Update would have similar policies and standards that encourage a rural lifestyle. However, the CSD Update would include the Transfer of Development Credit Program that would prevent an increase in the net amount of development that could occur in the North Area. As such, implementation of the Transfer of Development Credit Program would not be expected to increase population in the North Area. Without this program, the No Project Alternative would allow for an increase in the net amount of development and population density. Therefore, implementation of the No Project Alternative would have greater impacts to population and housing than those of the proposed Plan and CSD Update.

Public Services, Utilities, and Service Systems

The No Project Alternative would continue to ensure public services are available for proposed development in the North Area. In combination with the policies and standards of the General Plan/Zoning, the existing Plan and CSD addresses all required public facilities and services for project development such as water, schools, fire and paramedic, police, or solid waste services. The proposed Plan and CSD Update would also require and address the need to secure similar public facilities and services. Therefore, implementation of the No Project Alternative would have similar impacts on public services as the proposed Plan and CSD Update.

Transportation and Traffic

The existing Plan and CSD includes policies that address circulation patterns, roadway capacity, and transportation alternatives in the North Area. The No Project Alternative would not however include the updated or revised policies for these areas (i.e. circulation, capacity, alternatives), based on community concerns and that are included in the proposed Plan and CSD Update. The No Project Alternative would not address current concerns with transportation and traffic in the North Area. This alternative would also not include the updated development standards that address access roads in sensitive biological resources and community-wide road standards, as examples. Implementation of the No Project Alternative would result in greater impacts to transportation and traffic than the proposed Plan and CSD Update.

Wildland Fire and Hazards

The existing Plan and CSD address wildfire and identify the North Area as being within a high-fire area. Policies are included in the existing plan to address fire prevention and management. Implementation of the No Project Alternative would result in the continued guidance of existing policies that would avoid or minimize wildland fire threats to life and property. Wildland fire hazards would be reduced by emphasizing fire prevention, managing vegetation where feasible, siting development in lower-risk areas, and maintaining alternative water resources for firefighting purposes. However, the existing Plan does not include new and revised policies that would improve wildland fire protection and the existing CSD does not include standards for rebuilding after a natural disaster such as the recent Woolsey Fire. As such, the No Project Alternative would have greater impacts to Wildland Fire and Hazards than the proposed Plan and CSD Update.

Conclusion – Alternative 1

The implementation of the No Project Alternative has the potential for greater impacts than the proposed Plan and CSD Update for several issue areas including aesthetics, biological resources, land use, noise, transportation/traffic, and wildland fire/hazards. Both the existing and proposed Plan and CSD aim to manage development with policies that protect the natural landscape of the North Area. However, the proposed Plan and CSD Update includes revised policies and standards that address current public concerns with existing land uses (e.g. noise from special events) and that address protection of sensitive resources in the North Area (e.g. added biological resources measures/process, expanded tree protections).

D.3.2 Alternative 2: Reduced Density

Description

As noted in the project description (Section B of this EIR), the North Area was significantly changed by the 2018 Woolsey Fire. The fire destroyed 616 structures many of which were homes. The Santa Monica Mountains North Area is in a very high-fire hazard severity zone and even with proposed policies and CSD standards, the North Area continues to have the potential for future devastating fires.

To further reduce the potential for impacts from wildfire on residential structures in the North Area, this alternative proposes changes to residential land use designations in the North Area Plan Update (with comparable changes to zoning). Adoption of these changes would reduce the number of dwelling units per acre in areas where land uses are currently designated as Residential or Rural Land(s). This alternative would reduce development on properties that have the potential to impact scenic, biological, and other North Area resources, or that have limited emergency ingress/egress to a property. This alternative would shift all Rural Land and Residential land use designations down to the next lower land use designation to reduce the overall density allowed on properties. For example, a parcel with a designation of RL10 (1 dwelling unit [du] per 10 acres) and with zoning of R-1-10 would be changed to a designation of RL20 (1 dwelling unit per 20 acres).

Table D-1 provides an example of how this alternative would change the proposed residential land use designations in the North Area. For purposes of this analysis, the table presents the acres associated with residential land use designations and a worst-case estimate of the number of units that could be developed depending on the land use designations between the proposed project and Alternative 2. It appears from the total number of units that Alternative 2 could result in almost a 50 percent reduction in dwelling units. However, the numbers do not consider the number of units that could be reduced through the proposed project's Transfer Development Credit Program or the reduction of units that could be achieved by clustering development and limiting development on steep slopes. The estimated number of reduced units could fall anywhere from 20 to 50 percent.

This alternative would further provide consistency with the adopted General Plan and would serve to reduce the future number of dwelling units permitted in the North Area. This alternative would keep the density of residential development to no more than 5 units per acre on residential lands, which would serve to maintain the North Area's rural and open space character.

Table D-1 Alternative 2 Reduced Density					
PROPOSED UPDATE			ALTERNATIVE 2		
Proposed Update Designations	Acres	Maximum Dwelling Units (Proposed)	Alternative 2 Designations	Acres	Maximum Dwelling Units (Alternative 2)
RL1= 1 du/1 acre	444	444	RL2 = 1 du/2 acres	444	222
RL2 = 1 du/2 acres	662	331	RL5 = 1 du/5 acres	662	132.4
RL5 = 1 du/5 acres	1,956	391.2	RL10 = 1 du/10 acres	1,956	195.6
RL10 = 1 du /10 acres	4,273	427.3	RL20 = 1 du/20 acres	4,273	213.7
RL20 = 1 du/ 20 acres	5,509	275.5	RL40 = 1 du/40 acres	5,509	137.7
H2= 0 to 2 du/acre	251	502	RL1 = 1 du/1 acre	251	251
H4= 0 to 4 du/acre	149	596	H2 = 0 to 2 du/acre	149	298
H8 = 0 to 8 du/acre	26	208	H5 = 0 to 5 du/acre	26	130
Total	13,271	3,175*	Total	13,271	1,580.4

Source: County of Los Angeles, 2020a (acreage)

*This estimate does not take into account the number of dwelling units that could be reduced through the proposed Transfer of Development Credit Program or the reduction in units from other development standards such as clustering development and restricting development on significant ridgelines.

Objectives

Alternative 2 would not meet or would partially meet the program objectives. Under this alternative, the only changes that would go into effect would be changes to the North Area Plan Update's proposed land use designations for Residential and Rural Land(s). The program objectives are listed below with a notation on whether Alternative 2 meets, partially meets, or does not meet the program objective.

Alternative 2: Reduced Density			
Objectives (summarized)	Meets Objective	Partially Meets Objective	Does Not Meet Objective
Strengthen existing environmental resource policies.		■	
Identify policies/standards that support rural/semi-rural lifestyle.		■	
Align policies/standards with SMM LCP to ensure consistency in regulations and policies between the Coastal Zone and SMMNA.			■

Impact Analysis by Discipline

Aesthetics

The Reduced Density Alternative (Alternative 2) would propose changes to Rural Land and Residential land use designations to reduce the number of dwelling units per acre. Implementation of this alternative would reduce the allowable number of residential structures in the North Area. Although this reduction may result in somewhat fewer impacts to aesthetics than if no land use changes were made, the policies and standards in the proposed Plan and CSD would offer greater overall protections to aesthetic resources throughout the North Area. The proposed Plan and CSD Update would include policies and standards for scenic resource areas, scenic routes, visual resources, and outdoor lighting that were tailored to address or respond to current land uses in the North Area. The reduction of dwelling units under the Reduced

Density Alternative would not substantially reduce aesthetic impacts in any other part of the North Area and would be limited to residential areas. Additionally, the Reduced Density Alternative would not contain any other policies or address other concerns with aesthetics. Implementation of the Reduced Density Alternative would have greater impacts to aesthetics compared to the proposed Plan and CSD Update.

Air Quality

Alternative 2 would result in fewer dwelling units in land uses currently designated as Residential and Rural Land. The reduction of maximum allowable residential development within these land uses may result in a reduction of air quality impacts due to fewer construction and residential activities. A reduction in vehicular trips may also result from the reduced availability of dwelling units for potential residents. All activities would be required to remain in compliance with applicable air quality standards and practices. The proposed Plan and CSD Update would reflect the General Plan's air quality policies and standards and would maintain the same quantity of allowable dwelling units within these land uses. Although there would be a reduction in housing units under this alternative, compliance with air quality standards and requirements would mitigate potential impacts. However, because of the fewer dwelling units, the Reduced Density Alternative would have less impacts to air quality in comparison to the proposed North Area Plan and CSD Update.

