

Viewridge Road Stormwater Improvements Project

Addendum to the Enhanced Watershed Management Program Program Environmental Impact Report

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Acronyms and Abbreviations

AB	Assembly Bill
AQMP	Air Quality Management Plan
BMP	Best Management Practice
CAAQS	California Ambient Air Quality Standards
CalFIRE	California Department of Forestry and Fire Protection
Caltrans	California Department of Transportation
CCAP	County of Los Angeles Community Climate Action Plan
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFGF	California Fish and Game Code
CNDDDB	California Natural Diversity Data Base
CNPS	California Native Plant Society
CO	carbon monoxide
CO ₂	carbon dioxide
County	Los Angeles County Public Works
CRHR	California Register of Historical Resources
EWMP	Enhanced Watershed Management Program
FESA	federal Endangered Species Act
GHG	greenhouse gas
I-405	Interstate 405
IPaC	Information for Planning and Conservation
LACFCD	Los Angeles County Flood Control District
LACFD	Los Angeles County Fire Department
LARWQCB	Los Angeles Regional Water Quality Control Board
LST	localized significance threshold
MBTA	Migratory Bird Treaty Act
MS4	Municipal Separate Storm Sewer System
MTCO _{2e}	metric tons of carbon dioxide equivalents
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NO _x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NSMBCW	North Santa Monica Bay Coastal Watersheds
O ₃	ozone
PEIR	Program Environmental Impact Report
PM _{2.5}	fine particulate matter 2.5 microns or less in diameter
PM ₁₀	respirable particulate matter ten microns or less in diameter
proposed project	Viewridge Road Stormwater Improvements Project
Regional Board	Los Angeles Regional Water Quality Control Board
ROW	right(s)-of-way
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SMMNAP	Santa Monica Mountains North Area Plan

SO ₂	sulfur dioxide
SO _x	sulfur oxides
SR 1	State Route 1 or Pacific Coast Highway
SSC	CDFW species of special concern
TMDL	Total Maximum Daily Load
US 101	U.S. Route 101
USFWS	U.S. Fish and Wildlife Service
VOC	volatile organic compound
WL	CDFW Watch List

CHAPTER 1

PURPOSE AND BACKGROUND

Los Angeles County Public Works (County) has prepared this addendum to the Los Angeles County Flood Control District (LACFCD) Enhanced Watershed Management Program (EWMP) Final Program Environmental Impact Report (PEIR or program) (State Clearinghouse No. 2014081106) (LACFCD, 2015) to address the potential site-specific environmental impacts associated with the proposed Viewridge Road Stormwater Improvements Project (proposed project). This addendum is prepared in accordance with the California Environmental Quality Act of 1970 (CEQA) (Cal. Public Resources Code § 21000, et. seq., as amended) and its implementing guidelines (Cal. Code Regs., Title 14, Section 15000 et. seq., 2016).

The proposed project would implement Best Management Practices (BMPs) identified to achieve and maintain water quality objectives and protect beneficial uses pursuant to the Municipal Separate Storm Sewer System (MS4) Permit applicable to the project site. The BMPs identified for the proposed project focus on capture and treatment of urban and stormwater runoff along and near Viewridge Road between Topanga Canyon Boulevard and Summit Pointe Drive in the unincorporated community of Topanga in western Los Angeles County.

1.1 Applicability and Use of an Addendum

The County's intent through preparation of this addendum is to demonstrate whether the previously adopted CEQA document (PEIR 2015), including mitigation measures, remains adequate and valid for the proposed project. Pursuant to the CEQA Guidelines, the County, as the lead agency, must conduct an evaluation of proposed changes to the project in order to determine whether further environmental analysis is required, pursuant to Public Resources Code Section 21166 and CEQA Guidelines Section 15162. For a proposed modified project, CEQA Guidelines Sections 15162 and 15164 provide that an Addendum to an adopted Final EIR may be prepared if only minor technical changes or additions are necessary, or none of the following conditions calling for the preparation of a subsequent EIR have occurred:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

- b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
- c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternative; or
- d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

1.2 Format of This Addendum

The previously certified PEIR serves as the primary environmental compliance document for the project, and this addendum provides additional clarification and information about the proposed project. This addendum should be read together with the full text of the previously certified PEIR (2015). All applicable mitigation measures from the PEIR would be applicable to the proposed project and, therefore, are incorporated by reference into this addendum. This addendum relies on the use of an Environmental Checklist Form (Checklist), as suggested in Section 15063(d)(3) of the CEQA Guidelines.

1.3 Summary of Findings

Based upon the Checklist prepared for the proposed project and supporting responses (see Chapter 3), implementation of the modified project would not result in substantial changes requiring major revisions to the previously certified PEIR. Further, the proposed project would not result in any environmental impacts that have not already been addressed in the PEIR or a substantial increase in the severity of previously identified significant impacts. No new mitigation measures are required for the proposed project. Since only minor additions and clarifications are required to the PEIR, and none of the conditions described in Public Resources Code Section 21166 or CEQA Guidelines Section 15162 requiring preparation of a subsequent EIR have occurred, the County finds that the preparation of an addendum to the PEIR is the appropriate CEQA documentation for the proposed project.

1.4 Lead Agency and Discretionary Approvals

This addendum and the previously certified PEIR are intended to serve as the environmental documentation for the changes being proposed under the modified project. The County is the lead agency under CEQA and maintains authority to approve the addendum.

CHAPTER 2 PROJECT DESCRIPTION

2.1 Introduction

On May 26, 2015, the County certified the LACFCD EWMP PEIR. The PEIR analyzed the potential effects of implementing the structural and non-structural BMPs identified in the 12 EWMPs submitted to the Los Angeles Regional Water Quality Control Board (LARWQCB or Regional Board). As a component of the PEIR, potential BMPs were identified for the North Santa Monica Bay Coastal Watersheds (NSMBCW), including Topanga Canyon as one of the BMPs identified as a regional structural project in the PEIR – denoted as a priority project. The PEIR analyzed the general effects of the BMPs and identified program mitigation measures to reduce potential impacts; however, site-specific environmental analysis was not completed.

The purpose of this Addendum to the PEIR is to evaluate the site-specific environmental effects associated with the proposed project and determine whether these impacts are consistent with the evaluation presented in the PEIR in compliance with CEQA (Public Resources Code Sections 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations Section 15000 et seq.).

2.2 Background

Many of the waterbodies in the County have been identified as impaired for not meeting water quality standards and are listed in Section 303(d) of the Clean Water Act. As a result, the Regional Board developed Total Maximum Daily Load (TMDL) limits for a number of pollutants originating from urban and stormwater runoff on the watersheds throughout the County. Among those impaired waterbodies with TMDLs is the Santa Monica Bay, which is subject to several TMDLs including the Santa Monica Bay Beaches Bacteria TMDL, Nearshore and Offshore Debris TMDL, and the Santa Monica Bay TMDL for Dichlorodiphenyltrichloroethane (commonly known as DDTs) and Polychlorinated biphenyl (PCBs).

In December 2012, the Regional Board adopted the MS4 Permit for the County to regulate stormwater discharges and achieve water quality objectives. The 2012 MS4 Permit provides Permittees an innovative approach to TMDL compliance through the development and implementation of EWMPs. The LACFCD joined the City of Malibu to form the NSMBCW Group in the development of an EWMP plan. The EWMP plan was approved in April 2016 by the Regional Board. The EWMP plan identified a suite of institutional and structural control measures, including multi-benefit regional projects to demonstrate Permittees' ultimate compliance with TMDLs. As part of the EWMP plan development process, various parcels were evaluated and ranked based on their technical feasibility and site ownership. Through this screening process, the proposed project was determined to be a priority multi-benefit regional project.

The proposed project would treat flows that drain to Topanga Canyon Creek, which drains to the North Santa Monica Bay. The proposed project would help address the TMDLs in the Santa Monica Bay by capturing and treating runoff from the developed tributary area to the proposed project, thereby reducing pollutants from reaching Topanga Canyon Creek and ultimately the North Santa Monica Bay.

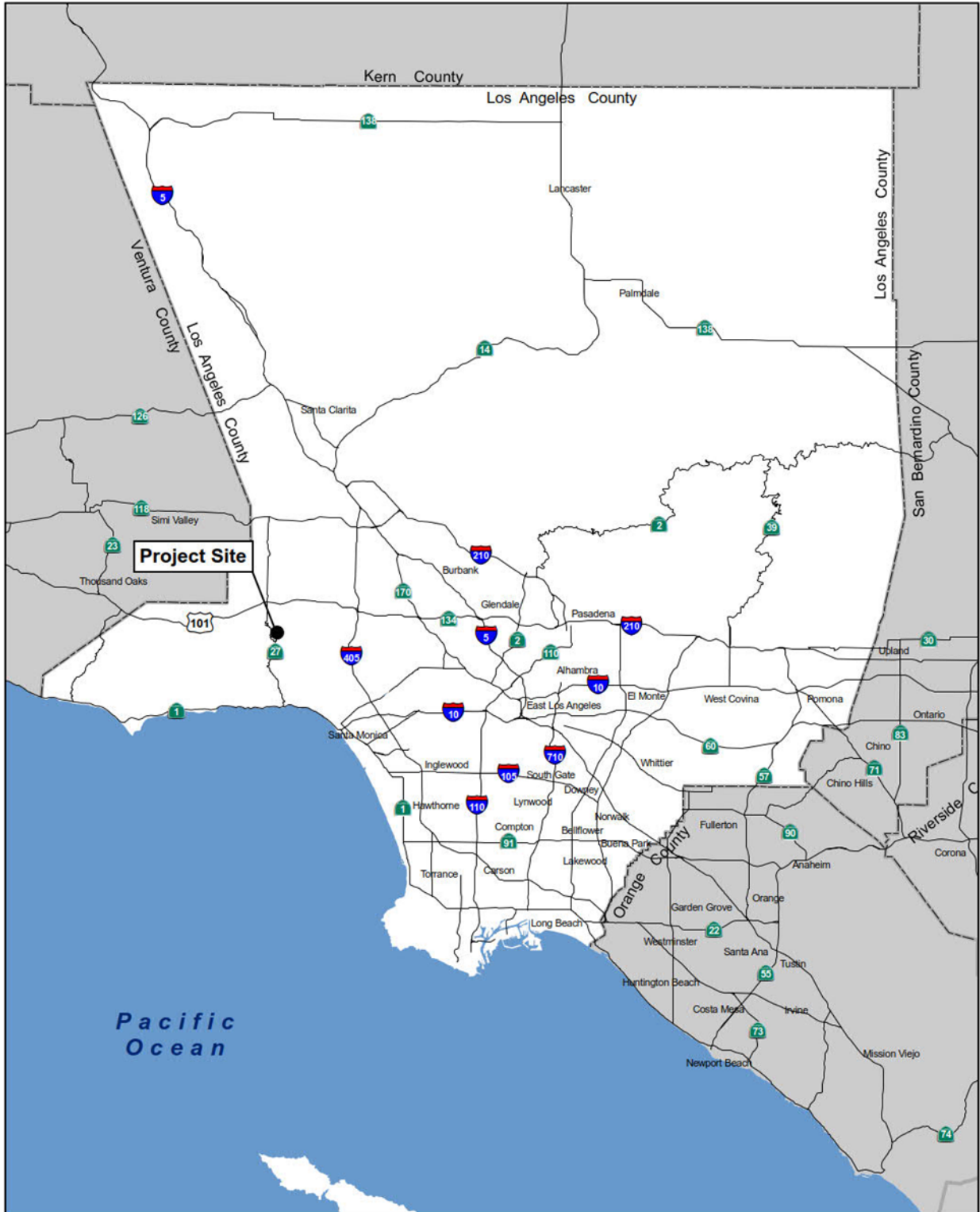
2.3 Project Location and Setting

The project site comprises several locations along and near Viewridge Road between Topanga Canyon Boulevard and Summit Pointe Drive in the unincorporated community of Topanga in western Los Angeles County. Work associated with the proposed project would occur on Viewridge Road, Hodler Drive, Chagall Road, and Voltaire Drive. In the project area, Viewridge Road contains an existing landscaped median between Hodler Drive and just west of Heidi Lane. The remainder of the roadways contain landscaped parkways. All project components would be located within the existing road rights-of-way (ROW) and/or parkways adjacent to the roadways. All portions of the project site are owned and maintained by the County, with the exception of the temporary construction staging along the east shoulder of Topanga Canyon Boulevard, which is California Department of Transportation (Caltrans) ROW.

Regional access to the project site is provided via Topanga Canyon Boulevard adjacent to the western boundary of the project; U.S. Route 101 (US 101), approximately 2.3 miles north of the project sites; State Route 1 (Pacific Coast Highway, SR 1), approximately 6.6 miles south of the project site; and Interstate 405 (I-405), approximately 6.8 miles east of the project site. Figure 1 shows the project location within the region and Figure 2 shows an aerial view of the project site.

The proposed project is located in the Topanga Canyon subwatershed, which is the largest subwatershed within the NSMBCW EWMP Area. It is a 12,611-acre subwatershed that is mostly undeveloped. There is little development near the shoreline other than Topanga Beach Park, a small commercial area, and a small (2-acre) maintenance facility zoned as industrial land use. The central and eastern areas of the subwatershed consist of undeveloped land, rural residential, low-density residential, commercial, public, equestrian, educational, and mixed urban land uses.

The project site is located within a low-density residential neighborhood characterized by single-family homes. Additionally, there are open space areas on the west side of Topanga Canyon Boulevard and to the south of Viewridge Road east of Heidi Lane. These open space areas provide recreational opportunities with hiking/walking trails.



Source: Esri Maps & Data, 2018

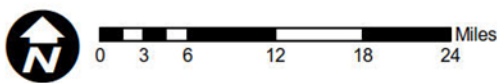
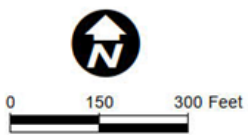


Figure 1
Regional Vicinity Map



Source: Esri, 2020



- Diversion Line to BMP
- Gravity Main
- Outlet to PD 2270
- Approximate BMP Location
- Electrical Controller
- Temporary Monitoring Equipment

Figure 2
Project Location Map

2.4 Project Objectives

The primary goals and objectives identified in the 2015 PEIR include:

- To collaborate among agencies (Permittee jurisdictions) across the watershed to promote more cost-effective and multi-beneficial water quality improvement projects to comply with the MS4 (Municipal Separate Storm Sewer System) Permit.
- To develop watershed-wide EWMPs that will, once implemented, remove or reduce pollutants from dry- and wet-weather urban runoff in a cost-effective manner.
- To reduce the impact of stormwater and non-stormwater on receiving water quality.

In accordance with these goals and objectives, the proposed project, which would utilize BMPs designed to capture stormwater for treatment, would comply with the MS4 Permit through the following:

- Water Quality: treat 33.46 acre-feet of stormwater per year.
- Environment: improve habitat by reducing discharged pollutants and reducing the effects of hydromodification.

2.5 Description of the Proposed Project

As previously discussed, the proposed project was identified by the EWMP Group as a priority regional project to reach permit compliance. The proposed project would help achieve permit compliance for TMDLs, Receiving Water Limitations, and Water Quality-Based Effluent Limitations through implementation of BMPs designed to capture stormwater for treatment. The proposed project is designed to capture stormwater for treatment and discharge to the existing storm drain at the project site. The proposed project would capture stormwater runoff from an 85th percentile, 24-hour storm event, and would divert urban and stormwater runoff from local unincorporated communities for flow-through treatment and discharge to the existing storm drain. The proposed project would also include Low Impact Development landscaping features and educational signage. The BMP components identified as part of the proposed project are described below.

Viewridge Road Median

As previously discussed, Viewridge Road currently contains an existing landscaped median between Hodler Drive and just west of Heidi Lane. The proposed project would create a new, approximately 850-foot-long raised median starting east of Heidi Lane to just west of Summit Pointe Drive. Some breaks may occur along the new median to allow for ease of access and maintenance. The number and location of breaks in the median would be determined during final design. Approximately 18 biofiltration units would be incorporated into the proposed median to capture runoff and stormwater, but the total number may change during final design but would not extend beyond the 850-foot median length. Water from the existing approximate 55-acre tributary area would reach the new median via a new diversion pipeline that would convey flows from the existing storm drain along Bellini Drive and Heidi Lane via a connection to the existing drain on Viewridge Road just east of its intersection with Heidi Lane. The new diversion line would convey water via gravity to a pretreatment system that would be installed

on the west end of the new median to pretreat the water by removing trash, sediment, and debris. Water would then flow through the biofiltration units to an 18-inch high density polyethylene pipe via gravity and discharge into an existing MS4 storm drain system located at the east end of Viewridge Road. Two electrical cabinets would be installed on the north side of Viewridge Road. The electrical cabinet located on the north side of Viewridge Road, east of Heidi Lane, would control the mechanical equipment in the new median, which includes a trash rack, slide gates, etc. The electrical cabinet located on the north side of Viewridge Road, west of Heidi Lane, would provide power to the electrical cabinet that controls the mechanical equipment. All components of this portion of the proposed project would be installed below ground with the exception of the median structure itself (curbs, etc.), electrical cabinets, and the landscaping elements (i.e., vegetation). To support monitoring equipment for sampling, two temporary cabinets would be installed aboveground within the new median, one of which will be equipped with a pole containing a rain gage and solar panel, and flow sensors and pressure transducers will be installed below ground. Temporary monitoring activities would occur during the first 3 to 5 years of project operations and monitoring will only be conducted for wet weather (storm) events. Routine maintenance activities would include periodic system cleanout activities, as well as landscaping maintenance, which would be conducted by the County.

Biofiltration Units – Viewridge Road, Hodler Drive, Chagall Road, and Voltaire Drive

Approximately 22 biofiltration units would be installed below ground at identified locations on the parkways along Viewridge Road, Hodler Drive, Chagall Road, and Voltaire Drive. One of the proposed 22 biofiltration units will be installed in the road ROW on Viewridge Road just east of Topanga Canyon Boulevard. Runoff and stormwater entering these units would flow into a pretreatment chamber that would separate larger sediments and debris before entering a filtration chamber which would reduce the target pollutants before discharging from the unit via gravity into the existing storm drain system. Existing landscaping would be replaced with new drought tolerant landscaping once the biofiltration units are installed. Temporary monitoring cabinets for stormwater sampling equipment would be installed at four locations, as shown on Figure 2: one approximately 6-foot long by 3-foot wide and 3-foot high cabinet would be installed on the southeast corner of Viewridge Road and Hodler Drive; one approximately 4-foot long by 3-foot wide and 4-foot high cabinet on the south side of Viewridge Road just east of Topanga Canyon Boulevard; one approximately 4-foot long by 3-foot wide and 4-foot high cabinet on the south side of Chagall Road just west of Schweitzer Drive; and one approximately 4-foot long by 3-foot wide by 4-foot high cabinet would be installed on the south side of Chagall Road just east of Schweitzer Drive. These cabinets would be removed by the County after the monitoring activities are completed (3 to 5 years). In addition, two permanent electrical cabinets would be installed to provide power for the temporary monitoring cabinets: one electrical cabinet would be installed on the south side of Viewridge Road just east of Topanga Canyon Boulevard, and one electrical cabinet would be installed on the south side of Chagall Road just west of Voltaire Drive. Maintenance of the biofiltration units would require routine system cleanout activities and periodic replacement of the filter cartridges, which would be conducted by the County.

2.6 Construction Schedule and Procedures

Construction of the proposed project is anticipated to begin in summer 2022 and take up to nine months to complete, concluding spring 2023. Construction is anticipated to occur Monday through Friday from 7:00 a.m. to 3:30 p.m. (one shift per day). No construction is expected on weekends or holidays. This construction schedule may differ from the selected contractor's

schedule depending on the contractor's equipment and personnel resources, and the construction contractor would be responsible for coordinating with County prior to and during construction.

