FINDINGS

CEQA FINDINGS

California Environmental Quality Act (CEQA) – Having received, reviewed, and considered the following information as well as the other information in the record of proceedings on this matter, pursuant to the requirements of CEQA, including but not limited to Public Resources Code, section 21081 and CEQA Guidelines, section 15091 the City finds, determines, and declares as follows:

PROJECT SUMMARY AND BACKGROUND

The Andora Subdivision Project Draft Environmental Impact Report (EIR) evaluated a 44-lot Vesting Tentative Tract Map (VTTM), including 42 residential lots and 2 open space lots, originally proposed for the Project Site. The Draft EIR included analysis of a reasonable range of alternatives to the proposed 44-lot subdivision as required by the California Environmental Quality Act (CEQA) to provide additional information on how to reduce the environmental effects of the Project as originally proposed and evaluated in the Draft EIR. One of the alternatives evaluated, the Reduced Density Alternative, a 35-lot subdivision design, consisting of 33 single family residential lots and 2 open space lots, was identified as the Environmentally Superior Alternative in the Draft EIR as it reduced the environmental effects of the Project to the greatest degree of the alternatives evaluated, while still meeting most of the basic objectives of the Project.

After release of the Draft EIR for public review, the Project Applicant replaced the 44-lot subdivision filed with the application with a 35-lot subdivision that is consistent with the Reduced Density Alternative as evaluated in the Draft EIR.

Following the public hearing on the project, the two open space lots were merged into one lot. The 34-lot subdivision Project as currently proposed will create 33 single-family residential and horse keeping lots and one open space lot on the 91-acre site. Related actions include a zone change to designate portions of the site, currently zoned Agricultural (A1-1) to Residential Estate zones (RE20 and RE40) and the establishment of a horsekeeping district. The proposed 34-lot tract map clusters residential development in the easterly portion of the site and uses Andora Avenue as the primary means of access to the community to minimize the amount of grading necessary and preserves the steeper hillside portions of the site in the open space lots.

Andora Avenue would be extended from its current terminus to provide access to the residential lots. A second single-entry access road ("Street A") extends south and easterly approximately 730-feet from the Andora Avenue extension and consists of a 44-foot-wide public right-of-way and a cul-de-sac bulb with a minimum 35-foot radius. Other components of the revised Project would also include a secondary emergency access road, utility infrastructure, permanent preservation of two open space lots, equestrian trails and a horse-watering station.

The open space lot zoned RE40-1-H-K/RE20-1-H-K will have an area of approximately 63.26 acres (85 percent of the total Project Site) and will remain in near natural condition, except for limited graded and landscaped slopes and retaining walls for slope stabilization at the westerly terminus of Andora Avenue and on several of the proposed single family residential lots.

Construction of the Proposed Project would occur over approximately 26 months and consist of 2 phases: Phase 1 - Grading and infrastructure construction (streets, sewer, storm drain, water, etc.); Phase 2 - Home construction, with construction of eight to nine homes at a time through completion of the Project.

ENVIRONMENTAL DOCUMENTATION BACKGROUND

The City of Los Angeles Department of City Planning, acting as lead agency, distributed a Notice of Preparation (NOP) of an Environmental Impact Report ("EIR") to the State Clearinghouse, Office of Planning and Research, responsible agencies and other interested parties on February 17, 2015. The NOP was circulated for a period of 30 days, with the review period ending March 19, 2015. Following the end of the review period for the NOP, the City considered the comments received and prepared the Draft EIR that evaluated the potential environmental effects of the 44-lot VTTM as originally proposed, and which was circulated for public review, pursuant to the California Environmental Quality Act (Public Resources Code Section 21000 *et seq.*), and the State CEQA Guidelines (14 Code of Regulations 15000 et seq., "CEQA Guidelines") and City Guidelines (L.A. CEQA Thresholds Guide). The City provided an extended public review and comment period of 61 days starting on February 18, 2016 and ending on April 18, 2016 for the Draft EIR in lieu of the required minimum 45-day public comment period.

During this review period, the City Planning Department accepted comments from public agencies and the public. The City received 88 letters and email messages during this review period commenting on Draft EIR. Copies of the original comment letters are contained in Section III of the Final Environmental Impact Report (Final EIR). Upon the close of the public review period, written responses were prepared to comments received on the Draft EIR.

The Final EIR for the Andora Subdivision Project was prepared pursuant to CEQA and the State and City CEQA Guidelines, and includes the Draft EIR (incorporated by reference), additions and corrections to the Draft EIR, a list of parties commenting on the Draft EIR, the comments received on the Draft EIR, and written responses to these comments. The Final EIR included a set of topical responses addressing topics raised in multiple comment letters to facilitate understanding of the information provided in the Final EIR related to these topics: Wildlife Movement, Visual Character of Area, Land Use Compatibility, Baseline Hillside Ordinance, Construction Air Quality Impacts, Traffic Impacts, and Water Supply.

The Final EIR was made available on the Los Angeles Department of City Planning website starting on September 2, 2016.

On September 20, 2016, a public hearing was conducted by the City's Deputy Advisory Agency and a Hearing Officer at the Marvin Braude Building as 6262 Van Nuys Boulevard, at which public testimony regarding the Proposed Project was accepted. At the end of this hearing, the Deputy Advisory Agency and Hearing Officer took the case under advisement for further review and determination and provided additional time for the submittal of written comments. The findings reported in the following pages incorporate the facts and discussions of the environmental impacts that are found to be significant in the EIR for the Project as fully set forth therein. Although Section 15091 of the CEQA Guidelines does not require findings to address environmental impacts that an EIR identifies as merely "potentially significant," these findings nevertheless fully account for all such effects identified in the EIR. For each of the significant impacts associated with the Project, the following sections are provided:

Description of Significant Effects – A specific description of the environmental effects identified in the EIR, including a conclusion regarding the significance of the impact, if any.

Mitigation Measures – Identified mitigation measures as well as Project Design Features, Conditions of Approval and/or Regulatory Compliance Measures or actions that are applicable to\required as part of the Project.

Finding – One or more of the findings made pursuant to CEQA Guidelines Section 15091(a).

Rationale – A summary for the reasons for the City's finding(s) in accordance with CEQA Guidelines Section 15091(a)

Reference – A notation on the specific section(s) of the Draft and/or Final EIR, which includes

the evidence, analysis and conclusion regarding the identified impact.

For the environmental impacts identified in the Final EIR to be less than significant, a statement explaining why the impacts are less than significant is provided.

ENVIRONMENTAL EFFECTS DETERMINTED TO BE LESS THAN SIGNIFICANT DURING THE INITIAL STUDY OF THE PROPOSED PROJECT

CEQA seeks to disclose environmental impacts associated with a proposed project. The CEQA process is primarily designed to identify and disclose to decision makers and the public the significant environmental impacts of a proposed project prior to its consideration and approval. This is accomplished by the preparation of initial studies and an environmental impact report. In this case, an initial study was conducted and determined that the Project will not result in any potentially significant impacts related to the environmental topics identified and discussed below and, for this reason, these topics are not analyzed in detail in the Final EIR.

A. Agricultural Resources

The Project Site does not contain any area designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Though the site is currently zoned Agricultural (A1-1) no agricultural uses occur on or adjacent to the site, the site has not been used historically for agricultural activities, and no Williamson Act contract applies to the site. For these reasons, the Initial Study prepared by the City concluded that there would be no impact on Agricultural Resources.

B. Geology and Soils

The Project would connect to the City of Los Angeles waste water collection and treatment system. For this reason, the adequacy of the soil to support septic tanks or similar on-site waste water disposal was not evaluated.

C. Hazards and Hazardous Materials

The Project Site is undeveloped and the Project would allow single family residential uses on a portion of the site. The proposed residential use would not involve the use, transport, emission, or disposal of hazardous materials. The Project Site is not listed on any regulatory databases of hazardous facilities or properties. No adjacent properties contain uses involving the handling of hazardous materials or are contaminated with hazardous materials that could affect the Project Site.

The single-family homes proposed on a portion of the site would not interfere with aviation operations or with emergency response or evacuation plans. The Project has also been designed to conform to necessary emergency access requirements and safety codes. Construction of the proposed Project would not pose a safety hazard except for a potential impact due to wildland fires which is discussed in **Section IV.K.1, Fire Protection Services** in the Draft EIR and pages III-26-III-28 in **Section III Comments and Responses** of the Final EIR.

D. Hydrology and Water Quality

The Project Site is not located within a mapped flood zone nor would it be potentially exposed to damage from failure of a levee or dam.

E. Mineral Resources

The Project Site and the surrounding area are not used for mineral extraction and are not known to contain valuable mineral resource nor have been so delineated on any plan; therefore, no impacts to mineral resources would result from implementation of the Proposed Project.

G. Population and Housing

The Project Site is currently undeveloped land. Therefore, the Project would not displace existing housing or people.

H. Public Services - Schools

The City of Los Angeles CEQA Thresholds Guide provides an initial screening criteria of "a net increase of at least 75 residential units, 100,000 square feet (sf) of commercial floor area or 200,000 sf of industrial floor area". If a project does not meet one of these criteria, the Thresholds Guide states that "there would normally be no significant impact on Public Schools from the Proposed Project." The Project is smaller than the screening criteria and would generate a relatively small population increase. LAUSD has been implementing a new facility construction program and a school upgrade program to address capacity issues within the district. The Project Applicant will be required to pay mandatory developer fees pursuant to *California Education Code*, Section 17620(a)(1); to offset the Project's demands upon local schools as indicated in Regulatory Compliance Measure RC-PS-1 in the Draft EIR:

Regulatory Compliance Measure RC-PS-1 (Payment of School Development Fee): Prior to issuance of a building permit, the General Manager of the City of Los Angeles, Department of Building and Safety, or designee, shall ensure that the Applicant has paid all applicable school facility development fees in accordance with Government Code Section 65995.

These fees provide full and complete mitigation of school facilities impacts.

I. Public Services - Parks

The population increase associated with the Project would be relatively small compared to the service population of the City of Los Angeles and the County of Los Angeles and within the population projections used to develop the City's current plans for park facilities. Furthermore, the Project Applicant would be assessed development fees for the acquisition or improvement of parks within the surrounding community as indicated in Regulatory Compliance Measure RC-PS-2 in the Draft EIR:

Regulatory Compliance Measure RC-PS-2 (Increased Demand for Parks or Recreational Facilities): [Subdivision] Pursuant to Section 17.12-A or 17.58 of the Los Angeles Municipal Code, the Applicant shall pay the applicable Quimby fees for the construction of dwelling units.

J. Public Services – Libraries

The population increase associated with the Project is relatively small compared to the service population of the City of Los Angeles and the population projections used to develop the City's current plans for library facilities and services.

K. Recreation

The Project as proposed would not include the construction of an active recreation facilities that could result in impacts on the environment. The open space and equestrian features of the Project would provide recreational amenities consistent with the existing environment. The existing trails, currently located on private property, are located on the portion of the Project Site that will be preserved as open space in a conservation easement to be granted to the Mountains Recreation and Conservation Authority (MRCA). Funds will also be provided by the applicant to provide for signs and limited improvements to these existing trails by the MRCA.

ENVIRONMENTAL EFFECTS FOUND TO BE LESS THAN SIGNIFICANT WITHOUT MITIGATION

The EIR found the following environmental impacts to be less than significant. In making each of the findings below, the City considered the project features, programs, and policies, and environmental setting discussed in the Final EIR. The following environmental impacts of the proposed Project will be less than significant. No mitigation measures are required.

A. Aesthetics

1. Visual Character

The City finds that the Project would result in ***less than significant impacts*** related to the visual and community character of the area. The Project would permanently alter the existing visual character of the Project Site through the development of 33 single family lots on the eastern portion of the site adjacent to the existing neighborhood on Andora Avenue. The aesthetic impact would be considered less than significant as the Project would be developed in a manner that is consistent with existing residential properties in the immediate vicinity on Andora Avenue and Trigger Street, would minimize grading and preserve most of the site in an undeveloped natural state, would follow contour grading practices consistent with the City's Landform Grading Manual, in conformance with Regulatory Compliance Measure RC-AE-1, and would not be prominently visible from the Valley Circle Scenic Corridor.

The Project Site is not visible from Valley Circle Boulevard between Plummer Street and Chatsworth Oaks Park and, for this reason, the impact of the Project on the visual character of the area and views from the Valley Circle Boulevard Corridor and the unincorporated community of Chatsworth Lake Manor would not be significant. Visual impacts would be less than significant. The Final EIR determined that the elevation of the representative viewpoints on Valley Circle Boulevard vary range from 915 to 935 feet and the elevations of the representative viewpoints in the unincorporated community of Chatsworth Lake Manor located west of the Project Site range from 995 to 1055 feet. The intervening topography between Valley Circle Boulevard and Chatsworth Lake Manor and the portion of the site proposed for development would obstruct views of the proposed homes from Valley Circle Boulevard and the community of Chatsworth Lake Manor. As stated in the letter commenting on the Draft EIR submitted by the Santa Monica Mountains Conservancy (SMMC), visual impact concerns from public lands, which include Chatsworth Oaks Park, are not considered significant because the 33 residential lots currently proposed are located within a portion of the Project Site that is a natural bowl that is lower in elevation than the surrounding topography.

The Final EIR concluded that the 35-lot VTTM Project would only impact several small rock outcroppings in the southern portion of the grading limits of the site, out of the more than 66 rock outcroppings present on the site. Overall, the Project Site contains 7.4 acres of rock outcroppings and the 35-lot VTTM Project will impact 0.1 acres of this total. Almost all the rock outcroppings present on the Project Site, including the larger and more visible and scenic rock outcroppings on the site will be preserved in the two open space lots and the deed restricted portions of the residential lots.

Landscaping in designated common space areas to be maintained by the Homeowner Association (HOA) will be designed to blend in with the existing vegetation and terrain of the area and would be consistent with the City of Los Angeles Landscape Ordinance and the provisions of the Valley Circle Boulevard/Plummer Street Scenic Corridor Specific Plan. Therefore, aesthetic impacts associated with site design and compatibility with the overall character of the neighborhood would be less than significant.

Further, the Project has been designed to minimize impacts to protected oak trees by minimizing the removal of and designing around sizable tree species. A modified street design

is proposed for Andora Avenue at the entry to the site to preserve existing oak trees at this location to the greatest extent feasible. The single-family residences would reflect the style and design of single-family homes typical to Southern California and would not exceed two stories, or 36 feet, in height (and 26 feet in height on Lots 25 and 26). After the Final VTTM is recorded, the new residential lots would be subject to the City's Baseline Hillside Ordinance as required by Regulatory Compliance Measure RC-AE-1. Each structure would maintain a safe and sanitary condition as required by Regulatory Compliance Measure RC-AE-2.

RC-AE-1: Compliance with Baseline Hillside Ordinance. To ensure consistency with the Baseline Hillside Ordinance, the project shall comply with the City's Hillside Development Guidelines, including but not limited to setback requirements, residential floor area maximums, height limits, lot coverage, and grading restrictions.

RC-AE-2: Compliance with provisions of the Los Angeles Building Code. The Project shall comply with all applicable building code requirements, including the following:

- Every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from debris, rubbish, garbage, trash, overgrown vegetation, or other similar material, pursuant to Municipal Code Section 91.8104.

- The exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a street or alley, pursuant to Municipal Code Section 91.8104.15.

2. Views and Vistas

The City finds that the Project would result in ***less than significant impacts*** related to views and vistas. The Project would occupy a relatively small portion of the field of view from locations surrounding the site and would not block views of the portion of the Project Site that would be preserved as open space. The Final EIR determined that due to intervening topography the portion of the site proposed for development would not be visible form Chatsworth Lake Manor or almost all of Valley Circle Boulevard. Portions of the homes on Lots 25 and 26 may be visible from a small section of Valley Circle Boulevard. Project Design Feature 10 (see Section 4 below), would be implemented to reduce any potential views from Valley Circle Boulevard to the extent feasible. Further, the Project is not visible from Chatsworth Lake Manor and therefore, there would be no impacts to views from this roadway segment. Comments to the Draft EIR submitted by SMMC (discussed above), further indicate that impacts to views from public lands near the Project Site would also not be significant. Therefore, approval of the Project would not lead to adverse effects on views and/or vistas.

3. Light and Glare

The City finds that the Project would result in ***less than significant impacts*** relating to light and glare. Lighting for the Project would include low-level exterior security lighting and street lighting located throughout the Project Site. The intervening topography located between the portion of the Project Site and the surrounding area will minimize the effect of lighting on the surrounding area. The masonry walls located along the rear edge of the building pad areas on some of the lots would also reduce the effect of lighting from homes and backyards onto adjacent areas.

The development of the site would be similar to the adjacent single-family neighborhood to the east of the site. To further minimize the effect of lighting on the surrounding area, no street lighting will be required for the 35-lot VTTM under the City's approval of the project. Further, and in an abundance of caution, Mitigation Measure C-14 requires all outdoor lighting at the proposed residences to be shielded, low luminescence and directed toward structures to

minimize nighttime lighting in the natural areas (though mitigation is not required to reduce impacts from light and glare to less than significant levels).

The Project would not create any substantial glare impacts. Any glass to be incorporated into the façades of the single-family dwelling units would be low-reflectivity or accompanied by a non-glare coating, as feasible.

For these reasons, the approval of the project would not result in any significant impacts relating to light or glare.

4. Project Design Features

PDF-1 The open space lot shall be donated in fee title to the Mountains Recreation and Conservation Authority (MRCA) to be retained in perpetuity as a permanent open space conservation easement. The specific boundaries and area of the open space conservation easement are dependent on the final recorded tract map and are approximated at 63.26 acres under the Project.

PDF-2 The Project shall include a deed restriction to designate a non-buildable conservation easement on portions of lots 1 through 33 for purposes of preserving the natural topography and landform within the subdivision. The deed-restricted areas would provide a buffer zone from the developed pad areas and the adjoining open space lot, and would preserve the natural ridgelines and geologic formations that occur on the slopes of the lots outside of the designated developed pad areas.