Biological Resources

Alternative 2 proposes a lower residential density in the North Area. The reduced density of dwelling units may result in a lower residential population and less development within Rural Land and Residential land use designations. However, this alternative does not include any new policies or standards that would further protect biological resources throughout the North Area. The proposed Plan and CSD Update would expand upon existing policies and development standards to protect biological resources. Four habitat categories have been mapped in the North Area and based on these habitat categories, the proposed Plan and CSD Update provides a process for review of future development projects. The proposed project would limit the intensities of development in the North Area based on the following four habitat categories:

- S1: Habitat of limited distribution, particular rarity, or important habitat function. Development shall be sited as far away from S1 habitat as possible.
- S2: Intact, but broadly distributed habitat. Development may occur in areas with S2 habitat provided avoidance and minimization measures are implemented.
- S3: Disturbed, non-native, and cleared habitat. Development will be less restricted in areas with S3 habitat.
- S4: Developed and agricultural lands. Development is least restricted in areas with S4 habitat.

Although implementation of the Reduced Density Alternative would reduce the amount of development within certain land uses, it would not provide the same extent of protections to the varied habitat types throughout the North Area as the proposed Plan and CSD Update. Its protections to biological resources would only be limited to Rural Land and Residential lands within the North Area. Therefore, this alternative would have greater biological impacts than the proposed North Area Plan and CSD Update.

Greenhouse Gas Emissions

Alternative 2 would reduce the density of dwelling units, which may result in a small reduction of greenhouse gas emissions due to reduced construction activities and number of vehicle trips (both from construction and residential commutes). The proposed Plan and CSD Update reflects the General Plan's

greenhouse gas emissions policies and standards, would allow slightly greater densities in these land use designations than Alternative 2, and would result in proportionally greater greenhouse gas emissions. However, impacts to greenhouse gas emissions are anticipated to be lower under this alternative. Therefore, this alternative would have less impacts compared to the implementation of the proposed Plan and CSD Update.

Cultural and Tribal Cultural Resources

Construction activities associated with this Alternative would still be required to comply with applicable laws such as AB 52 and the County General Plan regarding cultural and tribal cultural resources, so any impacts would be mitigated or avoided. The proposed Plan and CSD Update contains policies regarding cultural and tribal cultural resources, which all support the stewardship of the area's rich and diverse archaeological, paleontological, and historic cultural resources. Much like Alternative 2, the projects implemented under the proposed Plan and CSD would also comply with state law and the County General Plan. The requirements for protection of these resources are mandated by state law and the County General Plan. In addition, consistent with AB 52 tribal consultation requirements, the County currently reaches out to tribes for input on projects and will continue to do so on future projects. However, impacts to cultural resources are anticipated to be lower under this alternative because of the decrease in dwelling units. Therefore, this alternative would have the less impacts in comparison to implementation of the proposed Plan and CSD Update.

Energy

Implementation of Alternative 2 has the potential for lower energy consumption due to the decreased density of dwelling units. Fewer residential units may result in lower energy usage. Future development throughout the North Area would continue to follow standards outlined in County plans and comply with federal and state regulations. Energy is discussed in the Los Angeles Countywide Sustainability Plan, Community Climate Action Plan, and Los Angeles County General Plan. The proposed Plan and CSD Update would also look to the General Plan for policies and standards addressing energy. The County would guide future development under this Alternative in a similar way as the proposed update. However, because of the decrease in dwelling units, this alternative would use less energy resources. Therefore, this alternative would have the less impacts compared to implementation of the proposed Plan and CSD Update.

Geology, Soils, and Paleontological Resources

Alternative 2 would limit the maximum number of dwelling units within two land use designation categories, Rural Land and Residential. Construction of these dwelling units would be subject to existing regulations, standards, and the County General Plan. This alternative would not include extensive policies that guide development elsewhere in the North Area. The proposed Plan and CSD Update would include policies to protect future development from seismic and non-seismic geologic activities throughout the North Area, which would also be more comprehensive and elaborate on the policies outlined in the County's General Plan. However, implementation of Alternative 2 would still follow existing regulations that protect future development from seismic and non-seismic geologic activities and preserve important paleontological resources. Therefore, implementation of Alternative 2 would have similar impacts to geology, soils, and paleontological resources as those of the proposed Plan and CSD Update.

Hydrology and Water Resources

Alternative 2 would result in reduced demand for water and potential for water pollution because of fewer potential residents and less construction activity. Development would be required to meet requirements

of the County's NPDES Municipal Stormwater Permit. However, Alternative 2 does not propose any additional water quality policies that would guide development in other areas throughout the North Area. The proposed Plan and CSD Update would contain policies that support the goals of maintaining water quality and protecting watersheds from development in the North Area, which would include designing new development to protect the watershed from runoff pollution and limiting development in sensitive watersheds to protect specific waterways. Implementation of Alternative 2 would have similar impacts to hydrology and water resources than the proposed Plan and CSD Update.

Land Use and Recreation

Alternative 2 proposes to reduce the number of dwelling units per acre in land use designations of Residential and Rural Land(s). No other protections or changes would occur to other land use designations or recreational activities. Although this Alternative would maintain lower densities compared with the proposed Plan and CSD Update (see Table D-1), it would not contain the policies and standards that are in the proposed Plan and CSD Update that would address and regulate event facilities, equestrian uses, and noise levels in the North Area. These new policies and standards were developed based on public input and would not be implemented under Alternative 2. With this alternative, use of event facilities, equestrian activities, and unmanaged noise levels would continue to adversely affect residents. Implementation of Alternative 2 would also not include the changes in the land use designation and zoning for parcels owned or managed by public conservation agencies and organizations. These parcels are currently open space or parkland and the change in land use and zoning would bring these parcels in conformance with the existing land use. Implementation of Alternative 2 would cause these parcels to remain in nonconformance with the existing use of these lands and would have greater impacts on land use and recreation than the proposed Plan and CSD Update.

Noise

The reduced maximum allowable number of dwelling units per acre in Rural Land and Residential land use designations under Alternative 2 may result in lower noise levels during construction and from residential vehicle traffic. A reduced residential density would also result in fewer sensitive receptors, or residents, that would be impacted by other sources of noise. However, this alternative would not implement any other noise protection measures. Implementation of the proposed Plan and CSD Update would contain important noise policies that were based on a noise study conducted in 2018 that evaluated baseline ambient noise and noise generated during live events (e.g. weddings, outdoor parties). The noise thresholds in the proposed Plan and CSD Update were identified to mitigate noise from existing and future land uses. Noise protection measures such as enforcing event facility noise levels, restricting development and use of private helicopter pads, and reducing residential interior noise levels would limit noise hazards throughout the North Area and would not be limited to Rural Land and Residential land designations. Implementation of Alternative 2 would have greater impacts to noise than the proposed Plan and CSD Update.

Population and Housing

Implementation of Alternative 2 would reduce the number of potential dwelling units available for people but would remain consistent with the North Area's semi-rural and low-density nature. No aspect of Alternative 2 would cause a substantial influx of population growth in the North Area or cause a considerable shortage of housing. Similarly, the proposed Plan and CSD Update would also promote the rural and sparsely developed character of the area. In addition, the Transfer of Development Credit Program would limit the net amount of development in the North Area. Implementation of Alternative 2 would have similar impacts on public services as those associated with the proposed Plan and CSD Update.

Public Services, Utilities, and Service Systems

Implementation of Alternative 2 would reduce the need for public services, utilities, and service systems due to the reduced number of potential residences and structures in the North Area. This alternative would continue to ensure public services are available for future proposed development as outlined in the County General Plan and existing zoning standards. The proposed Plan and CSD Update would also require and address the need to ensure public facilities and services. The Transfer of Development Credit Program would limit the net amount of development in the North Area and thus also reduce the need for additional public services utilities, and service systems. Alternative 2 would have similar impacts on public services as the proposed Plan and CSD Update.

Transportation and Traffic

Implementation of this alternative would not include any guiding policies or standards regarding transportation or traffic measures that would improve circulation in and around the planning area. Conversely, the proposed Plan and CSD Update would include circulation and transportation policies that would improve traffic flow and access while also preserving the natural environment throughout the entire North Area. Therefore, Alternative 2 would have greater impacts to transportation and traffic compared with the proposed Plan and CSD Update.

Wildland Fire and Hazards

Implementation of Alternative 2 would curtail the density of residential development in Rural Lands and Residential land designations, which would reduce the risk of wildfire hazards to residents. However, these wildfire risk reductions would only occur to the few areas where dwelling units are limited, and protections would not apply to any other area within the North Area. Development within the North Area in land designations other than Rural Lands or Residential would not be subject to any new policies and may not receive the same protective measures as they would under the proposed Plan and CSD Update. The proposed project's policies would improve wildland fire protection and include standards for rebuilding after a natural disaster such as the recent Woolsey Fire. Alternative 2 would have greater wildland fire and hazards impacts compared with the proposed Plan and CSD Update.