The proposed project would be constructed completely within the existing road ROW and/or parkways adjacent to the roadways. All portions of the project site are owned and maintained by the County, with the exception of landscaped parkways, which are owned by the County but may be maintained by the homeowners. Construction staging is expected to occur on the east shoulder of Topanga Canyon Road within Caltrans ROW. The project footprint is estimated to be approximately 0.50 acres.

Viewridge Road Median

Installation of the new median on Viewridge Road would occupy a space in the road currently demarcated as a median with striping. The existing asphalt would be removed, and the area would be excavated up to approximately 20 feet below the ground surface to accommodate the installation of the pretreatment unit, the biofiltration units, and associated connecting drains.

The approximately 18-inch diversion pipeline would require excavation of a trench approximately 5 feet wide by 20 feet deep within the existing ROW on Viewridge Road. As partial lane closures would be needed to install the diversion line and construct the new median, development and implementation of a traffic control plan would be required.

Biofiltration Units – Viewridge Road, Hodler Drive, Chagall Road, and Voltaire Drive

Approximately 22 biofiltration units would be installed at various locations on Viewridge Road, Hodler Drive, Chagall Road, and Voltaire Drive. Installation of these units would require excavation of pits. Final BMP dimensions would be determined during final design; however anticipated dimensions are provided below. The proposed locations and dimensions of the BMPs from west to east within the project footprint are as follows:

Viewridge Road:

- North side of Viewridge Road just east of Topanga Canyon Boulevard: 2 units – approximately 10 feet wide by 26 feet long by 10 feet deep
- South side of Viewridge Road just west of Hodler Drive: 1 unit – approximately 5 feet wide by 20 feet long by 6 feet deep
- South side of Viewridge Road just east of Hodler Drive: 1 unit - approximately 5 feet wide by 30 feet long by 8 feet deep

Hodler Drive:

- East side of Hodler Drive between Viewridge Road and Chagall Road: 5 units – approximately 5 feet wide by 22 feet long by 8 feet deep
- West side of Hodler Drive between Viewridge Road and Chagall Road: 1 unit – approximately 5 feet wide by 20 feet long by 6 feet deep

- West side of Hodler Drive across from the corner of Chagall Road and Hodler Drive: 1 unit – approximately 5 feet wide by 20 feet long by 6 feet deep

Voltaire Drive:

- West side of Voltaire Drive just south of Chagall Road: 3 units (at 2 locations) – approximately 5 feet wide by 22 feet long by 8 feet deep
- East side of Voltaire Drive south of Chagall Road: 2 units (at 2 locations) – 1 unit approximately 5 feet wide by 20 feet long by 5 feet deep; and 1 unit approximately 5 feet wide by 22 feet long by 8 feet deep

Chagall Road:

- South side of Chagall Road just west of Schweitzer Drive (2 units): 1 unit approximately 5 feet wide by 16 feet long by 6 feet deep; and 1 unit approximately 5 feet wide by 18 feet long by 6 feet deep
- North side of Chagall Road at its eastern terminus just west of the cul-de-sac: 2 units approximately 5 feet wide by 14 feet long by 6 feet deep
- South side of Chagall Road at its eastern terminus just west of the cul-de-sac: 2 units- 1 unit approximately 5 feet wide by 20 feet long by 6 feet deep, and 1 unit approximately 5 feet wide by 22 feet long by 6.5 feet deep

Existing landscaping and/or vegetation in the parkways would be removed prior to excavation. The biofiltration units would connect to the existing storm drain system or adjacent catch basin. A hatch would be installed at grade level above the unit to provide access for maintenance purposes. Once the biofiltration units are installed, existing landscaping on the parkway would be replaced with new drought tolerant landscaping. No permanent modifications to the roads, sidewalks, or curbs would be required for this component of the proposed project.

Best Management Practices

An appropriate combination of monitoring and resource impact avoidance would be employed during all the construction activities, including implementation of the following BMPs:

- The proposed project would implement Rule 403 fugitive dust control measures required by the South Coast Air Quality Management District (SCAQMD), which requires reasonable precautions to be taken to prevent visible particulate matter from being airborne, under normal wind conditions, beyond the property from which the emission originates. Reasonable precautions include, but are not limited to the following:
 1. Application of water on dirt roads, material stockpiles, and other surfaces that can give rise to airborne dusts; and
 2. Maintenance of roadways in a clean condition.
- The proposed project would implement erosion control BMPs where necessary that may include, but not be limited to, the following:

1. Minimizing the extent of disturbed areas and duration of exposure
 2. Stabilizing and protecting disturbed areas
 3. Keeping runoff velocities low
 4. Retaining sediment within the construction area
 5. Use of silt fences or straw wattles
 6. Temporary soil stabilization
 7. Temporary drainage inlet protection
 8. Temporary water diversion around immediate work area
 9. Minimizing debris from construction vehicles on roads providing construction access
- The proposed project would implement Rule 402 measures required by the SCAQMD, which prohibits the discharge from any source whatsoever, such quantities of air contaminants or other materials that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such persons or the public or that cause or have a natural tendency to cause injury or damage to business or property.
 - The County would ensure all construction crews have fire-suppression equipment (such as fire extinguishers) on site to respond to the accidental ignition of a fire.
 - Spill kits will be available onsite for potential leaks or spills of hazardous materials.
 - Per Municipal Code Section 12.08.570(H), the improvements proposed for the project would be exempt from the County's noise ordinance. Nonetheless, the County would minimize short-term construction noise through: (1) proper maintenance and tuning of all construction equipment engines to minimize noise emissions; and (2) proper maintenance and functioning of the mufflers on all internal combustion and equipment engines.
 - The County would coordinate with emergency response agencies, including but not limited to the Los Angeles County Fire Department and Los Angeles County Sheriff's Department, during final design to ensure that emergency access is maintained during implementation of the proposed Project.

CHAPTER 3

EVALUATION OF ENVIRONMENTAL IMPACTS

The certified 2015 PEIR prepared for the overall program included analyses consistent with the checklist contained in Appendix G of the 2015 version of the CEQA Guidelines. The CEQA Guidelines Appendix G checklist was subsequently updated in 2019, and now includes new and/or revised thresholds, as well as additional environmental topics to be assessed. This chapter is organized to include analyses consistent with those environmental topics presented in the 2015 PEIR, as well as new environmental topics that were added in the 2019 CEQA Guidelines Appendix G update. Section 3.1 presents the analyses of the 2015 PEIR environmental topics and Section 3.2 presents analyses of the new environmental topics added in the 2019 CEQA Guidelines update that were not previously covered in the PEIR, including tribal cultural resources and wildfire.

3.1 2015 PEIR Environmental Topics

The following evaluation assesses the project-specific impacts of the proposed project in light of the analysis completed in the 2015 PEIR. Determinations are made as to whether the proposed project would result in new significant impacts or substantially more severe effects, which trigger the need for a Subsequent or Supplemental EIR. As the checklist contained in Appendix G of the CEQA Guidelines was updated in 2019 after the release of the 2015 PEIR, the analysis in this section includes an assessment of the project based on the checklist in the PEIR, and is then followed by a discussion of new or updated impact thresholds found in the current checklist and a determination of the proposed project's impacts regarding these changes.

Issues and Supporting Data Sources	Was Impact Analyzed Prior Environmental Document(s)?	Do Project Modifications Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigation's Implemented or Address Impact?
I. AESTHETICS. Would the project:					
a. Have a substantial adverse effect on a scenic vista?	Yes	No	No	No	Yes
b. Substantially damage scenic resources, including, but not limited to trees, rock outcroppings and historic buildings within a state scenic highway?	Yes	No	No	No	N/A
c. Substantially degrade the existing visual character or quality the site and its surroundings?	Yes	No	No	No	Yes
d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	Yes	No	No	No	N/A

Discussion:*Environmental Setting:*

The project site is located in the unincorporated community of Topanga in western Los Angeles County, in the North Santa Monica Bay EWMP and Santa Monica Mountains North Area Plan (SMMNAP) area.¹ The SMMNAP area encompasses 32.2 square miles that consists of a group of communities surrounded by steep mountains, rolling hills, canyons, streams, and oak woodlands. The Santa Monica Mountains are recognized as one of the area's natural scenic resources. There are also a number of local and regional recreation trails and scenic driving routes in the area, including three County Scenic Highways: Mulholland Highway, Malibu Canyon-Las Virgenes Road and Topanga Canyon Boulevard. The portion of Topanga Canyon Boulevard near the project site is an Eligible State Scenic Highway; however, it has not been officially designated by the California Department of Transportation (Caltrans).²

The project area is generally characterized by low-density residential uses and open spaces on the west side of Topanga Canyon Boulevard and to the south of Viewridge Road east of the Heidi Lane. Viewridge Road contains a landscaped median between Hodler Drive and just west of Heidi Lane. All project components would be located within the existing road ROW and/or parkways adjacent to the roadways. All portions of the project site are owned and

¹ Los Angeles County Department of Regional Planning. Draft Santa Monica Mountains North Area Plan, October 2018. Available at: http://planning.lacounty.gov/assets/upl/project/smmnap_plan-20181001.pdf, accessed July 8, 2019.

² State of California Department of Transportation. *State Scenic Highway Program*. Available at: http://www.dot.ca.gov/hq/LandArch/scenic_highways/scenic_hwy.htm, accessed May 6, 2019.

maintained by the County with the exception of the construction staging area on the east side of Topanga Canyon Boulevard, which is located on Caltrans ROW. The project area is located in a rural outdoor lighting district,³ which regulates uses of outdoor lighting for safety and security, promotes dark skies for enjoyment and health of humans and wildlife, and conserves energy and resources.⁴

PEIR Checklist Analysis

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

Scenic vistas are typically categorized as either panoramic views (visual access to a large geographic area) or focal views (visual access to a particular object, scene, setting, or feature of interest). The PEIR determined that impacts related to scenic vistas would be less than significant with mitigation, which requires aboveground structures be designed to be consistent with local zoning codes and minimize features that contrast with neighboring development.

As described above, the area surrounding the community which the project site is located in is characterized by scenic vistas that include the Santa Monica Mountains. However, the project site itself is not located within a scenic vista, and all construction activities would be located in the existing road ROW and/or parkways adjacent to the roadways. Construction equipment may be staged along Topanga Canyon Boulevard along the east side adjacent to the existing wall but will not impede any homeowner or driver views which are located to the west of Topanga Canyon Boulevard. Further, given the temporary nature of construction, any construction-related impacts to scenic vistas would be considered less than significant, similar to the PEIR. The proposed project involves the installation of water quality BMPs and associated landscaping features in the project area. The only permanent above-ground components of the project would be a new landscaped median and two electrical cabinets that would house electrical equipment. Additionally, two temporary monitoring cabinets would be installed above ground to house monitoring equipment. These temporary cabinets would be removed after 3 to 5 years by County. The electrical and temporary monitoring cabinets would not block views of or toward the nearby canyon. Nonetheless, the proposed project would comply with mitigation measure AES-1 for the approved program, which requires aboveground structures be designed to be consistent with local zoning codes and minimize features that contrast with neighboring development. Similar to the approved program, impacts to scenic vistas would be less than significant with mitigation measure AES-1. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

AES-1 Aboveground structures shall be designed to be consistent with local zoning codes and applicable design guidelines and to minimize features that contrast with neighboring development.

³ Los Angeles County Department of Regional Planning, GIS-NET, available online at: http://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public, accessed July 8, 2019.

⁴ Los Angeles County Department of Regional Planning. Overview of Rural Outdoor Lighting District Ordinance. Available at: http://planning.lacounty.gov/assets/upl/data/ord_outdoor-lighting-overview.pdf, accessed July 8, 2019.

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

The PEIR determined that impacts related to scenic resources would be less than significant with implementation of mitigation measure AES-1, which requires aboveground structures be designed to avoid obstructing scenic vistas or views from public vantage points. As described above, Topanga Canyon Boulevard is a County scenic highway; however, no construction would occur on Topanga Canyon Boulevard and although equipment will be staged within the Caltrans ROW, it will be located along the east side of the roadway and adjacent to an existing wall, and will not impede any homeowner or driver views towards the west. Further, given the temporary nature of construction, any construction-related impacts to scenic resources would be considered less than significant, similar to the PEIR. None of the roadways within the project site, including Viewridge Road, Hodler Drive, Voltaire Drive, or Chagall Road are designated state scenic highways. Therefore, no impact to scenic highways would occur. No mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

c. Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

The PEIR determined that impacts related to visual character and quality would be less than significant with mitigation which requires aboveground structures be designed to be consistent with local zoning codes and minimize features that contrast with neighboring development, and BMP maintenance plans be developed. Similar to the approved program, the proposed project would introduce construction equipment to the project site, which would introduce contrasting features to the visual landscape. However, construction activities would be temporary and would result in less than significant impacts to visual character and quality. As previously discussed, the only permanent above-ground components of the proposed project would be a new landscaped median, two electrical cabinets that would house electrical equipment, and two temporary cabinets to house monitoring equipment. These temporary cabinets would be removed after 3 to 5 years. As discussed in the PEIR, small aboveground supporting ancillary facilities would have no significant effect on the visual character of the area. The proposed project would not block views of or toward the nearby canyon. Once operational, the County would maintain the BMPs. Consistent with the approved program, the proposed project would implement mitigation measure AES-2, which requires the development of a BMP maintenance plan that includes measures to ensure functionality of the structural BMPs for the life of the BMP. Similar to the approved program, impacts to visual character or scenic quality would be less than significant with mitigation measure AES-2. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

AES-2 Implementing agencies shall develop BMP maintenance plans that are approved concurrently with each structural BMP approval. The maintenance plans must include measures to ensure functionality of the structural BMPs for the life of the BMP. These plans may include general

maintenance guidelines that apply to a number of smaller distributed BMPs.

d. Would the project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

The PEIR determined that impacts associated with light and glare would be less than significant. Consistent with the approved program, no nighttime work is anticipated that would require nighttime lighting during construction outside of the hours established by the County's noise ordinance (7:00 a.m. to 7:00 p.m., Monday through Friday). The proposed project would not include new street lighting along the roadways. Similar to the approved program, the proposed project would result in less than significant impacts associated with light and glare, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

Updated CEQA Checklist Analysis

Under the 2019 CEQA Guidelines Appendix G checklist, threshold (c) of the 2015 checklist has been expanded to consider a project's potential to conflict with applicable zoning and other regulations governing scenic quality if the project is located in an urbanized area. As previously discussed in Section 2.3, the project site is located in a low-density residential neighborhood surrounded by open space areas used for recreation, and is within the Topanga Canyon subwatershed, which is largely undeveloped. Nonetheless, there is some low-density residential development in the project area. The locations of the project components would be limited to the existing road ROW and/or parkways adjacent to the roadways. As discussed in the above assessment, mitigation measure AES-1 would ensure that aboveground structures proposed by the project be consistent with local zoning codes and applicable design guidelines and designed in a manner which minimizes features that contrast with neighboring development. Therefore, impacts related to scenic quality under the updated Appendix G checklist would be less than significant with implementation of the proposed project. As such, the proposed project would not have any additional impacts on aesthetics, and no new mitigation measures are required. The findings for the proposed project remain consistent with the impact determinations identified in the PEIR for the approved program.

AES-1 Refer to mitigation measure language above.

Issues and Supporting Data Sources	Was Impact Analyzed Prior Environmental Document(s)?	Do Project Modifications Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
II. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the Project:					
a. Conflict with or obstruct implementation of the applicable air quality plan?	Yes	No	No	No	N/A
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	Yes	No	No	No	N/A
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	Yes	No	No	No	N/A
d. Expose sensitive receptors to substantial pollutant concentrations?	Yes	No	No	No	N/A
e. Create objectionable odors affecting a substantial number of people?	Yes	No	No	No	Yes

Discussion:*Environmental Setting:*

This analysis is based on the Air Quality Impact Assessment prepared for the proposed project (Appendix A). Air quality is characterized by ambient air concentrations of seven specific pollutants identified by the United States Environmental Protection Agency (USEPA) to be of concern with respect to health and welfare of the general public. These specific pollutants, known as "criteria air pollutants," are pollutants for which the federal and State governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. The federal ambient concentration criteria are known as the National Ambient Air Quality Standards (NAAQS), and the California ambient concentration criteria are referred to as the California Ambient Air Quality Standards (CAAQS). Federal criteria air

pollutants include ground-level ozone (O_3), nitrogen oxides (NO_x), carbon monoxide (CO), sulfur oxides (SO_x), respirable particulate matter ten microns or less in diameter (PM_{10}), fine particulate matter 2.5 microns or less in diameter ($PM_{2.5}$), and lead (Pb).

The SCAQMD has jurisdiction over a total area of 10,743 square miles, consisting of the South Coast Air Basin (SCAB), which comprises 6,745 square miles including Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties, and the Riverside County portion of the Salton Sea and Mojave Desert Air Basins.

The project site is located in the unincorporated community of Topanga, which is situated in the SCAB portion of Los Angeles County and is within the jurisdiction of the SCAQMD. Sensitive receptors within the project area include single-family residences located adjacent to proposed construction activities.

PEIR Checklist Analysis

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

The PEIR determined that impacts related to consistency with air quality plans would be less than significant. The following analysis addresses the consistency with applicable SCAQMD and Southern California Association of Governments (SCAG) policies, including the SCAQMD's 2016 Air Quality Management Plan (AQMP) and growth projections within the SCAG's 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). In accordance with the procedures established in the SCAQMD's CEQA Air Quality Handbook, the following criteria are required to be addressed in order to determine the consistency with applicable SCAQMD and SCAG policies:

- Would the project result in any of the following?
 - An increase in the frequency or severity of existing air quality violations; or
 - Cause or contribute to new air quality violations; or
 - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- Would the project exceed the assumptions utilized in preparing the AQMP?
 - Is the project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
 - Does the project include air quality mitigation measures; or
 - To what extent is project development consistent with the AQMP land use policies?

With respect to the first criterion, as discussed below, localized concentrations of nitrogen dioxide as NO_x , CO, PM_{10} , and $PM_{2.5}$ have been analyzed for the proposed project. Sulfur dioxide (SO_2) emissions, assessed as SO_x within the SCAQMD thresholds, would be negligible during construction, and, therefore, would not have the potential to cause or affect a violation of the SO_2 ambient air quality standard. Since volatile organic compounds (VOCs) are not a criteria pollutant, there is no ambient standard or localized threshold for VOCs. Due to the role VOCs play in ozone

formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

NO₂, CO, PM₁₀, and PM_{2.5} emissions were analyzed in order to: (1) ascertain potential effects on localized concentrations; and (2) determine if there is a potential for such emissions to cause or affect a violation of the ambient air quality standards. Localized emissions would not exceed the SCAQMD-recommended localized thresholds.

With respect to the determination of consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2016–2040 RTP/SCS regarding population, housing, and growth trends. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis with respect to each of these three criteria.

- Is the project consistent with the population, housing, and employment growth projections upon which AQMP forecasted emission levels are based?

Implementation of the proposed project would not introduce new land uses to the project area, and therefore population, housing, and employment projections for the region would not be affected. The proposed project would not have any potential to result in growth that would exceed the projections incorporated into the AQMP or the 2016–2040 RTP/SCS.

- Does the project implement feasible air quality mitigation measures?

The proposed project would comply with all applicable regulatory standards (e.g., SCAQMD Rules 402 and 403) as required by the SCAQMD. As demonstrated in this analysis, the proposed project would not result in significant air quality impacts and no mitigation measures are required to reduce emissions. As such, the proposed project meets this AQMP consistency criterion.