PDF-3 Common open space areas (i.e.: equestrian trails) and deed restricted areas within the buildable pad area shall be maintained in an orderly manner under the control and operation of an active Homeowners Association (HOA), with covenants and restrictions defining how the open space hiking and equestrian trails will be maintained and remain accessible for the general public's use.

PDF-4 Landscaping within the HOA designated common space areas shall be limited to native drought-tolerant plant and tree species and non-native invasive species shall be prohibited. The Project Applicant will create an HOA with Covenants, Conditions, and Restrictions forbidding all non-native plants and invasive species in the deed restricted areas in the Project development area and a ban on the use of rodenticides to minimize indirect impacts to wildlife movement.

PDF-5 A perimeter fence, as shown in **Figure II-7, Proposed Deed Restricted Areas** (of the Final EIR), consisting of tubular steel or equivalent materials and/or a masonry retaining wall, shall be installed by the developer prior to issuance of the certificate of occupancy of any housing structure. The perimeter fence and/or wall shall be maintained by the Tentative Tract's HOA during the life of the Project. No other fencing shall be allowed within any deed restricted area except for Lots 25 through 33 where the fencing will be located slightly downslope from the building pads. The fencing is intended to minimize trespassing and protect adjacent conservation areas.

PDF-10 All structures proposed within Lot 25 and Lot 26 shall be limited to a maximum of 26 feet in building height. Vegetation shall be provided to block the views of two roofs from View Location 4 along Valley Circle Boulevard.

PDF-11 The exteriors of all building structures shall utilize earth-tone colors and natural building materials to promote aesthetic compatibility with the surrounding area.

5. Cumulative Impacts – Aesthetics

The City finds that the Project would result in ***less than significant cumulative impacts***

relating aesthetics. There are no related projects adjacent to or within the primary viewshed of the Project Site. As such, the Project Site and related projects would not have the potential to result in a cumulative aesthetic impact as they are all visually disconnected. Therefore, the Project's cumulative aesthetic impacts would not be cumulatively considerable and cumulative impacts would be less than significant.

B. Air Quality

1. Consistency with Air Quality Management Plan

The City finds that the Project would result in ***less than significant impacts*** relating to consistency with the Air Quality Management Plan (AQMP). The AQMP focuses on long-term sources of emissions. Compliance with the United States Environmental Protection Agency (US EPA) exhaust standards and California Air Resources Board (CARB) emission reduction strategies, in conjunction with local control measures such as the City's Green Building Ordinance, would ensure that development of the Project would not interfere with the implementation of AQMP. At expected build-out, VOCs would increase but still fall below the SCAQMD significance threshold. Therefore, approval of the Project would be consistent with the AQMP goals to reduce pollution levels.

2. Construction Emissions (Regional and Local)

The City finds that the Project would result in ***less than significant impacts*** relating to air quality emissions from construction activities. The EIR studied the worst-case daily construction emissions for each phase of construction for the original project of 42 homes, using the California Emissions Estimator Model (CalEEMod) modeling program. The highest emission source for Reactive Organic Gas (ROG) was architectural coating at 6.78 pounds/day, the highest emission for Nitrogen Oxides (NOx) was site clearing at 38.96 pounds/day, the highest emission for Carbon monoxide (CO) was site clearing at 39.96 pounds/day, the highest emission for Sulphur Oxide (Sox) was site clearing at 0.09 pounds/day, the highest emission for PM_{10} was site clearing at 10.33 pounds/day, and the highest emission for $PM_{2.5}$ was site clearing at 5.57 pounds/day. The Project's construction emissions were below the South Coast Air Quality Management District's (SCAQMD's) significance thresholds for each of the five criteria pollutants under the 42 homes and would be even further below these thresholds for the 33 home Project. Therefore, the Project's contribution to regional construction emissions would be less than significant.

Localized on-site emissions for NOx, CO, PM_{10}, and $PM_{2.5}$ would be below the thresholds of significance, with adherence to regulatory compliance measures RC AQ-1 through RC AQ-4, for a 5-acre site in SRA 6 during all phases of construction. Based on the construction schedule, it is not anticipated that any overlap of construction activities would occur during Project buildout. Maximum daily on-site emissions from each construction activity are examined individually as they would not take place concurrently. The highest estimated emission for NOx was excavation/grading at 29.78 pounds/day, the highest emission for CO was excavation/grading at 37.94 pounds/day, the highest emission for PM_{10} was site clearing/grubbing at 8.57 pounds/day, and the highest emission for $PM_{2.5}$ was site clearing/grubbing at 4.90 pounds/day. Localized air quality impacts would remain less than significant.

Individual construction projects that exceed SCAQMD recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment (as set forth by AQMD). As discussed previously, construction emissions associated with the Project would not exceed the SCAQMD's regional thresholds of significance for air quality pollutants. Therefore, the cumulative impact of the Project for construction emissions would be considered less than significant.

RC-AQ-1: Compliance with provisions of the SCAQMD District Rule 403. The project shall comply with all applicable standards of the SCAQMD, including the following provisions of District Rule 403:

- All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
- The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
- All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
- All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
- All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
- General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.

Trucks having no current hauling activity shall not idle but be turned off.

RC-AQ-2: In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.

RC-AQ-3: In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

RC-AQ-4: The Project shall comply with South Coast Air Quality Management District Rule 1113 limiting the volatile organic compound content of architectural coatings.

3. Operational Emissions

The City finds that the Project would result in ***less than significant impacts*** related to operational emissions. Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities on the Project Site after occupancy of the proposed homes. Operation of the Project would primarily generate emissions associated with motor vehicles traveling to and from the Project Site, energy use, architectural coatings (re-application of paint every ten years), consumer products, and the operation of landscape maintenance equipment. The analysis of daily operational emissions from the 42 residential unit Project was quantified utilizing the CalEEMod modeling software. The highest emission source with regulatory compliance for ROG was wintertime at 6.23 pounds/day, the highest emission for NOx was wintertime at 6.19 pounds/day, the highest emission for CO was summertime at 25.51 pounds/day, SOx was the same for summertime and wintertime at 0.06 pounds/day, PM_{10} was the same for summertime and wintertime at 4.48 pounds/day, and $PM_{2.5}$ was the same for summertime and wintertime at 1.29 pounds/day. The operational emissions associated with the 42-unit Project would not exceed the established SCAQMD threshold levels, with incorporation of regulatory compliance measures, during the summertime (smog season) and wintertime

(non-smog season) for any of the six criteria pollutants and the proposed 33 residential unit Project would have even lower emissions. Therefore, impacts associated with regional operational emissions from the Project would be less than significant. Compliance with Regulatory Compliance Measures RC-AQ-5 and RC-AQ-6 as contained in the Draft EIR will minimize operational air emissions:

RC-AQ-5 SCAQMD's Rule 445, Wood - Burning Devices was adopted on March 7, 2008 and includes the following requirement for new home construction projects:

- No permanently installed indoor or outdoor wood burning device can be installed in new developments (open hearth fireplaces with a gas log set or other design feature that precludes wood burning are acceptable).

RC-AQ-6 The Project will comply with the energy efficiency requirements of the L.A. Green Building Code. Specifically, the Project is subject to the following requirements:

- The Project shall reduce potable water consumption by 20% through the use of low-flow water fixtures; and
- All residential grade equipment and appliances provided and installed in the proposed dwelling units shall be ENERGY STAR labeled if ENERGY STAR is applicable to that equipment or appliance.

4. Toxic Air Contaminants

The Project would not include the operations of any land uses involving the routine use, storage, or processing of carcinogenic or non-carcinogenic toxic air contaminants. Thus, no appreciable operational-related toxic airborne emissions would result from Project implementation. With respect to construction, the construction activities associated with the Project would be typical of other similar single-family housing developments in the City and would be subject to the regulations and laws relating to toxic air pollutants at the regional, state, and federal level that would protect sensitive receptors from substantial concentrations of potentially hazardous emissions. Therefore, impacts associated with the release of toxic air contaminants would be less than significant.

Like the Project, related projects construction activity would not result in long-term substantial sources of toxic air contaminants (TAC) emissions (i.e., 70 years) and would not combine with the Project to generate ongoing TAC emissions. Thus, cumulative TAC emissions from the Project and related projects would be considered less than significant.

5. Odor Impacts – Construction

The City finds that the Project would result in ***less than significant impacts*** related to odors from construction activities. Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents as well as asphalt paving. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Based on mandatory compliance with SCAQMD Rules, odors associated with construction activities and/or the use and storage of materials such as paints, pesticides, and/or household cleaning solvents in small quantities in individual residential garages would not create a significant level of objectionable odors and impacts would be less than significant.

Based on mandatory compliance with SCAQMD Rules, it is anticipated that construction activities and materials used in the construction of the Project and related projects would not combine to create objectionable odors.

6. Air Quality Impacts - Valley Fever

The City finds that the Project would result in ***less than significant impacts*** related to

risk/exposure to Valley Fever. The risk of Valley Fever infection is considered low due to the characteristics of the Project area, the type and amount of construction excavation activities completed at any one location. The Project Site is in an area with a rate of infection of Valley Fever that is lower than the statewide average, and is not known to be mildly endemic for Valley Fever. Alkaline soils with a high salt content, rodent burrows, and Amerindian middens at archeological sites may increase the chance that the fungus is present, but there is no indication that live Valley Fever spores are present at a particular location. In addition, though not necessary to reduce this particular impact to less than significant, the implementation of Mitigation Measure B-2 to reduce worker exporsure and compliance with RC-AQ-1 (see Section 2 above) for dust reduction during construction, will further reduce the potential for exposure to any Valley Fever spores that may be present in the soil on the Project Site for construction workers and residents in the surrounding area. For these reasons, potential air quality impacts related to Valley Fever exposure are determined to be less than significant. For these reasons, potential air quality impacts resulting from related to Valley Fever exposure are determined to be less than significant. (Final EIR, Section III, Comments and Response, pages III-28-III-30)

MM B-2 The Applicant shall implement the following measures during construction:

- Train workers and supervisors on how to recognize symptoms of illness, and ways to minimize exposure, such as washing hands at the end of shifts;
- Provide washing facilities nearby for washing at the end of shifts;
- Provide vehicles with enclosed, air conditioned cabs and make sure workers keep the windows closed. Equip heavy equipment cabs with high efficiency particulate air (HEPA) filters; and
- Make National Institute for Occup ational Safety and Health (NIOSH) approved respiratory protection with particulate filters as recommended by the California Department of Public Health (CDPH) available to workers who request them.

C. Biological Resources

1. Noise/Vibration Impacts

Vibration and noise associated with Project grading and construction may have indirect effects on wildlife. Given the documented general adaptability of wildlife to urban noise and vibrations, as well as the seismically active environment in which local fauna evolved, it is determined that significant vibration effects are unlikely to occur. Sound from grading and construction would be expected to generate noise on site on an intermittent basis for approximately 26 months. Animals sensitive to noise generally would forage at night or away from this residential area. Noise-tolerant organisms will not be affected. Therefore, no significant noise or vibration impacts to wildlife are expected to occur from Project grading and construction activities.

2. Operational Impacts from Light/Increased Human Activity

It is reasonable to expect a certain area would be subject to household noise, dogs barking, home and auto alarms which could deter occupation by less urban-tolerant species. This zone would probably not exceed 300 feet in length from the edge of development. Most species, however, would be unaffected. Precautions taken by the developer and active management practices by the MRCA will work together to avoid serious edge effect impacts and promote the long-term integrity of the conserved area. The Santa Monica Mountains Conservancy (SMMC) submitted comments on the Draft EIR stating that the proposed Project, including conservation easements as currently proposed, would result in a compact lighting, fencing, and disturbance footprint but would nevertheless provide adequate local and regional habitat connectivity.

2. Operational Impacts from Maintenance Activities

After completion of construction, periodic maintenance activities of conserved open space within the deed-restricted areas of the private lots in accordance with City fuel modification requirements would be required. Impacts that could occur would include noise, dust, or death for animals in the way of maintenance activities. These activities should be conducted outside of spring and early summer, which correlates generally to mating/nesting season for animals in Southern California. The potential for disruption to nesting or denning animals in adjacent conserved areas, therefore, would be low. Because the area under individual homeowner control is a relatively small portion of the oversite, the effects due to maintenance activities are not anticipated to be significant.

3. Potential Impacts on Vegetation Communities

Numerous biological resource surveys have been conducted on the Project Site have been conducted since 2008 to support environmental review of a previous proposal to develop the site. Field investigations were performed by Impact Sciences in in March and April 2008 (March 18, 2008, April 23, 2008 and April 30, 2008) that were included in a 2010 Draft EIR released for public review by the City. The results of these surveys were reviewed as part of the preparation of a new biological resources study of the Project Site conducted in August 2015 as part of the Draft EIR prepared by the City to evaluate the Proposed Project. Field surveys were conducted on June 9-12, 2015. Four additional flora and fauna surveys were conducted in April 2016 and June 2016. A total of 71 hours of field surveys were completed by two biologists on June 1-3, June 9-10, June 12, and June 26-27, 2016). Five species of plants were added of which four had no status, including coyote brush (*Baccharis pilularis* ssp. *consanguinea*), prickly phlox (*Linanthus californicus*), chaparral currant (*Ribes malvaceum*) and southern tauschia (*Tauschia arguta*). Since these plant species have no special status, impacts to these and other common plant species present on the site are not significant (Final EIR, Appendices B1 and B2).

4. Wildlife Movement

Approximately 63.26 continuous acres within the northern, southern and western portions of the Project Site would be contained in the open space lot subject to an easement to be granted to the Mountains Recreation and Conservation Authority (MRCA) to preserve this portion of the site as open space. This Project design feature would ensure substantial areas are present on both the northwest and southeast face of the Simi Hills to allow for wildlife movement through the Simi Hills and Santa Susana Mountains located north of the site and to the Chatsworth Nature Preserve located south of the site. An adjacent 3.5-acre off-site parcel (not a part of the Project Site) will also be placed within a conservation easement granted to the MRCA to ensure a wider habitat linkage between the Chatsworth Nature Preserve and the Simi Hills. The existing off-site habitat linkage on the west side of Chatsworth Nature Preserve would not be affected by the Project.

Project design features (PDF-1, PDF-2, PDF-3, PDF-4, PDF-9) will permanently preserve a secondary wildlife linkage between the Simi Hills and Chatsworth Nature Preserve with a width over 1,500 feet between the nearest homes in the Lake Manor neighborhood located west of the Project Site and the buildable portions of the proposed residential lots, a sufficient width to allow for the continued movement of wildlife between the Chatsworth Nature Preserve and the Simi Hills located to the north of the of the Project Site. As discussed on page III-12 of the Final EIR, according to the Natural Resources Conservation Service, corridors are linear strips of vegetation that differ from the adjacent surroundings and which function to conserve soil, water, plants, wildlife or fish resources. Studies indicate that the recommended width for wildlife movement corridors generally ranges from 300 meters (approximately 1,000 feet) for sub-regional corridors to 500 meters (approximately 1,600 feet) for regional corridors. The SMMC consulted with the applicant on the design of the 35-lot subdivision and concluded that the 35-lot VTTM Project provides adequate local and regional habitat connectivity. The 35-lot VTTM

Project would be consistent with applicable plans and policies addressing wildlife movement in the area. The 35-lot VTTM Project as currently proposed would not result in any significant impact on the ability of wildlife to use the wildlife linkage across the site and impacts would be less than significant (Draft EIR, Biological Resources, pages IV.C-17 – IV.C-19).

5. Cumulative Impacts

Los Angeles and Ventura Counties are biologically diverse and contain both common and sensitive plant and animal species. The physical separation of the Project Site from the four related projects identified in Section III, Environmental Setting, and the difference in biological characteristics between the Project Site and the related project sites is such that the cumulative nature of biological impacts would be limited. Development of any of the related projects would be subject to the City of Los Angeles Protected Tree Ordinance. Therefore, the Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to biological resources would be less than significant. (Draft EIR, Biological Resources, page IV.C-19 of the Draft EIR).

D. Cultural Resources

1. Historic Resources

The City finds that the Project will have a ***less than significant impact*** on historic resources. The EIR and supporting technical appendix identified two resources listed on the National Register of Historic Places properties (Old Santa Susana Stage Road and Minnie Hill Palmer House) located within the vicinity of the Project area, as well as one resource identified as the Los Angeles Historic Cultural Monument (Chatsworth Community Church) located within the search radius of 0.5 miles from the Project Site. Though these resources were identified, construction and development activities for the Project will occur away from and will not disturb these resources. Therefore, the Project will not result in significant impacts to historic resources (Draft EIR, Cultural Resources, page IV.D-6)

2. Cumulative Impacts

The Project, in combination with the construction and operation of the four related projects would contribute to development of the surrounding area. However, impacts to cultural resources tend to be site specific and are assessed on a site-by-site basis. Furthermore, the physical separation of the related projects limits to cumulative nature of any impacts. Therefore, the Project's incremental contribution to a cumulative impact would not be considerable, and cumulative impacts to cultural resources would be less than significant.

E. Geology

1. Geologic Hazards, Sedimentation, Soil Erosion and Loss of Topsoil, and Lateral Spreading, Subsidence, and Collapse

The City finds that the Project would result in ***less than significant impacts*** related to geological, hazards. The Project Site is not located in an area delineated on the Alquist-Priolo Earthquake Fault Zoning Map. In addition, the Project Site is not located within a fault rupture zone. The Northridge Hills fault is located approximately 3 miles to the north-northeast of the Project Site. As such, the potential for surface fault rupture at the Project Site is low and impacts related to surface fault rupture would be less than significant.

The Project would be designed and constructed in conformance with Site Class D per the applicable California Building Code (CBC) design parameters in conformance with regulatory compliance measure RC-GEO-1, which are specifically tailored to minimize the risk of structure failure due to seismic hazards. The Project Site is located outside of the seismically induced liquefaction hazard zone as identified by the California Department of Conservation.

Because the lots are clustered away from the hillside, the potential for rock falls and/or rolling boulders to negatively impact the Project is considered low. The Project would be designed to comply with the Construction General Permit Water Quality Order 2009-0009-DWQ as amended by Order No. 2010-0014-DWQ to prevent short-term construction-induced water quality impacts resulting from erosion and sedimentation issues.