Conclusion – Alternative 2

The implementation of the Alternative 2 would have the potential for less impacts for six issue areas: air quality, GHG, cultural and tribal resources, and energy because it would reduce the number of dwelling units that could be built. Both Alternative 2 and the proposed Plan and CSD aim to maintain a rural landscape that is consistent with the current characteristics of the North Area. Although Alternative 2 would reduce the density of dwelling units in certain land use designations, which would have some benefit by reducing the density of residential units, which reduce risk of wildfire hazards to residents , it does not contain the protective policies and standards of the proposed Plan and CSD Update for aesthetics, biological resources, land use, noise, transportation/traffic, and wildland fire/hazards.

D.3.3 Alternative 3: Adopt SEA Ordinance Review Process

The County adopted the updated Significant Ecological Areas (SEA) Ordinance in January 2020. The SEA ordinance lays out a process for evaluating and permitting projects within areas of the County with sensitive biological resources. As noted in the Implementation Guide for this ordinance, the SEA Program “uses guidance and biological review and the application of certain development standards to balance the

preservation of the County's natural biodiversity with private property rights." The Santa Monica Mountains North Area is almost entirely within a SEA.

The proposed Plan and CSD Update acknowledges that the Santa Monica Mountains North Area is within a SEA and specifies that the standards in the CSD Update will regulate development in the North Area. Section 22.336.040, Applicability, Item D, of the CSD Update states:

D. Relation to Significant Ecological Areas. The Santa Monica Mountains North Area will remain within a designated Significant Ecological Area (SEA) as defined by the County General Plan and shall be regulated by the standards contained within this CSD.

Alternative 3 would replace the environmental review process and development standards to evaluate biological resources proposed in the North Area CSD Update with the review process and development standards in the SEA ordinance. Table D-2 provides a summary comparison of the process associated with the SEA ordinance and the CSD Update. This alternative would use the recently adopted process for evaluating biological resources on properties within a SEA (most of the North Area). The key differences between the proposed CSD Update and the SEA Ordinance include:

- The proposed North Area Plan and CSD Update is specific to the Santa Monica Mountains North Area and the SEA ordinance is countywide; and
- The proposed CSD Update includes a process for evaluating projects similar to the SEA ordinance and includes biological sensitivity maps that identify where in the North Area the proposed four habitat categories may be found in the North Area. The SEA ordinance does not map resources. It provides a process for evaluating the sensitivity of biological resources based on five resource categories.

Alternative 3 would provide another option for evaluating biological resources and in a framework that has already been adopted by the County. In addition, this alternative would respond to some property owner concerns with the mapped habitat categories on their properties. While the maps are not concrete and the CSD Update includes a process for recategorizing land in the North Area, some residents/property owners expressed concern with the maps being formalized if the maps are adopted as part of the proposed Plan and CSD Update. See Figure D-1 for the location of the SEA boundary in the North Area.

Table D-2. Summary Comparison of CSD Update with SEA Ordinance ¹	
North Area CSD Update	Countywide SEA Ordinance
Ministerial Review – S2 and S3 Habitat <ul style="list-style-type: none"> • Biological Inventory projects within habitat categories S2 and S3 • Biological Constraints Map that identifies all sensitive biological resources • Site Plan displays proposed development, grading, etc. • Consultation with County Biologist • Single Family Residence in S2 Habitat requires Minor Conditional Use Permit (CUP). 	Pre-application SEA Counseling to identify type of required review for each specific project. Ministerial SEA Review <ul style="list-style-type: none"> • Site plan to identify all proposed development • Biological Constraints Map that identifies all SEA resources according to checklist • Natural Open Space Recordation documentation • Site visit by County Biologist may be needed
Discretionary Review – S1 Habitat and may include S2 and S3 Habitat if review of resources is necessary <ul style="list-style-type: none"> • Biological Constraints Analysis prepared by qualified biologist • Biological Assessment review by SEATAC² • SEA Conditional Use Permit required 	Discretionary Review <ul style="list-style-type: none"> • Biological Constraints Analysis prepared by qualified biologist • Biota Report prepared by a qualified biologist that addresses impacts and identifies mitigation • SEA Conditional Use Permit required

Table D-2. Summary Comparison of CSD Update with SEA Ordinance ¹	
North Area CSD Update	Countywide SEA Ordinance
Habitat categories mapped according to the following: <ul style="list-style-type: none"> • S1 Habitat – Habitat of limited distribution, particular rarity, or important function (very sensitive habitat); development restricted. • S2 Habitat – Intact, but broadly distributed habitat (sensitive habitat); development limited. • S3 Habitat – Disturbed, non-native, and cleared habitat; development less restricted. • S4 Habitat – Developed and agricultural lands; development permitted. 	Resource Categories: <ul style="list-style-type: none"> • SEA Resource Category 1 – natural communities recognized by CDFW and ranked G1 or S1. (very sensitive) • SEA Resource Category 2 - natural communities recognized by CDFW and ranked G2 or S2. (sensitive) • SEA Resource Category 3 - natural communities recognized by CDFW and ranked G3 or S3. (sensitive) • SEA Resource Category 4 - natural communities recognized by CDFW and ranked G4, S4, G5 or S5. • SEA Resource Category 5 – disturbed, early successional or isolated resource elements, non-native species.
Habitat categories have been mapped; can be recategorized based on review by County Biologist, review of property documents and site visit.	Areas identified as Significant Ecological Areas are mapped; resource categories are not mapped.
Protected tree requirements Tree removal may require CUP Mitigation ratios identified based on type of impact (e.g. amount in percentage of encroachment area, removal)	Protected tree requirements Tree removal may require CUP Mitigation ratios identified based on type of impact (e.g. pruning, encroachment, removal)

Notes: 1. This table does not cover all components of each ordinance. The table provides a brief comparison for purposes of addressing the alternatives evaluation in compliance with CEQA.

2. SEATAC = Significant Ecological Area Technical Advisory Committee.

Source: County of Los Angeles, 2020b.

Objectives

Alternative 3 might not meet all program objectives. Under this alternative, the Plan and CSD policies and standards would be applied and only the process for evaluating and deciding on biological resources would be changed. The program objectives are listed below with a notation on whether Alternative 3 meets, partially meets, or does not meet the program objective.

Alternative 3: Adopt SEA Ordinance Review Process			
Objectives (summarized)	Meets Objective	Partially Meets Objective	Does Not Meet Objective
Strengthen existing environmental resource policies.	■		
Identify policies/standards that support rural/semi-rural lifestyle.		■	
Align policies/standards with SMM LCP to ensure consistency in regulations and policies between the Coastal Zone and SMMNA.		■	

Impact Analysis by Discipline

Aesthetics

Alternative 3 would have an impact on aesthetics in the context of protecting native trees. The SEA Ordinance Implementation Guide states that native trees shall not be trimmed for aesthetic purposes alone but does not specifically contain policies that specifically address general aesthetics in the North

Area. In contrast, the proposed Plan and CSD Update contains policies that protects a wide array of scenic elements that include natural geologic, historic, and biological resources. Implementation of Alternative 3 would not provide the same protections to aesthetics. Therefore, Alternative 3 would have greater impacts to aesthetics compared with the proposed Plan and CSD Update.

Air Quality

This Alternative would address air quality in the same way as the Plan and CSD Update. Future development projects under this alternative would be required to comply with regional and state air quality regulations as well as the County's General Plan policies. The proposed Plan and CSD Update would also refer to the General Plan for air quality policies and standards. Therefore, adopting the SEA Ordinance Review Process would have similar air quality impacts as those associated with the implementation of the proposed North Area Plan and CSD Update.