- To what extent is project development consistent with the land use policies set forth by the County of Los Angeles?

The proposed project would be consistent with the Los Angeles County 2035 General Plan, which does not address air quality emissions associated with stormwater infrastructure improvements. Similar to the approved program, the proposed project would not interfere with air pollution control measures listed in the 2016 AQMP and would not conflict with the goals of the General Plan Air Quality Element.

Similar to the approved program, the proposed project would result in less than significant impacts, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

b. Would the project violate any air quality standard or contribute substantially to an existing or project air quality violation?

The PEIR determined that, for BMPs that may result in significant air emissions, mitigation measures AIR-1 and AIR-2 would be required to reduce construction emissions to less than significant levels. As discussed in the PEIR, impacts from construction emissions would remain significant and unavoidable for some of the larger projects as there are no other feasible mitigation measures available to reduce these impacts at this program level; impacts from operational emissions would be less than significant.

Construction of the proposed project would have a potentially significant air quality impact under this criterion if maximum daily emissions of any regulated pollutant exceeded the applicable SCAQMD air quality significance thresholds presented in Table 1. Daily emissions of regulated pollutants were quantified for each phase of construction activity. The estimate of fugitive dust emissions account for Rule 403 compliance. Examples of Rule 403 compliance include: a) All exposed areas will be frequently watered to reduce the generation of dust, and b) Vehicle speed of construction vehicles/equipment in exposed areas (i.e., unpaved access) shall be reduced to reduce the generation of dust.

Table 1. SCAQMD Air Quality Significance Thresholds – Mass Daily Emissions

Pollutant	VOC	NO_x	CO	SO_x	PM₁₀	PM_{2.5}
Regional Threshold (lb/day)	75	100	550	150	150	55
Localized Threshold (lb/day)	--	147	827	--	6	4

Note: LST values selected for two-acre daily disturbance based on equipment inventory and 25-meter receptor distance in SRA 2.

Source: SCAQMD, 2019.

Table 2 shows a comparison of the maximum daily emissions during each phase of construction to the applicable SCAQMD air quality significance thresholds. Maximum daily emissions of air pollutants that would be generated by proposed project construction activities would not exceed any applicable regional or localized threshold values.

Table 2. Estimated Daily Construction Emissions

Phase	Daily Emissions (Pounds Per Day)					
	VOC	NO_x	CO	SO_x	PM₁₀	PM_{2.5}
Site Preparation						
On-Site Emissions	0.6	6.1	7.0	<0.1	0.4	0.3
Off-Site Emissions	0.2	5.9	1.7	<0.1	0.5	0.1
<i>Total</i>	<i>0.9</i>	<i>12.0</i>	<i>8.7</i>	<i><0.1</i>	<i>0.9</i>	<i>0.5</i>
Grading						
On-Site Emissions	1.0	10.9	5.3	<0.1	3.8	2.2
Off-Site Emissions	0.2	5.9	1.9	<0.1	0.5	0.1
<i>Total</i>	<i>1.2</i>	<i>16.8</i>	<i>13.1</i>	<i><0.1</i>	<i>1.1</i>	<i>0.8</i>
Building Construction						
On-Site Emissions	1.3	10.6	11.2	<0.1	0.6	0.6
Off-Site Emissions	0.3	5.9	1.9	<0.1	0.5	0.2
<i>Total</i>	<i>1.6</i>	<i>16.5</i>	<i>13.1</i>	<i><0.1</i>	<i>1.1</i>	<i>0.8</i>

Table 2. Estimated Daily Construction Emissions

Phase	Daily Emissions (Pounds Per Day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Regional Analysis						
Maximized Regional Daily Emissions	1.6	16.8	13.1	<0.1	4.3	2.3
Regional Significance Threshold	75	100	550	150	150	55
Exceed Regional Threshold?	No	No	No	No	No	No
Localized Analysis						
Maximized Localized Daily Emissions	--	10.9	11.2	--	3.8	2.2
Localized Significance Threshold	--	147	827	--	6	4
Exceed Localized Threshold?	--	No	No	--	No	No

Source: TAHA, 2019.

The proposed project would result in less than significant impacts, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

- c. **Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?**

The PEIR determined a significant and unavoidable impact related to cumulative emissions even with implementation of mitigation measures AIR-1 and AIR-2. Mitigation measure AIR-1 requires the use of low-emission equipment meeting Tier II emissions standards at a minimum, and mitigation measure AIR-2 requires contractors use lower-emission equipment where appropriate.

The SCAB is designated as nonattainment of the CAAQS and NAAQS for O₃, PM₁₀, and PM_{2.5}. Therefore, there is an ongoing regional cumulative impact associated with these air pollutants. Taking into account the existing environmental conditions, the SCAQMD propagated guidance that an individual project can emit allowable quantities of these pollutants on a regional scale without significantly contributing to the cumulative impacts. As discussed above and shown in Table 2, air pollutant emissions associated with construction of the proposed project would not exceed any applicable SCAQMD air quality thresholds of significance. Despite the region being in nonattainment of the ambient air quality standards for O₃, PM₁₀, and PM_{2.5}, the SCAQMD does not consider individual project emissions of lesser magnitude than the mass daily thresholds to be cumulatively considerable. The proposed project would not result in a cumulatively considerable net increase of nonattainment pollutants. Therefore, the impact would be less than significant, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

- d. **Would the project expose sensitive receptors to substantial pollutant concentrations?**

The PEIR determined that for large construction efforts, impacts related to sensitive receptors would be less than significant with mitigation, which requires a project-specific localized significance threshold (LST) analysis to be conducted where

necessary to determine local health impacts to neighboring land uses. The mitigation further requires that the project reduce its daily construction intensity to a level where the project's construction emissions would no longer exceed the SCAQMD's LST or result in pollutant emissions that would cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards.

The SCAQMD devised its LST values to prevent the occurrence of localized hot spots of criteria pollutant concentrations at sensitive receptor locations surrounding the project site. The LST values were determined using emissions modeling based on ambient air quality measured throughout the SCAB. If maximum daily emissions remain below the LST values during construction activities, it is highly unlikely that air pollutant concentrations in ambient air would reach substantial levels sufficient to create public health concerns for sensitive receptors. As shown in Table 2, maximum daily emissions of criteria pollutants and O₃ precursors from sources located on the project site would not exceed any applicable LST values. Therefore, construction of the proposed project would not result in exposure of sensitive receptors to substantial concentrations of criteria pollutants.

With regards to emissions of air toxics, carcinogenic risks, and non-carcinogenic hazards, the use of heavy-duty construction equipment and haul trucks during construction activities would release diesel PM to the atmosphere through exhaust emissions. Diesel PM is a known carcinogen, and extended exposure to elevated concentrations of diesel PM can increase excess cancer risks in individuals. However, carcinogenic risks are typically assessed over timescales of several years to decades, as the carcinogenic dose response is cumulative in nature. Short term exposures to diesel PM would have to involve extremely high concentrations in order to exceed the SCAQMD Air Quality Significance Threshold of 10 excess cancers per million.

Over the course of construction activities, average diesel PM emissions from on-site equipment would be approximately 0.52 pounds per day on workdays, and 0.38 pounds per day including non-workdays. Therefore, it is highly unlikely that diesel PM concentrations would be of any public health concern during the nine-month construction period, and diesel PM emissions would cease upon completion of construction activities. Therefore, the impact would be less than significant, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

e. Would the project create objectionable odors affecting a substantial number of people?

The PEIR determined that impacts related to odors would be less than significant with mitigation, which requires agencies to prepare and implement maintenance plans for all BMPs installed (refer to mitigation measure AES-2 in the Aesthetics section), and assess the potential for nuisance odors. The analysis contained herein is consistent with mitigation measure AIR-4 of the PEIR, which requires an assessment for the potential for nuisance odors, and prioritizes BMPs that minimize odors when in close proximity to sensitive receptors. Potential sources that may emit odors during construction activities include equipment exhaust. Odors from these sources would be localized and generally confined to the immediate area surrounding the proposed project. The proposed project would utilize typical construction techniques, and the

odors would be typical of most construction sites and temporary in nature. During operation, the proposed project is not anticipated to generate odors. Therefore, similar to the approved program, impacts related to odors would be less than significant with mitigation measures AES-2 and AIR-4. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

AES-2 Refer to mitigation measure AES-2 in Section I - Aesthetics.

AIR-4 During planning of structural BMPs, implementing agencies shall assess the potential for nuisance odors to affect a substantial number of people. BMPs that minimize odors shall be considered the priority when in close proximity to sensitive receptors.

Updated CEQA Checklist Analysis

The 2019 CEQA Guidelines Appendix G checklist no longer includes threshold (b) of the 2015 checklist as part of the impact analysis for air quality. All other thresholds remain as written in the 2015 checklist version and no new thresholds have been added to this checklist section. As such, the proposed project would not have any additional impacts on air quality, and no new mitigation measures are required. The findings for the proposed project remain consistent with the impact determinations identified in the PEIR for the approved program.

Issues and Supporting Data Sources	Was Impact Analyzed Prior Environmental Document(s)?	Do Project Modifications Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
III. BIOLOGICAL RESOURCES. Would the Project:					
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?	Yes	No	No	No	Yes
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	Yes	No	No	No	N/A
c. Have a substantial adverse effect on state or federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Yes	No	No	No	N/A
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Yes	No	No	No	N/A

Issues and Supporting Data Sources	Was Impact Analyzed Prior Environmental Document(s)?	Do Project Modifications Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
III. BIOLOGICAL RESOURCES. Would the Project:					
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Yes	No	No	No	N/A
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	Yes	No	No	No	N/A

Discussion:

This analysis is based on the Biological and Water Resources Reviews prepared for the proposed project (Appendix B). The California Natural Diversity Data Base (CNDDDB)⁵ and the California Native Plant Society's (CNPS) on-line Inventory of Rare and Endangered Plants of California⁶ were reviewed for the most recent distribution information for special-status plant and wildlife species and sensitive natural communities within the Canoga Park quadrangle and surrounding eight quadrangles. Additionally, the U.S. Fish and Wildlife Service's (USFWS) Information for Planning and Conservation (IPaC) on-line environmental review process⁷ was queried for the project area. On April 30, 2019, a field assessment of the project site was conducted to review the locations of the proposed project elements and document existing biological resources that occur or have the potential to occur on-site.

Environmental Setting:

The project site comprises several locations along and near Viewridge Road between Topanga Canyon Boulevard and Summit Pointe Drive. Work associated with the proposed project would occur on Viewridge Road, Hodler Drive, Chagall Road, and Voltaire Drive. Topanga Canyon Creek and riparian habitat along it occur approximately 150 feet south of

⁵ CDFW. 2019. California Natural Diversity Data Base (CNDDDB). Full condensed report for Canoga Park, Beverly Hills, Calabasas, San Fernando, Malibu Beach, Topanga, Santa Susana, Oat Mountain, and Van Nuys quadrangles. Generated July 26, 2019.

⁶ CNPS. 2019. Rare Plant Program. Inventory of Rare and Endangered Plants (online edition, v8-02). California Native Plant Society. Sacramento, CA. Available at <http://www.cnps.org/inventory>. Accessed July 26, 2019.

⁷ USFWS. 2019. Information for Planning and Conservation (IPaC). Available at <https://ecos.fws.gov/ipac/>. Accessed November 28, 2018.

Viewridge Boulevard; however, no elements of the project coincide with the stream and riparian habitat.

Vegetation Communities and Plants. No native plant communities occur where proposed project elements would be installed. Plants occurring around the project elements are generally common southern California ornamental species associated with residential development, including native and nonnative trees and shrubs such as pine, palm, eucalyptus, cypress, olive, oak, pepper, and bottle-brush trees.

Wildlife. Wildlife species observed within the project site and surrounding area included California towhee (*Melospiza crissalis*), house finch (*Haemorhous mexicanus*), house wren (*Troglodytes aedon*), collared dove (*Streptopelia decaocto*), rock pigeon (*Columba livia*), western gull (*Larus occidentalis*), Cooper's hawk (*Accipiter cooperii*), red-tailed hawk (*Buteo jamaicensis*), red-shouldered hawk (*Buteo lineatus*), turkey vulture (*Cathartes aura*), desert cottontail (*Sylvilagus audubonii*), western fence lizard (*Sceloporus occidentalis*), and alligator lizard (*Elgaria multicarinata*).

Wildlife Corridors. The project site is located in a developed area and does not coincide with an established regional wildlife corridor, nor does the project area likely serve as a significant local corridor. Riparian habitat occurring along Topanga Canyon Creek south of Viewridge Road may provide a corridor for local movement between the project area and the coastline approximately 6.5 miles to the south, and open/green space between the project and coastline. The riparian corridor likely provides suitable opportunities for wildlife cover, resting, foraging, and nesting. Ornamental trees surrounding the project elements may also provide some opportunities for cover, resting, foraging, and nesting to localized bird populations; however, they do not provide functions as a significant wildlife movement corridor.

Special-Status Plant Species.

A total of 54 special-status plant species were identified from a search of the CNDDDB⁸ (CDFW 2019a) and CNPS⁹ databases for the Canoga Park and surrounding eight quadrangles, and from the IPaC environmental review.¹⁰ Fifteen plant species identified from the CNDDDB, CNPS inventory, and IPaC are protected under Federal Endangered Species Act (FESA) and/or California Endangered Species Act (CESA).

No historical records of any special-status plant species coincide directly with the project; however, two records in the CNDDDB coincide with Topanga Canyon Creek, which lies just west of the project, along the west side of Topanga Canyon Road. Included are a record of Braunton's milk-vetch and white-veined monardella (*Monardella hypoleuca* ssp. *hypoleuca*; CRPR 1B.3), both of which stretch along Topanga Canyon Creek from the project area south for approximately 6.5 miles to the canyon's estuary at the coastline. Records of Santa Monica dudleya and slender mariposa-lily (*Calochortus clavatus* var. *gracilis*; CRPR 1B.2) also

⁸ CDFW. 2019. California Natural Diversity Data Base (CNDDDB). Full condensed report for Canoga Park, Beverly Hills, Calabasas, San Fernando, Malibu Beach, Topanga, Santa Susana, Oat Mountain, and Van Nuys quadrangles. Generated July 26, 2019.

⁹ CNPS. 2019. Rare Plant Program. Inventory of Rare and Endangered Plants (online edition, v8-02). California Native Plant Society. Sacramento, CA. Available at <http://www.cnps.org/inventory>. Accessed July 26, 2019.

¹⁰ USFWS. 2019. Information for Planning and Conservation (IPaC). Available at <https://ecos.fws.gov/ipac/>. Accessed November 28, 2018.

coincide with Topanga Canyon Creek; however, these occurrences are from four miles south of the project.

No USFWS-designed critical habitat for plants listed under the FESA coincide with the project site. The nearest critical habitat is for Braunton's milk-vetch, which lies nearly 4 miles southeast of the project, in the vicinity of Santa Ynez Reservoir. Additional critical habitat areas for the species occurs 7 plus miles to the northwest, in the Simi Hills. Additionally, numerous critical habitat areas for Lyon's pentachaeta occur 10 plus miles west of the project, in the vicinity of the unincorporated community of Cornell.¹¹

No plant species listed under FESA or CESA, or any non-listed special-status plants were observed during the survey. Cooper's hawk, observed flying over the project area during the field survey, is designated by CDFW as a Watch List species. No other special-status wildlife species were observed during the survey.

Special-Status Wildlife Species.

A total of 52 special-status wildlife species were identified from a search of the CNDDDB¹² database for the Canoga Park and surrounding eight quadrangles, and the IPaC.¹³ Fifteen wildlife species identified during reviews of the CNDDDB and IPaC are protected under FESA and/or CESA.

No historical records of any special-status wildlife species coincide directly with the project site; however, wildlife records from within Topanga Canyon, from approximately three miles downstream of the project site south to the coastline, were identified in the CNDDDB. Included are records of southern California steelhead (federally-listed endangered), western pond turtle (*Emys marmorata*; SSC), two-striped garter snake (*Thamnophis hammondi*; SSC), Crotch bumble bee (*Bombus crotchii*; tracked in CNDDDB), San Bernardino ringnecked snake (*Diadophis punctatus modestus*; tracked in CNDDDB), and Gertsch's socialchemmis spider (*Socalchemmis gertschi*; tracked in CNDDDB).

No USFWS-designated critical habitat for wildlife listed under FESA coincides with the project. Critical habitat occurs approximately 3.5 miles south of the project along Topanga Canyon Creek for southern California steelhead Distinct Population Segment and approximately 6.5 miles south of the project within the canyon's estuary for tidewater goby (federally-listed endangered).¹⁴

No wildlife species listed under FESA or CESA were observed during the survey. Cooper's hawk, observed flying over the project area during the field survey, is designated by CDFW

¹¹ USFWS. 2018. Environmental Conservation Online System (ECOS). Critical Habitat Portal. Available at <http://ecos.fws.gov/crithab/>. Accessed November 28, 2018.

¹² CDFW. 2019. California Natural Diversity Data Base (CNDDDB). Full condensed report for Canoga Park, Beverly Hills, Calabasas, San Fernando, Malibu Beach, Topanga, Santa Susana, Oat Mountain, and Van Nuys quadrangles. Generated July 26, 2019.

¹³ USFWS. 2019. Information for Planning and Conservation (IPaC). Available at <https://ecos.fws.gov/ipac/>. Accessed November 28, 2018.

¹⁴ USFWS. 2018. Environmental Conservation Online System (ECOS). Critical Habitat Portal. Available at <http://ecos.fws.gov/crithab/>. Accessed November 28, 2018.

as a Watch List species. No other special-status wildlife species were observed during the survey.

Sensitive Natural Communities. Sensitive natural communities are those that are designated as rare in the region by the CNDDDB, support special-status plant or wildlife species, or receive regulatory protection (i.e., §404 of the Clean Water Act and/or §1600 et seq. of the California Fish and Game Code [CFGF]). Rare communities are given the highest inventory priority.^{15,16} (Holland 1986, CDFW 2010). Thirteen sensitive natural communities have been documented in the Canoga Park and surrounding eight quadrangles,¹⁷ including: California Walnut Woodland, Riversidian Alluvial Fan Sage Scrub, Southern California Coastal Lagoon, Southern California Steelhead Stream, Southern Coast Live Oak Riparian Forest, Southern Mixed Riparian Forest, Southern Willow Scrub, Cismontane Alkali Marsh, Southern Coastal Salt Marsh, Southern Sycamore Alder Riparian Woodland, Southern Cottonwood Willow Riparian Forest, Valley Needlegrass Grassland, and Valley Oak Woodland.

Based on the field survey, these communities, or any other sensitive natural communities, do not coincide with the project site. Natural habitats have been disturbed by urban development and are no longer present. Sensitive riparian habitat in the form of Southern Coast Live Oak Riparian Forest occurs outside the project footprint along Topanga Canyon Creek, approximately 150 feet south of Viewridge Road.

No streams or wetlands coincide directly with the project footprint; however, as previously introduced, Topanga Canyon Creek occurs just south of Viewridge Road. The creek lies within the Santa Monica Bay Watershed Management Area and has a Hydrologic Unit Code (HUC) of 180701040401, which is contained in the Watershed Boundary Dataset, the most recent HUC delineation effort completed by the US Geological Survey.¹⁸ With direct hydrology to the Pacific Ocean, the creek falls under the jurisdiction of the US Army Corps of Engineers, with CDFW and the LARWQCB exert State jurisdiction over the creek.