Construction of the Project would be required to comply with the CBC and LAMC, which includes building foundation requirements appropriate to site-specific conditions. Compliance with Regulatory Compliance Measures RC-GEO-1 through RC-GEO-3 will result in less than significant impacts. These regulatory compliance measures require the design and construction of the Project to conform to CBC seismic standards as approved by the Department of Building and Safety and comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report approval letter addressing subsidence and soil strength loss, settlement, and lateral movement or reduction in foundation soil-bearing capacity. (Draft EIR, Geology, pages IV.E-15 – IV.E-19)

RC-GEO-1: The design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.

RC-GEO-2: The grading plan shall conform with the City's Landform Grading Manual guidelines, subject to approval by the Advisory Agency and the Department of Building and Safety's Grading Division. Appropriate erosion control and drainage devices shall be provided to the satisfaction of the Building and Safety Department. These measures include interceptor terraces, berms, v-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code, including planting fast-growing annual and perennial grasses in areas where construction is not immediately planned.

RC-GEO-3: The Project shall be designed and constructed in accordance with the recommendations provided in the *Assumption of Geotechnical Responsibility and Updated Soils and Engineering Geological Report, Vesting Tentative Tract 73427 (Formerly Vesting Tentative Tract No. 53426), 9503 Andora Avenue Los Angeles, California,* by GeoSystems, Inc., dated January 30, 2015 ("Geotechnical Report"), as approved by the Department of Building and Safety, and in any subsequent geotechnical reports and recommendations.

F. Greenhouse Gas Emissions

1. Construction and Operational GHG Emissions

The City finds that the Project will have a ***less than significant impact*** related to GHG emissions. The amount of greenhouse gases (GHGs) that would be generated by the construction of the Project and occupancy of the proposed homes was estimated using the CalEEMod Emissions Model for the 44-lot VTTM as originally proposed for each phase and each year of construction of the Project. The greatest annual increase in GHG emissions from the Project's construction activities would be 397.4 million metric tons of carbon dioxide equivalent (MtCO2e) in 2016. The total amount of construction-related GHG emissions is estimated to be approximately 639.1 MtCO2e, or approximately 21.3 MtCO2e amortized over a 30-year period. These emissions would be less for the 35 lot VTTM as currently proposed.

The interim screening threshold recommended for residential projects by the SCAQMD is 3,000 MtCO2e per year. The total construction and operational emissions estimated for the 44-lot VTTM project originally proposed was 1,147 MtCO2e per year. These emissions would be less for the 33 lot VTTM as currently proposed. As the amount of GHG emissions generated by the 35-lot VTTM would be less than the 3,000 MtCO2e per year threshold, the GHG emissions are not significant. Compliance with Regulatory Compliance Measure RC-GHG-1 will minimize

operational GHG emissions:

RC-GHG-1: The Project shall implement all applicable mandatory measures within the LA Green Building Code that would have the effect of reducing the Project's energy use.

2. Project Consistency with Plans, Policies, and Regulations

The City finds that the Project would result in ***less than significant impacts*** related to greenhouse gas emissions. The Project as proposed, is consistent with statewide goals and policies in place for the reduction of greenhouse gas emissions, including AB 32 and the corresponding scoping plan. The scoping plans encourage communities to adopt building codes that go beyond the state code. Accordingly, as the City of Los Angeles Green Building Code meets and exceeds applicable provisions of the CALGreen Code, a new development project that complies with the City's Green Building Code is considered consistent with statewide GHG-reduction goals and policies, including AB 32.

3. Cumulative Impacts

The City finds that the Project ***will not result in significant, cumulative impacts*** related to GHG emissions. Consistent with CEQA Guidelines Section 15064(h)(3), there is a presumption of less than significant impacts with respect to climate change for a project that complies with a previously approved plan for the reduction of GHG emissions that includes specific requirements that will reduce or avoid the cumulative impact for the geographic area in which the project is located. This quantified GHG reductions will be realized through incorporation of the energy conservation features into the proposed homes. In conformance with the City of Los Angeles recommendations for green buildings, GHG emissions reductions would be achieved through energy-efficient lighting and building design, installation of low-flow appliances and water conservation, and 50 percent reduction in solid waste generation. These reductions would support State goals for emissions reduction. The methods used to establish this relative reduction are consistent with the approach used in the California Air Resources Board (CARB) Scoping Plan for the implementation of AB 32 through 2020. The Project's features and GHG reduction measures make the Project consistent with the goals of AB 32.

The Project is also consistent with the approach outlined in the CARB Scoping Plan, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended in the CARB Scoping Plan, the Project incorporates green building features as a framework for achieving crosscutting emissions reductions.

The Project also would comply with the City of Los Angeles Green Building Ordinance, which emphasizes improving energy conservation, energy efficiency, and increasing renewable energy generation. It is assumed that all related projects would also comply with the City of Los Angeles Green Building Ordinance.

Based on the Project's compliance and consistency with Federal, State and local GHG emission reduction goals and objectives, the Project would not result in significant cumulative impacts to greenhouse gas emissions.

G. Hydrology and Water Quality

1. Construction and Operational Impacts

Pre-developed and post-development areas drain to the same off-site location, the northeast corner of the Project Site. The two drainage areas were compared to show that the elevation change and drainage paths area about the same in both areas. The post-development condition, due to grading, results in a much longer flow path. The longer flow path and the smaller impervious portion results in a reduced flow leaving the Project Site in the post-

developed state.

The Project would be required to incorporate Best Management Practices (BMPs) and retain and treat the first 0.75-inches of rainfall on the Project Site in accordance with the Low Impact Design (LID) Ordinance. Site design and source control BMPs help manage the quantity and quality of both wet and dry weather runoff by limiting the frequency of occurrences and decreasing pollutant concentration. Based on the information presented above, compliance with the City's LID Ordinance is technically feasible and would ensure that post development flows would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site.

New developments are required to be designed to reduce water pollution by implementing BMPs and to retain and treat the first 0.75-inch rainfall as required by the LID Ordinance. Treatment control BMPs are designed to remove pollutants once they are mobilized by rainfall and runoff. Implementation of the LID Ordinance requirements and site design would ensure that the Project's impact upon surface water quality would be less than significant.

Implementation of the Stormwater Pollution Prevention Plan (SWPPP) and LID Ordinance would ensure that the construction and operation of the Project would not violate any water quality standards or discharge requirements, or otherwise substantially degrade water quality that may affect groundwater.

The City finds that Project will have ***less than significant impacts*** to water quality. Compliance with Regulatory Compliance Measures RC-WQ-1 through RC-WQ-5 will minimize any impacts to water quality:

RC-WQ-1: National Pollutant Discharge Elimination System General Permit. Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit) for the Project. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Storm Water Pollution Prevention Plan (SWPPP) shall be prepared and implemented for the proposed Modified Project in compliance with the requirements of the Construction General Permit. The SWPPP shall identify construction Best Management Practices (BMPs) to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff from construction activities.

RC-WQ-3: Low Impact Development (LID) Plan. Prior to issuance of grading permits, the Applicant shall submit a LID Plan and/or SWPPP to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The LID Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

RC-WQ-4: Development Best Management Practices (BMPs). The BMPs shall be designed to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period, in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed BMPs meet this numerical threshold standard shall be provided.

RC-WQ-5: (Alteration of a State or Federal Watercourse): The Project shall comply with the applicable sections of the federal Clean Water Act (CWA) and California's Porter Cologne Water Quality Control Act (Porter Cologne). Prior to the issuance of any grading, use of land, or building permit which may affect an existing watercourse, the Applicant shall consult with the following agencies and obtain all necessary permits and/or authorizations, to the satisfaction of the Department of Building and Safety. Compliance shall be determined through written communication from each jurisdictional agency, a copy of which shall be submitted to the Environmental Review case file for reference:

- United States Army Corps of Engineers (USACE). The Applicant shall obtain a Jurisdictional Determination (preliminary or approved), or a letter otherwise indicating that no permit is required. Contact: Aaron O. Allen, Chief - North Coast Branch, Regulatory Division, 805-585-2148.

- State Water Resources Control Board (SWRCB). The Applicant shall consult with the 401 Certification and Wetlands Unit and obtain all necessary permits and/or authorizations, or a letter otherwise indicating that no permit is required. Contact: 401 Certification and Wetlands Unit, Los Angeles Region, 320 W 4th Street, #200, Los Angeles, CA 90013, (213) 576-6600.

- California Department of Fish and Wildlife (CDFW). The Applicant shall consult with the Lake and Streambed Alteration Agreement Program and obtain a Streambed Alteration Agreement, or a letter otherwise indicating that no permit is required. Contact: LSAA Program, 4949 Viewridge Avenue, San Diego, CA 92123, (858) 636-3160.

2. Flooding and Inundation

The Project Site is located in Flood Zone D, which indicates there are possible but undetermined flood hazards, as no analysis of flood hazards has been conducted. As such, the Project would not place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or any other flood hazard delineation map. Conformance with regulatory compliance measure RC WQ-3 will ensure that the Project's potential impacts from landslides, mudflows, and flooding would be less than significant.

RC-WQ-3: Low Impact Development (LID) Plan. Prior to issuance of grading permits, the Applicant shall submit a LID Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The LID Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

H. Land Use and Planning

1. Land Use Compatibility

The proposed residential homes would range in size from approximately 3,500 square feet to 5,500 square feet. This range in size is consistent with existing homes in the neighborhood, which range from approximately 2,200 to 5,700 square feet. Similar to the surrounding neighborhood, the homes are proposed to be 2 stories and would range in height from 26 to 36 feet above grade. Depending on the plan layout, each home would include either a two- or three-car attached garage. Furthermore, lots would include designated equinekeeping areas consistent with the Equinekeeping district. Based on these collective features, the Project would be compatible with the existing single-family neighborhood bordering the Project Site to the east.

The 35-lot VTTM Project clusters the development toward the central and easterly portions of the site. By clustering the 35-lot VTTM Project to this location of the Project Site, the 35-lot VTTM Project utilizes the existing Andora Avenue extension as the primary means of access to the community, reducing the amount of earthwork necessary to achieve vehicular access and buildable area for new home-sites, and allowing for the consolidation of steeper hillside portions of the Project Site into open-space lots comprising approximately 63.26 acres (85 percent of the total Project Site). Use of the cluster concept in this case is consistent with the Community Plan, and is responsive to neighborhood concerns of compatibility by creating an extension of the Andora neighborhood that is similar in lot size and home size with existing neighborhoods. Moreover, the use of the cluster concept, when compared with other alternative land use configurations, results in: less grading, reduced traffic impacts, provides greater assurance for the preservation of open space areas and preserves existing equestrian trails. Therefore, land use would be compatible with the area and there would be no impacts.

2. Plan Consistency

Project design features PDF 1 through PDF 5 would incorporate aspects into the design and layout of the site to conform to the City's General Plan, the Chatsworth – Porter Ranch Community Plan, the Valley Circle Boulevard-Plummer Street Scenic Corridor Specific Plan, the LAMC, and the National Park Service Rim of the Valley Corridor Resource Study. Compliance with Regulatory Compliance Measure RC-LU-1 as will ensure the density of the Project is compatible with the City's standards for development in hillside areas:

RC-LU-1: The project shall not exceed the maximum density permitted in Hillside Areas, as calculated by the formula set forth in Los Angeles Municipal Code Section 17.05-C (for tracts).

3. Baseline Hillside Ordinance

The Baseline Hillside Ordinance (BHO) applies to single family lots in hillside areas. While the BHO does not apply to the proposed land division Project, the 35-lot VTTM Project will minimize the extent of hillside grading by clustering the 33 proposed residential lots in the easterly portion of the Project Site and will preserve the western portion of the site in an open space lot through a conservation easement granted to the MRCA. Impacts would be considered less than significant. After the Final VTTM is recorded, the residential lots created would be subject to the BHO.

4. Project Design Features

PDF-1 The open space lot shall be donated in fee title to the MRCA to be retained in perpetuity as a permanent open space conservation easement. The specific boundaries and area of the open space conservation easement are dependent on the final recorded tract map and are approximated at 63.26 acres under the Project.

PDF-2 The Project shall include a deed restriction to designate a non-buildable conservation easement on portions of lots 1 through 33 for purposes of preserving the natural topography and landform within the subdivision. The deed-restricted areas would provide a buffer zone from the developed pad areas and the adjoining open space lots, and would preserve the natural ridgelines and geologic formations that occur on the slopes of the lots outside of the designated developed pad areas.

PDF-3 Common open space areas (i.e. equestrian trails) and deed restricted areas within the buildable pad area shall be maintained in an orderly manner under the control and operation of an active Homeowners Association (HOA), with covenants and restrictions defining how the open space hiking and equestrian trails will be maintained and remain accessible for the general public's use.

PDF-4 Landscaping within the HOA designated common space areas shall be limited to native

drought-tolerant plant and tree species and non-native invasive species shall be prohibited. The Project Applicant will create an HOA with Covenants, Conditions, and Restrictions forbidding all non-native plants and invasive species in the deed restricted areas in the Project development area and a ban on the use of rodenticides in the Project development to minimize indirect impacts to wildlife movement.

PDF-5 A perimeter fence, as shown in Figure II-7, Proposed Deed Restricted Areas, of the Final EIR, consisting of tubular steel or equivalent materials and/or a masonry retaining wall, shall be installed by the developer prior to issuance of the certificate of occupancy of any housing structure. The perimeter fence and/or wall shall be maintained by the Tentative Tract's HOA during the life of the Project. No other fencing shall be allowed within any deed restricted area except for Lots 25 through 33 where the fencing will be located slightly downslope from the building pads. The fencing is intended to minimize trespassing and protect adjacent conservation areas.

5. Cumulative Impacts

Cumulative land use impacts could occur if the Project and other related projects together conflict with any of the thresholds described above. Based upon the information available regarding the related projects that are currently under construction, it is reasonable to assume that they were approved in conformity to local and regional planning goals and policies. Therefore, development of the Project would not result in a significant cumulative land use impact.

I. Noise

1. Construction-Related Groundborne Vibration to Existing Buildings

A significant vibration impact would occur if Project construction activities would cause a peak particle velocity (PPV) groundborne vibration level to exceed 0.3 inches per second at any building that is constructed with engineered concrete and masonry buildings. The Project's construction activities would not have the potential to cause or create building damage upon structures in the Project vicinity and, therefore, vibration impacts would be considered less than significant.

2. Operational Noise

The Project would increase local noise levels by a maximum of 0.8 dBA Community Noise Equivalent Level (CNEL) during the PM peak hour at the intersection of Valley Circle Boulevard/Lassen Street/Baden Avenue. This increase would not exceed the identified thresholds of significance. Because the increase in local noise levels at all the analyzed roadway intersections resulting from implementation of the Project would be less than the 3 dBA and 5 dBA CNEL thresholds established under the *L.A. CEQA Thresholds Guide*, impacts for all scenarios would be less than significant. In addition, as the other roadway intersections that are located even further away from the Project Site would experience less traffic increases due to the Project, the increase in local noise levels at these roadway segments would also not exceed the identified thresholds of significance, and traffic generated noise impacts would be less than significant.

Nighttime noise limits would be applicable to any equipment items required to operate between the hours of 10:00 P.M. and 7:00 A.M. The use of residential Heating, ventilation and air conditioning (HVAC) equipment would not create a substantial impact to the ambient noise levels at the residential community such that the resulting noise would exceed the acceptable noise standards for single-family residential uses. As such, potential impacts related to stationary noise sources would be less than significant.

The Project consists of a residential subdivision of 33 single-family dwelling units and would not include any stationary equipment that would result in excessive operational vibration levels.

Thus, vibration impacts associated with operation of the Project would be less than significant.

Impacts that could occur would include noise for animals in the way of maintenance activities. These activities would be conducted outside of Spring and early Summer, which correlates generally to mating/nesting season for animals in Southern California. During maintenance operations, some animals would naturally relocate away from human activity with no long-lasting negative consequences. Lower awareness organisms, such as snakes, may have to be actively relocated to avoid incidental injury or death. It is common for homeowners to consider all snakes a threat and snakes are sometimes killed when encountered. Because the area under individual homeowner control is small, no significant effects due to maintenance activities are anticipated. Therefore, no significant noise or vibration impacts are expected to result from project grading and construction activities. Compliance with Regulatory Compliance Measure RC-1-4 as contained in the Draft EIR would minimize noise generated by the proposed homes:

RC I-4: All new mechanical equipment associated with the Project shall comply with Section 112.02 of the LAMC, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than five decibels CNEL.

3. Cumulative Impacts

As noise is a localized phenomenon and decreases in magnitude as distance from the source increases, only projects and ambient growth in the immediate vicinity (generally within a distance or 500 feet of less) would have the potential to combine with the Project in a manner that would result in cumulatively considerable noise impacts. As none of the related projects are located within 500 feet of the Project, the Project's cumulative noise impacts from construction would be considered less than significant.

The Project's traffic volume on area roadways would yield an increase in cumulative roadway noise levels with the Project (i.e., existing conditions, plus project, plus ambient growth, plus related projects). As shown therein, local noise levels would not increase by more than 3.0 dBA CNEL at any of the roadway segments analyzed. Therefore, the cumulative impact associated with mobile source noise would be less than significant.

J. Population, Housing, and Employment

1. Project Impacts

Based on an average household size of 3.18 person per single-family dwelling unit, the 35-lot VTTM would result in an increase of 105 residents. The Project's population growth represents approximately 0.04 percent of the total population growth anticipated to occur within the City of Los Angeles between 2020 and 2035. On a regional scale, the Project represents only 0.006 percent of the growth that is expected to occur in the SCAG region between 2020 and 2035. The new residents anticipated to be generated by the Project would result in a negligible increase in the City's population growth forecast, and is within SCAG's regional population growth projection and therefore there would be no impacts to population, housing, and employment.