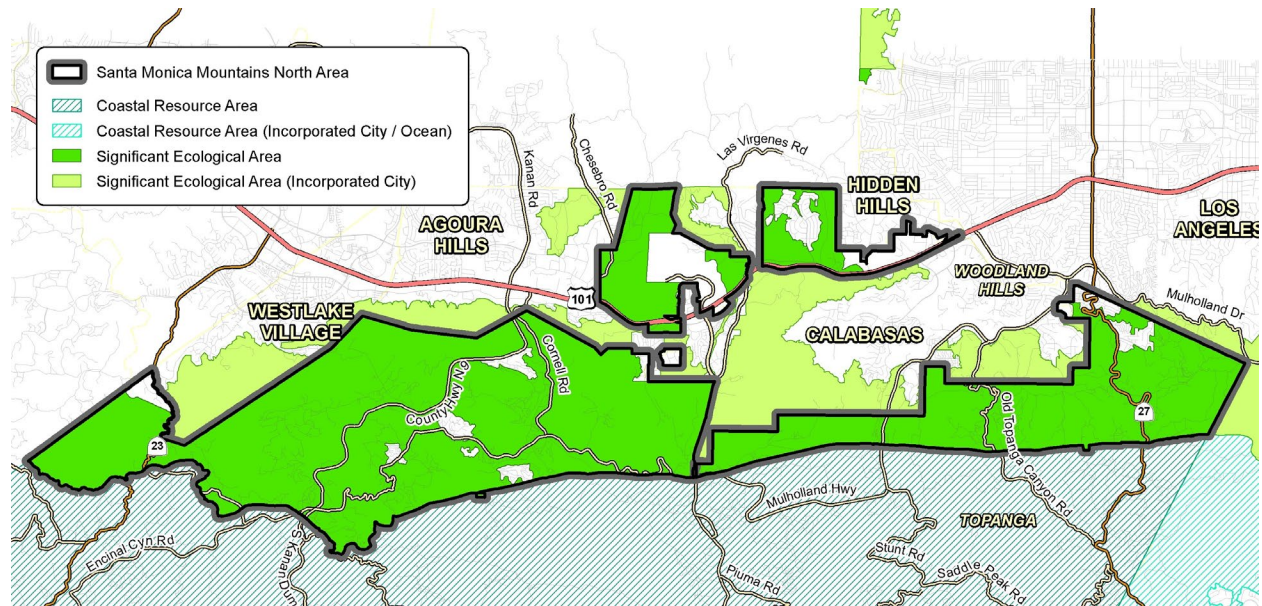


Figure D-1. North Area SEA Boundary

Biological Resources

Implementation of the Alternative 3 would protect valuable biological resources in the North Area. Most of the North Area is considered a significant ecological area and would be subject to SEA Counseling. Although the SEA Ordinance does not map resource categories, it guides the process of reviewing individual sites within SEAs to evaluate the sensitivity of biological resources based on five resource categories (see Table D.2). The countywide SEA Ordinance would require a SEA Conditional Use Permit if a project's disturbance exceeds thresholds established for each of the SEA Resource Categories as outlined in the SEA Ordinance Section 22.102.090. Similarly, under the proposed CSD Update, projects located entirely in S1 habitat and projects in S2 and S3 habitats which require a biological assessment would require a SEA Conditional Use Permit. Implementation of either ordinance or development standard would protect native trees.

The proposed CSD Update includes a process for evaluating projects similar to the SEA ordinance and includes biological sensitivity maps that identify where in the North Area the proposed four habitat categories may be found in the North Area (see Table D-2). Clear boundaries would be determined on a site-specific basis, substantial evidence, and site-specific biological inventory and/or assessment. Habitat

categories can be adjusted based on substantial biological evidence and independent review by the Department Biologist. The ability to adjust habitat categories allows for the same flexibility seen in the SEA Ordinance Review Process. Both the SEA Ordinance Review Process and updated CSD's Biological Resources Standards would guide detailed review processes of future projects. Implementation of the SEA Ordinance Review Process would have similar impacts to biological resources as that of the Plan and CSD Update.

While the SEA Ordinance would achieve a similar outcome to the procedures in the proposed Plan and CSD Update, the proposed update identifies sensitive biological resources in the North Area and their anticipated location through the biological resources maps. This specific information for the North Area is not provided under the SEA ordinance. Even though the maps would be used as a guide because they are based on existing documented information regarding biological resources, they provide a useful guide to the sensitive resources in the North Area and provide an upfront assessment of how development would need to proceed depending on the habitat category. There is also a process in the update that allows for property owners to change the designations on the biological resources maps based on documented information. The approach in the proposed update provides for a more tailored process for the unique biological resources of the North Area. In addition, the proposed Plan and CSD Update requires a SEA Conditional Use Permit within certain habitat categories and review by the SEATAC to allow for consistency between the update and the SEA Ordinance. Implementation of the SEA Ordinance Review Process would have similar impacts to biological resources as that of the proposed Plan and CSD Update.

Greenhouse Gas Emissions

Alternative 3 would address greenhouse gas emissions in the same way as the proposed Plan and CSD Update. Existing greenhouse gas policies and standards are covered by the County's General Plan, Community Climate Action Plan, and the Countywide Sustainability Plan as well as regional and state regulations. The proposed Plan and CSD Update would also look to the General Plan for policies and standards that address greenhouse gas emissions. Under Alternative 3, the County would guide future development in a similar way as the proposed update. All future projects would require compliance with relevant laws and policies regarding greenhouse gas emissions. Alternative 3 would have the similar impacts to those associated with the implementation of the proposed North Area Plan and CSD Update.

Cultural and Tribal Cultural Resources

Implementation of this alternative would still require future development to comply with applicable laws and the County General Plan regarding cultural and tribal cultural resources. The proposed Plan and CSD Update contains policies regarding cultural and tribal cultural resources, which all preserve the area's rich and diverse cultural and tribal cultural resources. The projects implemented under the proposed Plan and CSD would also comply with applicable federal and state laws and the County General Plan. The requirements for protection of these resources are mandated by state law and the County General Plan. Consistent with AB 52 tribal consultation requirements, the County currently reaches out to tribes for input on projects and will continue to do so on future projects. Therefore, Alternative 3 would have similar impacts to cultural and tribal cultural resources as those associated with the proposed Plan and CSD Update.

Energy

Adopting the SEA Ordinance Review Process would not introduce any new energy policies that would address energy efficiency or renewable energy. Future development in the North Area would continue to follow standards outlined in the Countywide Sustainability Plan, Community Climate Action Plan, and the

County General Plan, as well as comply with federal and state regulations. The proposed Plan and CSD would also look to the General Plan for policies and standards addressing energy. The County would guide future development under Alternative 3 in a similar way as the proposed updates. Therefore, this alternative would have the same impacts to those associated with the proposed Plan and CSD Update.

Geology, Soils, and Paleontological Resources

Alternative 3 would not contain any new measures regarding geology, soils, or paleontological resources. Construction of future projects in the North Area would be subject to existing regulations, standards, and the County General Plan. Compliance with these standards would continue to protect future development from geologic hazards and preserve paleontological resources. Implementation of the proposed Plan and CSD Update would include extensive tailored policies that guide development throughout the North Area. Compliance with existing regulations and guidance from the proposed Plan and CSD Update would safeguard the public from unstable geologic units and preserve important paleontological resources at a similar level. Therefore, implementation of Alternative 3 would have similar impacts to geology, soils, and paleontological resources as implementation of the proposed Plan and CSD Update.

Hydrology and Water Resources

Alternative 3 recognizes the value of water resources within the North Area and would require minimum setbacks at which development and associated fuel modification must be sited from water bodies. The SEA Ordinance addresses protection of biological resources and any requirements regarding buffers from water bodies, which would be consistent with the requirements in the proposed Plan and CSD Update. The proposed Plan and CSD Update includes similar policies that protect water resources. These policies include but are not limited to designing new developments in such a way to minimize pollution from runoff; designing and following BMPs to control water quality; protecting specific sensitive waterways by limiting maximum potential buildout; and minimizing land disturbance activities to avoid erosion that would be detrimental to water quality. Alternative 3 would have similar impacts to hydrology and water as those associated with the proposed Plan and CSD Update.

Land Use and Recreation

Because Alternative 3 would only replace the process for reviewing and addressing biological resources, the proposed Plan and CSD Update would be applied for all issue areas in the North Area. Adopting the SEA Ordinance Review Process would guide future development that, much like the proposed Plan and CSD Update, and would conform to the County's existing environmental standards. Therefore, this alternative would have the same impacts to land use and recreation as those associated with the proposed Plan and CSD Update.

Noise

Alternative 3 would only replace the process for reviewing and addressing biological resources, the proposed Plan and CSD Update would be applied for all other issue areas in the North Area. The proposed Plan and CSD Update would include noise policies that were tailored to address noise hazards and annoyances associated with live events. The noise thresholds developed in the proposed Plan and CSD Update were identified to mitigate noise from existing and future land uses. Therefore, under this alternative, impacts from noise would be similar to those associated with the proposed Plan and CSD Update.

Population and Housing

Alternative 3 would only replace the process for reviewing and addressing biological resources, the proposed Plan and CSD Update would be applied for all other issue areas in the North Area. Both the SEA Ordinance and the proposed Plan and CSD Update would not cause development to exceed growth projections in the General Plan for the North Area. Therefore, under this alternative, impacts on population and housing would be similar to those associated with the proposed Plan and CSD Update.

Public Services, Utilities, and Service Systems

Implementation of this alternative would not introduce any revised policies or standards regarding public services, utilities, and service systems. All future development in the North Area would adhere to existing policies and standards of the proposed North Area Plan and CSD. Both the SEA Ordinance and the proposed Plan and CSD Update would not cause development to exceed growth projections in the General Plan for the North Area, and therefore would not significantly increase the demand for public services. Therefore, implementation of Alternative 3 would have similar impacts on public services, utilities, and service systems as the proposed Plan and CSD Update.

Transportation and Traffic

Implementation of Alternative 3 would prohibit streets, highways, and other transportation corridors from traversing natural open spaces unless determined necessary for public safety. The SEA Ordinance Review Process would not address any other transportation/traffic issues. The circulation and transportation policies that would improve traffic flow and access in the proposed Plan and CSD Update would continue to apply under this alternative. Therefore, Alternative 3 would have similar impacts to transportation and traffic compared with the proposed Plan and CSD Update.