PEIR Checklist Analysis

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

The PEIR determined that impacts related to special status species would be less than significant with mitigation. Mitigation measure BIO-1 for the approved program requires that implementing agencies evaluate the suitability of potential BMP sites for their potential to impact valued habitats such as oak woodland and riparian willow forests. Mitigation measures BIO-2 through BIO-8 for the approved program require

¹⁵ Holland, R. 1986. Preliminary Descriptions of the Terrestrial Natural Communities of California. California Department of Fish and Game, The Resources Agency. 156 pp.

¹⁶ CDFW. 2010. List of California Terrestrial Natural Communities Recognized by the Natural Diversity Data Base. Natural Heritage Division. The Resources Agency. September. Available at <http://www.dfg.ca.gov/biogeodata/vegcamp/pdfs/natcomlist.pdf>. Accessed July 18, 2016.

¹⁷ CDFW. 2019. California Natural Diversity Data Base (CNDDDB). Full condensed report for Canoga Park, Beverly Hills, Calabasas, San Fernando, Malibu Beach, Topanga, Santa Susana, Oat Mountain, and Van Nuys quadrangles. Generated July 26, 2019.

¹⁸ U.S. Geological Survey (USGS). 2018. Hydrologic Unit Maps. Available at <https://water.usgs.gov/GIS/huc.html>. Accessed December 3, 2018.

impact characterization, minimization and compensation for impacts to highly valued habitats in consultation with the USFWS and CDFW.

Special-Status Plant Species. Individual special-status plant species could be damaged or destroyed from crushing or trampling during construction activities; however, no federal or State-listed plant species were identified within the project site and the proposed project would be implemented within the footprint of existing paved roadways. As a result, special-status plants are not expected to coincide with project elements due to a lack of suitable habitat. Since no special-status plants were observed during the field survey and the site is not suitable for them, significant direct impacts to special-status plants are not anticipated.

Indirect impacts to special-status plant species occurring outside the project site could result from construction-related habitat loss and modification of sensitive natural communities related to dust, noise, stormwater runoff, and through the potential spread of noxious and invasive plant species into these communities. Such impacts would be considered significant. The riparian habitat south of Viewridge Road may provide suitable habitat for special-status plants; however, by implementing the BMP outlined above in Section 2.6, Construction Schedule and Procedures, related to fugitive dust and erosion control, the potential for indirect impacts to special-status plants occurring in the riparian habitat would be reduced. As a result, indirect impacts to special-status plants would be less than significant.

Special-Status Wildlife Species. The proposed project would be implemented within the footprint of existing paved roadways surrounded by residential development with ornamental vegetation. No native vegetation communities that may provide potentially suitable habitat for special-status wildlife species coincide with the project site. Southern Live Oak Riparian Forest habitat along Topanga Canyon Creek is potentially suitable for special-status wildlife species; however, no project activities would occur within the riparian habitat, and as a result, direct impacts to special-status wildlife and habitat that potentially supports such species would be avoided.

Four raptor species including, Cooper's hawk, red-tailed hawk, red shouldered hawk, and turkey vulture, were detected flying over the project area during the field visit. Trees potentially suitable for nesting raptors would not be removed by the project. However, similar to the approved program, the proposed project would implement mitigation measure BIO-5, requiring a qualified biologist conduct a pre-construction survey for breeding and nesting birds and raptors. With adherence to mitigation measure BIO-5, direct impacts to special-status and common raptor species during project implementation would be less than significant. Construction noise may, however, indirectly affect raptor species if they are present in the vicinity, causing them to change their behavior and move out of the area. If raptors are detected nesting in the vicinity of the project prior or during construction, noise-reduction measures may need to be implemented to reduce construction noise levels to acceptable levels, or work discontinued until the young have fledged. As discussed in the Noise section below, the proposed project would implement mitigation measure NOISE-1, which requires implementation of noise-reducing measures as well as notification to sensitive receptors. Similar to the approved program, by implementing BMPs presented in Section 2.6 above and adhering to avoidance and minimization measure BIO-5, indirect impacts to special-status and common raptor species are not anticipated and would be less than significant.

Ornamental trees in areas surrounding the project site provide potentially suitable nesting habitat for bird species. As a result, birds protected by the Migratory Bird Treaty Act (MBTA) and the CFGC have the potential to nest in the vicinity of where project elements would be constructed. Although no vegetation would be removed by the project, should construction occur during the nesting bird season, indirect impacts from construction noise, dust, increased human presence, and vibrations could significantly impact birds protected by the MBTA and CFGC Code, causing them to change their behavior and potentially move out of the area. Increased nestling mortality due to nest abandonment or decreased feeding frequency could occur, resulting in significant indirect impacts. By implementing the BMP presented in Section 2.6 above and by avoiding project construction during the nesting bird season, or adhering to mitigation measure BIO-5, the indirect impacts of construction on nesting birds and their associated habitat would be reduced to less than significant with implementation of mitigation measure BIO-5. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

BIO-5 If construction and vegetation removal is proposed between February 1 and August 31, a qualified biologist shall conduct a pre-construction survey for breeding and nesting birds and raptors within 500-feet of the construction limits to determine and map the location and extent of breeding birds that could be affected by the project. Active nest sites located during the pre-construction surveys shall be avoided until the adults and young are no longer reliant on the nest site for survival as determined by a qualified biologist.

- *The pre-construction nesting survey shall be conducted by a qualified biologist within 3 days prior to the start of construction activities to determine whether active nests are present within or directly adjacent to the construction zone. All nests found shall be recorded.*
- *If construction activities must occur within 300 feet of an active nest of any passerine bird or within 500 feet of an active nest of any raptor, with the exception of an emergency, a qualified biologist shall monitor the nest on a weekly basis, and the activity shall be postponed until the biologist determines that the nest is no longer active.*
- *If the recommended nest avoidance zone is not feasible, the qualified biologist shall determine whether an exception is possible and obtain concurrence from the resource agencies before construction work can resume within the avoidance buffer zone. All work shall cease within the avoidance buffer zone until either agency concurrence is obtained or the biologist determines that the adults and young are no longer reliant on the nest site.*

The text in *italics* represent project-specific control measures tiered from Mitigation Measure BIO-5 in the PEIR.

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

The PEIR determined that impacts related to riparian habitat or other sensitive natural communities would be less than significant with mitigation. The proposed project would be implemented within the footprint of existing paved roadways surrounded by residential development with ornamental vegetation. Based on the Biological and Water Resources Reviews prepared for the proposed project, no native vegetation communities, sensitive natural communities, or sensitive aquatic habitats occur within or coincide with the project site. Additionally, no vegetation would be removed during project construction. Riparian habitat in the form of Southern Live Oak Riparian Forest occurs along Topanga Canyon Creek, approximately 150 feet south of Viewridge Road. The project would utilize existing stormwater outfalls that occur within the riparian habitat and discharge into Topanga Canyon Creek; however, no work associated with the project would occur at the discharge points. As a result, no direct impacts to natural vegetation communities would occur.

Indirect impacts to vegetation surrounding project elements and riparian habitat along Topanga Canyon Creek could include the accumulation of fugitive dust, and the colonization of nonnative, invasive plant species. Other indirect impacts could include an increase in the amount of compacted or modified surfaces that, if not controlled, could increase the potential for surface runoff, increased erosion, and sediment deposition beyond the proposed project's footprint. With implementation of the BMPs outlined in Section 2.6 above, related to fugitive dust and erosion control, potential significant indirect impacts to vegetation and riparian habitat are not anticipated. Impacts would be less than significant, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

c. Would the project have a substantial adverse effect on state or federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The PEIR determined that, for projects impacting native vegetation within jurisdictional drainages, impacts related wetland habitats would be less than significant with mitigation, which would ensure compliance with state and federal regulations relating to potentially jurisdictional features, including wash habitat vegetation that may fall under CDFW jurisdiction. As previously discussed, no streams or wetlands coincide directly with the project footprint; as such, no direct impacts to wetlands or riparian habitat would occur. The project would utilize existing stormwater outfalls that occur within the riparian habitat and discharge into Topanga Canyon Creek, just south of Viewridge Road; however, no work associated with the project would occur at the discharge points. As such, impacts would be less than significant, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

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

The PEIR determined that impacts related to the implementation of the EWMP would be less than significant as they are not be expected to interfere with wildlife movement or any migratory corridor/linkage and would not be constructed within a native wildlife nursery site. The project area does not serve as a regional wildlife corridor. As a result, direct impacts to a regional wildlife movement corridor would not occur. Potential direct and indirect impacts related to birds protected by the MBTA and CFGC are discussed in threshold (a). Similar to the approved program, impacts related to wildlife movement corridors would be less than significant. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

- e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

The PEIR determined that impacts related to local policies or ordinances protecting biological resources would be less than significant with mitigation requiring oak trees and other protected trees be avoided to the extent feasible, and obtaining required County or City permits if necessary. The project does not coincide with a SEA and no trees would be removed by the project. As such, the proposed project would not conflict with any local policies and ordinances that protect biological resources. No impact would occur, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

- f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**

The PEIR determined that impacts regarding conflict with habitat conservation plans or natural community conservation plans would be less than significant. The proposed project is not located within a habitat conservation plan or natural community conservation plan area. As such, no impact would occur, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

Updated CEQA Checklist Analysis

The 2019 CEQA Guidelines Appendix G checklist does not include any new or updated thresholds for biological resources in comparison to the 2015 checklist used to analyze the program in the PEIR. As such, the proposed project would not have any additional impacts on biological resources, and no new mitigation measures are required. The findings for the proposed project remain consistent with the impact determinations identified in the PEIR for the approved program.

Issues and Supporting Data Sources	Was Impact Analyzed Prior Environmental Document(s)?	Do Project Modifications Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
IV. CULTURAL RESOURCES. Would the Project:					
a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	Yes	No	No	No	Yes
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	Yes	No	No	No	Yes
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Yes	No	No	No	Yes
d. Disturb any human remains, including those interred outside of formal cemeteries?	Yes	No	No	No	Yes

Discussion:

This analysis is based on the Cultural Resources Assessment prepared for the proposed project (Appendix C). The project site is located in an unincorporated area of Topanga in Township 1 North, Range 16 West, Section 30 on the Canoga Park (1952) 1:24000 U.S. Geologic Survey topographic map.

A records search was conducted at the South Central Coastal Information Center on December 5, 2018, to evaluate the archaeological sensitivity of the project area for cultural resources. The purpose of this records search was to review previously recorded cultural resources and previous investigations completed within a 0.5-mile search radius of the project area. Information reviewed included location maps for all previously recorded trinomial and primary prehistoric and historic archaeological sites and isolates, site record forms and updates for all cultural resources previously identified, previous investigation boundaries and National Archaeological Database citations for associated reports, technical reports, historic maps, and historic addresses. The search reviewed lists of California Points of Historical Interest, California Historical Landmarks, and local city and county registries of historic properties. In addition, the Caltrans Historic Highway Bridge Inventory, the Historic Resources Inventory, the California Register of Historical Resources (CRHR), and the National Register of Historic Places (NRHP) were consulted.

Environmental Setting:

The records search revealed that 17 archaeological studies have been undertaken within a 0.5-mile radius of the project area. Approximately 60 percent of the project footprint has been surveyed in previous studies. The records search identified 13 archaeological sites and five isolates within 0.5 mile of the project footprint. Ten of the resources are prehistoric sites, one site includes both prehistoric and historic components, and two sites are historic sites. The remaining five resources are prehistoric isolates.

Study of the California Office of Historic Preservation's Historic Resources Inventory focused on resources located within Woodland Hills. The Historic Resources Inventory lists no historic resources within 0.5 mile of the project footprint within Woodland Hills. A listing of California Points of Historical Interest identified no historic landmarks within 0.5 mile of the project footprint. A listing of California Historical Landmarks identified no historic landmarks within 0.5 mile of the project footprint. Study of the Caltrans Historic Bridge Inventory revealed that no historic state or local agency bridges are located within 0.5 mile of the project area (Caltrans 2015). Los Angeles Historic-Cultural Monuments are sites that have been designated by the City of Los Angeles Cultural Heritage Commission as worthy of preservation based on their architectural, historic, and cultural merits. A search of the Los Angeles Historic-Cultural Monuments found no monuments within 0.5 mile of the project area.

A Sacred Lands File search was conducted for the project area, and that the result of the search was negative. Additionally, a Native American contact program was conducted as part of the proposed project, which involves contacting Native American representatives identified by the Native American Heritage Commission (NAHC) as potentially having knowledge about the project area, in order to solicit comments and concerns regarding the proposed project. Several Native American representatives stated that the area is sensitive for tribal cultural resources and recommended Native American and archaeological monitoring.

A field survey was conducted on July 23, 2019, as part of this assessment to identify the presence of any cultural resources in the proposed project area and to help determine the archaeological sensitivity for the project area. The majority of the project area is located on ridgetops. Geologically, these ridgetops have erosional regimes, and there is little visible naturally deposited soil. The entire project area shows numerous signs of recent disturbances including roadbuilding and the installation of utilities. No cultural resources were observed in any of the planned work locations.

The cultural resources archival research and survey did not identify any archaeological materials or historic buildings or structures within the project site. Based on the results of the archival research and survey, there is low potential that archaeological resources will be encountered during ground disturbing activities for the proposed project.

PEIR Checklist Analysis**a. Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?**

The PEIR determined that impacts related to historic resources may be significant and unavoidable even with implementation of mitigation measures as it is possible that no mitigation may be available to maintain the historic integrity of the affected resource or its surroundings. The cultural resources archival research and survey conducted for

the proposed project indicated that there are no known historical resources coinciding with or in the vicinity of the project site. As such, no impact to historic built environment resources would occur.

The PEIR also determined that the proposed program has the potential to adversely affect archaeological resources and other cultural resources that qualify as historical resources. The cultural resources archival research and survey did not identify any archaeological materials within the project site. Nonetheless, the proposed project involves ground disturbance, which has the potential to impact previously undiscovered archaeological resources or other cultural resources. As such, the proposed project would implement mitigation measures CUL-2, CUL-3, and CUL-4. Mitigation measure CUL-2 requires projects with ground disturbance to conduct a Phase I cultural resources inventory by a qualified archaeologist and in consultation with the local Native American representatives expressing interest, and that archaeological resources encountered during the pedestrian archaeological survey be evaluated by the qualified archaeologist for their eligibility for listing in the CRHR and for significance as a historical resource or unique archaeological resource per CEQA Guidelines Section 15064.5. Mitigation measure CUL-3 requires archaeological monitors during ground disturbing activities that have the potential to impact archaeological resources qualifying as historical resources or unique archaeological resources, as determined by a qualified archaeologist in consultation with the implementing agency, and any local Native American representatives expressing interest in the project. Mitigation measure CUL-4 requires construction work to stop in the vicinity should subsurface archaeological resources be discovered, and a qualified archaeologist be contacted to assess the significance of the find according to CEQA Guidelines Section 15064.5, and in consultation with any local Native American groups expressing interest. As such, impacts related to historic resources would be less than significant with mitigation. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

CUL-2 Implementing agencies shall ensure that individual EWMP projects that require ground disturbance shall be subject to a Phase I cultural resources inventory on a project-specific basis prior to the implementing agency's approval of project plans. The study shall be conducted or supervised by a qualified archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archaeology, and shall be conducted in consultation with the local Native American representatives expressing interest. The cultural resources inventory shall include a cultural resources records search to be conducted at the South Central Coastal Information Center; scoping with the NAHC and with interested Native Americans identified by the NAHC; a pedestrian archaeological survey where deemed appropriate by the qualified archaeologist; and formal recordation of all identified archaeological resources on California Department of Parks and Recreation 523 forms and significance evaluation of such resources presented in a technical report following the guidelines in Archaeological Resource Management Reports (ARMR): Recommended Contents and Format, Department of Parks and Recreation, Office of Historic Preservation, State of California, 1990.

If potentially significant archaeological resources are encountered during the survey, the implementing agency shall require that the resources are evaluated by the qualified archaeologist for their eligibility for listing in the CRHR and for significance as a historical resource or unique archaeological resource per CEQA Guidelines Section 15064.5. Recommendations shall be made for treatment of these resources if found to be significant, in consultation with the implementing agency and the appropriate Native American groups for prehistoric resources. Per CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred manner of mitigation to avoid impacts to archaeological resources qualifying as historical resources. Methods of avoidance may include, but shall not be limited to, project reroute or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, which may include data recovery or other appropriate measures, in consultation with the implementing agency, and any local Native American representatives expressing interest in prehistoric or tribal resources. If an archaeological site does not qualify as an historical resource but meets the criteria for a unique archaeological resource as defined in Section 21083.2, then the site shall be treated in accordance with the provisions of Section 21083.2.

- CUL-3 The implementing agency shall retain archaeological monitors during ground-disturbing activities that have the potential to impact archaeological resources qualifying as historical resources or unique archaeological resources, as determined by a qualified archaeologist in consultation with the implementing agency, and any local Native American representatives expressing interest in the project. Native American monitors shall be retained for projects that have a high potential to impact sensitive Native American resources, as determined by the implementing agency in coordination with the qualified archaeologist.
- CUL-4 During project-level construction, should subsurface archaeological resources be discovered, all activity in the vicinity of the find shall stop and a qualified archaeologist shall be contacted to assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, the archaeologist shall determine, in consultation with the implementing agency and any local Native American groups expressing interest, appropriate avoidance measures or other appropriate mitigation. Per CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred means to avoid impacts to archaeological resources qualifying as historical resources. Methods of avoidance may include, but shall not be limited to, project reroute or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, such as data recovery or other appropriate measures, in consultation with the implementing agency and any local Native American representatives expressing interest in prehistoric or tribal resources. If an archaeological

site does not qualify as an historical resource but meets the criteria for a unique archaeological resource as defined in Section 21083.2, then the site shall be treated in accordance with the provisions of Section 21083.2.

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

The PEIR determined that impacts related to archaeological resources would be less than significant with mitigation measures as known archaeological resources, as well as unknown and unrecorded archaeological resources may be unearthed during construction activities associated with implementation of structural BMPs. As such, the proposed project would implement mitigation measures CUL-3, and CUL-4, as further described in threshold (a) above. Consistent with mitigation measure CUL-1, a cultural resources inventory was conducted for the proposed project. The cultural resources archival research and survey did not identify any archaeological materials within the project site. Nonetheless, the proposed project would implement mitigation measures CUL-3 and CUL-4, as unknown and unrecorded archaeological resources may be unearthed during construction activities. Similar to the approved program, impacts would be less than significant with mitigation measures CUL-3 and CUL-4. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

CUL-3 Refer to mitigation measure language above.

CUL-4 Refer to mitigation measure language above.

c. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The PEIR determined that impacts related to inadvertent discovery of paleontological resources would be less than significant with mitigation measures, which require evaluation of the sensitivity of the project site for paleontological resources and paleontological monitoring during construction, if necessary. No unique geologic features are located within the project site.¹⁹ Additionally, no known paleontological resources are located within the project site and the area has been previously disturbed with development along the Viewridge Road ROW and surrounding roadways in the project area.²⁰ Although not expected to occur, the proposed project would implement mitigation measures CUL-5, requiring evaluation of the sensitivity of the project site for paleontological resources, and CUL-6, requiring paleontological monitoring during construction, if necessary, consistent with the approved program. Similar to the approved program, impacts to paleontological resources would be less than significant with mitigation measures CUL-5 and CUL-6. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

¹⁹ Los Angeles County Public Works, Geotechnical and Materials Engineering Division. *Geotechnical Investigation for the Topanga Viewridge Super Greenstreets Project*, August 2016.

²⁰ County of Los Angeles Department of Regional Planning. County of Los Angeles General Plan, Santa Monica Mountains North Area Plan. 2000. Available at: http://planning.lacounty.gov/assets/upl/data/pd_smm.pdf, accessed May 7, 2019.