2. Cumulative Impacts

Including the development of 143 single family homes that was not considered in the Draft EIR, the related projects would consist of 315 new housing units, and thus approximately 1,002 new residents (average household size of 3.18 persons). Together, the Project and related projects would result in a total of 348 new housing units and approximately 1,107 new residents. The Chatsworth – Porter Ranch Community Plan Area is projected to grow to contain 96,500 persons and 33,200 households. The combined Project and related projects would account for approximately 1.1 percent of estimated persons and 1.0 percent of all households within the

Chatsworth Porter Ranch Community Plan Area and would result in a negligible portion of the regional growth projections. As such, the cumulative housing and population impacts would be less than significant.

K. Public Services

1. Fire Protection Services

a) Construction

The construction of the Project would incrementally increase the potential for personal injury and fires from such sources as the operation of mechanical equipment; the use and storage of flammable fuel and construction materials; and other dangers that are inherent to the construction industry. Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and by partial lane closures during street improvements and utility installations. The impacts, while potentially adverse, will be less than significant as described below.

Throughout the construction process, the Project would be required to maintain appropriate fire flow and access pursuant to the Fire Code. Project construction would not be expected to tax firefighting and emergency services to the extent that there would be a need for new or expanded fire facilities, the construction of which could cause significant environmental impacts. Therefore, construction-related impacts to fire protection services would be less than significant.

b) Operational

The Project Site is located within a Very High Fire Hazard Severity Zone; thus, an increase in the demand for fire protection services is anticipated.

Station 96 reported an annual average turnout time to respond to incidents in 2015 as 1:18 (one minute and eighteen seconds) for non-emergency medical service incidents and 1:17 (one minute and seventeen seconds) for emergency medical service (EMS) incidents. The reported annual average travel time to respond to incidents in 2015 was 4:43 (four minutes and forty-three seconds) for non-EMS incidents and 4:45 (four minutes and forty-five seconds) for EMS incidents. These turnout and response times are consistent with the Citywide average and below the National Fire Protection Association standard of responding to 90 percent of medical calls within six minutes from call to arrival, and Station 96's 2015 average turnout time was almost 2:30 (two minutes and thirty seconds) faster than the City's average turnout times. Due to the proximity of the Project Site to Fire Station 96, and the services provided by Fire Station 96, fire protection response would be considered adequate with respect to response distances and impacts would be less than significant.

As part of regulatory compliance described below, the Project Applicant would be required to ensure adequate fire flows and infrastructure pursuant to the LAFD Fire Code. The proposed points of connection would need to be verified at the time of connection to ensure adequate water supply and pressure existing in the proposed connection lines. As such, no significant adverse effects on fire flow are expected. The Project Applicant also will be required to provide access roads that comply with Fire Code and Government Code section 66474.02 ("to the extent practicable, ingress and egress for the subdivision [should] meet[] the regulations regarding road standards for fire equipment access adopted pursuant to Section 4290 of the Public Resources Code and any applicable local ordinance").

The Fuel Modification Zone is required to maintain landscape vegetation in such a condition as not to provide an available fuel supply to augment the spread or intensity of a fire. This defensible space would further reduce fire risks associated with constructing dwellings within a High Fire Hazard Area and would serve to reduce demands on firefighting activities in the event of a wildfire. Therefore, with code compliance, impacts upon LAFD services would be

considered less than significant.

c) Project Design Features

PDF-6 The Project includes the extension of Andora Avenue, the installation of public utilities on site, and the development of an emergency access route from Plummer Street. Andora Avenue will be the primary access to the Project Site. The extension of Andora Avenue and development of on-site public utilities and the emergency access route shall be designed and constructed prior to the construction of the single-family homes in accordance and guidance of the Los Angeles Department of Water and Power (LADWP), LAFD, and Los Angeles Public Works to ensure adequate on-site access and utilities.

d) Cumulative Impacts

Similar to the Project, each of the other cumulative residential projects would be individually subject to LAFD review and would be required to comply with all applicable construction-related and operational fire safety requirements of the LAFD, Government Code section 66474.02, and the LADWP to adequately mitigate fire protection impacts. In addition, if the other four residential projects are more than 1.5 miles from the nearest LAFD Engine Company or Truck Company, the Fire Code would require the installation of automatic fire sprinkler systems, to compensate for the additional response distance. Therefore, cumulative impact would be less than significant.

2. Police Protection Services

a) Construction

Construction sites can be sources of nuisances, providing hazards and inviting theft and vandalism. As standard practice, the Project Site would be secured with fencing; equipment, tools, and materials would be secured overnight. While some calls for service are likely, the impact on police facilities would not be significant.

b) Operational

Implementation of the Project would result in the increase of residents and in the number of service calls from the Project Site. Such calls are typical of problems experienced in the existing neighborhoods, and do not represent unique law enforcement issues specific to the Project. In addition, though not necessary to reduce this particular impact to less than significant, impacts related to police services will be further reduced with the implementation of security/design features noted in mitigation measure K.2-1 and PDF-5, identified below. Therefore, the Project's impacts upon police services would be less than significant. (See **Section IV.K.2., Police Protection Services** in the Draft EIR)

Mitigation Measure

MM K.2-1: **Public Services (Police):** The plans shall incorporate the *Design Guidelines* (defined in the following sentence) relative to security, semi-public and private spaces, which may include, but not be limited to, access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the Project Site if needed. Please refer to *Design Out Crime Guidelines: Crime Prevention Through Environmental Design*, published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Police Department prior to the issuance of building permits

Project Design Features

PDF-5 A perimeter fence, as shown in **Figure II-7, Proposed Deed Restricted Areas**, consisting of tubular steel or equivalent materials and/or a masonry retaining wall, shall be installed by the developer prior to issuance of the certificate of occupancy of any housing structure. The perimeter fence and/or wall shall be maintained by the Tentative Tract's HOA during the life of the Project. No other fencing shall be allowed within any deed restricted area except for Lots 25 through 33 where the fencing will be located slightly downslope from the building pads. The fencing is intended to minimize trespassing and protect adjacent conservation areas.

c) Cumulative Impacts

To the extent cumulative development causes the need for additional police stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the development of any new police station would be subject to further CEQA review and evaluated on a case-by-case basis. On this basis, the Project would not make a cumulatively considerable contribution to police protection services, and cumulative impacts on police protection would be less than significant.

L. Transportation and Circulation

1. Construction Impacts

It is not expected that complete closure of any streets would be required during construction of the Project. Construction activities may, however, result in partial lane closures on streets adjacent to the Project Site on a temporary and/or intermittent basis for utility upgrading, relocations, and hook-ups; delivery of materials; and other construction activities, as required. Any traffic lane or sidewalk closures would need to be coordinated with and approved by the Los Angeles Department of Transportation (LADOT) prior to being implemented. Because partial lane closures would be temporary in nature, and would not require long-term complete closures of any adjacent roadway, such impacts would be considered less than significant.

The impact of construction worker trips on the surrounding roadways and intersections during the AM and PM peak hours is therefore expected to be negligible and traffic impacts from construction worker trips would be less than significant.

2. Operational Impacts

All study intersections during Existing with Project and Future with Project conditions would operate at Level of Service (LOS) A, except for Baden Avenue and Plummer Street AM peak hour with the traffic generated by the 42-lot VTTM originally proposed. The amount of traffic generated by the 33-lot VTTM currently proposed would be less. Baden Avenue and Plummer Street would operate at LOS B during Existing with Project and LOS C during Future with Project conditions. None of the study intersections will be significantly impacted by the Project for Existing with Project and Future with Project traffic conditions using the significant impact criteria established by LADOT, and no significant impact would occur. The reduced number of peak hour and daily trips that would be generated by the 35-lot VTTM Project as currently proposed would not result in significant impacts to the intersections analyzed in the Draft EIR or local streets, including Andora Avenue, which have sufficient capacity to accommodate the additional trips that would be generated by the Project.

The on-site streets and each driveway will be designed and constructed in accordance with the standards of the LADOT. The Site Plan is also subject to review and approval by applicable departments of the City of Los Angeles to ensure no significant impacts would occur.

3. Cumulative Impacts

The Final EIR updated the analysis for cumulative impacts to traffic to include the development of 143 single family homes at Roscoe and Valley Circle Boulevards was not considered in the analysis of cumulative traffic impacts in the Draft EIR. This updated analysis determined the traffic from this additional project, when combined with the traffic generated by the 35-lot VTTM Project and other related projects considered in the cumulative impact analysis, would not result in any significant cumulative traffic impacts. The addition of the traffic from this project would not change the LOS at the study intersections of Devonshire Street & Valley Circle Boulevard and Lassen Street/Andora Place & Valley Circle Boulevard/Baden Avenue. The LOS would decrease from a LOS C to a LOS D during the AM Peak Hour and would decrease in the future conditions without and with the 35-lot VTTM Project during the PM Peak Hour from a LOS A to a LOS B at Baden Avenue & Plummer Street. However, cumulative traffic impacts would remain less than significant.

K. Public Utilities

The numbers within this section were updated for the 35-lot VTTM proposed Project from the 44-lot VTTM as originally proposed, based on information provided within Section IV.M Public Utilities of the Draft EIR.

1. Water Supply

a) Construction

Construction of the Proposed Project would require the contractor to connect to the existing potable water infrastructure in the Project's service area to serve the Project's operational demands. Advisory notices would also be distributed in advance to the affected homeowners to inform existing LADWP water customers of any planned disruptions in service. Therefore, any temporary disruptions in local water service during the construction period would result in a less than significant impact. Construction of the Proposed Project would result in a less than significant impact with respect to water resources and/or water conveyance infrastructure.

b) Operation

The 44-lot VTTM as originally proposed would require approximately 11,592 gallons per day (gpd) of water. Water required by the Proposed Project was updated and as proposed, the Project is expected to generate approximately 9,108 gpd of water. LADWP determines the adequacy of water supplies to meet the needs of a project based on the project's consistency with the demographic projection from the Regional Transportation Plan (RTP) by the SCAG. The LADWP Board of Water and Power Commissioners adopted the 2015 Urban Water Management Plan (UWMP) on June 7, 2016. The UWMP identifies short-term and long-term water resources management measures to meet growing water demands during normal, single-dry, and multiple-dry years over a 25-year horizon. The City's water demand projection in the UWMP was developed based on the demographic projections in the SCAG 2012 RTP. The conclusion of the water supply analysis is that with its current water supplies, planned future water conservation, and planned future water supplies, LADWP has available supplies to meet all projected water demands for all three of these hydrologic scenarios through the year 2040. The UWMP also accounts for multiple dry years (drought conditions). Since the 35-lot VTTM Project is consistent with growth projections and is accounted for in the UWMP, impacts on water supply during multiple dry years would also be less than significant.

The City's Water Efficiency Requirements Ordinance No. 180,822, effective December 2009; 2013 California Plumbing Code, effective January 1, 2014; 2013 CALGreen, effective January 1, 2014; 2014 Los Angeles Plumbing Code, effective January 1, 2014; and 2014 Los Angeles Green Building Code, effective January 1, 2014, require the use of numerous conservation measures, as described in the regulatory compliance measures. Additional voluntary

conservation measures recommended by LADWP as project design features yield additional savings. As the Proposed Project would be designed and developed in accordance with the LADWP specifications and design requirements for new residential subdivisions, and would not exceed the planned growth projections that were relied on as part of the 2015 UWMP, the Project would result in a less than significant impact on water resources. Compliance with Regulatory Compliance Measures RC-WS-1 through RC-WS-3 will ensure impacts are minimized:

RC-WS-1: (Fire Water Flow). The Project Applicant shall consult with the Los Angeles Department of Building and Safety (LADBS) and LAFD to determine fire flow requirements for the Proposed Project, and will contact a Water Service Representative at the LADWP to order a SAR. This system hydraulic analysis will determine if existing LADWP water supply facilities can provide the proposed fire flow requirements of the Project. If water main or infrastructure upgrades are required, the Applicant would pay for such upgrades, which would be constructed by either the Applicant or LADWP.

RC-WS-2: (Green Building Code): The Project shall implement all applicable mandatory measures within the LA Green Building Code that would have the effect of reducing the Project's water use.

RC-WS-3: (Landscape) The Project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

c) Project Design Features

PDF-7 The Project includes the extension of existing water mains from the current terminus of Andora Avenue to within the site. The construction of on-site water mains shall be constructed with the guidance of the LADWP.

d) Cumulative Impacts

The total water demand by the related projects and the proposed Project would be approximately 96,048 gpd. The LADWP has determined that the Project's anticipated water demands are within the growth projections of the 2010 UWMP, the Project's cumulative contribution to impacts upon the City's water resources would be less than significant. Further, the cumulative water demand for the Proposed Project and the related projects would not substantially increase the water demand for the area. Therefore, the Proposed Project in combination with the related projects would not require the City or the MWD to identify any new sources of water or develop new water infrastructure. Similar to the Proposed Project, each related project would be evaluated on a case-by-case basis and would be required to consult with the LADWP and comply with all applicable City and state water conservation programs and ordinances. Therefore, cumulative impacts on water supply would be less than significant.

2. Wastewater

a) Project Impacts

The 44-lot VTTM as originally proposed would generate approximately 9,660 gallons per day (gpd) of wastewater, or 3.53 million gallons per year. Wastewater generation associated with the Proposed Project was updated using generation factors based on land use, as provided by the City of Los Angeles Bureau of Engineering. As proposed, the Project is expected to

generate approximately 7,590 gpd of wastewater or 2.8 million gallons per year. Sewage generated by the Proposed Project would be conveyed and treated at the Tillman Treatment Plant, which has adequate capacity to accommodate the increased wastewater flows generated by the Proposed Project. The projected increase of 7,590 gpd would represent a fraction of one percent of the available treatment capacity at the Tillman Plant, which has an available capacity of 13 millions of gallons per day (mgd). As such, Regional Water Quality Control Board (RWQCB) treatment standards area would be maintained and impacts would be less than significant. The 35-lot VTTM as currently proposed would generate less wastewater than the 44-lot VTTM as originally proposed and analyzed in the Draft EIR.

A preliminary Sewer Capacity Availability Report (SCAR) was prepared in August 2014 and concluded that the existing 8-inch-diameter pipe under Andora Avenue could accommodate the expected flow of the previously proposed 44-lot VTM. The Applicant will be required to submit the finalized SCAR to verify the anticipated sewer flows and points of connection and to assess the condition and capacity of the sewer lines receiving additional sewer flows from the Proposed Project. If it is determined that the sewer system has insufficient capacity to serve the Proposed Project, the developer may be required to replace or build new sewer lines to a point in the sewer system with sufficient capacity to accommodate the Proposed Project's increased flows. Infrastructure improvements to update or expand the sewer lines in the Project vicinity, if necessary, would be limited to trenching, excavating and backfilling the sewer lines beneath the public right-of-way. Such construction activities would be localized in nature and would generally involve partial lane closures for a relatively short duration of time typically lasting a few days to a few weeks. Therefore, impacts to sewer capacity and infrastructure would be less than significant.

RC-WS-1: (Fire Water Flow). The Project Applicant shall consult with the LADBS and LAFD to determine fire flow requirements for the Proposed Project, and will contact a Water Service Representative at the LADWP to order a SCAR. This system hydraulic analysis will determine if existing LADWP water supply facilities can provide the proposed fire flow requirements of the Project. If water main or infrastructure upgrades are required, the Applicant would pay for such upgrades, which would be constructed by either the Applicant or LADWP.

RC-WS-2: (Green Building Code): The Project shall implement all applicable mandatory measures within the LA Green Building Code that would have the effect of reducing the Project's water use.

RC-WS-3: (Landscape) The Project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

b) Project Design Features

PDF-7 The Project includes the extension of existing water mains from the current terminus of Andora Avenue to within the site. The construction of on-site water mains shall be constructed with the guidance of the LADWP.

PDF-12 A bioswale filtration system shall be designed and utilized on lots via a capture and use system. The captured water will be used to water landscaping through a drip irrigation system.

c) Cumulative Impacts

The total sewage generation by the related projects and the Proposed Project would be approximately 80,040 gpd. Sewage generated by the Proposed Project would contribute approximately 9 percent of the total cumulative sewage generation created by the related projects. Furthermore, the cumulative sewage generation for the Proposed Project and the related projects would represent a fraction of one percent of the available capacity of the Tillman Treatment Plant. Therefore, the Proposed Project in combination with the related projects would not require the construction of new wastewater treatment facilities or the expansion of existing wastewater treatment facilities. Similar to the Proposed Project, each related project would be evaluated on a case-by-case basis and would be required to consult with the Bureau of Sanitation and comply with all applicable City and state water conservation programs and sewer allocation ordinances. Therefore, cumulative impacts on wastewater services would be less than significant.

3. Solid Waste

a) Construction

Based on national averages for residential projects, construction of the 44-lot VTTM as originally proposed was estimated to generate approximately 431 tons of construction debris. The 35-lot VTTM currently proposed is estimated to generate approximately 325 tons of construction debris. Soil would be balanced on site; however, it is anticipated that 3,670 cubic yards of soil may need to be imported on site. The Sunshine Canyon Landfill has a remaining capacity of approximately 3.775 million tons, approximately a 3-year lifespan assuming the maximum disposal rate of 12,100 tons per day. The Chiquita Canyon Landfill has a remaining capacity of approximately 48.1 million tons and has a remaining lifespan of 46 years. The amount of solid waste generated during construction would fall well within the available permitted daily intake capacity of area landfills and recycling centers. The California Green Building Standards Code prescribes mandatory measures for residential projects to recycle and/or salvage for reuse a minimum of 50 percent of the nonhazardous construction and demolition waste. Implementation of regulatory compliance measures CM M.3-1, CM M.3-2 and CM M.3-3, described below, would achieve a 50 percent reduction in the Project's solid waste disposal needs upon area landfills. Implementation of the regulatory compliance measures and mitigation measures below would ensure that the Project's construction related solid waste impact upon regional landfill capacity would be less than significant.

RCM M.3-1 California Green Building Standards Code Section 4.408.1, Construction Waste Management. Mandatory measures for residential projects require developers to recycle and/or salvage for reuse a minimum of 50 percent of the nonhazardous construction and demolition waste in accordance with either Section 4.408.2, 4.408.3 or 4.408.4, or meet a more stringent local construction and demolition waste management ordinance.