Wildland Fire and Hazards

Implementation of the SEA Ordinance Review Process would require future development to comply with Los Angeles County Fire Department fire safety standards. These standards include but are not limited to allowing removal of natural features such as fallen native trees for fire protection; requiring compliance with a Fire Department-approved Fuel Modification Plan for existing and new structures in a Very High Fire Hazard Severity Zone; and requiring landscaping to consist of fire-resistant vegetation consistent with Fire Department requirements. The policies and standards of the proposed Plan and CSD Update would continue to apply under this alternative and are consistent with the fire-related requirements (e.g. fuel modifications) in the SEA Ordinance. Therefore, implementation of Alternative 3 would have similar impacts regarding wildland fire hazards compared with implementation of the proposed Plan and CSD Update.

Conclusion – Alternative 3

Both Alternative 3 and the proposed Plan and CSD would protect the diverse biological resources and maintain a rural landscape that is consistent with the current characteristics of the North Area. The proposed Plan and CSD Update and the SEA Ordinance both provide protection of North Area biological resources. Although Alternative 3 would provide protection of biological resources and outlines a thorough review process, it does not include the area-specific policies, standards, and habitat categorization for biological resources as the proposed Plan and CSD Update. In addition, this ordinance does not include the policies and standards that would continue to support a rural/semi-rural lifestyle in the North Area and it would not bring the existing North Area Plan into consistency with the Santa Monica

Mountains North Area Plan. This alternative only partially meets the objectives of the proposed project/program.

D.4 Alternatives Considered but Eliminated from Further Consideration

Mitigation Fee

The County's Santa Monica Mountains Local Coastal Program (LCP) Resource Conservation Plan requires a mitigation fee to compensate for adverse habitat impacts to coastal habitat resource areas containing habitats of the highest biological significance, rarity and sensitivity, categorized as H1 and H2 by the LCP. The LCP planning area is adjacent to the southern boundary of the North Area. Under this alternative, the County would implement a similar compensatory fee program for impacts to habitat categories S1 and S2 in the North Area. Habitat impact fees would be charged to projects that remove or otherwise modify sensitive habitat in the Santa Monica Mountains.

The proposed Plan and CSD Update includes policies that identify use of fees to mitigate for impacts to S1 and S2 Habitat. Policy C-10 provided below identifies use of fee-simple acquisition as a way to mitigate for impacts to sensitive habitat.

CO-10: *Pursue a variety of methods to preserve open space, including fee-simple acquisition, purchase of development rights, land swaps, regulations, or development density and lot retirement incentives. For County, State, and federal funds that may be earmarked for open space, assign high priority to acquiring properties designated on the National Park Service's Land Protection Plan, and to parcels within S1 and S2 habitat areas.*

The CSD includes Biological Resources Standards to address use of impact fees for mitigation. Section 22.336.060 (A)(4)(b), Development Standards for Habitat Categories, allows for use of mitigation fees and Section 22.336.060 (A)(10), Habitat Impact Fees, requires the preparation of a habitat impact study to determine appropriate fees for the North Area.

The Mitigation Fee Alternative would look at the North Area characteristics that could influence the type and amount of fees to mitigate for possible impacts. This alternative would only address issues related to the North Area.

Rationale for Eliminating. The County is currently developing a Habitat Fee Study to determine the appropriate fees to adequately compensate for loss of S1 and S2 habitats in both the Coastal Zone and in the North Area. Therefore, the Mitigation Fee Alternative is no longer valid for the proposed Plan and CSD Update.

Apply Adopted Santa Monica Mountains LCP to North Area

In this alternative, the County would adopt the certified Santa Monica Mountains LCP policies and standards for application to the North Area. This alternative would protect key resources in the North Area such as biological and cultural resources but would require modifications to the LCP maps and to adopted policies and standards to make some of the requirements applicable to the North Area.

Rationale for Eliminating. This alternative would not provide an opportunity to tailor policies and standards to the unique characteristics of the North Area.

D.5 Comparison of Alternatives

Section D.3 describes and evaluates the three alternatives to the proposed project. Table D-1 presents a comparison of the potential significant impacts of the proposed project in comparison with the alternatives.

CEQA Guidelines Section 15126.6(d) requires the following for alternatives analysis and comparison:

The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. (CEQA Guidelines Section 15126.6[d])

If the environmentally superior alternative is the No Project Alternative, CEQA requires the identification of an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6[e][2]).

Based on the analysis presented in this section and the impact analysis for the proposed project presented in Section C of this EIR, the proposed project has been identified as “environmentally superior.” The proposed project (proposed Plan and CSD Update) meets the program objectives while improving the consideration and evaluation of North Area resources. The proposed updates would have no significant unavoidable impacts to the environment. The proposed project would have less-than-significant impacts to aesthetics, biological resources, greenhouse gas emissions, energy, hydrology and water resources, land use and recreation, noise, population and housing, public systems/utilities/service systems, transportation and traffic, and wildland fire and hazards. With mitigation, the proposed project would have less-than-significant impacts to air quality, cultural and tribal cultural resources, and geology/soils/paleontological resources.

While the Reduced Density Alternative and the SEA Ordinance Alternative would only partially meet the program objectives. These alternatives were not identified as the environmentally superior alternative because neither alternative would include the area-specific information on biological resources or the evaluation process that are included in the proposed Plan and CSD Update. Table D-3 provides a comparison of the proposed project and alternatives for each issue area.

Table D-3. Comparison of Alternatives

Impact	Proposed Program	Alternative 1	Alternative 2	Alternative 3
Aesthetics	Less than significant	+	+	+
Air Quality	Less than significant with mitigation	=	—	=
Biological Resources	Less than significant	+	+	=
Greenhouse Gas Emissions	Less than significant	=	—	=
Cultural and Tribal Cultural Resources	Less than significant with mitigation	=	—	=
Energy	Less than significant	=	—	=

Table D-3. Comparison of Alternatives

Impact	Proposed Program	Alternative 1	Alternative 2	Alternative 3
Geology, Soils, and Paleontological Resources	Less than significant with mitigation (Paleontology)	=	=	=
Hydrology and Water Resources	Less than significant	+	+	=
Land Use and Recreation	Less than significant	+	+	=
Noise	Less than significant	+	+	=
Population and Housing	Less than significant	+	=	=
Public Services, Utilities, and Service Systems	Less than significant	=	=	=
Transportation and Traffic	Less than significant	+	+	=
Wildland Fire and Hazards	Less than significant	+	+	=

Notes: = impact would be comparable to proposed program; + impact would be greater than proposed program; - impact would be less than proposed program

E. Other CEQA Considerations

This section presents four topics required by CEQA. These topics include environmental effects found not to be significant, growth-inducing effects, significant irreversible environmental changes, and significant effects that cannot be avoided. Section C.7 of this EIR includes a discussion of Energy use for this project.

E.1 Environmental Effects Found not to Be Significant

Section 15128 of the CEQA Guidelines states that an EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and therefore were not discussed in detail in the EIR. As described in the Notice of Preparation (NOP) prepared for the proposed project, all impact categories were found to have at least one potentially significant impact; therefore, all categories have been evaluated in the EIR.

E.2 Growth-Inducing Effects

Section 15126.2(e) of the CEQA Guidelines provides the following guidance on growth-inducing impacts: a project is identified as growth inducing if it *“could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.”* This section also states that growth in an area should not be assumed to be necessarily beneficial, detrimental, or of little significance to the environment.

In accordance with Section 15126.2(e) of the CEQA Guidelines, the proposed project’s potential growth-inducing effects considers population growth, demand on public services, economic effects, and precedent-setting action. Growth-inducing impacts are evaluated to provide additional information on ways in which the proposed project could contribute to significant changes in the environment, beyond the direct consequences of implementing the proposed Plan and CSD Update evaluated in Section C of this EIR. The following analysis considers the proposed project’s (proposed Plan and CSD Update) effect on population growth, public services, economy, precedent-setting action, and whether there would be effects on the environment. The issues discussed below are consistent with the issues addressed in the County’s General Plan.

Population Growth

The purpose of the proposed project (proposed Plan and CSD Update) is to guide growth and development in the North Area. The proposed project does not include a population or growth projection. It relies on the analysis and projections of the adopted General Plan and provides additional area-specific policies and development standards that would better address the rural and natural resources of the North Area. Given the rural nature of the North Area, it is not anticipated that adoption of the proposed Plan and CSD Update would significantly change or increase the North Area population. Likewise, the proposed policies and standards would not impede development in the North Area. The proposed project would provide a framework for future development and would accommodate growth based on the projected growth evaluated in the General Plan. Therefore, the proposed project would not impose regulatory obstacles to growth, and growth would be managed consistent with the policies and standards of the proposed Plan and CSD Update. Because of the rural nature of the community and the desire to maintain the area as such, the proposed project is not expected to have a significant impact on growth in the North Area.