CUL-5 For individual structural BMP projects that require ground disturbance, the implementing agency shall evaluate the sensitivity of the project site for paleontological resources. If deemed necessary, the implementing agency shall retain a qualified paleontologist to evaluate the project and provide recommendations regarding additional work, potentially including testing or construction monitoring.

CUL-6 In the event that paleontological resources are discovered during construction, the implementing agency shall notify a qualified paleontologist. The paleontologist will evaluate the potential resource, assess the significance of the find, and recommend further actions to protect the resource.

d. Would the project disturb any human remains, including those interred outside of formal cemeteries?

The PEIR determined that impacts related to the discovery of human remains would be less than significant with mitigation, which requires that work in the vicinity of the find shall cease and the County Coroner shall be contacted to evaluate the remains. No known burial sites are located within the project site and the area has been previously disturbed with development along the Viewridge Road ROW and surrounding roadways in the project area. Although not expected, human remains could be encountered during construction. Consistent with mitigation measure CUL-7 in the PEIR, in the event that any human remains or related resources are discovered, such resources would be treated in accordance with state and local regulations and guidelines for disclosure, recovery, relocation, and preservation, as appropriate, including CEQA Guidelines Section 15064.5(e)(1). If human remains are discovered, they will require evaluation by the county coroner as to the nature of the remains. If the remains are determined to be of Native American origin, the NAHC shall be contacted and a Most Likely Descendent identified. Similar to the approved program, impacts related to the discovery of human remains would be less than significant with mitigation measure CUL-7. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

CUL-7 The implementing agency shall require that, if human remains are uncovered during project construction, work in the vicinity of the find shall cease and the County Coroner shall be contacted to evaluate the remains, following the procedures and protocols set forth in Section 15064.5 (e)(1) of the CEQA Guidelines. If the County Coroner determines that the remains are Native American, the Coroner will contact the Native American Heritage Commission, in accordance with Health and Safety Code Section 7050.5, subdivision (c), and Public Resources Code 5097.98 (as amended by AB 2641). The NAHC will then designate a Most Likely Descendant of the deceased Native American, who will engage in consultation to determine the disposition of the remains.

Updated CEQA Checklist Analysis

The 2019 CEQA Guidelines Appendix G checklist no longer includes threshold (c) of the 2015 checklist as part of the impact analysis for cultural resources; rather, this threshold is analyzed in regard to Geologic and Mineral Resources and a discussion of the threshold is included in Section V below. All other thresholds are unchanged and no new thresholds have been added to the current checklist regarding cultural resources. As such, the proposed project would not have any additional impacts on cultural resources, and no new mitigation measures are required. The findings for the proposed project remain consistent with the impact determinations identified in the PEIR for the approved program.

Issues and Supporting Data Sources	Was Impact Analyzed Prior Environmental Document(s)?	Do Project Modifications Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
V. GEOLOGIC AND MINERAL RESOURCES. Would the Project:					
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	Yes	No	No	No	N/A
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	Yes	No	No	No	N/A
ii. Strong seismic ground shaking?	Yes	No	No	No	N/A
iii. Seismic-related ground failure, including liquefaction?	Yes	No	No	No	N/A
iv. Landslides?	Yes	No	No	No	N/A
b. Result in substantial soil erosion or the loss of topsoil?	Yes	No	No	No	N/A
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Yes	No	No	No	Yes
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	Yes	No	No	No	N/A

Issues and Supporting Data Sources	Was Impact Analyzed Prior Environmental Document(s)?	Do Project Modifications Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
V. GEOLOGIC AND MINERAL RESOURCES. Would the Project:					
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	Yes	No	No	No	N/A
f. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state or a locally important mineral resource recovery site delineated on a local General Plan, Specific Plan, or other land use plan?	Yes	No	No	No	N/A

Discussion:

Environmental Setting:

The project site is located in the unincorporated community of Topanga surrounded by steep mountains, rolling hills, and canyons. The Santa Monica Mountains is a major topographical feature of the area. The common rock types underlying the surface soil in the area are poorly-cemented sedimentary rock, and fine-grained or indurated (cemented) soil and bedrock formations. These common rock units are unstable, particularly in earthquakes and under wet conditions. Clay rich soils found throughout the Santa Monica Mountains are subject to shrink-swell behavior, which has implications for the structural integrity of slopes, buildings, and foundations.²¹ Based on the geotechnical investigation conducted for the project site, the geologic units observed in the area of the proposed project include artificial fill and siltstone and sandstone bedrock. The siltstone and sandstone bedrock is a member of the upper Miocene Monterey Formation, which is also known as the Modelo Formation (bedrock).²²

²¹ Los Angeles County Department of Regional Planning. Draft Santa Monica Mountains North Area Plan, October 2018. Available at: http://planning.lacounty.gov/assets/upl/project/smmnap_plan-20181001.pdf, accessed July 19, 2019.

²² Los Angeles County Public Works, Geotechnical and Materials Engineering Division. *Geotechnical Investigation for the Topanga Viewridge Super Greenstreets Project*, August 2016.

The project site and all of southern California is considered to be a seismically active region. The region has numerous active, potentially active, and inactive faults. California Geological Survey's Earthquake Zones of Required Investigation of the Canoga Park Quadrangle that includes the project site, shows Alquist-Priolo Earthquake Fault Zones and Seismic Hazards Zone. The Project site is not located within an Alquist-Priolo Special Study Zone Area.²³ The Santa Monica Fault and Malibu Coast Fault is located to the south of the project site and the Chatsworth Fault is to the north.

In the event of an earthquake, fault rupture and seismic groundshaking could be experienced in the project area, as is typical throughout Southern California. The seismic groundshaking could trigger seismically induced liquefaction, landslides, or other slope failure.

Liquefaction involves the sudden loss in strength of saturated, cohesionless soil caused by the build-up of pore water pressure during cyclic loading, such as produced by an earthquake. Liquefaction can cause vertical and lateral ground displacements, slope instability, lateral spreading, and bearing failure. The project site and surrounding area are not located within an area determined to be susceptible to liquefaction.²⁴

Strong ground shaking can cause the densification of soils, resulting in local or regional settlement of the ground surface. During strong ground shaking, soil grains may become more tightly packed due to the collapse of voids or pore spaces. This type of failure typically occurs in loose, granular, cohesionless soil and can occur in either wet or dry conditions. As the project site is not located in an area identified as being susceptible to liquefaction, the risk of seismically-induced settlement at the project site is considered low.

Landslides occur when masses of rock, earth, or debris move down slope. Landslides are caused by disturbances in the natural stability of a slope. They can accompany heavy rains or follow droughts, earthquakes, or volcanic eruptions. A small area in the western portion of the Project site is located within an Earthquake-Induced Landslide Zone.²⁵

Collapsible soils consist of loose dry materials that collapse and compact under the addition of water or excessive loading. Collapsible soils are prevalent throughout the southwestern United States, specifically in areas of young alluvial fans. Soil collapse occurs when the land surface is saturated at depths greater than those reached by typical rain events. As previously discussed, the project site is primarily underlain by artificial fill and siltstone and sandstone bedrock.

Land subsidence is the loss of surface elevation due to the removal of subsurface support. Land subsidence is caused by activities that contribute to the loss of support materials within the underlying soils, such as agricultural practices or the overdraft of an aquifer. The uses at the project site do not include the types of activities that would contribute to the loss of subsurface support.

²³ State of California Department of Conservation, California Geological Survey. Seismic Hazard Zone Report for the Canoga Park 7.5-Minute Quadrangle, 1997. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/regulatorymaps/>, accessed May 1, 2019.

²⁴ State of California Department of Conservation, California Geological Survey. Seismic Hazard Zone Report for the Canoga Park 7.5-Minute Quadrangle, 1997. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/regulatorymaps/>, accessed May 1, 2019.

²⁵ State of California Department of Conservation, California Geological Survey. Seismic Hazard Zone Report for the Canoga Park 7.5-Minute Quadrangle, 1997. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/regulatorymaps/>, accessed May 1, 2019.

Mineral resources include commercially viable oil and gas deposits, and nonfuel mineral resources deposits. Nonfuel mineral resources include metals such as gold, silver, iron, and copper; industrial metals such as boron compounds, rare-earth elements, clays, limestone, gypsum, salt, and dimension stone; and construction aggregate, including sand, gravel, and crushed stone. Mineral resource zones are mapped by the County in the Los Angeles County General Plan; the North Santa Monica Bay EWMP does not contain any mineral resources zones.²⁶

PEIR Checklist Analysis

a. Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

The PEIR determined that impacts related to seismic hazards would be less than significant. The Project site is not located within an Alquist-Priolo Special Study Zone Area.²⁷ Nonetheless, the proposed project would be designed and constructed in accordance with the latest version of the applicable federal, state, and local codes relative to seismic criteria, including the current California Building Code and County of Los Angeles Low Impact Development Standards. Furthermore, the proposed project does not include the development of any habitable structures. Similar to the approved program, compliance with existing regulations would ensure a less than significant impact related to fault rupture, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

(ii) Strong seismic ground shaking?

The PEIR determined that impacts related to seismic hazards would be less than significant. The project site is located within the seismically active southern California region, and like all locations within the area, is subject to strong seismic ground shaking. However, as discussed in Section (a)(i) above, the proposed project would be designed and constructed in accordance with the latest version of the applicable federal, state, and local codes relative to seismic criteria. Additionally, the proposed project does not include the development of any habitable structures. Similar to the approved program, compliance with existing regulations would ensure a less than significant impact from strong seismic ground shaking, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR;

²⁶ Los Angeles County Department of Regional Planning. Figure 9.6, Mineral Resources. Available at: http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-6_mineral_resources.pdf, accessed July 19, 2019.

²⁷ State of California Department of Conservation, California Geological Survey. Seismic Hazard Zone Report for the Canoga Park 7.5-Minute Quadrangle, 1997. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/regulatorymaps/>, accessed May 1, 2019.

no new or intensified impacts would occur, and no new mitigation measures are required.

(iii) Seismic-related ground failure, including liquefaction?

The PEIR determined that impacts related to seismic hazards would be less than significant. The project site and surrounding area are not located within an area determined to be susceptible to liquefaction.²⁸ Additionally, the proposed project does not include the development of any habitable structures. As such, implementation of the proposed project would not expose people or structures to adverse effects due to seismic-related ground failure, including liquefaction. No impact would occur, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

(iv) Landslides?

The PEIR determined that impacts related to seismic hazards would be less than significant. A small area in the western portion of the Project site is located within an Earthquake-Induced Landslide Zone.²⁹ All proposed BMP facilities would be constructed to meet county standards for slope stability factors of safety.³⁰ Similar to the approved program, compliance with existing regulations would ensure a less than significant impact, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

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

The PEIR determined that impacts related to soil erosion would be less than significant with compliance with BMPs identified in the Los Angeles County MS4 permit. Construction activities for the proposed project would expose soils for a limited time, allowing for possible erosion. During construction, transport of sediments from the project site would be prevented through the use of appropriate erosion control BMPs, as listed in Section 1.6, including implementation of Rule 403 dust control measures, as required by SCAQMD. Similar to the approved program, implementation of erosion control BMPs would ensure that soil erosion impacts during construction of the proposed project would be less than significant. No mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

²⁸ State of California Department of Conservation, California Geological Survey. Seismic Hazard Zone Report for the Canoga Park 7.5-Minute Quadrangle, 1997. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/regulatorymaps/>, accessed May 1, 2019.

²⁹ State of California Department of Conservation, California Geological Survey. Seismic Hazard Zone Report for the Canoga Park 7.5-Minute Quadrangle, 1997. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/regulatorymaps/>, accessed May 1, 2019.

³⁰ Los Angeles County Public Works, Geotechnical and Materials Engineering Division. *Geotechnical Investigation for the Topanga Viewridge Super Greenstreets Project*, August 2016.

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

The PEIR determined that impacts related to soil stability would be less than significant with mitigation, which requires a geotechnical investigation of each infiltration BMP site to evaluate infiltration suitability. As discussed in Sections (a)(iii) and (a)(iv) above, the project site is not located within a liquefaction zone; however, a small area on the western portion of the project site is identified as being at risk for earthquake-induced landslides. The proposed BMP facilities would be constructed to meet county standards for slope stability factors of safety and adhere to the latest version of the applicable federal, state, and local codes relative to landslide criteria.

The project site is primarily underlain by artificial fill and siltstone and sandstone bedrock. As such, susceptibility to failure from collapsible soils is low. However, consistent with mitigation measure GEO-1 for the approved program, a site-specific geotechnical investigation was conducted for the proposed project. The proposed project would be constructed in accordance with the latest version of the applicable federal, state, and local codes, as well as site-specific design measures, to ensure safe construction.

Subsidence is the lowering of surface elevation due to changes occurring underground, such as the extraction of large amounts of groundwater, oil, or gas. When groundwater is extracted from aquifers at a rate that exceeds the rate of replenishment, overdraft occurs, which can lead to subsidence. However, the proposed project does not include the extraction of any groundwater, oil, or gas. Therefore, subsidence would not occur. Similar to the approved program, the proposed project would result in less than significant impacts with mitigation. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

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

The PEIR determined that impacts related to expansive soils would be less than significant. Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink (lessen in volume) as water is drawn away. If soils consist of expansive clays, foundation movement and/or damage can occur if wetting and drying of the clay does not occur uniformly across the entire area. As the project site is already developed, it is primarily underlain by artificial fill and siltstone and sandstone bedrock. Due to the mix of earth materials underlying the project site, these soils are not expected to be high clay bearing. Furthermore, the proposed project would be constructed in accordance with applicable federal, state, and local building codes. Therefore, the proposed project would not create a substantial risk to life or property resulting from expansive soils. Similar to the approved program, impacts related to expansive soils would be less than significant, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

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

The PEIR determined that no impact would occur related to soil suitability for septic or alternative wastewater disposal systems. The project site is connected to City sewer and storm drains, and septic tanks or alternative wastewater systems are not proposed as part of the project. Therefore, similar to the approved program, no impact associated with the use of such systems would occur, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

- f. **Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state or a locally important mineral resource recovery site delineated on a local General Plan, Specific Plan, or other land use plan?**

The PEIR determined that compliance with the County of Los Angeles General Plan would ensure that impacts to mineral resources would be less than significant. There are no known mineral resources in the project area and the project site is not delineated as a locally-important mineral resource recovery site on any land use plan.^{31,32} Additionally, the proposed project components would be installed within existing roadways and adjacent parkways. Therefore, the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state or a locally important mineral resource recovery site delineated on a local General Plan, Specific Plan, or other land use plan. No impact would occur, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

Updated CEQA Checklist Analysis

The 2019 CEQA Guidelines Appendix G checklist does not include any revisions or new thresholds for mineral resources. The 2019 update does include assessment criteria within the geology and soils section for potential impacts to unique paleontological resources or sites or unique geologic features. Previously, this threshold was included under cultural resources. The PEIR determined that impacts related to inadvertent discovery of paleontological resources would be less than significant with mitigation measures, which require evaluation of the sensitivity of the project site for paleontological resources and paleontological monitoring during construction, if necessary. No unique geologic features are located within the project site.³³ Additionally, no known paleontological resources are located within the project site and the area has been previously disturbed with development along the Viewridge

³¹ County of Los Angeles Department of Regional Planning. County of Los Angeles General Plan, Santa Monica Mountains North Area Plan, 2000. Available at: http://planning.lacounty.gov/assets/upl/data/pd_smm.pdf, accessed May 7, 2019.

³² County of Los Angeles Department of Regional Planning. County of Los Angeles General Plan, Santa Monica Mountains North Area Plan, 2000. Available at: http://planning.lacounty.gov/assets/upl/data/pd_smm.pdf, accessed May 7, 2019

³³ Los Angeles County Public Works, Geotechnical and Materials Engineering Division. *Geotechnical Investigation for the Topanga Viewridge Super Greenstreets Project*, August 2016.

Road ROW and surrounding roadways in the project area.³⁴ Although not expected to occur, the proposed project would implement mitigation measures CUL-5, requiring evaluation of the sensitivity of the project site for paleontological resources, and CUL-6, requiring paleontological monitoring during construction, if necessary, consistent with the approved program. Similar to the approved program, impacts to paleontological resources would be less than significant with implementation of mitigation measures CUL-5 and CUL-6. As such, the proposed project would not have any additional impacts on geology and soils, and no new mitigation measures are required. The findings for the proposed project remain consistent with the impact determinations identified in the PEIR for the approved program.

CUL-5 For individual structural BMP projects that require ground disturbance, the implementing agency shall evaluate the sensitivity of the project site for paleontological resources. If deemed necessary, the implementing agency shall retain a qualified paleontologist to evaluate the project and provide recommendations regarding additional work, potentially including testing or construction monitoring.

CUL-6 In the event that paleontological resources are discovered during construction, the implementing agency shall notify a qualified paleontologist. The paleontologist will evaluate the potential resource, assess the significance of the find, and recommend further actions to protect the resource.

³⁴ County of Los Angeles Department of Regional Planning. County of Los Angeles General Plan, Santa Monica Mountains North Area Plan. 2000. Available at: http://planning.lacounty.gov/assets/upl/data/pd_smm.pdf, accessed May 7, 2019.

Issues and Supporting Data Sources	Was Impact Analyzed Prior Environmental Document(s)?	Do Project Modifications Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
VI. GREENHOUSE GAS EMISSIONS. Would the Project:					
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Yes	No	No	No	N/A
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Yes	No	No	No	N/A

Discussion:

Environmental Setting:

This analysis is based on the Greenhouse Gas Impact Assessment prepared for the proposed project (Appendix D). Greenhouse gas (GHG) emissions refer to a group of emissions that are generally believed to affect global climate conditions. The greenhouse effect compares the Earth and the atmosphere surrounding it to a greenhouse with glass panes. The glass panes in a greenhouse let heat from sunlight in and reduce the amount of heat that escapes. GHGs, such as carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O), keep the average surface temperature of the Earth close to 60°F. Without the natural greenhouse effect, the Earth's surface would be about 61°F cooler.

In addition to CO₂, CH₄, and N₂O, GHGs include hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), black carbon (black carbon is the most strongly light-absorbing component of particulate matter emitted from burning fuels such as coal, diesel, and biomass), and water vapor. CO₂ is the most abundant pollutant that contributes to climate change through fossil fuel combustion. The other GHGs are less abundant but have higher global warming potential than CO₂. To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent of CO₂, denoted as CO₂e. CO₂e is a measurement used to account for the fact that different GHGs have different potential to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. This potential, known as the global warming potential of a GHG, is dependent on the lifetime, or persistence, of the gas molecule in the atmosphere.

The LACFCD has not adopted any thresholds for GHG emissions. Additionally, while SCAQMD has issued proposed standards and guidelines, there is no adopted state or local standard for determining the significance of the proposed project's GHG emissions on global climate change. In December 2008, SCAQMD adopted an annual interim quantitative threshold value of 10,000 metric tons of carbon dioxide (CO₂) equivalents (MTCO₂e)/year for industrial facilities, but only with respect to projects where SCAQMD is the lead agency. Additionally, SCAQMD has proposed, but not adopted, a 3,000 MTCO₂e/year threshold for

mixed use developments, a 3,500 MTCO₂e/year threshold for residential developments, and a 1,400 MTCO₂e/year threshold for commercial developments. As an alternative to the aforementioned proposed thresholds for residential, commercial, and mixed-use developments, SCAQMD has also recommended the use of a single numerical threshold of 3,000 MTCO₂e/year for all non-industrial projects. For the purposes of this analysis, because the BMPs (structural and non-structural) associated with the proposed program are not residential, commercial, mixed-use, or industrial projects, the most appropriate threshold that would apply to the proposed program would be, although not formally adopted, the 3,000 MTCO₂e/year criteria recommended by SCAQMD.