RCM M.3-2 California Green Building Standards Code Section 4.408.2, Construction Waste Management Plan. Mandatory measures for residential projects require developers to submit a construction waste management plan in conformance with Items 1 through 5. The construction waste management plan shall be updated as necessary and shall be available during construction for examination by the enforcing agency.

- Identify the construction and demolition waste materials to be diverted from disposal by recycling, reuse on the project or salvage for future use or sale.
- Specify if construction and demolition waste materials will be sorted on site (source-separated) or bulk mixed (single stream).

- Identify diversion facilities where the construction and demolition waste material will be taken.
- Identify construction methods employed to reduce the amount of construction and demolition waste generated.
- Specify that the amount of construction and demolition waste materials diverted shall be calculated by weight or volume, but not by both.

RCM M.3-3: California Green Building Standards Code Section 4.408.3, Waste Management Company. Mandatory measures for residential projects require developers to utilize a waste management company, approved by the enforcing agency, which can provide verifiable documentation that the percentage of construction and demolition waste material diverted from the landfill complies with Section 4.408.1. Note: The owner or contractor may make the determination if the construction and demolition waste materials will be diverted by a waste management company.

b) Operational

The 44-lot VTTM as originally proposed was estimated to generate approximately 420 pounds of solid waste per day, or approximately 76.7 tons per year. The 35-lot VTTM as currently proposed would generate approximately 330 pounds of solid waste per day. Both estimates are conservative, as they do not factor in the diversion of the Project waste stream from implementing on-site recycling areas. There is sufficient daily capacity at the Sunshine Canyon Landfill and at the Chiquita Canyon Landfill. For purposes of a Project specific impact conclusion, the Project's impact upon solid waste disposal facilities would be considered less than significant with the implementation of the regulatory compliance measures below.

RCM M.3-1 California Green Building Standards Code Section 4.408.1, Construction Waste Management. Mandatory measures for residential projects require developers to recycle and/or salvage for reuse a minimum of 50 percent of the nonhazardous construction and demolition waste in accordance with either Section 4.408.2, 4.408.3 or 4.408.4, or meet a more stringent local construction and demolition waste management ordinance.

RCM M.3-2 California Green Building Standards Code Section 4.408.2, Construction Waste Management Plan. Mandatory measures for residential projects require developers to submit a construction waste management plan in conformance with Items 1 through 5. The construction waste management plan shall be updated as necessary and shall be available during construction for examination by the enforcing agency.

- Identify the construction and demolition waste materials to be diverted from disposal by recycling, reuse on the project or salvage for future use or sale.
- Specify if construction and demolition waste materials will be sorted on site (source-separated) or bulk mixed (single stream).
- Identify diversion facilities where the construction and demolition waste material will be taken.
- Identify construction methods employed to reduce the amount of construction and demolition waste generated.
- Specify that the amount of construction and demolition waste materials diverted shall be calculated by weight or volume, but not by both.

RCM M.3-3: California Green Building Standards Code Section 4.408.3, Waste Management Company. Mandatory measures for residential projects require developers to utilize a waste management company, approved by the enforcing agency, which can provide verifiable documentation that the percentage of construction and demolition waste material diverted from the landfill complies with Section 4.408.1. Note: The owner or contractor may make the determination if the construction and demolition waste materials will be diverted by a waste management company.

c) Cumulative Impacts

Although it is impossible to calculate at present, the impact of the continued growth of the region would likely have the effect of diminishing the daily excess capacity of the Sunshine Canyon Landfill and Chiquita Canyon Landfill. Furthermore, although there are several proposals for new landfills in the region, there are currently few viable options for City of Los Angeles waste past 2029. The Proposed Project would contribute approximately 330 pounds of solid waste per day to the Sunshine Canyon landfill or the Chiquita Canyon Landfill, which represents under one percent of the current excess remaining capacity. Because this increase is negligible in relation to the region and solid waste disposal solutions are continuously being sought after on the regional level, the Project's contribution to cumulative impacts would be considered less than significant. The total solid waste generation by the Proposed Project and the related projects would be approximately 3,480 pounds per day or approximately 635 tons per year.

As with the Proposed Project, related projects would participate in regional source reduction and recycling programs, significantly reducing the number of tons deposited in area landfills. Although there is currently adequate capacity to accommodate the cumulative disposal needs of the Proposed Project and related projects, it should be noted that continued capacity into the future is an increasing regional concern. Solutions to resolve the regional solid waste disposal needs are continuously being investigated at the state, regional and local levels. Nevertheless, since there is currently adequate capacity to accommodate the cumulative disposal needs of the Proposed Project and related projects, cumulative impacts with respect to solid waste would be less than significant.

4. Energy Conservation

a) Electricity

1. Construction

Due to the relatively short duration of the construction process, and the fact that the extent of fuel consumption is inherent to construction projects of this size and nature, fuel consumption impacts would not be considered excessive or substantial with respect to regional fuel supplies. The energy demands during construction would be typical of construction projects for projects of this size and would not necessitate additional energy facilities. Accordingly, energy demands during construction would be less than significant.

2. Operation

The estimated net increase in electricity consumption by the 44-lot VTTM as originally proposed was estimated to be approximately 236,313 kilowatts per year. The 35-lot VTTM as currently proposed, would generate approximately 185,675 kilowatts per year. The projected increase in electrical demand due to the Proposed Project would not have an adverse impact on its electrical system. New service connections may occasionally result in temporary disruptions in electrical services for existing customers. However, no outages or short outage is anticipated to occur when hooking up the Proposed Project. Energy supplies are adequate to serve the Project and the installation of needed infrastructure would not be expected to result in any significant secondary environmental effects. Additionally, implementation of the regulatory compliance measure below would ensure that the impact of the Project on the electrical service

system would be less than significant.

RCM M.3-1 California Green Building Standards Code Section 4.408.1, Construction Waste Management. Mandatory measures for residential projects require developers to recycle and/or salvage for reuse a minimum of 50 percent of the nonhazardous construction and demolition waste in accordance with either Section 4.408.2, 4.408.3 or 4.408.4, or meet a more stringent local construction and demolition waste management ordinance.

RCM M.3-2 California Green Building Standards Code Section 4.408.2, Construction Waste Management Plan. Mandatory measures for residential projects require developers to submit a construction waste management plan in conformance with Items 1 through 5. The construction waste management plan shall be updated as necessary and shall be available during construction for examination by the enforcing agency.

- Identify the construction and demolition waste materials to be diverted from disposal by recycling, reuse on the project or salvage for future use or sale.
- Specify if construction and demolition waste materials will be sorted on site (source-separated) or bulk mixed (single stream).
- Identify diversion facilities where the construction and demolition waste material will be taken.
- Identify construction methods employed to reduce the amount of construction and demolition waste generated.
- Specify that the amount of construction and demolition waste materials diverted shall be calculated by weight or volume, but not by both.

RCM M.3-3: California Green Building Standards Code Section 4.408.3, Waste Management Company. Mandatory measures for residential projects require developers to utilize a waste management company, approved by the enforcing agency, which can provide verifiable documentation that the percentage of construction and demolition waste material diverted from the landfill complies with Section 4.408.1. Note: The owner or contractor may make the determination if the construction and demolition waste materials will be diverted by a waste management company.

3. Cumulative Impacts

The total electricity consumption by the Proposed Project and related projects would be approximately 1,958,023 kilowatts per year. In accordance with current building codes and construction standards, each of the related projects would be required to comply with the energy conservation standards established in Title 24 of the California Administrative Code. Compliance with Title 24 energy conservation standards, the Los Angeles Green Building Code, and other energy conservation programs on the local level will further reduce cumulative energy demands. Cumulative impacts to electricity service would therefore be less than significant.

4. Project Design Features

PDF-13 Each single-family residence shall be designed and built with integrated electrical and mechanical features for the integration of photovoltaic systems (e.g., "solar-ready") and shall have pre-installed conduits for electric cars in each garage.

b) Natural Gas

1. Operation

The Proposed Project would increase demand for natural gas service in the Project Area. The natural gas demand for the 44-lot VTTM as originally proposed was estimated to be approximately 279,930 cubic feet (cf) per month, or approximately 3,359,160 cf/year. The natural gas demand of the 35-lot VTTM as currently proposed is estimated to be 219,945 cf/month or approximately 2,639,340 cf/year. It is anticipated that the SCG would be able to meet the natural gas demands of the Proposed Project; however, a natural gas survey of equipment will be completed before knowing if the current infrastructure will sustain the demand for the Project. Further, since natural gas supplies vary with time, the ability of the Southern California Gas Company (SGC) ability to accommodate Project's demand for natural gas supplies can only be evaluated when the Project is approved. Since the Proposed Project is in an area already served by existing natural gas infrastructure, the Project would not require extensive infrastructure improvement to serve the Project Site. Impacts associated with utility upgrades or additional connections would be temporary in nature and thus result in less than significant impacts upon the environment. Therefore, impacts associated with natural gas consumption would be less than significant.

2. Cumulative Impacts

The total natural gas consumption by the Proposed and related projects would be 2,319,420 cubic feet per month. As a public utility provider, the SCG continuously analyzes increases in natural gas demands resulting from projected population and employment growth in its service area, and SCG anticipates that it would be able to meet the needs of future development within the region. Additionally, compliance with energy conservation standards pursuant to Title 24 of the California Administrative Code would reduce cumulative demands for natural gas resources. Each of the related projects would be reviewed on a case-by-case basis to determine the Gas Company's ability to serve each project. As such, it is anticipated the related projects would likely also be accommodated by SCG. Cumulative impacts upon natural gas resources and infrastructure would therefore be less than significant.

3. Project Design Features

PDF-13 Each single-family residence shall be designed and built with integrated electrical and mechanical features for the integration of photovoltaic systems (e.g., "solar-ready") and shall have pre-installed conduits for electric cars in each garage.

ENVIRONMENTAL IMPACTS FOUND TO BE LESS THAN SIGNIFICANT AFTER MITIGATION

The Final EIR identifies significant impacts, which are reduced to a "less than significant" level by the inclusion of mitigation measures and project design features identified in the Final EIR. It is hereby determined that the significant environmental impacts that these mitigations address, will be avoided or substantially lessened by their inclusion in the Project.

A. Air Quality

1. Odor Impacts

The 35-lot VTTM would allow the development of 33 single-family homes. Single-family homes do not generate any substantial odor impacts. Horsekeeping would be allowed on all the proposed lots.

a) Odor Impacts (Operational)

While the proposed lots will be designed to comply with the standards of the City's "K" Equinekeeping District, and would be consistent with the surrounding properties where horses are kept, equine enclosures, bedding materials and manure can cause odors. Notwithstanding compliance with SCAQMD Rule 402, the Project has the potential to generate potentially significant odors affecting nearby residential properties. Cumulative odor impacts from the Project Site and the equine-oriented properties within the immediate vicinity have the potential to generate significant cumulative odor impacts.

b) Mitigation Measure

MM B-1 Equine related activities on site may produce odors that cause nuisance to persons on site and to the surrounding community. The Project shall incorporate and maintain best management practices to reduce odors associated with equine keeping and equine activities on site to the maximum extent feasible. Best management practices include, when applicable:

- Equine enclosures shall be sited with the maximum distance feasible from existing and proposed dwelling units.
- All equine enclosures shall be maintained by the property owners in clean and sanitary conditions;
- All equine enclosures shall be properly ventilated to prevent drafts and to remove odors;
- Bedding shall be changed regularly and properly disposed of in receptacle bins;
- Storage of manure and used bedding shall be in enclosed locations and not exposed to precipitation and runoff. All manure disposal and storage receptacle shall be sturdy, insect-resistant, seepage-free, covered, and protected from leaching (such as plastic garbage cans with lids, fly-tight wooden or concrete storage sheds, and composters);
- Regular disposal of manure off site;
- No vehicle or trailer used for the transportation of equine, equine keeping materials and maintenance, or disposal of equine keeping refuse shall be parked upon public street abutting land uses not zoned for equine keeping, unless thoroughly cleaned and free from all manure and odor; and

- The proposed equine trail easement within the developed area of the site shall be maintained by the Project's HOA in clean and sanitary conditions.

c) Finding

The Project's equine related uses have the potential to generate Project-specific and cumulatively significant odor impacts. Implementation of **MM B-1** and compliance with SCAQMD Rule 402 (nuisance), would reduce the Project's odor impacts to less-than-significant levels.

d) Rationale for Finding

Implementation of Mitigation Measure B-1 and compliance with SCAQMD Rule 402 (nuisance), would reduce the Project's odor impacts to less-than-significant levels because these measures will ensure the source of odors are kept as far away from dwellings as possible and that conditions that cause excessive orders are minimized through proper maintenance of facilities. Mitigation Measure B-1 will be enforced by the City as described in the MMP. Based on the foregoing, the City finds that impacts related to odors would be mitigated to less-than-significant levels.

e) EIR Reference

Section IV.B, Air Quality of the Draft EIR, beginning on page IV.B-34.

B. Biological Resources

1. Potential Impacts on Vegetation Communities

a) Significant Environmental Effects

The 35-lot VTTM minimizes impacts to the existing native vegetation communities on the Project Site. The vegetation communities identified on the 91-acre Project Site include Venturan Coastal Sage Scrub (86.11 acres), Coast Live Oak/Sage Scrub Association (2.65 acres), Non-native grassland (0.73 acres) and Ruderal (1.51 acres). The Proposed Project would impact 18.11 acres of Venturan Coastal Sage Scrub vegetation, 0.84 acres of Coast Live Oak/Sage Scrub Association, 0.61 acres of Non-native grassland and 0.81 acres of the ruderal vegetation present on the Project Site. The required fuel modification would impact 3.95 acres of Venturan Coastal Sage Scrub vegetation, 0.76 acres of Coast Live Oak/Sage Scrub Association, 0.07 acres of Non-native grassland and 0.00 acres of the ruderal vegetation present on the Project Site.

Impacts to Venturan coastal sage scrub vegetation present on the site is minimized by the location and configuration of the lots and the dedication of a conservation easement over approximately 77 acres of the Project Site for conservation. As described above, a total of 22.06 acres of Venturan coastal sage scrub will be impacted by the proposed 35-lot VTTM Project, and for this reason, the 35-lot VTTM Project will only incrementally contribute to the cumulative loss of Venturan coastal sage scrub in the region, and will preserve 64.05 acres of Venturan coastal sage scrub (75 percent of the total) connected to local sage scrub resources with the dedication of open-space lots and deed-restricted property that will remain in its natural condition.

The 35-lot VTTM will impact approximately 0.84 acres of the 2.65 acres of Coast Live Oak/Sage Scrub Association present on the Project Site. Impacts to these native plant communities will be mitigated by replanting graded or disturbed areas with native plants associated with this vegetation community. These native plants will readily grow on areas that area graded or have been previously disturbed.

Potential impacts to areas of native vegetation to remain on the Project Site and on surrounding

properties will be minimized to a less than significant level by restricting the use of non-native invasive plants on the proposed residential lots.

b) Mitigation Measure

MM C-1 Any portion of the dedicated open space or deed-restricted areas of the Project shall be revegetated with seed and plants (e.g., Venturan coastal sage scrub/grassland, Santa Susana tarplant, or Plummer's mariposa lily) collected from the Project Site prior to grading and replanted on the graded areas, conservation easement areas, and/or the 3.5-acre adjacent conservation property not a part of the proposed subdivision to establish plantings (subject to fuel modification requirements).

Project Design Features

PDF-4 Landscaping within the HOA designated common space areas shall be limited to native drought-tolerant plant and tree species and non-native invasive species shall be prohibited. The Project Applicant will create an HOA with Covenants, Conditions, and Restrictions (CC&Rs) forbidding all non-native plants and invasive species in the deed restricted areas in the Project development area and a ban on the use of rodenticides within the Project to minimize indirect impacts to wildlife movement.

c) Finding

Implementation of the mitigation measure identified in the Draft EIR would avoid any potential significant environmental effects of the Proposed Project relating to the loss of Venturan coastal sage scrub and Coast live oak/sage scrub association on the Project Site. This mitigation measure has been required in, or incorporated into the Proposed Project.

d) Rationale for Finding

The loss of Venturan coastal sage scrub and Coast live oak/ sage scrub vegetation present on the Project Site is a potentially significant impact. However, the portion of the dedicated open space or deed-restricted areas of the Project will be revegetated with native seed and plants from the areas that will be graded to mitigate this impact. Therefore, the implementation of MM C-1 and incorporation of PDF-4 ensures that any potential environmental effects relating to the loss of Venturan coastal sage scrub and Coast live oak/sage scrub will be reduced to less than significant levels as these measure will reduce the potential for invasion by non-native vegetation.

e) Reference

See page IV.C-14 in **Section IV.C, Biological Resources**, of the Draft EIR; and the responses to Comment Letter 2 from the California Department of Fish and Wildlife in **Section III, Comments and Responses** of the Final EIR.

2. Potential Impacts on Animal Species

a) Significant Environmental Effects

Direct impacts could occur through incidental death during tree and brush removal operations and grading. Indirect impacts would be expected to occur with project implementation through habitat loss and associated stresses related to adjacent habitat carrying capacity negatively affected via competition by displaced organisms. As adjacent habitats adjust to influx from displaced individuals, effects range from minor and temporary to direct loss of some organisms which are out-competed for resources.

Several species with regulatory status have been confirmed present and could be impacted. Regulatory-status reptile species (silvery legless lizard, coast horned lizard, and coast patch-

nosed snake) have a moderate or high potential to occur on the site. Regulatory-status bird species (Cooper's hawk, grasshopper sparrow, and Bell's sage sparrow) have a moderate potential for nesting on the subject property; another regulatory-status bird species (Southern California rufous-crowned sparrow) has a high potential of occurrence on site. Regulatory status small mammal species (San Diego black-tailed jackrabbit and San Diego desert woodrat) have been confirmed or are presumed present on the subject property. Four regulatory-status bat species (pallid bat, California leaf-nosed bat, pocketed free-tailed bat, and big free-tailed bat) have a moderate likelihood of occurrence on the subject property, and two regulatory-status bat species (spotted bat and western mastiff bat) have a high likelihood of occurrence on the subject property.