Demand on Public Services

As discussed in Section C.13 (Public Services, Utilities, and Service Systems), the North Area includes commercial, residential, and open space lands uses. While it is expected that the North Area would include some level of growth, this growth would not significantly impact existing public services, utilities, and service systems. As an existing rural community, the North Area would require public services such as fire protection, sheriff protection, public schools, public recreation, and other services as appropriate. Because of the rural nature of the community and the desire to maintain the area as such, the proposed project is not expected to have a significant impact on public services, utilities, and service systems in the North Area.

Even though the proposed Plan and CSD Update includes policies and standards that address fire-related issues such as fuel modifications and vegetation management, the North Area is in a Very High Fire Hazard Severity Zone and may continue to need fire protection services at a greater amount than other areas of the County. Regarding fire, the North Area may require additional fire protection services in the future. This need is not however related to the proposed Plan and CSD Update, but of the natural conditions of the North Area.

Encourage Economic Effects

Future development consistent with the proposed Plan and CSD Update could create temporary construction jobs during development of individual projects such as residences or development of commercial uses. This would be a direct, growth-inducing effect of the proposed project.

The Woolsey Fire destroyed many structures in the North Area and property owners have been in the process of rebuilding. This activity may continue if the proposed Plan and CSD Update is adopted. This unexpected need could result in an increase in building under the proposed Plan and CSD Update and temporarily increase spending of economic goods and services. Therefore, the proposed project could have both direct and indirect growth-inducing effects on the economy.

Precedent-Setting Action

The proposed Plan and CSD Update would not set a precedent that could encourage and facilitate other activities that could significantly affect the environment. The proposed project updates an existing plan and CSD for the North Area, which would be consistent with the County's adopted General Plan. While the updated Plan and CSD would include revised policies and standards, it is continuation of the existing long-range land use plan for the North Area. The proposed project would continue to allow development while protecting the natural resources of the North Area.

As discussed in Section B (Plan and CSD Update Description), the proposed project consists of the update or revision of Santa Monica Mountains North Area Plan and CSD, which includes revisions to area maps and new area maps such as the biological resources maps. The purpose for the update is bring consistency between the North Area and the Santa Monica Mountains Local Coastal Program. Adoption of the update could put pressures on surrounding cities for housing, commercial, office and industrial land uses that may be directly or indirectly influenced by the proposed project.

Although the proposed project would not include physical development, it would create the potential for additional development in the North Area compared to existing conditions. Much of this development would be induced more by market demands than by new development capacity created by land use changes proposed in the Plan and CSD Update. Because adoption of the proposed project could result in

subsequent projects that would have their own environmental impacts—including potentially significant impacts—the proposed project is a precedent-setting and growth-inducing action.

E.3 Significant Irreversible Environmental Changes

Section 15126.2(d) of the CEQA Guidelines defines an irreversible impact as an impact that uses nonrenewable resources during the initial and continued phases of the project. Irretrievable commitments of resources should be evaluated to assure that such consumption is justified. Irreversible impacts can also result from permanent loss of habitat, damage caused by environmental accidents associated with project construction, or operational resource use.

The proposed Plan and CSD Update would not induce a significant growth in the North Area. Buildout of the Santa Monica Mountains North Area would occur consistent with the projections identified in the County's General Plan. Implementation of the proposed project would provide guidance for additional residential and commercial development consistent with adopted goals, policies, and development standards. The significant irreversible changes due to the proposed project could include:

- Future development would involve construction activities that entails the commitment of nonrenewable and/or slowly renewable energy resources, including gasoline, diesel fuel, electricity; human resources; and natural resources such as lumber and other forest products, sand and gravel, asphalt, steel, copper, lead, other metals, and water.
- An increased commitment of social services and public maintenance services (e.g., police, fire, and sewer and water services) may also be required.
- Population growth related to project implementation could increase vehicle trips over the long term. Emissions associated with such vehicle trips would continue to contribute to the South Coast Air Basin's nonattainment designation for ozone and particulate matter (PM10 and PM2.5).
- Future development of the proposed project is a long-term irreversible commitment of vacant parcels of land (including open space) or redevelopment of existing developed land in the North Area of Santa Monica Mountains.

E.4 Significant Effects that Cannot be Avoided

E.4.1 Significant Direct Effects of the Proposed Project

Sections 15126.2(a) and 15126.2(c) of the CEQA Guidelines requires that the EIR describe any significant impacts on the environment, including those that can be mitigated but not reduced to less than significant levels. Potential environmental effects of the proposed project and mitigation measures are discussed in detail in Section C of this EIR. Table ES-1 of the Executive Summary summarizes the impacts, mitigation measures, and levels of significance after mitigation. The EIR analysis found that three issue areas had the potential to have significant impacts. With mitigation, impacts to air quality, cultural resources and paleontological resources would be reduced to a less than significant level. As such, the proposed Plan and CSD Update would not have any significant, unavoidable impact that would remain adverse after mitigation measures are applied.

E.4.2 Significant Cumulative Effects

According to Section 15355 of the CEQA Guidelines, the term "*cumulative impacts*" refers to two or more individual effects which, when considered together, are considerable or which compound or increase

other environmental impacts.” Individual effects that may contribute to a cumulative impact may be from a single project or a number of separate projects. Individually, the impacts of a project may be relatively minor, but when considered along with impacts of other closely related or nearby projects, including newly proposed projects, the effects could be cumulatively considerable.

This EIR has considered the potential cumulative effects of the proposed project in Section C. Impacts of the proposed project, when combined with impacts from past, present, and probable future projects, would not be considered cumulatively significant. For all environmental issue areas, the EIR did not identify any significant unavoidable cumulative impacts.

F. Public Participation and Consultation

Section F presents two key components of the EIR process: (1) public participation and (2) consultation with agencies and tribal governments. This information describes how input was received on the EIR, who was contacted, and what agency information was reviewed as part of the preparation of this document. In addition, this section provides a list of the EIR preparers as required by the CEQA Guidelines.

F.1 Public Participation and Notification

Public participation included collection of agency and public input on the North Area Plan and CSD Update (proposed project) and the environmental review process as well as providing different avenues for reviewing the proposed project information and providing public comment. These activities are summarized below.

F.1.1 EIR Scoping Process

The scoping process for the North Area Plan and CSD Update included the following elements that are detailed in the subsections below.

- Publication of Notice of Preparation of an EIR to solicit comments from affected public agencies and the public, as required by CEQA.
- Public scoping meeting to take comments on the scope of the EIR.
- Preparation of a Summary of Comments that documented key issues raised during the comment period from comment letters and scoping meeting.

Notice of Preparation

On August 1, 2018 the County of Los Angeles Department of Regional Planning (DRP) issued a Notice of Preparation (NOP) consistent with CEQA guidelines 15082, which summarized the key issues addressed in the North Area Plan and CSD Update, stated its intention to prepare an EIR, and requested comments from interested parties (See Appendix 2). The purpose of the NOP was to inform recipients that the County had begun preparation of an EIR for the North Area Plan and CSD Update and to solicit information that could be helpful in the environmental review process. The notice also included project location and environmental setting information, project summary, proposed policies and development standards, potential environmental effects of the project, date and time of the public scoping meeting, and information on how to provide comments to the County. The NOP started the 30-day comment period where responsible, trustee, interested agencies, the State Clearinghouse, tribal governments, and private citizens had the opportunity to comment on the project. The 30-day public comment period was open from August 1, 2018 through August 31, 2018.

Public Notification and Scoping Meetings

In accordance with CEQA Guidelines Section 15082 the County completed distribution of the NOP and public notice for the proposed project. Notification of the NOP, 30-day comment period, and notice of public scoping meeting included:

- Posting on Facebook on August 1, 2018
- Posting on Twitter on August 1, 2018
- Posting on NextDoor on August 1 and August 21, 2018

- Publication of a meeting notice in The Malibu Times on August 2, 2018
- Approximately 250 postcards notices were mailed to interested parties on July 31, 2018
- Approximately 320 emails to the County's list of interested parties on July 31, 2018
- Mailed notice to interested tribes for compliance with AB 52 on July 26, 2018
- Filed the NOP with State Clearinghouse on July 27, 2018 ("Summary of Postings" from July 16-31, 2018)
- Posted the NOP at Register-Recorder/County Clerk on July 30, 2018
- Posted information regarding EIR activities on the County website for the project: <http://planning.lacounty.gov/smmnap>

Appendix 2 provides proof of publication of the NOP and notice regarding the public scoping meeting. The public scoping meeting was held within the 30-day scoping period on August 21, 2018. The meeting was held from 6:00 p.m. to 7:30 p.m. and conducted at the Los Angeles County Field Office in Calabasas.