PEIR Checklist Analysis

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

The PEIR determined that impacts related to generation of greenhouse gas emissions would be less than significant. The proposed project would generate GHG emissions from construction equipment and vehicular traffic. California Emissions Estimator Model (CalEEMod) was used to prepare estimates of annual GHG emissions. Construction of the proposed project would produce approximately 180.0 MTCO₂e, or 6.0 MTCO₂e annually over a 30-year period. This mass rate is substantially below the most applicable quantitative draft interim threshold of 3,000 MTCO₂e per year as recommended by the SCAQMD, representing only 0.2 percent of the limit designed to capture 90 percent of CEQA projects within the SCAQMD jurisdiction. Therefore, similar to the approved program, implementation of the proposed project would result in a less than significant impact related to GHG emissions. No mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

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

The PEIR determined that impacts related to conflict with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs would be less than significant. The analysis for the proposed project is consistent with the PEIR, which includes a discussion of Assembly Bill (AB) 32, the California Air Resources Board Scoping Plan, and the County of Los Angeles Community Climate Action Plan (CCAP).

As discussed in threshold (a), GHG emissions would not exceed the SCAQMD's recommended threshold of 3,000 MTCO₂e/year for non-industrial projects. GHG emissions would occur only during construction, which would be temporary in nature. Consequently, the implementation of these structural BMPs in the EWMP areas under the program would not generate substantial amounts of GHG emissions that would hinder the State's ability to achieve AB 32's goal of achieving 1990 levels of GHG emissions by 2020.

Out of the Recommended Actions contained in the California Air Resources Board Scoping Plan, the actions that are most applicable to the proposed project would be Action W-4 (Reuse Urban Runoff), which aims to reduce urban runoff by capturing and treating the runoff. The proposed project would contribute to reducing and treating

urban runoff throughout the County of Los Angeles to comply with the MS4 Permit. Implementation of the proposed project would serve as GHG emission reduction measures that are consistent with this recommended action from the Scoping Plan. Therefore, the program would not conflict with the CARB scoping plan.

The County of Los Angeles CCAP serves to mitigate and avoid GHG emissions associated with community activities in unincorporated Los Angeles County. The CCAP establishes a GHG reduction target that is consistent with AB 32. As part of the CCAP, 26 local actions have been identified to reduce GHG emissions in the unincorporated areas of the County. In particular, Mitigation Measure WAW-2 (Recycled Water Use, Water Supply Improvement Programs, and Stormwater Runoff) from the CCAP specifically aims to promote recycled water use and policies to better manage stormwater to protect local groundwater supplies. A part of the goal for this measure is to manage stormwater and protect local groundwater supplies. A specific implementation step associated with this measure identified in the CCAP is to expand the Low Impact Development stormwater catchment to more facilities where feasible in the County. The proposed project would be consistent with this GHG reduction measure of the CCAP. Therefore, the proposed project would not conflict with the County's CCAP.

Similar to the approved program, the proposed project would result in less than significant impacts, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

Updated CEQA Checklist Analysis

The 2019 CEQA Guidelines Appendix G checklist does not include any new or updated thresholds related to greenhouse gas emissions in comparison to the 2015 checklist. As such, the proposed project would not have any additional impacts on greenhouse gas emissions, and no new mitigation measures are required. The findings for the proposed project remain consistent with the impact determinations identified in the PEIR for the approved program.

Issues and Supporting Data Sources	Was Impact Analyzed Prior Environmental Document(s)?	Do Project Modifications Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
VII. HAZARDS AND HAZARDOUS MATERIALS. Would the Project:					
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Yes	No	No	No	N/A
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Yes	No	No	No	Yes
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Yes	No	No	No	N/A
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Yes	No	No	No	N/A
e. Be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, or for a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	Yes	No	No	No	N/A

Issues and Supporting Data Sources	Was Impact Analyzed Prior Environmental Document(s)?	Do Project Modifications Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
VII. HAZARDS AND HAZARDOUS MATERIALS. Would the Project:					
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Yes	No	No	No	N/A
g. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	Yes	No	No	No	N/A

Discussion:*Environmental Setting:*

A hazardous material is defined as any material that, because of quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment (Health and Safety Code §25501(o)). The term “hazardous materials” refers to both hazardous substances and hazardous wastes. Under federal and state laws, any material, including wastes, may be considered hazardous if it is specifically listed by statute as such or if it is toxic (causes adverse human health effects), ignitable (has the ability to burn), corrosive (causes severe burns or damage to materials), or reactive (causes explosions or generates toxic gases).

Hazardous wastes are hazardous substances that no longer have practical use, such as materials that have been spent, discarded, discharged, spilled, contaminated, or are being stored until they can be disposed of properly (22 CCR Section 66261.10). Soil that is excavated from a site containing hazardous materials is a hazardous waste if it exceeds specific 22 CCR criteria. While hazardous substances are regulated by multiple agencies, cleanup requirements of hazardous wastes are determined on a case-by-case basis according to the agency with lead jurisdiction over the project.

Stormwater and urban runoff may also pick up hazardous pollutants, including but not limited to, fuels, oils, grease, and chemicals from motor vehicles and mechanized equipment; fertilizers, pesticides, and herbicides from landscaping and gardens; viruses, bacteria, and nutrients from pet waste and septic systems; road salts; and heavy metals from various sources.

The project site consists of existing roads and parkways. There are no hazardous materials sites,³⁵ schools, or airports located within a quarter mile of the project site. The project site is located in a Very High Fire Hazard Severity Zone.³⁶ Fire protection in the region is provided by the Los Angeles County Fire Department (LACFD); however, mutual aid is also given by the Ventura County Fire Department, City of Los Angeles, and California Department of Forestry. The nearest fire station to the project site is LACFD Station 84 (21050 Burbank Blvd. Woodland Hills, CA 91367), which is approximately 4.1 miles north of the project site. Topanga Canyon Boulevard, which provides regional access to the project site and is adjacent to the western boundary of the project site, is considered a freeway disaster route. Additionally, the Topanga Coalition for Emergency Preparedness, a non-governmental organization that gathers and disseminates information to the local population near the project site, identifies Viewridge Road as a Public Safe Refuge Area, which is an area where evacuees may be redirected if evacuation is not possible due to traffic gridlock.³⁷

PEIR Checklist Analysis

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

The PEIR determined that impacts related to the routine transport, use, or disposal of hazardous materials would be less than significant. Construction activities for the proposed project would include ground-disturbing activities such as excavation, and would use hazardous materials typical of construction (i.e., fuel for construction equipment, materials for road construction). However, the transport, use, and disposal of construction-related hazardous materials would comply with applicable laws and regulations for such activities. Once operational, the proposed project would primarily use passive treatment techniques that capture stormwater and then reduce pollutant loads and stormwater volumes through containment, filtration, infiltration, and/or treatment techniques. Operation of the proposed project would not require the routine transport, use, or disposal of hazardous materials. Similar to the approved program, impacts related to the routine transport, use, or disposal of hazardous materials would be less than significant. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

The PEIR determined that impacts related to the accidental release of hazardous materials into the environment would be less than significant with mitigation, which requires the development of a BMP maintenance plan that addresses the potential accumulation of contaminants from migrating into sub-soils and groundwater. Construction activities for the proposed project would involve the limited transport, storage, use, or disposal of hazardous materials, such as fuel for construction

³⁵ California Environmental Protection Agency. Cortese List Data Resources. Available at: <https://calepa.ca.gov/sitecleanup/corteselist/>, accessed July 18, 2019.

³⁶ Los Angeles County Office of the Assessor. GIS Viewer. Available at: <http://egisgcx.isd.lacounty.gov/slv/?Viewer=GISViewer>, accessed July 18, 2019.

³⁷ Topanga Coalition for Emergency Preparedness, Public Safe Refuges and Public Temporary Refuge Areas. Available at: PSRTRA1Page (t-cep.org), accessed August 12, 2021.

equipment and materials for road construction. These types of materials, however, are not acutely hazardous, and all storage, handling, and disposal of these materials would comply with existing regulations. Compliance with regulations would ensure a less than significant impact related to creating a significant hazard to the public through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment with regard to construction of the proposed project.

Operation of the proposed project would not increase the potential for accidental release of hazardous materials into the environment. During operation, implementation of the proposed project would serve to add protection against accidental spills and urban runoff. Contaminants in runoff water from accidental spills or urban runoff may accumulate in the soils and vegetation of the biofiltration units. As such, consistent with the approved program, the proposed project would implement mitigation measure HAZ-1. Mitigation measure HAZ-1 would address the accumulation of contaminants in soil at BMPs through the development of operations and maintenance plans for BMPs that include periodic removal and replacement of these potentially impacted surface materials to reduce the potential for long-term loading leading to hazardous concentrations in soils and groundwater. Similar to the approved program, the proposed project would result in less than significant impacts with mitigation measure HAZ-1. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

HAZ-1 Implementing agencies shall prepare and implement maintenance practices that include periodic removal and replacement of surface soils and media that may accumulate constituents that could result in further migration of constituents to sub-soils and groundwater. A BMP Maintenance Plan shall be prepared by Implementing Agencies upon approval of the BMP projects, that identifies the frequency and procedures for removal and/or replacement of accumulated debris, surface soils and/or media (to depth where constituent concentrations do not represent a hazardous conditions and/or have the potential to migrate further and impact groundwater) to avoid accumulation of hazardous concentrations and the potential to migrate further to sub-soils and groundwater. The Maintenance Plan shall include vector control requirements. The BMP Maintenance Plan may consist of a general maintenance guideline that applies to several types of smaller distributed BMPs. For smaller distributed BMPs on private property, these plans may consist of a maintenance covenant that includes requirements to avoid the accumulation of hazardous concentrations in these BMPs that may impact underlying subsoils and groundwater. Structural BMPs shall be designed to prevent migration of constituents that may impact groundwater.

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

The PEIR determined that some structural BMPS may be installed within one-quarter mile of a school, and potentially involve hazardous materials during construction and operation. However, compliance with regulations governing the use, transport, and

disposal of hazardous materials would ensure a less than significant impact. The PEIR further determined that structural BMPs constructed on school properties may collect spills from off-site sources or accumulate contaminants from urban runoff in soil in the BMPs over time. However, with implementation of mitigation measure HAZ-1, as described in Section (b) above, impacts related to handling hazardous materials within one-quarter mile of a school would be less than significant with mitigation.

There are no schools located within one-quarter mile of the project site. Additionally, as discussed in Sections (a) and (b) above, construction of the proposed project would involve the limited use of hazardous materials, and would be handled in accordance with applicable federal, state, and local regulations regarding storage, use, and disposal. No impact would occur related to hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing school. As the proposed project would not be constructed on school facilities or within school sites, no impact would occur, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

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

The PEIR determined that some structural BMPs may be located on a hazardous materials site, which would be considered significant impact requiring mitigation as contaminated soils and/or groundwater could be encountered during ground-disturbing activities. The proposed project would not be located on or near a hazardous materials site. As the construction of the proposed project would not expose workers or the public to hazardous materials. No impact would occur, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

- e. Would the project be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, or for a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?**

The PEIR determined that, for projects located within an airport land use plan or within 2 miles of a public airport, or within the vicinity of a private airstrip, impacts related to safety hazards for people residing and working in the area would be less than significant with mitigation. There are no airports or private airstrips located within 2 miles of the project site.³⁸ As such, the proposed project would not create a safety hazard for people residing or working in or adjacent to the project site. No impact would occur, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

³⁸ AirNav. Search by location. Available at: <http://www.airnav.com/>, accessed May 1, 2019.

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

The PEIR determined that impacts associated with impairing or interfering with an adopted emergency response or evacuation plan would be less than significant. During construction of the proposed project, partial road closures would be necessary along the Viewridge Road ROW as well as areas along Hodler Drive, Voltaire Drive, Chagall Road, Heidi Lane, and Bellini Drive. These partial closures would be temporary, occurring only for the duration of construction activities. However, these temporary closures could affect emergency response and/or evacuation plans. No partial closures would occur on Topanga Canyon Boulevard, a freeway disaster route. However, partial closures would be required on Viewridge Road, which is identified as a local Public Safe Refuge Area. These areas are identified by the Topanga Coalition for Emergency Preparedness as areas where evacuees may be redirected if evacuation is not possible due to traffic gridlock.³⁹ Consistent with the approved program, as discussed further in Section XII (a) below, mitigation measure PS-1 would require the advance notification to emergency services providers and homeowners and residents within the project area to ensure that emergency responsiveness was not impaired during construction work. Additionally, as further discussed in Section XIII (a), consistent with the approved program, the proposed project would implement mitigation measure TRAF-1, which includes the preparation of a traffic control plan during construction. No long-term impacts would result from operation of the proposed project. Similar to the approved program, impacts would be less than significant with implementation of mitigation measures PS-1 and TRAF-1, and no new mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

g. Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

The PEIR determined that impacts related to risk of loss, injury, or death involving wildland fires would be less than significant. Portions of the project site are located within a Very High Fire Hazard Severity Zone, as identified by the California Department of Forestry and Fire Protection (CalFire).⁴⁰ However, the proposed project would be implemented within existing ROW's and adjacent parkways. Additionally, as discussed in Section 1.6 of the Chapter 1, Project description, the construction crews would have fire suppression equipment to respond to accidental ignition of fire. Adherence to the requirements of the Department of Transportation and California Vehicle Code for spark arrester protection on vehicles would reduce the potential risk. Furthermore, the proposed project does not include any habitable structures. Similar to the approved program, the proposed project would result in less than significant impacts, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

³⁹ Topanga Coalition for Emergency Preparedness, Public Safe Refuges and Public Temporary Refuge Areas. Available at: PSRTA1Page (t-cep.org), accessed August 12, 2021.

⁴⁰ California Department of Forestry and Fire Protection. Fire and Resource Assessment Program, Los Angeles County Fire Hazard Severity Map, November 2007. Available at: http://frap.fire.ca.gov/webdata/maps/los_angeles/fhszs_map.19.pdf, accessed May 1, 2019.

Updated CEQA Checklist Analysis

The 2019 CEQA Guidelines Appendix G checklist does not include any new or updated thresholds for hazards and hazardous materials. As such, the proposed project would not have any additional impacts on hazards and hazardous materials, and no new mitigation measures are required. The findings for the proposed project remain consistent with the impact determinations identified in the PEIR for the approved program.

Issues and Supporting Data Sources	Was Impact Analyzed Prior Environmental Document(s)?	Do Project Modifications Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
VIII. HYDROLOGICAL RESOURCES. Would the Project:					
a. Violate any water quality standards or waste discharge requirements?	Yes	No	No	No	N/A
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	Yes	No	No	No	N/A
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	Yes	No	No	No	Yes
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	Yes	No	No	No	N/A
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	Yes	No	No	No	N/A

Issues and Supporting Data Sources	Was Impact Analyzed Prior Environmental Document(s)?	Do Project Modifications Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
VIII. HYDROLOGICAL RESOURCES. Would the Project:					
f. Otherwise substantially degrade water quality?	Yes	No	No	No	N/A
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	Yes	No	No	No	N/A
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	Yes	No	No	No	N/A
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure or a levee or dam?	Yes	No	No	No	N/A
j. Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	Yes	No	No	No	N/A

Discussion:*Environmental Setting:*

The climate of the project area is Mediterranean, characterized by warm, dry summers and wet, cool winters with average precipitation of 12 inches per year.⁴¹ The project site is located in the NSMBCW EWMP area, which encompasses 55,121 acres including portions of six HUC-12 watersheds, 18 subwatersheds, and 28 freshwater coastal streams as defined by the Los Angeles Basin Plan.⁴² The area is characterized by lower-density development along the

⁴¹ Los Angeles County Public Works. 2010 Urban Water Management Plan for Waterworks District No. 29, Malibu and the Marina Del Rey Water System. Available at: <https://dpw.lacounty.gov/wwd/web/Documents/2010%20Urban%20Water%20Management%20Plan%20for%20District%20No.%2029%20and%20the%20Marina%20del%20Rey%20Water%20System.pdf>, accessed July 22, 2019

⁴² California Water Boards, Los Angeles. North Santa Monica Bay Watershed Management Group. Enhanced Watershed Management Program (EWMP) Work Plan for North Santa Monica Bay Coastal Watersheds EWMP Group, June 2014. Available at: https://www.waterboards.ca.gov/losangeles/water_issues/programs/stormwater/municipal/watershed_mana

coast and the larger creeks with greater open space and park areas inland. The NSMBCW subwatersheds are tributary to Santa Monica Bay.

This project is located in the Topanga Canyon subwatershed, which is the largest subwatershed within the NSMBCW EWMP Area. It is a 12,611-acre subwatershed that is mostly undeveloped. There is little development near the shoreline other than Topanga Beach Park, a small commercial area, and a small (2-acre) maintenance facility zoned as industrial land use. The central and eastern areas of the subwatershed consist of undeveloped land, rural residential, commercial, public, equestrian, educational, and mixed urban land uses.

The eastern portion of the project site is located in an area currently designated by the Federal Emergency Management Agency (FEMA) as Zone D, areas in which flood hazards are undetermined, but possible.⁴³

Water quality priorities for the watershed include bacteria, toxics, trash, and nutrients as well as benthic community impairments. The primary benefit of the proposed project is water quality. By treating the 85th percentile, 24-hour storm event, the proposed project would reduce bacteria, metals, nutrients, trash, and other pollutants of concern potentially being discharged into Topanga Canyon Creek and Santa Monica Bay, and would assist in addressing the County's TMDL compliance efforts.

Based on the geotechnical report conducted for the proposed project, groundwater was not encountered in any of the exploratory borings. Based on review of the California Department of Conservation Seismic Hazard Zone Report for the Canoga Park Quadrangles, the historical high groundwater level for the project area is at a depth of 10 feet.⁴⁴

The nearest reservoirs to the project site are the Encino Reservoir and Franklin Canyon Reservoirs, both located to the east; additionally, there is a dam located south of the project site. The project site is not located within a tsunami inundation area.⁴⁵

PEIR Checklist Analysis

a. **Would the project violate any water quality standards or waste discharge requirements?**

The PEIR determined that impacts related to water quality standards or waste discharge requirements would be less than significant. Construction activities have the potential to degrade water quality through the exposure of surface runoff to exposed soils, dust, and other debris, as well as from runoff from construction equipment. However, consistent with the approved program, the proposed project would comply with National Pollutant Discharge Elimination System (NPDES) Phase II requirements and implement construction BMPs. As the proposed project would install pretreatment

gement/santa_monica/north_santamonicabay/North%20Santa%20Monica%20Bay%20Coastal%20Watersheds%20WMG_WP.pdf, accessed July 22, 2019.

⁴³ FEMA. Flood Insurance Rate Map, Los Angeles County and Incorporated Areas, Panel 1290 of 2350, December 2018. Available at http://pw.lacounty.gov/des/NAS/FEMA_FIRM_Sept2008/06037C1288G.pdf, accessed July 22, 2019.

⁴⁴ Los Angeles County Public Works, Geotechnical and Materials Engineering Division. *Geotechnical Investigation for the Topanga Viewridge Super Greenstreets Project*, August 2016.