Rock outcrops (the are generally known to be a habitat for bat species) are distributed throughout the property. The EIR identifies 66 different rock outcrops and/or large boulders that could be mapped via aerial photography using computer aided drafting (CAD) analysis. These 66 outcrops comprise 7.4 acres, which is 8.13 percent of the 91-acre Project Site. Additionally, it was determined that just 5 outcrops consisting of a total of 0.1 acres are present within the grading footprint for the 35-lot VTTM Project. With the implementation of a bat pre-construction survey the impact to bats with mitigation will be less than significant.

b) Mitigation Measures

MM C-2 The Project developer would create potential bat-roosting habitat by installing and maintaining up to three (3) bat-roosting/reproductive structures in suitable locations on the Project Site. A retained biological monitor shall determine the appropriate number of bat-roosting/reproductive structures based on the number rock outcrops removed during Project implementation that were potentially used as habitat. If any project-related clearing, grubbing, grading, and tree removals occur during the maternity roosting season for regulatory-status bat species (April 1 to September 30), a qualified biologist shall determine in advance the number of maternity roosts structures to be constructed (up to three), and said structures shall be in place prior to the maternity roosting season to offset reproductive effects to bats. If grading occurs outside of the reproductive season, maternity structures shall be in place prior to issuance of building permits.

MM C-6 Project grubbing/shrub removal shall occur outside of bird-nesting season (March 1 to September 15). If Project grading and construction activities requiring the removal of vegetation occur during the breeding season for birds, nesting bird surveys would be conducted within the disturbance footprint plus a 100-foot buffer in accordance with the following:

a. A minimum of two (2) pre-construction surveys for nesting birds shall be conducted five (5) days apart prior to construction. The last survey shall be conducted no more than three (3) days prior to the initiation of clearance/construction work;

b. If pre-construction surveys indicate that bird nests are not present or are inactive, or if potential habitat is unoccupied, no further mitigation is required;

c. If active nests of birds are found during the surveys, a species-specific no-disturbance buffer zone shall be established by a qualified biologist around active nests until a qualified biologist determines that all young have fledged (are no longer reliant upon the nest).

MM C-7 The Project developer shall retain a qualified biologist to monitor brush and tree removal operations full time and grading activities part time and unannounced on

the Project Site. The monitor shall ensure compliance with these mitigation measures. For purposes of these mitigation measures, a qualified biologist/ecologist is defined as a working professional with an educational and work history background in biological disciplines, including field biology, plant and animal taxonomy, restoration ecology, biogeography, or related fields, and substantial field experience in cismontane Southern California, particularly in woodland and scrub habitats.

MM C-8 Orange temporary construction fencing shall be installed along the Project perimeter during grading and construction.

MM C-9 Siltation/cryptic organism fencing shall be installed along the perimeter of any Project area with natural habitat downslope during grading and construction.

MM C-10 The Project developer shall implement dust control and periodic washing of habitat foliage within 100 feet of the Project-grading perimeter if dust drifts onto adjoining habitat areas.

MM C-11 "No Trespassing—Natural Habitat Area" signs shall be posted on the construction side of the construction fencing areas adjacent to conserved natural areas.

MM C-12 The Project developer shall prepare homeowner notifications and an education brochure advising homeowners of deed-restricted areas and building restrictions in deed-restricted areas.

MM C-13 All grading and construction contractors shall receive copies of all mitigation measures required to reduce impacts to biological resources. Additionally, verbal instruction shall be provided by the Project biologist to all site workers to ensure clear understanding that biological resources are to be protected on the Project Site in accordance with the mitigation measures. A brochure depicting the sensitive biological resources on site shall be provided to all grading and construction contractors.

MM C-14 All lighting adjacent to natural areas shall be of low luminescence, directed downward or toward structures, and shielded to the extent necessary to prevent artificial illumination of natural areas and protect nocturnal biological resources, as determined appropriate by a qualified biologist.

MM C-15 Prior to the issuance of grading permits for the Project, the Project developer shall obtain all necessary permits from the ACOE, CDFW, and the LARWQCB, as applicable, as described in Mitigation Measure C-5 (see MMP pp. V-10-11).

c) Finding

Implementation of the mitigation measures identified in the Draft EIR would avoid any potential significant environmental effects of the Proposed Project relating to the impacts on regulatory-status animal species. These mitigation measures have been required in, or incorporated into the project, or are within the responsibility and jurisdiction of another public agency, and can and should be adopted by such agency.

d) Rationale for Finding

Although the impacts from the loss of regulatory-status species could be potentially significant, implementation of the mitigation measures identified above will mitigate these impacts to less than significant. Impacts during construction will be minimized and avoided by conducting pre-

construction surveys and having a biological monitor onsite during construction. Indirect impacts will be minimized and avoided by educating residents and controlling lighting. Bat-roosting habitat will be created on the Project Site under the direction of a qualified biologist to reduce impacts to bat species. Taken together, MM C-2 and MMC-6 through MMC-15 will mitigate potential impacts to less than significant.

e) Reference

See pages IV.C-14-IV.C-15 in **Section IV.C, Biological Resources**, of the Draft EIR; and responses to Comment Letter 2 from the California Department of Fish and Wildlife in **Section III, Comments and Responses**, of the Final EIR.

3. Regulatory Status Plant Species Impacts

a) Significant Environmental Effects

A biological survey was conducted as part of the Draft EIR in August 2015. After receiving comments regarding the amendments to the California Code of Regulations about Take of Rare Plants, an additional biological survey was conducted in June 2016. A total of 290 individual plants of Santa Susana tarplant were detected and mapped within the 94.5-acre Project Site. Of those 290 plants, only 4 are located within the potential grading and fuel modification area. Authorization to affect those plants will be sought from the CDFW. In accordance with the revision to Mitigation Measure MM C-3, development will not occur anywhere on the site where a Santa Susana tarplant is located without first obtaining an Incidental Take Permit (ITP) from the CDFW. In addition, once an ITP is obtained from the CDFW, seeds will be collected from individual plants of Santa Susana tarplant to be impacted and either distributed on-site or within the 3.5-acre conservation parcel or donated to a native plant nursery or conservation entity skilled and actively engaged in the propagation of plant material to be utilized as deemed appropriate by that entity, consistent with Mitigation Measure MM C-1. Impacts would be potentially significant, however the impact would be reduced to less than significant levels through the implementation of MM C-1.

Invasive species could potentially outcompete, and therefore reduce, existing occurrences of Santa Susana tarplant on-site. In order to minimize this indirect effect, the California Invasive Plant Council's list of invasive plants will be identified as prohibited plants in the Covenants, Conditions and Restrictions applied to the 33 proposed residential lots. Please refer to PDF-4 regarding deed restrictions on invasive, non-native plants. Impacts would be potentially significant, however the impact would be reduced to less than significant levels through the implementation of PDF-4 and Mitigation Measure MM C-3.

A biological assessment was conducted in August 2015 as part of the Draft EIR. Four additional flora and fauna surveys were conducted in April 2016 and June 2016. Out of these five additional plant species, only Plummer's mariposa lily is considered sensitive. A total of 26 individual plants of Plummer's mariposa lily were detected within and adjacent to the Project Site. Out of the 26 Plummer's mariposa lilies detected, only one is located within the 35-lot VTTM Project's grading and fuel modification area that would be impacted by development of the 35-lot VTTM Project. ***As only 1 of the 26 plants on the site would be impacted, this impact is considered adverse but not significant.*** To minimize this adverse impact, the bulbs/seeds from the one Plummer's mariposa lily to be impacted will be salvaged and either transplanted on site or within the 3.5-acre conservation parcel or donated for use by a native plant nursery or conservation entity skilled and actively engaged in the propagation of plant material. Section IV in the Final EIR includes a revision to Mitigation Measure MM C-1 to address salvage of the bulbs/seeds from the Plummer's mariposa lily that will be impacted.

Prior to preparing the Final EIR, the Coast live oak was discussed with CDFW staff. The coast live oak woodland cells described in the Draft EIR and General Biological Assessment have been re-categorized as Coast live oak/coastal sage scrub. Coast live oak/coastal sage scrub on

the Project Site is limited in geographic extent to 2.65 acres and include even smaller, outlying single oaks located throughout the Project Site. Per the January 2015 Tree Report, most of the trees on the Project Site will be preserved. Up to eleven (11) oak trees impacted by the 35-lot VTTM Project, five (5) are located within the 35-lot VTTM Project grading footprint and will be removed, and six (6) are located along the south side of Andora Avenue and will be conserved but affected via minor incursion into the protected zone of the oak tree associated with the extension of Andora Avenue. The coast live oak/coastal sage scrub that has been avoided will be placed into a conservation easement in favor of the MRCA. Therefore, the approval of the Project would result in a ***significant impact*** resulting to the permanent loss of the specified live oak and sage scrub, prior to mitigation.

b) Mitigation Measures

MM C-1 Any portion of the dedicated open space or deed-restricted areas of the Project shall be revegetated with seed and plants (e.g., Venturan coastal sage scrub/grassland, Santa Susana tarplant, or Plummer's mariposa lily) collected from the Project Site prior to grading and replanted on the graded areas, conservation easement areas, and/or the 3.5-acre adjacent conservation property not a part of the proposed subdivision to establish plantings (subject to fuel modification requirements).

MM C-3 No incidental take of Santa Susana tarplant shall be allowed on the Project Site until the California Department of Fish and Wildlife has issued an Incidental Take Permit (ITP) and the Project Applicant has demonstrated compliance with the terms of that ITP. Compliance shall consist of the following measures: 1) conserve 286 individual plants of the Santa Susan tarplant on-site and within the off-site 3.5-acre adjacent conservation parcel not a part of the proposed subdivision, and 2) collect seeds from individual plants of Santa Susana tarplant to be impacted and either transplant them on-site or within the 3.5-acre conservation parcel or donating them to a native plant nursery or conservation entity skilled and actively engaged in the propagation of plant material to be utilized as deemed appropriate by that entity.

MM C-5 To mitigate removal of protected coast live oak trees and the valley oak tree the following measures shall be implemented:

a) The replacement ratios for trees in CDFW jurisdictional areas to be removed are as follows: trees from 4 to 5 inches diameter at breast height (DBH) shall be replaced at 2:1; trees from 5 to 12 inches DBH shall be replaced at 3:1; trees from 13 to 24 inches DBH shall be replaced at 5:1; trees from 25 to 36 inches DBH shall be replaced at 10:1; and trees greater than 37 inches DBH shall be replaced at 15:1. Replacement trees shall be acorns or saplings, and shall be of the same species as that removed. Replacement trees may be planted either on the subject property or off site, and may be planted in connection with the creation, restoration, and/or enhancement of habitat required pursuant to other Project mitigation measures.

b) CDFW jurisdictional replacement trees may be used to satisfy the City-required replacement of non-jurisdictional trees. If CDFW-jurisdictional replacement trees are not used to satisfy City-required replacement of non-jurisdictional trees, the replacement ratios for upland trees not within CDFW-jurisdictional areas to be removed are as follows: each tree shall be replaced with a coast live oak or valley oak at a 4:1 ratio at an on-site or other City-approved location in accordance with the City Tree Ordinance replacement requirements.

c) Prior to planting of replacement trees, a qualified biologist/restoration ecologist shall review landscaping and irrigation systems that are adjacent to the replacement trees to determine whether such landscaping and irrigation systems are compatible for the survival of the replacement trees.

d) All tree protection measures in the above-referenced Tree Report would be implemented during Project construction.

e) Exemptions from Replacement Tree Requirements: The routine maintenance of a non-jurisdictional coast live oak tree under the direction of a registered arborist or qualified biologist retained by the Project developer would not require any mitigation

c) Finding

Implementation of the mitigation measures identified in the Draft EIR would avoid any potential significant environmental effects of the Proposed Project relating to the impacts on regulatory-status plant species. These mitigation measures have been required in, or incorporated into the Project.

d) Rationale for Finding

Although the impacts from the loss of regulatory-status plants could be potentially significant, Mitigation Measures C-1, C-3 and C-5 will mitigate these impacts to less than significant by compensating for the loss of Venturan coastal sage scrub/grassland, Santa Susana tarplant, Plummer's mariposa lily and oak trees by collecting seeds and other materials and planting replacement plants in open space areas under the supervision of a qualified biologist to ensure successful implementation.

e) Reference

See page IV.C-16 in **Section IV.C, Biological Resources**, of the Draft EIR; and comment letter 2 in **Section III Comments and Responses**, of the Final EIR.

4. Potential Impacts to Jurisdictional Resource Areas

a) Significant Environmental Effects

The Project has the potential to permanently impact 0.21 acres of non-wetland waters on the Project Site. The Project has the potential to permanently impact 0.15 acres of CDFW streambeds on the Project Site. Stream areas on site are limited to ephemeral systems, which likely only contain flowing water during and shortly after rainfall events. No subsites were identified that could support successful amphibian reproduction, and vegetative structure in all these ephemeral washes is identical to adjoining scrub habitat.

Most of the 0.15 acre of affected streambeds is comprised of effects to Drainage D. Drainage D is a human-induced and discontinuous erosional feature. Further, the lower portion of Drainage D has been disturbed from historic grading, dumping and construction of Andora Avenue. As directed by CDFW, a fee mitigation is generally an acceptable primary mitigation option after avoidance had been thoroughly evaluated and achieved to the greatest extent feasible, and that the mitigation needed to be approved bythe CDFW.

b) Mitigation Measure

MM C-4 To offset the permanent loss of 0.15 acres of CDFW-jurisdictional "streambeds" and 0.21 acres of Corps-jurisdictional "waters of the U.S.," the Project developer shall retain a qualified biologist/restoration ecologist to identify degraded on-site and/or off-site streambeds and/or "Waters of the U.S." (i.e., CDFW, Los Angeles

Regional Water Quality Control Board [LARWQCB] and/or United USACE jurisdictional areas) and identify opportunities for creation, restoration, and/or enhancement. Areas for consideration may include areas on the Project Site or other properties located within the Los Angeles River watershed, including headwaters of the Los Angeles River.

The acreage to be created, restored, or enhanced shall be determined on a mitigation-to-impact ratio (e.g., 1:1 or 2:1). Mitigation for project impacts generally should be calculated at a 1:1 ratio for creation; a 2:1 ratio for restoration; and a 3:1 ratio for enhancement, subject to approval of the applicable agencies. Implementation of this mitigation measure may also be satisfied by payment of a mitigation fee to a third party responsible for mitigation implementation and long-term maintenance for off-site mitigation, subject to the approval of CDFW, the USACE, and LARWQCB, as applicable.

The qualified biologist/restoration ecologist and/or third party responsible for off-site mitigation, if applicable, shall consult with the USACE, LARWQCB, and CDFW regarding appropriate mitigation site selection. If a pre-existing mitigation bank or similar instrument is not in place, the biologist/ecologist shall prepare a creation, restoration, and/or enhancement plan for the mitigation areas. The plan shall demonstrate that the restoration area(s) are hydrologically and edaphically suitable for the permanent establishment of a self-sustaining ephemeral or riparian area, subsequent to creation/restoration/enhancement techniques. The plan shall also demonstrate that the area(s) proposed for mitigation can be permanently conserved and protected, and shall include assurances to effectuate permanent conservation and protection. The plan shall obtain all necessary City approvals, as applicable.

c) Finding

Implementation of the mitigation measures identified in the Draft EIR would avoid any potential significant environmental effects of the Proposed Project relating to the impacts to streambeds. This mitigation measure has been required in, or incorporated into the Project, or are within the responsibility and jurisdiction of another public agency, and can and should be adopted by such agency.

d) Rationale for Finding

Impacts to streambeds will be mitigated by creating, restoring, and/or enhancing streambeds on the Project Site by the applicant or in the watershed the Project Site is in through fee mitigation by the applicant, to compensate for the loss of streambed habitat subject to permits issued by, and oversight, by the California Department of Fish and Wildlife and Army Corps of Engineers.

e) Reference

See pages IV.C-16- IV.C-17 in **Section IV.C, Biological Resources**, of the Draft EIR and comment letter 2 in **Section III Comments and Responses**, of the Final EIR.

C. Cultural Resources

1. Archeological and Paleontological Resources

a) Significant Environmental Effects

There are no known paleontological resources on the Project Site. No vertebrate fossil sites have been identified on or near the Project Site. Regulatory Compliance Measures require preservation in place for the identified prehistoric resource. However, given the documented

occupation of the Los Angeles Basin by indigenous tribes, both prehistorically and historically, there is a reasonable potential that the Project site may contain previously unknown archeological or paleontological resources. Therefore, Project development that would substantially disturb the soil would result in a significant impact related to archaeological or paleontological resources without mitigation.

b) Mitigation Measures

MM D-1: The Project Applicant shall avoid and preserve the prehistoric resource in place and protect the cultural and natural context of the prehistoric resource with culturally appropriate protection and management criteria, including, but not limited to, fencing with environmental barriers (i.e., cactus around the site) and/or a small sign that reads "Private Property, No Trespassing."

MM D-2: Prior to the start of ground-disturbing activities, the appropriate Native American representatives shall be notified of the pending activities. A qualified archaeologist shall coordinate with Tribal representatives to draft an archaeological monitoring plan. During ground-disturbing activities, if there is any evidence of Native American resources (significant or otherwise), the Tribe shall be notified and construction activities modified in accordance with the archaeological monitoring plan.

c) Regulatory Compliance Measures

RC-CR-1 (Archaeological): If additional archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the proposed Project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project site. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

- Distinctive features, finishes, and construction techniques or examples of skilled craftsmanship which characterize an historic property shall be preserved.
- Deteriorated historic features shall be repaired rather than replaced. Where the severity if deterioration requires replacement of a distinctive historic feature, the new feature shall match the old in design, color, texture, and other visual qualities, and where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
- Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

- Significant archaeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

- New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

- New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

RC-CR-2 (Paleontological): If paleontological resources are discovered during excavation, grading, or construction, the LADBS shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

RC-CR-3 (Human Remains): If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed:

- Stop immediately and contact the Los Angeles County Coroner:
  1104 N. Mission Road, Los Angeles, CA 90033
  323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or
  323-343-0714 (After Hours, Saturday, Sunday, and Holidays)

If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).