Project Related Information

Project related information, including the North Area Plan and CSD Update released August 29, 2019, the NOP, and other information on community outreach and the environmental review process, has been made available to the public on the project website, noted below:

<http://planning.lacounty.gov/smmnap>

This site hosts all public documents for the North Area Plan and CSD Update during the environmental review process, announcements of upcoming public meetings, and materials from past meetings.

Publicly distributed project documents included contact information and invited interested parties to provide comments to the County Regional Planner. (See discussion below for contact information.)

An email address (smmnortharea@planning.lacounty.gov) was also established for the proposed project to provide another means of submitting comments on the scope and content of the EIR. The email address was provided on the NOP that was distributed at the start of the scoping period and included in the notifications of the NOP and scoping meeting. Comments received have been considered in the preparation of this EIR; for a more complete summary of the scoping comments, please see Appendix 2 and its associated sub-appendices.

Scoping Summary

The County received a total of 89 comment letters and emails during the 30-day scoping period. Nine regional and local agencies and ten organizations submitted comments on the North Area Plan and CSD Update. Twenty-five members of the public provided oral comments at the public scoping meeting on August 21, 2018 (101 attendees based on sign-in sheets). The following bullets are a summary of public concerns that were presented during the scoping period:

- Safety of Santa Monica Mountains North Area, including environmental and public-well being
- Impacts to biological resources, such as impacts to sensitive plant and animal species
- Impacts to viticulture processes, including potential increase in fire hazard and impacts to viable land
- Protection of cultural resources and Native American history
- Impacts from development in and around the North Area, such as increase in traffic, noise, and population
- Modifications to current land use, including increase in development and reduction in open space
- Protection of equestrian heritage and processes in Santa Monica Mountains North Area

Appendix 2 contains the Summary of Scoping Comments with copies of the comment letters and emails as supporting information. Each of the issue area authors for this EIR reviewed the scoping comments

received as part of preparation of their analyses. In addition, each of the EIR issue-area sections include a summary of the scoping comments that pertain to that issue area.

F.1.2 Draft EIR Distribution and Public Review

The County issued the Draft EIR for a 45-day comment period consistent with CEQA Guidelines Section 15105(a). The Draft EIR evaluates 14 environmental issue areas and addresses the cumulative impacts of the proposed project. The EIR also includes consideration of alternatives to the proposed project and a comparison of the alternatives to the project.

Notice of Availability

A Notice of Availability (NOA) was distributed to all contacts on the County's EIR Mailing List. The NOA included information on accessing the Draft EIR, a list of the significant environmental effects anticipated as a result of the project, to the extent which such effects are known to the County at the time of notice, and the starting and ending dates for the review period during which the County will receive comments on the Draft EIR.

The following additional activities were conducted as part of the noticing for the release of the Draft EIR for the proposed Project:

- The NOA was filed with County Clerk as required by CEQA Guidelines 15087[d].
- A Notice of Completion (NOC) form was filed with the State Clearinghouse (CEQA Guidelines 15085[a]) along with multiple copies of the EIR.

Draft EIR Distribution List

Copies of the Draft EIR were distributed to the State Clearinghouse, regulatory agencies, local agencies, and interested tribal governments. Other contacts on the mailing list received the NOA that provided information on where the document could be reviewed such as the document repositories, the project website and contact information.

Draft EIR Public Meeting

The County will hold a public meeting to present the findings of the Draft EIR and to take public comment. The date, time, and location of the public meeting will be advertised in a local newspaper and on the project website prior to the meeting. All comments or questions on the Draft EIR should be addressed to:

Thuy Hua

Los Angeles County Department of Regional Planning
320 W. Temple Street, 13th Floor | Los Angeles, CA 90012
smnortharea@planning.lacounty.gov

F.2 Organization and Tribal Consultation

The consultant team reviewed agency websites for data and regulatory information in preparation of this EIR. The agency websites are listed in their respective technical chapter in Section G (References). Please refer to Section G (References) for this information.

Tribal Consultation. For the North Area Plan and CSD, DRP needed to complete two phases of tribal consultation: SB 18 consultation for the North Area Plan and CSD and AB 52 for the EIR that evaluates the

North Area Plan and CSD Update. A summary of the results of these consultations is presented below. Also refer to Section C.6 Cultural and Tribal Cultural Resources for more information. Copies of the notification and courtesy letters sent by DRP are included in Appendix 4 of this EIR.

To meet the requirements of AB 52, the DRP mailed notification letters to three tribes in the North Area and on the list of California Native American Tribes that requested formal notification. The letters were sent to Gabrieleno Tongva–San Gabriel Band of Mission Indians, Fernandeno Tataviam Band of Mission Indians, and Gabrieleno Band of Mission Indians – Kizh Nation. Letters were sent in July 2018 with follow-up correspondence in the September/November 2018 timeframe. The tribes requested changes to one of the North Area Plan policies and another tribe requested inclusion of specific mitigation measures for future site-specific projects. DRP revised the policy as suggested by the tribe. Letters were again sent to all three tribes to close out the consultation under AB 52.

Subsequent to the consultation noted above, DRP also sent a courtesy notification letter to the Santa Ynez Band of Chumash Indians. This tribe did not request AB 52 notification but was included as they may have ties to historical cultural resources in the North Area. The courtesy notification letter included information on the North Area Plan and CSD and included links to project documents. With this notification and the notification summarized above, DRP completed and closed the required consultation under AB 52.

To address the requirements of SB 18, DRP contacted the Native American Heritage Commission (NAHC) in October 2018 to conduct a Sacred Lands File Search. The NAHC did not identify sacred lands in their database. NAHC also provided a contact list. Notification letters were sent to representatives of two tribes and courtesy letters were sent to representatives of seven tribes. DRP is awaiting response from these tribes.

F.3 EIR Preparers

A consultant team headed by Aspen Environmental Group prepared this document under the direction of the County of Los Angeles Department of Regional Planning. Consistent with Section 15129 of the CEQA Guidelines, the preparers and technical reviewers of this EIR are listed below.

Table F-1. EIR Preparers

COUNTY STAFF

Thuy Hua, Principal Regional Planner, Department of Regional Planning
 Luis Duran, Regional Planner, Department of Regional Planning
 Cameron Robertson, Regional Planner, Department of Regional Planning

CONSULTANTS

Personnel	Education	Role / Issue Area
Aspen Environmental Group		
Sandra Alarcón-Lopez	MA, Architecture and Urban Planning BA, Speech and Hearing Sciences	Project Manager, Issues Areas, Alternatives
Beth Bagwell, Ph.D.	PhD, Anthropology (Archaeology) MA, Anthropology (Archaeology) BA, Anthropology and Creative Writing	Cultural Resources, Paleontological Resources and Tribal Cultural Resources
Emily Biro	BS, Environmental Policy Analysis and Planning	Cumulative Projects list, Appendices
Scott Debauche, CEP	BS, Urban Planning and Design	Aesthetics, Noise, Transportation/Traffic, Population and Housing, Noise Technical Study

Table F-1. EIR Preparers

Chris Huntley	BA, Biology	Principal Biologist, Biological Assessment
Kellie A. Keefe	BS, Environmental Studies	GIS, Population and Housing
Jennifer Lancaster	MS, Biology BS, Biology	Biological Assessment, Biological Resources, Public Services
Phil Lowe, PE	MA, Watershed Management BA, Wildlife Management	Wildland Fire and Hazards
Stephanie Tang	BA, Environmental Studies	Project Support, Alternatives
Erik Waardenburg	BS, Wildlife Biology and Fisheries	Biological Assessment
William Walters, PE	BS, Chemical Engineering	Air Quality, CC/GHG, Energy
Arellano Associates		
Chester Britt	BA, Sociology and Business Administration	Scoping Meeting Facilitation
Cooper Ecological Monitoring		
Dan Cooper	MS, Biogeography BA, Biology	Biological Assessment
Geotechnical Consultants (now part of ENGEO Incorporated)		
James Thurber, PG, CEG, CHG	MS, Geology BS, Geology BA, Geography	Geology and Soils
Aurie Patterson, PG	BA, Geology	Geology and Soils, Paleontological Resources
Hamilton Biological		
Robert Hamilton	BS, Biological Sciences	Biological Assessment
Rincon Consultants		
Joe Power, AICP, CEP	MA, Architecture and Urban Planning BA, Urban and Economic Geography	Land Use and Recreation, Water Resources
Susanne Huerta, AICP	Master of Urban Planning BA, Geography	Land Use and Recreation
Aubrey Mescher	MESM, Water Resources Management BA, Environmental Studies/Film Studies	Water Resources
Jonathan True	BA, Environmental Studies	Biological Assessment

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H. Acronyms and Abbreviations