⁴⁵ Los Angeles County Department of Regional Planning. Figure 12.3, Tsunami Hazard Areas. Available at: http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_12-3_la_co_tsunami_hazard_areas.pdf, accessed July 22, 2019.

and biofiltration units to improve the quality of stormwater runoff entering the existing storm drain system, it would minimize the off-site transport of typical urban runoff pollutants during operation. Similar to the approved program, the proposed project would result in less than significant impacts related to water quality standards or waste discharge requirements, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

- b. Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?**

The PEIR determined that impacts related to groundwater supplies would be less than significant with mitigation for areas with shallow groundwater, soils, and aquifers. The proposed project would capture runoff and stormwater, which would be pretreated to remove sediments and debris, before being returned to the storm drain. The project site is currently developed with roadways and adjacent parkways consisting of impervious surfaces. Following completion of construction activities, the project site would slightly increase permeable surface with the addition of a new median that would capture and pre-treat stormwater flows. Groundwater would not be extracted during construction or operation of the proposed project. Therefore, the impact to groundwater recharge would be less than significant, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

- c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?**

The PEIR determined that the proposed structural BMPs would reduce the potential for erosion or siltation within existing streams or river, and impacts would be less than significant with mitigation that requires evaluation of potential hydromodification impacts from the structural BMPs. The proposed project would capture runoff and stormwater, which would be pretreated to remove sediments and debris, before being returned to the storm drain. As such, it is anticipated that the proposed project would be effective in minimizing erosion or transport of sedimentation into receiving waters. Under existing conditions, flows from Heidi Lane and Bellini Drive are discharged into the existing storm drain system just east of the Chagall Road eastern terminus. The proposed project would divert flows from Heidi Lane and Bellini Drive to the proposed new median on Viewridge Road, which would discharge flows into the existing drainage system at the eastern terminus of Viewridge Road. However, it is not anticipated that the change in discharge locations would result in impacts to erosion or siltation. Nonetheless, the proposed project would implement mitigation measure HYDRO-4, which requires evaluation of potential hydromodification impacts from the structural BMPs, similar to the approved program, to ensure that impacts related to flooding, erosion, and/or scour would be less than significant. No additional mitigation measures are required. This finding is consistent with the impact determination in the

PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

HYDRO-4 Prior to approving a structural BMP, the implementing agencies shall conduct an evaluation of the potential hydromodification impacts of the project. The evaluation shall recommend design measures necessary to prevent or minimize any identified impacts, including flooding, erosion and/or scour. Design measures could include velocity dissipaters and bank re-enforcement components. Implementing agencies shall include these measures in project designs.

d. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

The PEIR determined that impacts related to alteration of drainage patterns resulting in flooding would be less than significant. The proposed project would be designed to handle stormwater runoff from an 85th percentile, 24-hour storm event, and divert urban and stormwater runoff from local unincorporated communities for flow-through treatment and discharge to the existing storm drain. By retaining stormwater flows and either infiltrating or releasing these flows closer to the natural hydrograph, the change in drainage patterns would result in reduced peak flows and as a result a reduced potential for flooding on- or off-site. Similar to the approved program, impacts would be less than significant, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

e. Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

The PEIR determined that impacts related to stormwater drainage systems would be less than significant. The proposed project would capture stormwater from local unincorporated communities for treatment and returned to the existing storm drain system. The proposed project would improve the quality of stormwater runoff entering the existing storm drain system. Similar to the approved program, impacts would be less than significant, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

f. Would the project otherwise substantially degrade water quality?

The PEIR determined that impacts related to substantially degrading water quality would be less than significant. Other than the sources described for construction activities (i.e., potential soil erosion and fuels for construction equipment), the proposed project does not include other potential sources of contaminants that could potentially degrade water quality. Consistent with the approved program, the proposed project would comply with NPDES Phase II requirements and implement construction BMPs. Once constructed, the proposed project would reduce bacteria, metals, nutrients, trash, and other pollutants of concern potentially being discharged into

Topanga Canyon Creek and Santa Monica Bay, and would assist in addressing the County's TMDL compliance efforts. Similar to the approved program, the proposed project would result in less than significant impacts related to substantially degrading water quality, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

g. Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

The PEIR determined that no impact would occur related to placing housing within a 100-year flood hazard area. The proposed project does not include any housing or habitable structures. Therefore, the proposed project would not place housing within a 100-year flood hazard area. No impact would occur, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

h. Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

The PEIR determined that less than significant impacts would occur related to placing structures within a 100-year flood hazard area. The project site is not located within a 100-year flood hazard area. Therefore, no impact would occur, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

i. Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure or a levee or dam?

The PEIR determined that impacts related to failure of a levee or dam would be less than significant. The nearest reservoirs to the project site are the Encino Reservoir and Franklin Canyon Reservoirs, both located to the east; additionally, there is a dam located south of the project site. The proposed project would consist of features with a very low profile and would be designed to aid in the conveyance of runoff and high flows. Additionally, the proposed project does not include any housing or habitable structures. Similar to the approved program, impacts would be less than significant, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

j. Would the project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?

The PEIR concluded that impacts related to inundation by seiche, tsunami, or mudflow would be less than significant. The project site is not located in a coastal zone and, thus, is not susceptible to tsunami. Furthermore, the project site is not located in proximity to an enclosed body of water that could produce a seiche. The proposed project consists of subterranean improvements and low profile features that are

generally not considered susceptible to substantive damage from these hazards. Similar to the approved program, impacts would be less than significant, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

Updated CEQA Checklist Analysis

While the 2019 CEQA Guidelines Appendix G checklist has reorganized the thresholds contained in the 2015 checklist regarding hydrological resources, thresholds (a) through (d) of the current checklist are addressed within the 2015 checklist. However, under threshold (e), the current checklist now includes assessment criteria for potential conflicts with or obstructions to implementation of a water quality control plan or sustainable groundwater management plan. As previously stated in Sections 2.4 and 2.5 of the Project Description, the proposed project has been identified by the EWMP Group as a priority regional project that addresses the goals and objectives of the PEIR regarding MS4 permit compliance. The proposed project would help achieve permit compliance for TMDLs, Receiving Water Limitations, and Water Quality-Based Effluent Limitations through implementation of BMPs designed to capture stormwater for treatment. The proposed project is designed to capture stormwater for treatment and discharge to the existing storm drain at the project site. As such, the proposed project would not conflict with or obstruct a water quality control or sustainable groundwater management plan; rather, the implementation of the proposed project would aid in achieving compliance with the MS4 permit and improve water quality and groundwater sustainability. No impacts would occur in light of this new threshold. As such, the proposed project would not have any additional impacts on hydrological resources, and no new mitigation measures are required. The findings for the proposed project remain consistent with the impact determinations identified in the PEIR for the approved program.

Issues and Supporting Data Sources	Was Impact Analyzed Prior Environmental Document(s)?	Do Project Modifications Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
IX. LAND USE AND AGRICULTURE. Would the project:					
a. Physically divide an established community?	Yes	No	No	No	N/A
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	Yes	No	No	No	N/A
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	Yes	No	No	No	N/A
d. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	Yes	No	No	No	N/A
e. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	Yes	No	No	No	N/A

Issues and Supporting Data Sources	Was Impact Analyzed Prior Environmental Document(s)?	Do Project Modifications Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
IX. LAND USE AND AGRICULTURE. Would the project:					
f. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	Yes	No	No	No	N/A
g. Result in the loss of forest land or conversion of forest land to non-forest use?	Yes	No	No	No	N/A
h. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	Yes	No	No	No	N/A

Discussion:*Environmental Setting:*

The project site is located in the North Santa Monica Bay Coastal Watersheds EWMP area within an unincorporated community of the County of Los Angeles. The North Santa Monica Bay Coastal Watersheds EWMP area encompasses 55,121 acres and is comprised of over 93 percent of vacant land.

Land use decisions in the County of Los Angeles is governed by the Land Use Element of the Los Angeles County General Plan.⁴⁶ The Land Use Element provides strategies and planning tools to facilitate and guide future development and revitalization efforts for unincorporated areas. The project site is located in the Santa Monica Mountains North Area Plan area, which refines the policies of the County's General Plan as applicable to the area.⁴⁷

The proposed project would be constructed completely within the existing road ROW and/or parkways adjacent to the roadways. All portions of the project site are owned and maintained by the County, with the exception of the temporary construction staging along the east shoulder of Topanga Canyon Boulevard, which is Caltrans ROW. Surrounding the project site is a low-density residential neighborhood characterized by single-family homes. Additionally, there are open space areas on the west side of Topanga Canyon Boulevard and to the south of Viewridge Road east of the Heidi Lane.

The project site is not located within a habitat conservation plan or natural community conservation plan area.

The County of Los Angeles contains very little agricultural or forest land, as the majority of the land is urbanized with some adjacent rural areas. The watersheds in the northwestern corner of the County along the coast contain land designated as Farmland of Local Potential by the California Department of Conservation. This type of land is primarily located in the North Santa Monica Bay Coastal and the Malibu Creek Watersheds. However, the project site is located within an area designated as Urban and Built-Up Land by the California Division of Land Resource Protection Farmland Mapping and Monitoring Program,⁴⁸ and the area surrounding the project site is currently zoned R-1 and developed with single-family residences. The only Williamson Act contracts in effect in Los Angeles County are for land on Santa Catalina Island, which is not located within the EWMP group areas.⁴⁹

PEIR Checklist Analysis

a. Would the project physically divide an established community?

The PEIR determined that no impact would occur associated with physically dividing an established community. The proposed median, diversion line, and biofiltration units would be located entirely within the existing roadway and/or adjacent parkways. Following installation of these facilities, all roadways would be returned to their existing condition. The electrical cabinets and temporary monitoring equipment cabinets would not block off access along the sidewalks, and no streets or sidewalks would be permanently closed as a result of the proposed project. No separation of uses or disruption of access between land use types would occur. Similar to the approved

⁴⁶ County of Los Angeles Department of Regional Planning, County of Los Angeles General Plan, Chapter 6: Land Use Element. Available at: http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch6.pdf, accessed July 16, 2019.

⁴⁷ County of Los Angeles Department of Regional Planning, County of Los Angeles General Plan, Santa Monica Mountains North Area Plan. 2000. Available at: http://planning.lacounty.gov/assets/upl/data/pd_smm.pdf, accessed July 16, 2019.

⁴⁸ State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping & Monitoring Program. *Important Farmland in California, 2016* map. Website: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf>, accessed July 12, 2019.

⁴⁹ California Department of Conservation, Division of Land Resource Protection. Los Angeles County Williamson Act FY 2015/2016 Map. Available at: ftp://ftp.consrv.ca.gov/pub/dlrp/wa/LA_15_16_WA.pdf, accessed April 26, 2019.

program, the proposed project would not divide an established community. No impact would occur, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

- b. Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?**

The PEIR determined that no impact would occur related to conflict with any applicable land use plan, policy, or regulation. The area surrounding Viewridge Road east of Topanga Canyon Boulevard is designated as U4-Residential in the Los Angeles County General Plan. Additionally, the area surrounding Viewridge Road is zoned R-1, for Single Family Residences. The proposed project would implement biofiltration units and associated infrastructure within existing roadways and adjacent parkways, and would not change the existing land use at the project site or in the surrounding area. Therefore, the proposed project would not conflict with any applicable land use plan, policy or regulation. Similar to the approved program, the proposed project would result in no impact, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

- c. Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?**

The PEIR determined that impacts regarding conflict with habitat conservation plans or natural community conservation plans would be less than significant. The proposed Project is not located within a habitat conservation plan or natural community conservation plan area. As such, no impact would occur, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

- d. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

The PEIR determined that there would be no impact to farmland. The proposed project would not convert farmland to non-agricultural uses. The project site is located within an area designated as Urban and Built-Up Land by the California Division of Land Resource Protection Farmland Mapping and Monitoring Program. The area surrounding the project site is currently zoned R-1 and developed with single-family residences. Therefore, no impact to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would occur. Similar to the approved program, the proposed project would result in no impacts to agricultural and forestry resources, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

e. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

The PEIR determined that there would be no impact to existing agricultural zoning or land under the Williamson Act contract. The project site is located entirely within the existing road ROW and/or parkways, and the adjacent parcels are not zoned or developed for agricultural use. Furthermore, the only land in Los Angeles County currently under a Williamson Act contract is located on Santa Catalina Island, approximately 47 miles southeast of the project site. Therefore, the proposed project would not conflict with existing zoning or a Williamson Act contract. Similar to the approved program, the proposed project would result in no impacts, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

f. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

The PEIR determined that no impact on forest land, timberland, or timberland zoned Timberland Production would occur. The area surrounding the project site is zoned R-1 and OS, for residential and open space uses. No portion of the project site is zoned for or developed as forest land or timberland as defined in Pub. Res. Code Section 12220(g) and Government Code Section 4526, respectively.⁵⁰ Therefore, the proposed project would not conflict with existing zoning or cause the rezoning of forest or timberland areas. Similar to the approved program, the proposed project would result in no impacts, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

g. Would the project result in the loss of forest land or conversion of forest land to non-forest use?

The PEIR determined that no impact on forest land would occur. The area surrounding the project site is zoned R-1 and OS, for residential and open space uses. No portion of the project site or adjacent properties are zoned or developed for a forest land use.⁵¹ Therefore, the proposed project would not result in loss of forest land or conversion of forest land to non-forest use. Similar to the approved program, the proposed project would result in no impacts, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

⁵⁰ Los Angeles County Department of Regional Planning. GIS-NET. Available at: http://rpgis.isd.lacounty.gov/Html5Viewer/index.html?viewer=GISNET_Public.GIS-NET_Public, accessed December 4, 2018.

⁵¹ Ibid.

h. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

The project site and adjacent properties are designated as Urban and Built-Up Land, and no portion of the project site or surrounding area is identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.⁵² Additionally, no forest lands exist on or adjacent to the project site. Therefore, the proposed project would not change the existing environment resulting in the conversion of Farmland to non-agricultural use or forest land to non-forest use. Similar to the approved program, the proposed project would result in no impacts, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

Updated CEQA Checklist Analysis

The 2019 CEQA Guidelines Appendix G checklist does not include any new or updated thresholds for agriculture in comparison to the 2015 checklist used to analyze the PEIR. However, the 2019 CEQA Guidelines Appendix G checklist no longer includes threshold (c) of the 2015 checklist as part of the impact analysis for land use and planning. Prior to 2019, threshold (c) under land use and planning was similar to threshold (f) from the biological resources analysis. Therefore, the 2019 update eliminated that redundancy, but the topic remains covered in the biological resources analysis. As such, the proposed project would not have any additional impacts on land use and planning, and no new mitigation measures are required. The findings for the proposed project remain consistent with the impact determinations identified in the PEIR for the approved program.

⁵² State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping & Monitoring Program. *Important Farmland in California, 2016* map. Website: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf>, accessed May 1, 2019.

Issues and Supporting Data Sources	Was Impact Analyzed Prior Environmental Document(s)?	Do Project Modifications Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
X. NOISE. Would the project result in:					
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Yes	No	No	No	Yes
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	Yes	No	No	No	N/A
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	Yes	No	No	No	N/A
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	Yes	No	No	No	Yes
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	Yes	No	No	No	N/A
f. For a project located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	Yes	No	No	No	N/A

Discussion:*Environmental Setting:*

This analysis is based on the Noise and Vibration Impact Assessment prepared for the proposed project (Appendix E). The project site is located within a low-density residential neighborhood characterized by single-family homes. Additionally, there are open space areas on the west side of Topanga Canyon Boulevard and to the south of Viewridge Road east of the Heidi Lane. Existing noise sources in the area are those typically associated with urbanized environments, including vehicles and human activities, such as lawn mowing or playing music. Sensitive receptors within the project area include single-family residences located adjacent to proposed construction activities.

PEIR Checklist Analysis

- a. Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

The PEIR determined that impacts related to construction noise levels in excess of standards established in the local general plan or noise ordinance would be significant and unavoidable. Construction of the proposed project is anticipated to begin in summer 2022 and take up to nine months to complete, concluding in spring 2023. The County of Los Angeles Municipal Code allow construction activity to occur Monday through Friday between the hours of 7:00 a.m. and 7:00 p.m. Daily construction would not likely occur after 6:00 p.m. No construction activities are expected to take place on Sundays or federal holidays, and no construction would occur during prohibited hours. Per County of Los Angeles Municipal Code Section 12.08.570(H), the improvements proposed for the project would be exempt from the Noise Ordinance.

Nonetheless, construction noise was assessed at sensitive receptors near the project site per the County of Los Angeles construction noise limits in the noise technical memorandum prepared for the proposed project (Appendix E). When considered as an entire process with multiple pieces of equipment, the loudest construction phase for the proposed project is anticipated to be site preparation, which typically generates a noise level of 83.5 dBA L_{eq} at 50 feet. Residences would typically be located approximately 50 feet from construction activity related to the Viewridge Road median. Biofiltration unit installation along Viewridge Road, Holder Drive, Chagall Road, and Voltaire Drive, and on Viewridge Road just east of Topanga Canyon Boulevard, would typically occur approximately 15 feet from residences. Electrical cabinet installation along Viewridge Road would typically occur approximately 15 feet from residences. Construction noise levels would exceed the 60 dBA daytime construction noise limit established for single-family residences in the Noise Ordinance. Consistent with the approved program, the proposed project would implement mitigation measure NOISE-1, which requires implementation of noise-reducing measures as well as notification to sensitive receptors. Additionally, project-specific control measures are tiered from mitigation measure NOISE-1 in the PEIR.

The project-specific control measures are designed to reduce construction noise levels. The equipment mufflers associated with Mitigation Measure NOISE-1a would reduce construction noise levels by approximately 3 dBA. The sound blankets

associated with Mitigation Measure NOISE-1b would reduce construction noise levels by approximately 35 dBA at locations with equipment activities lasting more than one month at the same location. Mitigation measures NOISE-1c and NOISE-1d, although difficult to quantify, would also reduce and/or control construction noise levels. Similar to the approved program, construction related noise would be reduced to the maximum extent feasible, but mitigated equipment noise levels would still exceed the County of Los Angeles Municipal Code's noise standard of 60 dBA for residential uses. Therefore, similar to the PEIR, the proposed project would result in a significant and unavoidable impact related to construction noise.

The PEIR determined that impacts related to operational noise levels in excess of standards established in the local general plan or noise ordinance would be less than significant with mitigation requiring mechanized stationary equipment that generate noise levels comply with the applicable noise standards established by the implementing agency with jurisdiction over the structural BMP site. Upon project operation, the only project component that may generate noise are the electrical and mechanical equipment associated with operation of the slide gates and pretreatment unit under the proposed new median, and the monitoring equipment. Of these components, only the electrical and temporary monitoring cabinets would be installed above ground, and the noise levels would be negligible. The proposed project would be consistent with mitigation measure NOISE-2 to comply with the applicable established noise standards as the mechanized equipment would be installed underground and the electrical cabinets would be enclosed. Sound blankets may also be installed in the monitoring cabinets to provide additional noise reduction. As such, the operational noise levels associated with the proposed project would not exceed or violate noise standards and regulations established by implementing agencies. Similar to the PEIR, impacts would be less than significant with mitigation measures NOISE-1 and NOISE-2. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

NOISE-1 The implementing agencies shall implement the following measures during construction as needed:

- Include design measures necessary to reduce the construction noise levels to where feasible. These measures may include noise barriers, curtains, or shields.

(a) Construction equipment shall be properly maintained and equipped with mufflers; and

For equipment activities lasting more than one month in one location and within 500 feet of a sensitive receptor, temporary barriers (e.g., noise blankets) shall be placed between the equipment and sensitive receptor. The barriers shall be at least six feet tall and capable of attenuating noise levels by 35 dBA.

- Place noise-generating construction activities (e.g., operation of compressors and generators, cement mixing, general truck idling) as far as possible from the nearest noise-sensitive land uses.

(b) Equipment shall be located on portions of Viewridge Road and Topanga Canyon Road that do not abut residential properties, if allowed by the construction needs.

- Locate stationary construction noise sources as far from adjacent noise-sensitive receptors as possible.

(c) Equipment shall be located on portions of Viewridge Road and Topanga Canyon Road that do not abut residential properties, if allowed by the construction needs.