- The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.

- The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.

- If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

d) Finding

Implementation of the mitigation measures and regulatory compliance measures identified in the Draft EIR would avoid any potential significant environmental effects of the Proposed Project relating to archaeological and paleontological resource impacts. The mitigation measures have been required in, or incorporated into the Project, or are within the responsibility and jurisdiction of another public agency, and can and should be adopted by such agency.

d) Rationale for Finding

Implementation of the included mitigation measures would ensure that any impacts would remain less than significant. The mitigation measures will ensure that the Project will not impact archaeological or paleontological resources in the future because of the monitoring and protocols for handling the discovery of paleontological and archeological resources required during construction activities.

e) Reference

See pages IV.D-6-IV.D-7 in **Section IV.D, Cultural Resources,** of the Draft EIR.

D. Public Services

1. Fire Protection Services - Operational

a) Significant Environmental Effects

The Project would result in a less than significant impact with respect to traffic, emergency access, design hazards, or alternative modes of transportation that currently serve the Project area. With respect to each of these areas, the design of the Project would be evaluated individually in coordination with LADOT, LAFD, and Los Angeles Police Department (LAPD) to minimize any potential impacts. Overall, the Project's transportation and traffic impact would be less than significant. Implementation of the regulatory compliance measures and mitigation measures would ensure that adequate emergency access to the Project Site is maintained.

A 20-foot wide paved secondary emergency access road easement is proposed in the southeastern portion of the Project Site to provide emergency access from Plummer Street to the westerly extension of Andora Avenue. This access road will to the extent practical meet the regulations regarding road standards for fire equipment access adopted pursuant to Section 4290 of the Public Resources Code and the Fire Code. This access road joins with a 13-foot wide paved access road extending from and providing additional vehicle access to lots 18 through 25 as well as to adjacent lot 1 of Tract 23710 (APN No. 2724-011-019) and parcel B of Parcel Map Los Angeles No. 2996 (APN No. 2007-001-009). A public equestrian trail will be located adjacent to this road. Based on a correspondence from the LAFD, the secondary access as proposed is acceptable and will be sufficient to allow fire agreement to access the Project Site while simultaneously allowing residents to exit the Project site.

The design of the proposed water infrastructure system would provide necessary updates to the water mains in the area to ensure adequate fire pressure flows to the neighborhood. The 12-inch water main was tested for an 8-inch lateral within Andora Avenue and resulted in 98 pounds per square inch (psi) for full diameter gallons per minute (gpm) flow and 79 psi for 2,500 gpm flow. The 6-inch water main within Plummer Street was tested for 8-inch lateral. These flows meet minimum fire flow requirements.

The 6-inch water line within Plummer Street resulted in 130 psi for full diameter gpm flow and 16 psi for 2,500 gpm flow, which does not maintain minimum pressure. As such, a water main

upgrade would be required for Plummer Street to achieve minimum pressure. As described in **Section II** of the Final EIR, the 35-lot VTTM Project would install an 8-inch line to upgrade the system at Plummer Street.

The design, construction, and operation of the Project are subject to the review of the LAFD to ensure adequate site access and safety. With adherence to the Fire Code and the recommendations of the LAFD, the Project would be adequate with regards to fire safety. Further implementation of regulatory compliance measures and mitigation measures below, would ensure that the Project's impact to fire protection services are less than significant.

b) Mitigation Measures

K.1-1: Irrigated and managed greenbelts around the perimeter of all structures for a distance of 100 feet shall be installed as "Defensible Space" where vegetation is less flammable and not excessive in volume.

K.1-2: All Landscaping on the Project Site shall utilize fire-resistant plants and materials.

K.1-3: All homes shall be constructed with non-combustible (non-wood) roofs.

K.1-4: The brush located in the area between 100 and 200 feet of structures, or the "Fuel Modification Area", shall be cleared or thinned periodically by the HOA under supervision of the LAFD in order to reduce the risk of brush fires spreading to homes.

K.1-5: Entrance or exit of all units shall not exceed 150 feet from the edge of a roadway of an improved street, access road or designated fire lane.

c) Regulatory Compliance Measures

RCM K-1: The Project shall comply with the 2014 Fire Code and any subsequent codes at the time of building permits, including the requirements for automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems, etc.).

RCM K.1-2: The plot plan shall be submitted to the LAFD for review and approval, and shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

RMC K.1-3: A plot plan shall be submitted to the LAFD for review and approval prior to occupancy of the Project, which shall provide the capacity of the fire mains serving the Project Site. Any required upgrades shall be identified and implemented prior to occupancy of the Project.

RMC K.1-4: Prior to occupancy of the Project, an emergency response plan shall be submitted to the LAFD. The emergency response plan would include, but not be limited to, the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire stations. Any required modifications shall be identified and implemented prior to occupancy of the Project.

d) Finding

The Proposed Project would present a potentially significant impact on fire protection services. However, implementation of the mitigation measures and regulatory would reduce the potentially significant impact to less than significant. These mitigation measures have been required in, or incorporated into the Proposed Project.

d) Rationale for Finding

The mitigation measures and regulatory compliance measures identified above will minimize the impacts of the Proposed Project on fire protection services by reducing the potential for fire risks and ensuring adequate access for emergency vehicles will be provided.

e) Reference

See **Section IV.K.1, Fire Protection Services** in the Draft EIR and pages III-26-III-28 in **Section III Comments and Responses** of the Final EIR.

E. Transportation and Circulations

1. Construction Impacts

a) Significant Environmental Effects

Temporary impacts to the surrounding neighborhood could be anticipated during the hauling phases as a result of trucks staging, idling excessively, and traveling on area roadways. The Project's construction activities, including hauling, would be subject to the City of Los Angeles standard conditions to mitigate any adverse impacts upon the neighborhood. The 35-lot VTTM has been designed to minimize the need for hauling of soil to minimize temporary construction impacts.

b) Mitigation Measures

MM L-1 To mitigate potential temporary traffic impacts of any necessary lane and/or sidewalk closures during the construction period, the Applicant shall, prior to construction, develop a Construction Traffic Control/Management Plan (the "Plan") to be approved by LADOT to minimize the effects of construction on vehicular and pedestrian circulation and assist in the orderly flow of vehicular and pedestrian circulation in the area of the Project. The Plan shall include temporary roadway striping and signage for traffic flow as necessary, as well as the identification and signage of alternative pedestrian routes in the immediate vicinity of the Project.

MM L-2 Prior to the issuance of a grading permit, the Applicant shall record and execute a Covenant and Agreement (Planning Department General Form CP-6770), binding the Applicant to the following haul route conditions:

- All construction truck traffic shall be restricted to truck routes approved by LADBS, which shall avoid residential areas and other sensitive receptors to the extent feasible.
- Hours of operation shall be from 7:00 AM to 4:00 PM.
- Permitted Days of the week shall be Monday through Saturday. No hauling activities are permitted on Sundays or Holidays.
- Trucks shall be restricted to 18-wheel trucks or smaller.

- The Traffic Bureau of the LAPD shall be notified prior to the start of hauling at (213) 485-3106.
- Streets shall be cleaned of spilled materials at the termination of each workday.
- The final approved haul routes and all the conditions of approval shall be available on the job site at all times.
- Hauling and grading equipment shall be kept in good operating condition and muffled as required by law.
- All loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
- All trucks are to be watered only when necessary at the job site to prevent excessive blowing dirt.
- All trucks are to be cleaned of loose earth at the job site to prevent spilling. Any material spilled on the public street shall be removed by the contractor.
- The Project Applicant shall be in conformance with the State of California, Department of Transportation policy regarding movements of reducible loads.
- All regulations set forth in the State of California Department of Motor Vehicles pertaining to the hauling of earth shall be complied with.
- "Truck Crossing" warning signs shall be placed 300 feet in advance of the exit in each direction.
- One flag person(s) shall be required at the job site to assist the trucks in and out of the Project area. Flag person(s) and warning signs shall be in compliance with Part II of the 1985 Edition of "Work Area Traffic Control Handbook."
- The LADOT, telephone (213)485-2298, shall be notified 72 hours prior to beginning operations in order to have temporary "No Parking" signs posted along the route.
- Any desire to change the prescribed routes must be approved by the concerned governmental agencies by contacting the Los Angeles Bureau of Street Services, Street Use Inspection Division at (213) 485-3711 before the change takes place.
- The permittee shall notify the Los Angeles Bureau of Street Services, Street Use Inspection Division, at (213) 485-3711, at least 72 hours prior to the beginning of hauling operations and shall also notify the Division immediately upon completion of hauling operations.
- A surety bond by Contractor shall be posted in an amount satisfactory to the City Engineer for maintenance of haul route streets. The forms for the bond shall be issued by the Central District Engineering Office, 201 N. Figueroa Street, Room 770, Los Angeles, CA 90012. Further information regarding the bond may be obtained by calling (213) 977-6039.

c) Finding

The construction of the Proposed Project would present a potentially significant impact on traffic and transportation. However, implementation of the mitigation measures would reduce the potentially significant impact to less than significant. This mitigation measure has been required in, or incorporated into the Proposed Project.

d) Rationale for Finding

Implementation of mitigation measures MM L-1 and L-2 will mitigate potential traffic impacts during construction by limiting and controlling the time periods construction traffic is allowed to avoid the evening commute time period, avoid Sundays and Holidays, and requiring use of an approved haul route.

e) Reference

See **Section IV.L, Transportation and Circulation and Appendix I** in the Draft EIR.

ENVIRONMENTAL IMPACTS FOUND TO BE SIGNIFICANT AND UNAVOIDABLE

The Final EIR indicates that potentially significant and unavoidable impacts attributable to the Project are limited to Noise resulting from construction activities. As discussed in the findings below, there are either no feasible mitigation measures or the feasible mitigation measures would only partially mitigate this significant impact and would cease upon the completion of Project construction.

The City finds, based on the facts set forth in the record, which include but are not limited to the facts discussed below, those facts contained in the Draft EIR, Responses to Comments, Final EIR, EIR Appendices and Technical Exhibits, that there are no feasible mitigation measures, changes or alterations available to reduce the significant and unavoidable impacts attributable to construction noise associated with the Project.

A. Noise

Construction of the Project would require the use of heavy equipment for grading/excavation, installation of new utilities, and building construction for the proposed development. Development activities would also require the use of smaller power tools, generators, and other sources of noise.

1. Construction-Related Noise and Groundborne Vibration Effects to Surrounding Land Uses

a) Significant Environmental Effects

Due to the use of construction equipment, the Project has the potential to impact existing residential uses located adjacent to the Project Site. The surrounding residential land uses on Andora Avenue, Baden Street, Plummer Street, and Trigger Street would be exposed to increased noise levels during Project construction. The increase in noise levels at the off-site locations during construction would be temporary in nature and would only occur periodically, not continuously throughout the construction day. Properties within 500 feet of and with a direct line-of-sight to the Project Site would be the most directly impacted. Outdoor noise levels at land uses 50 feet from the noise source could range from 77 dBA to 86 dBA L_{eq} with the use of noise-attenuating devices on construction equipment. These noise levels would represent short-term, but substantial, noise level increase compared to the existing noise level range of 44.7 dBA L_{eq}. The increase in noise levels at the off-site locations during construction would be temporary in nature and would only occur periodically, not continuously throughout the construction day. The highest noise levels that would be experienced by the off-site receptors shown would occur only for a limited duration during construction of the Project. As construction progresses, noise levels would be reduced at the ground level as construction activities move to interior spaces that would break the line-of-sight noise transmission from the Project Site to the immediately adjacent land uses. However, construction noise impacts would exceed the thresholds of significance and would thus be considered potentially significant.

In terms of human annoyance, construction activities would require the use of large bulldozers and loaded trucks within 15 feet of two adjacent homes on Andora Avenue. As such, the Project's construction activities would have the potential to cause or create vibration levels in the range of 94 velocity decibel (VdB), above the 72 VdB annoyance threshold for residential land uses. All Project construction activities would subject to LAMC Section 41.40, which prohibits construction activities (including any construction or repair work of any kind upon, or any excavating for, any building or structure, where any of the foregoing entails the use of any power driven drill, riveting machine excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling) between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday. All such construction activities are also prohibited on

Sundays and all federal holidays. Nevertheless, vibration annoyance impacts at the existing adjacent residential land uses could exceed the vibration annoyance threshold for limited periods during construction and are potentially significant and unavoidable for this reason.

b) Mitigation Measures

MM I-1: Noise and groundborne vibration construction activities whose specific location on the Project Site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be located as far as possible from the nearest off-site land uses.

MM I-2: When possible, construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

MM I-3: Flexible sound control curtains shall be placed around all drilling apparatuses, drill rigs, and jackhammers when in use.

MM I-4: The Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.

Regulatory Compliance Measures

RC I-1: The Project shall comply with the City of Los Angeles Noise Ordinance No. 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

RC I-2: Construction activities shall be restricted to the hours of 7:00 A.M. to 6:00 P.M. Monday through Friday, and 8:00 A.M. to 6:00 P.M. on Saturday, and prohibited on all Sundays and federal holidays.

RC I-3: The Project shall comply with the City's Building Regulations Ordinance No. 178048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public and approved by the City's Department of Building and Safety.

d) Finding

Specific economic, legal, social, technological or other considerations, including considerations identified in **Section IX, Statement of Overriding Considerations**, make infeasible additional mitigation measures or alternatives to the Proposed Project identified in the Final EIR. Construction related noise impacts would be significant and unavoidable.

e) Rationale for Finding

Mitigation measures MM I-1 through MM I-4 and regulatory compliance measures RC I-1 through RC I-3 will mitigate potential temporary noise and vibration impacts during construction to the fullest extent feasible by limiting the hours of construction and requiring all construction equipment to be located and operated in a manner that minimizes effects on nearby residents. After diligent research and analysis, additional feasible mitigation measures that would further reduce these impacts to a less than significant level were not identified

f) Reference

See **Section IV.I, Noise** of the Draft EIR.

ALTERNATIVES TO THE PROJECT

Pursuant to CEQA Guidelines Section 15126.6, the Draft EIR described and provided comparative analysis of a reasonable 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.

According to the CEQA Guidelines, alternatives initially considered by the Lead Agency but rejected as infeasible during the scoping process and not analyzed in the Draft EIR are to be identified and discussed. An alternative location was initially considered but determined to be infeasible because the Project Applicant does not own or control other property near the Project Site that could be used for the Project. It is speculative to evaluate the ability of the Project Applicant to find and purchase an alternative site to develop the Project. In addition, the Project is not unique in that development of a similar Project elsewhere would not preclude nor eliminate demand for the development of the Project on this Project Site.

In addition, use of the site under the current A1 zone for agricultural uses was also rejected as inconsistent with the objectives of the Project.

Based on the objectives of the Project and the significant impacts identified for the 44-lot VTTM as originally proposed the Draft EIR included comparative analysis of three alternatives: (1) the No Project Alternative as required by the CEQA Guidelines; (2) the Existing Zoning Alternative; and (3) a Reduced Density Alternative consisting of a 35-lot VTTM. Under the Existing A1 Zoning, the entire Project Site could be subdivided into 16 five-acre residential parcels. While fewer residences would be built under this alternative than with the 44-lot VTTM or the Reduced Density Alternative, more of the Project Site would be disturbed and graded, which would result in greater impacts. Based on the analysis in the Draft EIR, the Reduced Density Alternative was identified as the Environmentally Superior Alternative. After the release of the Draft EIR for public review, the Project Applicant replaced the 44-lot VTTM filed with the application with a 35-lot VTTM that is consistent with the Reduced Density Alternative as evaluated in the Draft EIR. Following the public hearing, the two open space lots were merged into one lot, resulting in a 34-lot VTTM. As such, the reduced density alternative was determined to be feasible and is now proposed as the project for approval.

STATEMENT OF OVERRIDING CONSIDERATIONS

The implementation of the Project may have significant and adverse effects on the environment as described in the EIR, specifically potential significant temporary noise impacts during construction. No further changes or alterations in the Project to avoid or substantially lessen these significant environmental effects are feasible (i.e., no feasible mitigation measures or alternatives to the Proposed Project have been identified which will reduce the impacts listed above to less than significant levels).

CEQA Guidelines Section 15093(a) requires the decision-making agency to balance, as applicable, the economic, legal, social, technological or other benefits of a Project against its unavoidable environmental risks. If the specific economic, legal, social, technological or other benefits of a proposal outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered acceptable.

The City, having balanced the benefits of the proposed Andora Subdivision Project against the adverse environmental effects of the Project as described in the Final EIR, and these findings, the City, acting pursuant to Section 15093 of the CEQA Guidelines, hereby determines that the proposed Project will result in substantial community benefits, including economic, legal, social, technological, or other benefits, that outweigh and render acceptable the significant effects on the environment that cannot be mitigated to a level less than significant. Such benefits include, but are not limited to, the following, any one of which, standing alone, would justify the approval of this project:

- Furtherance of goals and objectives of the Chatsworth-Porter Ranch Community Plan by expanding opportunities for residential housing with the development of an equestrian-oriented community consistent with the surrounding neighborhood, clustering the single family lots on the eastern portion of the site to minimize grading quantities, preserving the natural terrain in the majority of the site including 7.4 acres of the 7.5 acres of rock outcroppings on the site; and preserving views from Valley Circle Boulevard consistent with the policies in the Valley Circle Boulevard/Plummer Street Corridor Specific Plan;

- Implementation of the Project will help respond to the City's housing deficiency, as well as the Mayoral Objective to add 100,000 new residential units within the City by 2021, and further the goals of the City's Housing Element of its General Plan by adding new 33 housing units to the Site.

- Preserve views, the unique topography and vegetation, and the existing wildlife movement corridor by granting a conservation easement over approximately 63.26 acres of the site and an additional 3.5-acre parcel to the north of the Project Site to the Mountains Recreation and Conservation Authority, as well as preserving an additional 13.74 acres of open space through deed restrictions on the 33 residential lots, to ensure the open space area will remain in perpetuity;

- Permanently preserve public access to the existing trails located on the Project Site by preserving these trails in the open space lots and providing new trails and equestrian amenities to link to existing trails;

- Provide a secondary emergency ingress/egress route for the adjacent Andora Avenue neighborhood, which currently has limited emergency access as Andora Avenue is a dead-end street. Residents along Andora Avenue and the dead-end feeder streets will be provided a secondary emergency access to and from Plummer Street by the Project; and

- Provide construction jobs, tax revenues and economic benefits, including community development fee revenue to support local schools.