AB	Assembly Bill	CCR	Code of California Regulations
ADA	American Disability Act	CDFW	California Department of Fish and Wildlife
ADT	Average Daily Traffic	CEC	California Energy Commission
AF	Acre-Feet	CEQA	California Environmental Quality Act
AFY	Acre-Feet Per Year	CESA	California Endangered Species Act
AMR	American Medical Response	CFPD	Consolidated Fire Protection District
API	Area of Potential Impact	CGS	California Geological Survey
APS	Accessible Pedestrian Signals	CHP	California Highway Patrol
AQMD	Air Quality Management District	CMP	Congestion Management Program
AQMP	Air Quality Management Plan	CNDDDB	California Natural Diversity Data Base
ARAs	Agricultural Resource Areas	CNEL	Community Noise Equivalent Level
ARB	Air Resources Board	CNPS	California Native Plant Society
BAER	Burned Area Emergency Rehabilitation	CPUC	California Public Utilities Commission
BAT	Best Available Technologies	CRHR	California Register of Historical Resources
BMPs	Best Management Practices	CRPR	California Rare Plant Rank
Board	Board of Supervisors, County of Los Angeles	CSD	Community Standards District
BTO	Building Technologies Office	CUP	Conditional Use Permit
CAA	Clean Air Act	CUPA	Certified Unified Program Agency
CAAQS	California Ambient Air Quality Standards	CWA	Clean Water Act
Cal/EPA	California Environmental Protection Agency	DEIR	Draft Environmental Impact Report
CalARP	California Accidental Release Prevention	DOC	Department of Conservation
CARB	California, Air Resources Board	DOT	U.S. Department of Transportation
CBC	California Building Code	DBH	Diameter Breast Height
CCAA	Clean Air Act of 1988	DPH	Department of Public Health
CCAP	Community Climate Action Plan	DPM	Diesel particulate matter
CCCC	California Climate Change Center	DRP	Department of Regional Planning, County of Los Angeles
		DTSC	Department of Toxic Substance Control

DWR	Department of Water Resources, California	HRA	Health Risk Assessment
EIR	Environmental Impact Report	HVAC	Heating, Ventilation and Air Conditioning
EPCRA	Emergency Planning Community Right-to-Know Act	HWCA	Hazardous Waste Control Act
ESA	Endangered Species Act	IBC	International Building Code
FAA	Federal Aviation Administration	ICC	International Code Council
FEMA	Federal Emergency Management Agency	IPCC	Intergovernmental Panel on Climate Change
FERC	Federal Energy Regulatory Commission	IPM	Integrated Pest Management
FESA	Federal Endangered Species Act of 1973	IRWM	Integrated Regional Water Management
FHSZs	Fire Hazard Severity Zones	KOP	Key observation point
FHWA	Federal Highway Administration	LACC	Los Angeles County Code
FIRM	Flood Insurance Rate Map	LACFD	Los Angeles County Fire Department (or LACoFD)
FMMP	Farmland Mapping and Monitoring Program	LACWD	Los Angeles County Waterworks District
FTIP	Federal Transportation Improvement Program	LADWP	Los Angeles Department of Water and Power
GCC	Global Climate Change	LASD	Los Angeles County Sheriff's Department
GHG	Greenhouse gas	LAUSD	Los Angeles Unified School District
GLAC	Greater Los Angeles County	LCP	Local Coastal Program
GP	General Plan	LEEDND	Leadership in Energy and Environmental Design–Neighborhood Development
GPS	Global Positioning System	LID	Low Impact Development
GSPs	Groundwater Sustainability Plans	LOS	Levels of Service
GWH	Gigawatt-hours	LSAA	Lake and Streambed Alteration Agreement
GWP	Global Warming Potential	LUST	Leaking Underground Storage Tank
GWR	Ground Water Recharge	LVMWD	Los Virgenes Municipal Water District
HFCs	Hydrofluorocarbons	LVUSD	Las Virgenes Unified School District
HMA	Hillside Management Areas	MBTA	Migratory Bird Treaty Act
HMBPs	Hazardous Materials Business Plans	MCA	Medieval Climatic Anomaly
HMTA	Hazardous Materials Transportation Act		
HR	Hydrologic Region		

MERV	Maximum Efficiency Rating Value	OES	Office of Emergency Services
MLD	Most Likely Descendants	OHV	Off-highway vehicle
MMRP	Mitigation Monitoring and Reporting Program	OPLMA	Omnibus Public Lands Management Act
MPO	Metropolitan Planning Organization	OPR	Office of Planning and Research
MRDS	Mineral Resources Data System	OSHA	Occupational Safety and Health Act of 1970
MT	Metric Tons	OTWS	Onsite Treatment Wastewater System
MUN	Municipal and Domestic Supply	OWCMP	Oak Woodlands Conservation Management Plan
MWDSC	Metropolitan Water District of Southern California	PCE	Tetrachloroethylene
NAAQS	National Ambient Air Quality Standards	PEIR	Program Environmental Impact Report
NAHC	Native American Heritage Commission	PERP	Portable Equipment Registration Program
NERC	North American Electric Reliability Corporation	PFCs	perfluorocarbons
NFIP	National Flood Insurance Program	PFYC	Potential Fossil Yield Classification system
NHPA	National Historic Preservation Act	PGAs	Peak ground accelerations
NOA	Notice of Availability	PM	Particulate matter
NOC	Notice of Completion	PM10	Particulate matter (less than 10 microns in diameter)
NOP	Notice of Preparation	PM2.5	Fine particulate matter (less than 2.5 microns in diameter)
NPDES	National Pollution Discharge Elimination System	PPV	Peak Particle Velocity
NPDWR	National Primary Drinking Water Regulations	PRC	Public Resources Code
NPPA	Native Plant Protection Act	PRP	Paleontological Resources Preservation
NPS	National Park Service	PSHA	Probabilistic Seismic Hazard Assessment
NRCS	National Resource Conservation Service	RCP	Regional Comprehensive Plan
NRHP	National Register of Historic Places	RCRA	Recovery Act of 1976
NSDWR	National Secondary Drinking Water Regulations	RHNA	Regional Housing Needs Allocation
NU	Non-Urban Residential	RL	Rural Land
OEHHA	Office of Environmental Health Hazard Assessment	ROW	Right-of-way
OEM	Office of Emergency Management	RPS	Renewables Portfolio Standard

RTP	Regional Transportation Plan	SMMNRA	Santa Monica Mountains National Recreation Area
RTP/SCS	Regional Transportation Plan/ Sustainable Communities Strategy	SMMUSD	Santa Monica-Malibu Unified School District
RTPA	Regional Transportation Planning Agency	SP	Service population
RWQCB	Regional Water Quality Control Board	SR	State Route
SB	Senate Bill	SRA	State Responsibility Area
SBX7-7	Bill 7 of Special Extended Session 7	SSURGO	Soil Survey Geographic
SCAB	South Coast Air Basin	SWIS	Solid Waste Information System
SCAG	Southern California Association of Governments	SWPPP	Storm Water Pollution Prevention Plan
SCAGGMC	Southern California Association of Governments Growth Management Chapter	SWRCB	State Water Resources Control Board
SCAQMD	South Coast Air Quality Management District	TAC	Toxic Air Contaminants
SCCIC	South Central Coastal Information Center	T-BACTs	Best Available Control Technologies for Toxics
SCE	Southern California Edison	TCE	Trichloroethylene
SCEDC	Southern California Earthquake Data Center	TCR	Tribal Cultural Resource
SCS	Sustainable Communities Strategy	TIS	Traffic Impact Studies
SDWA	Safe Drinking Water Act	TMDLs	Total Maximum Daily Loads
SEA	Significant Ecological Area	TPH	Total Petroleum Hydrocarbons
SEATAC	Significant Ecological Areas Technical Advisory Committee	TTCP	Traditional Tribal Cultural Places
SGMA	Sustainable Groundwater Management Act	TWRF	Tapia Water Reclamation Facility
SIP	State Implementation Plan	UBC	Uniform Building Code
SLF	Sacred Lands File	US	United States
SMM	Santa Monica Mountains	USACE	U.S. Army Corps of Engineers
SMMNA	Santa Monica Mountains North Area	USDA	U.S. Department of Agriculture
SMMNAP	Santa Monica Mountains North Area Plan	USEPA	U.S. Environmental Protection Agency
		USFWS	U.S. Fish and Wildlife Service
		USGS	U.S. Geologic Survey
		UST	Underground Storage Tank
		UWMP	Urban Water Management Plan
		VCAPCD	Ventura County Air Pollution Control District

VCWD	Valley County Water District
VFHSZ	Very High Fire Hazard Severity Zone (or VHFHSZ)
VHT	Vehicle Hours Travelled
VMT	Vehicle Miles Travelled
VOC	Volatile organic compound
WDRs	Waste Discharge Requirements
WWD	Waterworks District, Los Angeles County