MITIGATION MONITORING PLAN

Pursuant to Section 15091 (a)(1) of the CEQA Guidelines, the City finds that implementation of the mitigation measures, regulatory compliance measures, and project design features included in Section 4 of the Final EIR would substantially lessen the significant environmental effects resulting from the Project. These mitigation measures, regulatory compliance measures, and project design features have been required in, or incorporated into the Project. In accordance with Section 15091(d) and Section 15097 of the CEQA Guidelines that require a public agency to adopt a program for reporting or monitoring required changes or conditions of approval to substantially lessen significant environmental effects, the Mitigation Monitoring Plan provided as Section 4 of the Final EIR is hereby adopted as the mitigation monitoring plan for this Project. The Mitigation Monitoring Plan for the Project is contained in full in **Section V, Mitigation Monitoring Plan** in the Final EIR, and is included herein as Conditions of Approval for the Project.

FINDINGS REGARDING FINAL EIR

Pursuant to CEQA, on the basis of the review and consideration of the Final EIR, the City finds the following:

1. Factual corrections and minor changes have been set forth as clarifications and modifications to the Draft EIR;

2. The factual corrections and minor changes to the Draft EIR are not substantial changes in the Draft EIR that would deprive the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the Project, a feasible way to mitigated or avoid such an effect, or a feasible project alternative;

3. The factual corrections and minor changes to the Draft EIR will not result in new significant environmental effects or substantially increase the severity of the previously identified significant effects disclosed in the Draft EIR;

4. The factual corrections and minor changes in the Draft EIR will not involve mitigation measures or alternatives that are considerably different from those analyzed in the Draft EIR that would substantially reduce one or more significant effect on the environment; and

5. The factual corrections and minor changes to the Draft EIR do not render the Draft EIR so fundamentally inadequate and conclusory in nature that meaningful public review and comment would be precluded.

Thus, none of the conditions set forth in CEQA requiring recirculation of a Draft EIR have been met. Incorporation of the factual corrections and minor changes to the Draft EIR into the Final EIR does not require the Final EIR to be circulated for public comment.

FINDINGS OF FACT (SUBDIVISION MAP ACT)

In connection with the approval of Vesting Tentative Tract Map No. 73427, the Advisory Agency of the City of Los Angeles, pursuant to Sections 66473.1, 66474.60, .61 and .63 of the State of California Government Code (the Subdivision Map Act), makes the prescribed findings as follows:

(a) THE PROPOSED MAP IS CONSISTENT WITH APPLICABLE GENERAL AND SPECIFIC PLANS.

The Land Use Element of the General Plan divides the City into 35 Community Plan areas, which provide local guidance and policies for future development within the City. The Chatsworth-Porter Ranch Community Plan designates the site for Minimum and Very Low I Residential land uses, with respective corresponding zones of OS, A1, A2, RE40, and RE20, RA. The Community Plan Map also indicates two proposed horse trails running through the property, connecting from Los Angeles County areas west of the subject site, to Valley Circle Boulevard and Plummer Street to the east of the site.

Although the Community Plan does not address subdivisions directly and instead addresses residential issues more broadly, it notes that the intensity of planned land use shall be limited in accordance with "the adequacy of the existing and potential street circulation system", "the availability of sewer, drainage facilities, fire protection services and facilities, and other public utilities" and "the compatibility of proposed developments with the existing adjacent developments" (Housing Section, pg.5). Development within the vicinity of high fire danger areas should also include features for protection against brush fires. In addition, the Plan encourages the preservation of archeological sites, horse-keeping uses, and the development of equestrian trails.

The site is also located within the Valley Circle Boulevard - Plummer Street Scenic Corridor Specific Plan, which primarily sets width and improvement standards for Valley Circle Boulevard and seeks to preserve the area's natural terrain and scenic view sheds.

The subdivision of the site into thirty-four lots for the purpose of a residential development with integrated equestrian and public open space amenities, is consistent with the General Plan Framework, Community Plan, land use designations, and Valley Circle Scenic Corridor Specific Plan. The map is consistent with the Minimum and Very Low I Residential designations under the proposed (T)(Q)RE40-1-H-K and (T)(Q)RE20-1-H-K zones.

The recommended project and tract map will meet the Plan's objectives and policies by creating a logical land use pattern, consistent with the density and character of the surrounding established residential community. The property is accessed from Andora Avenue, with secondary fire road access from Valley Circle Boulevard, and internal streets to provide vehicular approaches for the individual lots. The development of thirty-three new single-family residences is not expected to create a significant impact on traffic or circulation, as evidenced in the traffic analysis provided in the Environmental Impact Report for the project. The land use intensity is also compatible with the available utilities. The availability of sewer and drainage facilities, fire and traffic access, as well as other public services and utilities, were found to be adequate or were appropriately mitigated during the environmental analysis for the project which included recommendations submitted from respective City departments or agencies. The tract map and its associated mitigation measures also incorporate fire protection features, the preservation of archaeological resources, installation of equestrian facilities, and

dedicated open space conservation easements, in-line with Plan policies. The project also meets the tract map technical requirements of the Municipal Code.

As conditioned, the proposed Tentative Tract Map is consistent with the intent and purpose of the applicable General and Specific Plans.

(b) THE DESIGN AND IMPROVEMENT OF THE PROPOSED SUBDIVISION IS CONSISTENT WITH APPLICABLE GENERAL AND SPECIFIC PLANS.

Section 66418 of the Subdivision Map Act defines the term "design" as follows: "Design" means: (1) street alignments, grades and widths; (2) drainage and sanitary facilities and utilities, including alignments and grades thereof; (3) location and size of all required easements and rights-of-way; (4) fire roads and firebreaks; (5) lot size and configuration; (6) traffic access; (7) grading; (8) land to be dedicated for park or recreational purposes; and (9) such other specific physical requirements in the plan and configuration of the entire subdivision as may be necessary to ensure consistency with, or implementation of, the general plan or any applicable specific plan.

Section 17.05-C of the Los Angeles Municipal Code enumerates design standards for Subdivisions and requires that each Tentative Map be designed in conformance with the Street Design Standards and in conformance to the General Plan.

Subdivision Map Act and Los Angeles Municipal Code
The design and layout of the map is consistent with the design standards established by the Subdivision Map Act and Division of Land Regulations of the Los Angeles Municipal Code. Several public agencies (including the Bureau of Engineering, Bureau of Sanitation, Department of Water and Power, Fire Department, Department of Transportation, Department of Building and Safety, and Grading Division) have reviewed the map and found the subdivision design satisfactory and have imposed improvement requirements and/or conditions of approval. The proposed street design, public right-of-ways, and easements, which include the extension of Andora Place, modifications to the Andora Place Local Street standard for the protection of several mature oak trees, internal streets, a secondary access road, and horse trail easements, have all been found to be adequate. The proposed site drainage, grading, and availability of sewer connections would be able to accommodate the proposed project. In addition, secondary traffic access and fire protection measures have been imposed for public safety.

In addition, in conformance with LAMC 17.05.I, the Advisory Agency finds that traffic access, topography, and drainage conditions will safely allow lot averaging, and that such averaging is consistent with proper subdivision design, and in addition will provide the following benefits: require less grading than would a subdivision of conventional design not utilizing lot averaging and other environmental benefits such as the preservation of natural open space areas. Therefore, the width and area of not more than 20 percent of the lots in the subdivision are reduced as follows, in conformance with the minimum standards set in LAMC 17.05.I, while maintaining an average lot size of 22,340 square-feet for RE20-1-H-K zoned lots, and an average lot size of 43,372 square-feet for RE40-1-H-K zoned lots:

Lot 20 lot size (RE40 zone): 34,091 square-feet
Lot 21 lot size (RE40 zone): 33,592 square-feet
Lot 32 lot size (RE20 zone): 19,972 square-feet

Lot 29 lot width (RE20 zone): 77 feet
Lot 30 lot width (RE20 zone): 77 feet

General Plan and Community Plan
Other physical project features, such as lot sizes, lot configuration, equestrian amenities, and open space conservation easements, would be consistent with the General Plan and Community Plan. The existing site is currently vacant and adjacent to open space areas as well as single-family properties, with lot sizes primarily ranging from 15,000 to 40,000 square feet in area, and with larger half- to five-acre lots located further east of Andora Avenue. The improvement of the site with thirty-three single-family homes will be located on lots ranging in size from approximately 19,972 square-feet to 63,615 square-feet of lot area, with average lot sizes of 22,340 square-feet for RE20 zoned lots, and average lot sizes of 43,372 square-feet for RE40 zoned lots. These residential lots would all be clustered on the flatter portions of the site, compatible with the design and improvement of existing adjacent developments and designed to minimize grading and disruption to ecological communities and scenic and cultural resources.

The site's proposed equine-keeping "K"-district designation and the submitted Tract Map illustrating feasible locations for equinekeeping uses on each lot, indicate that the improvement of the proposed subdivision will remain viable for the keeping of horses on all lots, in-line with the policies of the Chatsworth-Porter Ranch Community Plan. Improvements on the site, such as approximately 1.5 miles of public equestrian trails, a horse water feature, and over 63 acres of open space conservation easements, further the goals of the Community Plan to retain the unique semi-rural and natural character of the area.

Improvements to the site, such as roadway, sidewalk, lighting and streetscape improvements on the proposed streets (**Condition S-3**) will also promote safety and visually enhance the public-right-of-way adjoining and within the property. The street widening improvement condition for Andora Avenue has been tailored to protect the existing oak trees with a modified 30-foot to 36-foot wide roadway. In compliance with LAMC 12.37.H.4, the Advisory Agency finds that the reduced improvement on Andora Avenue is made necessary by the conditions of the terrain and the existing improvements contiguous to the property involved.

Valley Circle Boulevard - Plummer Street Scenic Corridor Specific Plan
In addition, the site design would be in conformance with the standards of the Valley Circle Specific Plan through the following features: minimized lighting; installation of horsekeeping features such as trails and water station; a reasonable protection of the scenic corridor through the use of earth-tone colors and materials for the residences; appropriate landscaped screening of the development from Valley Circle Boulevard; a preservation of over 63 acres of terrain through the designation of an open space lot; minimized grading; and landscaping of areas with native, low-water-need, fire-resistant plants.

Therefore, as conditioned, the design and improvement of the proposed tract map is consistent with the intent and purpose of the applicable General and Specific Plans.

(c) THE SITE IS PHYSICALLY SUITABLE FOR THE PROPOSED TYPE OF DEVELOPMENT.

The environmental review conducted by the Department of City Planning (Case No. ENV-2014-3995-EIR (Sch.No.2015021057), established that the physical characteristics of the site are suitable for the proposed residential development. The subject site is not located in a hazardous zone and does not contain any known hazards (i.e., toxic waste, methane hazards, flood-related hazards, erosion hazard area, Alquist-Priolo Fault Zone,

etc.) However, the site is located within a sloping hillside area, within a very high fire hazard zone, and has a low potential for Valley Fever spores in the soil. The proposed residential portions of the development have therefore been concentrated on the flatter segments of the lot in order to minimize grading and to protect existing ecological and cultural resources. The proposed project site would also maintain appropriate fire buffer and brush clearance areas. Compliance with existing Air Quality Management District (AQMD) regulations and conformance to additional mitigation measures included in the project conditions will aim to protect workers from dust inhalation and to limit soil disturbance and dust generation to mitigate potential effects from Valley Fever exposure. In addition, the project's geological and soils engineering report, dated July 21, 2016, has been conditionally approved by Grading Division of the Department of Building and Safety, and the Fire Department has conditionally approved both the tract map and initial plans for the secondary access road for the development. Therefore, the site is considered suitable and safe for the proposed development.

(d) THE SITE IS PHYSICALLY SUITABLE FOR THE PROPOSED DENSITY OF DEVELOPMENT.

The subject site is suitable for the proposed 34-lot subdivision and development of 33 single-family residences. Approximately 61 acres of the site is designated for Minimum Residential land uses, with the remaining 30 acres designated for Very Low I Residential land uses. Compounded with the reduced density standards for Hillside areas, as noted in the Community Plan and LAMC Section 17.05-C, the maximum allowable density for the site would be capped at 43 dwelling units. The proposed project for 33 dwelling units has clustered the residential homes on the eastern and central portions of the property with access from Andora Avenue, thereby minimizing grading and disruption to areas of natural wildlife habitat located on the surrounding portions of the site. The resulting subdivision design also sets aside 63.2 acres of the property (approximately 70-percent of the site), including areas with the steepest local slopes, to be retained as open space and dedicated to a private non-profit entity. In addition, approximately 13.7 acres of the single-family residential lots are also "deed-restricted" to remain clear of structures and to serve as a buffer and transition between the open-space areas and the developed single-family residences. The environmental review conducted by the Department of City Planning (Case No. ENV-2014-3995-EIR (Sch.No.2015021057), further established that the physical characteristics of the site are suitable for the proposed residential development.

(e) THE DESIGN OF THE SUBDIVISION AND THE PROPOSED IMPROVEMENTS ARE NOT LIKELY TO CAUSE SUBSTANTIAL ENVIRONMENTAL DAMAGE OR SUBSTANTIALLY AND AVOIDABLY INJURE FISH OR WILDLIFE OR THEIR HABITAT.

The project site is undeveloped and primarily comprised of natural open space. Habitat values are generally intact on site, although the eastern and central area that lies at the terminus of Andora Avenue is substantially disturbed, having been graded and used in the past for dumping of building waste. The site contains streambeds, non-wetland waters, several animal and plant regulatory species, habitat and migratory paths, as well as nine (9) non-protected trees and 30 protected oak trees located throughout the site.

The environmental review conducted by the Department of City Planning (Case No. ENV-2014-3995-EIR (Sch.No.2015021057), established that the project would have a less than significant impact on the biological environment after the incorporation of several mitigation measures. Construction on the site has been limited to the previously-disturbed eastern and central portions of the site in order to protect a majority of the natural terrain for existing habitat and migratory linkages. In addition, a robust set of

mitigation measures have been included in the environmental report for the revegetation of riparian and plant areas, the protection of natural resources through the conservation of approximately 70 percent of the site area, and measures for minimized disturbance to local wildlife during construction and operation of the project.

Therefore, no potential adverse impact on fish or wildlife resources as far as earth, air, water, plant life, animal life, or risk of upset are concerned as part of the project.

(f) THE DESIGN OF THE SUBDIVISION AND THE PROPOSED IMPROVEMENTS ARE NOT LIKELY TO CAUSE SERIOUS PUBLIC HEALTH PROBLEMS.

The proposed subdivision and subsequent improvements are subject to the provisions of the Los Angeles Municipal Code and the Building Code. Any applicable health and safety related requirements as mandated by law would be enforced to ensure for public health and welfare (e.g., asbestos/lead abatement, seismic safety, flood hazard management). The project is not located over a hazardous materials site or flood hazard area and is not located on unsuitable soil conditions. The project would not place any occupants or residents near a hazardous materials site or involve the use or transport of hazardous materials or substances. The development would be connected to the City's sanitary sewer system, where collected sewage is directed to sewer treatment plants, which have been upgraded to meet Statewide Ocean Discharge Standards.

In addition, a Draft Environmental Impact Report ("DEIR") has been prepared for the proposed project, which further analyzed the project's potential to impact air quality, noise, hazards, public services, and utilities on the immediate and surrounding community. The environmental analysis concluded that with the imposition of prescribed mitigation measures, that the project would not result in any adverse impacts to public health or safety, with the exception of temporary and intermittent construction noise impacts. However, these noise impacts would not be sustained and would not result in a serious public health problem.

Therefore, the design of the subdivision and the proposed improvements are not likely to cause serious public health problems.

(g) THE DESIGN OF THE SUBDIVISION AND THE PROPOSED IMPROVEMENTS WILL NOT CONFLICT WITH EASEMENTS ACQUIRED BY THE PUBLIC AT LARGE FOR ACCESS THROUGH OR USE OF PROPERTY WITHIN THE PROPOSED SUBDIVISION.

There are two irrevocable offer easements located on the Subject Property that are proposed to be merged because they are no longer needed. They are:

- Sanitary sewer easement 01-0089302 O.R. with an area of 2,769 square feet;
- Future street (3.27 acres), slope (20.58 acres) and storm drain easement 01-0089303 O.R.

There are no additional existing public access easements. Needed public access for roads and utilities, as well as an equestrian trail will be acquired by the City prior to recordation of the proposed tract.

Therefore, the design of the proposed subdivision and the proposed improvements will not conflict with easements acquired by the public at large for access through or use of property within the proposed subdivision.

(h) THE DESIGN OF THE PROPOSED SUBDIVISION WILL PROVIDE, TO THE EXTENT FEASIBLE, FOR FUTURE PASSIVE OR NATURAL HEATING OR COOLING OPPORTUNITIES IN THE SUBDIVISION. (REF. SECTION 66473.1)

In assessing the feasibility of passive or natural heating or cooling opportunities in the proposed subdivision design, the applicant has prepared and submitted materials which consider the local climate, contours, configuration of the parcel(s) to be subdivided and other design and improvement requirements.

Providing for passive or natural heating or cooling opportunities will not result in reducing allowable densities or the percentage of a lot which may be occupied by a building or structure under applicable planning and zoning in effect at the time the tentative map was filed.

The lot layout of the subdivision has taken into consideration the maximizing of the north/south orientation.

The topography of the site has been considered in the maximization of passive or natural heating and cooling opportunities.

In addition, prior to obtaining a building permit, the subdivider shall consider building construction techniques, such as overhanging eaves, location of windows, insulation, exhaust fans; planting of trees for shade purposes and the height of the buildings on the site in relation to adjacent development.

These findings shall apply to both the tentative and final maps for Vesting Tentative Tract Map No. 73427.