- If construction is to occur near a school, the construction contractor shall coordinate the with school administration in order to limit disturbance to the campus. Efforts to limit construction activities to non-school days shall be encouraged.
- For the centralized and regional BMP projects located adjacent to noise-sensitive land uses, identify a liaison for these off-site sensitive receptors, such as residents and property owners, to contact with concerns regarding construction noise and vibration. The liaison's telephone number(s) shall be prominently displayed at construction locations.

(d) Because residences would be located adjacent to construction activities, the construction area shall display the name and phone number of a liaison to contact with concerns regarding construction noise and vibration.

- For the centralized and regional BMP projects located adjacent to noise-sensitive land uses, notify in writing all landowners and occupants of properties adjacent to the construction area of the anticipated construction schedule at least 2 weeks prior to groundbreaking.

NOISE-2 All structural BMPs that employ mechanized stationary equipment that generate noise levels shall comply with the applicable noise standards established by the implementing agency with jurisdiction over the structural BMP site. The equipment shall be designed with noise-attenuating features (e.g., enclosures) and/or located at areas (e.g., belowground) where nearby noise-sensitive land uses would not be exposed to a perceptible noise increase in their noise environment.

The text in *italics* represent project-specific control measures tiered from Mitigation Measure NOISE-1 in the PEIR.

b. Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

The PEIR determined that impacts related to vibration would be less than significant. Construction activity can generate varying degrees of vibration, depending on the

procedure and equipment. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of a construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, and to slight damage at the highest levels. In most cases, the primary concern regarding construction vibration relates to damage. The proposed project would require equipment similar to bulldozers and excavators, in addition to equipment with smaller engines. All portions of the project site are owned and maintained by the County, with the exception of the temporary construction staging along the east shoulder of Topanga Canyon Boulevard, which is Caltrans ROW. Therefore, the significance threshold established in the Noise Ordinance is 0.01 inches per second at 150 feet. Bulldozers and excavators generate vibration levels of approximately 0.089 inches per second at 25 feet. At 150 feet, the vibration level from bulldozers and excavators would be approximately 0.006 inches per second. As such, project-related vibration levels would not exceed the standard in the Noise Ordinance. Similar to the PEIR, the proposed project would result in a less than significant impact related to vibration. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

c. Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

The PEIR determined that impacts related to a permanent increase in ambient noise levels would be less than significant with mitigation requiring implementation of noise-reducing measures as well as notification to sensitive receptors, and all structural BMPs that employ mechanized stationary equipment that generate noise levels comply with the applicable noise standards established by the implementing agency with jurisdiction over the structural BMP site. The proposed project involves the installation of biofiltration units within the existing roadways and/or adjacent parkways to capture and treat stormwater runoff in the project area. Upon project operation, the only project component that may generate noise is the electrical and mechanical equipment associated with operation of the slide gates and pretreatment unit under the proposed new median. Of these components, only the electrical cabinets would be installed above ground, and the noise levels would be negligible. The proposed project would be consistent with mitigation measure NOISE-2 to comply with the applicable established noise standards as the mechanized equipment would be installed underground and the electrical cabinets would be enclosed. With implementation of mitigation measure NOISE-2, the proposed project would not result in a substantial permanent increase in ambient noise levels. Similar to the PEIR, the impact would be less than significant with mitigation. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

d. Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

The PEIR determined that impacts related to construction noise levels would be significant and unavoidable. As previously discussed in threshold (a), nearby sensitive

receptors would experience increased noise levels associated with construction. Construction noise would be temporary but would exceed the standards established in the Los Angeles County Noise Ordinance. Mitigation measures would reduce noise levels, but not to below the County standards. Therefore, similar to the approved program, the proposed project would result in a significant and unavoidable impact related to temporary and periodic construction activity. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

- e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

The PEIR determined that, for projects located within an airport land use plan or within 2 miles of a public airport, impacts related to exposure to airport noise would be less than significant. There are no airports located within 2 miles of the project site. As such, the proposed project would not expose people residing or working in the project area to excessive noise levels. No impact would occur, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

- f. For a project located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?**

The PEIR determined that, for projects located within the vicinity of a private airstrip, impacts related to exposure to airport noise would be less than significant. No private airstrip is located in the vicinity of the project site. As such, the proposed project would not expose people residing or working in the project area to excessive noise levels. No impact would occur, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

Updated CEQA Checklist Analysis

The 2019 CEQA Guidelines Appendix G checklist has reorganized and condensed the thresholds contained within the 2015 checklist used in the PEIR to assess impacts to noise; however, the 2015 checklist encompasses the analyses for all current thresholds, and no additional thresholds have been added. As such, the proposed project would not have any additional impacts on noise, and no new mitigation measures are required. The findings for the proposed project remain consistent with the impact determinations identified in the PEIR for the approved program.

Issues and Supporting Data Sources	Was Impact Analyzed Prior Environmental Document(s)?	Do Project Modifications Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
XI. POPULATION AND HOUSING AND ENVIRONMENTAL JUSTICE. Would the project:					
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Yes	No	No	No	N/A
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	Yes	No	No	No	N/A
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	Yes	No	No	No	N/A
d. Affect the health or environment of minority or low income populations disproportionately?	Yes	No	No	No	N/A

Discussion:*Environmental Setting:*

The project site is located in the unincorporated community of Topanga in Los Angeles County. The estimated population of the Topanga census-designated place is 7,705.⁵³ The proposed project involves installation of a new median and biofiltration units and associated facilities to improve water quality in the project area. It would not construct additional housing units, nor would it remove any existing housing units from the available supply.

⁵³ U.S. Census Bureau. 2013-2017 ACS 5-Year Estimate for Topanga CDP. Available at: <https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml>, accessed July 16, 2019.

PEIR Checklist Analysis

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

The PEIR determined that there would be no impact on population growth, either directly or indirectly. The proposed project would involve installation of a new median and biofiltration units and associated facilities to improve water quality in the project area. Construction of the proposed project would be short-term and temporary, and it is assumed that construction personnel would come from Los Angeles County or adjacent areas, which would not generate a permanent increase in the population. The proposed project would not induce population growth either directly or indirectly. Similar to the approved program, the proposed project would result in no impacts on population growth, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

- b. **Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?**

The PEIR determined that no impacts to existing housing would occur. No housing currently exists on the project site and the proposed project would not displace any housing. Similar to the approved program, the proposed project would result in no impacts on existing housing, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

- c. **Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?**

The PEIR determined that no impacts associated with displacing housing would occur. No housing currently exists on the project site and the proposed project would not displace any people. Similar to the approved program, the proposed project would result in no impacts related to displacing housing, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

- d. **Would the project affect the health or environment of minority or low income populations disproportionately?**

The PEIR determined that impacts related to disproportionately affecting the health or environment of minority or low-income populations would be less than significant. The proposed project is located in an area with a primarily White population, with a median household income of \$120,404, which is significantly higher than the County average of \$61,015. The proposed project would not disproportionately impact the health or environment of minority or low-income populations. No impact would occur. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

Updated CEQA Checklist Analysis

The 2019 CEQA Guidelines Appendix G checklist has reorganized and condensed the thresholds contained within the 2015 checklist used in the PEIR to assess impacts to population and housing; however, the 2015 checklist encompasses the analyses for all current thresholds, and no additional thresholds have been added. As such, the proposed project would not have any additional impacts on population and housing, and no new mitigation measures are required. The findings for the proposed project remain consistent with the impact determinations identified in the PEIR for the approved program.

Issues and Supporting Data Sources	Was Impact Analyzed Prior Environmental Document(s)?	Do Project Modifications Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
XII. PUBLIC SERVICES AND RECREATION. Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:					
a. Fire protection?	Yes	No	No	No	Yes
b. Police protection?	Yes	No	No	No	N/A
c. Schools?	Yes	No	No	No	N/A
d. Parks?	No	No	No	No	N/A
e. Other public facilities?	No	No	No	No	N/A
f. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Yes	No	No	No	N/A
g. Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	Yes	No	No	No	N/A

Discussion:

Environmental Setting:

The Santa Monica Mountains is designated by the LACFD as a Very High Fire Hazard Severity Zone. Fire protection in the region is provided by the LACFD; however, mutual aid is also given by the Ventura County Fire Department, City of Los Angeles, and CalFIRE. The nearest fire station to the project site is LACFD Station 84 (21050 Burbank Blvd. Woodland Hills, CA 91367), which is approximately 4.1 miles north of the project site.⁵⁴

The Los Angeles County Sheriff's Department (LACSD) provides law enforcement services to the County's unincorporated communities. The nearest sheriff's station is LACSD

⁵⁴ County of Los Angeles Fire Department. Fire Station Locator. Available at: <https://locator.lacounty.gov/fire>, accessed July 12, 2019.

Malibu/Lost Hills Station (27050 Agoura Rd. Agoura Hills, CA 91301), located approximately 9.4 miles to the west.⁵⁵

The nearest school to the project site is Alice C. Stelle Middle School (22450 Mulholland Hwy, Calabasas, CA 91302), located approximately 3 miles driving northwest. The nearest library is Topanga Library (122 N Topanga Canyon Blvd, Topanga, CA 90290), located approximately 4.5 miles south of the project site.

As previously stated, the project site is located in the SMMNAP area. Approximately 7,400 acres, or 35 percent of the SMMNAP area is public open space.⁵⁶ Regional parks include the Summit Valley Edmund D. Edelman Park to the south of the project site and Marvin Braude Mulholland Gateway Park to the east. Recreation in the area primarily consists of hiking trails. There are no County-owned or operated parks located in the North Santa Monica Bay EWMP.

PEIR Checklist Analysis

Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a. Fire protection?

The PEIR determined that impacts related to the provision of fire services would result in a less than significant impact with mitigation that requires advance notification to service providers such as fire, police, and emergency medical services. The proposed project would not result in an increase in population, and thus, would not generate a need for new or altered fire protection facilities. The proposed project would be constructed in accordance with all applicable fire codes set forth by the State Fire Marshall and LACFD. In addition, the County would ensure all construction crews have fire-suppression equipment (such as fire extinguishers) on site to respond to the accidental ignition of a fire. Therefore, the proposed project would not be considered a fire hazard and would not exceed the capacity of the LACFD to serve the site or other areas with existing fire protection services.

As previously discussed, during construction of the proposed project, partial road closures would be necessary along the Viewridge Road ROW as well as areas along Hodler Drive, Voltaire Drive, Chagall Road, Heidi Lane, and Bellini Drive. These partial closures would be temporary, occurring only for the duration of construction activities. However, these temporary closures could affect emergency response. No partial closures would occur on Topanga Canyon Boulevard, a freeway disaster route. However, partial closures would be required on Viewridge Road, which is identified as a local Public Safe Refuge Area where evacuees may be redirected if evacuation is

⁵⁵ Los Angeles County Sheriff's Department. Station Location. Available at: <https://lasd.org/stations/>, accessed July 12, 2019.

⁵⁶ Los Angeles County Department of Regional Planning. Draft Santa Monica Mountains North Area Plan, October 2018. Available at: http://planning.lacounty.gov/assets/upl/project/smmnap_plan-20181001.pdf, accessed July 16, 2019.

not possible due to traffic gridlock.⁵⁷ Consistent with the approved program, the proposed project would implement mitigation measure PS-1, which would provide advance notice to local fire responders, as appropriate, of construction activities so as to coordinate emergency response routing during construction work. Additionally, as discussed in the BMPs listed in Section 2.6, the County would coordinate with emergency response agencies during final design to ensure that emergency access is maintained during implementation of the proposed Project. Furthermore, as discussed in Section XIII (a), consistent with the approved program, the proposed project would implement mitigation measure TRAF-1, which includes the preparation of a traffic control plan during construction. Similar to the approved program, the proposed project would result in less than significant impacts with mitigation related to the provision of fire services. No new mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

PS-1 The Permittee implementing the EWMP project shall provide reasonable advance notification to service providers such as fire, police, and emergency medical services as well as to local businesses, homeowners, and other residents adjacent to and within areas potentially affected by the proposed EWMP project about the nature, extent, and duration of construction activities. Interim updates should be provided to inform them of the status of the construction activities.

b. Police protection?

The PEIR determined that structural BMPs associated with the program would not result in the need for new or physically altered police protection facilities, as there would be no increase in the demand for police protection services. Similar to the approved program, the proposed project would not result in an increase in population, and thus, would not generate a need for new or altered police protection facilities. The proposed project would not require additional police protection beyond what is currently provided. As previously discussed, temporary lane closures could affect emergency response. Consistent with the approved program, the proposed project would implement mitigation measure PS-1, which would provide advance notice to local police responders, as appropriate, of construction activities so as to coordinate emergency response routing during construction work. Additionally, as discussed in the BMPs listed in Section 2.6, the County would coordinate with emergency response agencies during final design to ensure that emergency access is maintained during implementation of the proposed Project. Furthermore, as discussed in Section XIII (a), consistent with the approved program, the proposed project would implement mitigation measure TRAF-1, which includes the preparation of a traffic control plan during construction. Similar to the approved program, the proposed project would result in less than significant impacts with mitigation related to the provision of police protection services. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

⁵⁷ Topanga Coalition for Emergency Preparedness, Public Safe Refuges and Public Temporary Refuge Areas. Available at: PSRTRA1Page (t-cep.org), accessed August 12, 2021.

PS-1 Refer to mitigation measure language above.

c. Schools?

The PEIR determined that impacts to existing school facilities would be less than significant because some of the structural BMPs may be installed on school facilities, on or under large grassy fields typically found on school sites. The proposed project would be constructed entirely within the existing road ROW and/or parkways adjacent to the roadways. Similar to the approved program, construction activities would not be anticipated to significantly affect the operation of existing school facilities such that new or physically altered facilities would be required. The proposed project would not induce employment or population growth, either directly or indirectly, and would therefore not increase the demand for schools in the area. As the proposed project would not be constructed on school facilities or within school sites, no impact would occur, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

d. Parks?

Similar to the approved program, the proposed project would not result in an increase in population, and thus, would not increase the demand for park facilities. No impact would occur, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

e. Other public facilities?

Similar to the approved program, the proposed project would not result in an increase in population, and thus, would not increase the demand for other public facilities. No impact would occur, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

f. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

The PEIR determined that impacts related to the substantial physical deterioration of recreational facilities would be less than significant as some of the structural BMPs associated with the proposed program are anticipated to be located on existing parkland. All construction equipment and activities would be located in the existing road ROW and/or parkways adjacent to the roadways. The proposed project would not result in an increase in population that would increase the use of existing recreational facilities. As the proposed project would not be constructed in existing parklands, no impact would occur, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

g. Would the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

The PEIR determined that impacts related to construction or expansion of recreational facilities would be less than significant. The proposed project does not include new or require the expansion of existing recreational facilities. No impact would occur, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

Updated CEQA Checklist Analysis

The 2019 CEQA Guidelines Appendix G checklist does not include any new or updated thresholds for public services and recreation in comparison to the 2015 checklist used to analyze the PEIR. As such, the proposed project would not have any additional impacts on public services and recreation, and no new mitigation measures are required. The findings for the proposed project remain consistent with the impact determinations identified in the PEIR for the approved program.

Issues and Supporting Data Sources	Was Impact Analyzed Prior Environmental Document(s)?	Do Project Modifications Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
XIII. TRANSPORTATION AND CIRCULATION. Would the project:					
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	Yes	No	No	No	Yes
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	Yes	No	No	No	N/A
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	Yes	No	No	No	N/A
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Yes	No	No	No	N/A
e. Result in inadequate emergency access?	Yes	No	No	No	N/A

Issues and Supporting Data Sources	Was Impact Analyzed Prior Environmental Document(s)?	Do Project Modifications Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
XIII. TRANSPORTATION AND CIRCULATION. Would the project:					
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	Yes	No	No	No	N/A

Discussion:*Environmental Setting:*

This analysis is based on the Construction Traffic Evaluation prepared for the proposed project (Appendix F). The project site comprises several locations along and near Viewridge Road between Topanga Canyon Boulevard and Summit Pointe Drive in the unincorporated community of Topanga in western Los Angeles County. In the project area, Viewridge Road contains a landscaped median between Hodler Drive and just west of Heidi Lane. The remainder of the roadways contain landscaped parkways. All project components would be located within the existing road ROW and/or parkways adjacent to the roadways.

Viewridge Road: Viewridge Road connects the neighborhood to Topanga Canyon Boulevard, the main thoroughfare in the area. Viewridge Road is generally a 60-foot wide, two lane roadway in the vicinity of the project. A landscaped median is currently present between Hodler Drive and Heidi Lane, while a painted median exists from Heidi Lane to the easterly terminus of the project. The posted speed limit is 40 miles per hour. Translutions staff visited the area and traffic volumes on Viewridge Road during the p.m. peak hour was approximately 200 vehicles. Using the capacity of a two-lane roadway (2,500 vehicles per hour using a 70-30 directional split) from the Traffic Impact Analysis Report Guidelines, County of Los Angeles Public Works, January 1, 1997, Viewridge Road currently operates at level of service (LOS) A.

Hodler Drive: Hodler Drive is a 30-foot wide residential street and connects to Viewridge Road. It provides access to approximately 60 homes via Chagall Road, Voltaire Drive and Schweitzer Drive.

Chagall Road and Voltaire Drive: Chagall Road and Voltaire Drive are approximately 33-foot wide residential streets.

PEIR Checklist Analysis

- a. **Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?**

The PEIR determined that impacts related to construction traffic would be less than significant with mitigation, which requires all construction activities to be conducted in accordance with an approved construction traffic control plan. During construction, construction workers, equipment and haul trucks would travel to and from the site. Table 3 shows the anticipated number trips based on the number of workers and equipment during each phase of construction.

Table 3. Construction Workers and Equipment Trip Estimates

Construction Phase	Classification	Vehicle Type	PCE Factor	Daily Trip Generation			AM/PM Peak Hour		
				Trip	PCE Trips	Total PCE for Phase	Trip	PCE Trips	Total PCE for Phase
Site Preparation	Employees	Automobile	1	14	14	32	7	7	16
	Excavator*	Truck	3	2	18		1	9	
	Tractor/Loaders/Backhoes*	Truck		2			1		
	Other General Industrial Equipment	Truck		2			1		
Grading	Employees	Automobile	1	14	14	92	7	7	25
	Graders*	Truck	3	2	78		1	18	
	Rubber Tired Dozers*	Truck		2			1		
	Tractor/Loaders/Backhoes*	Truck		2			1		
	Haul Trips	Truck		20			3		
Construction	Employees	Automobile	1	14	14	44	7	7	22
	Forklifts*	Truck	3	2	30		1	15	
	Generator Sets*	Truck		2			1		
	Tractor/Loaders/Backhoes*	Truck		4			2		
	Welders*	Truck		2			1		

* Likely to be stored on site. However, trips have been included to provide a worst-case evaluation

PCE = Passenger Car Equivalents

Source: Translutions, 2019

As seen in Table 3, the site preparation phase is anticipated to generate 6 daily truck trips and 14 passenger car trips (32 PCE trips), of which 16 PCE trips are anticipated during the peak hours. The grading phase is anticipated to generate 26 daily truck trips and 14 passenger car trips (92 PCE trips), of which 25 PCE trips are anticipated during the peak hours. The construction phase is anticipated to generate 10 daily truck trips and 14 passenger car trips (44 PCE trips), of which 22 PCE trips are anticipated during the peak hours.

During construction, lane narrowing, temporary blockages, and driver behavior reduce the carrying capacity of roadways. Based on research conducted by the Transportation Research Board, the saturation flow rate during construction is approximately 10 percent lower than under normal operations. Since the carrying capacity of Viewridge Road is currently 2,500 passenger cars per hour, this would be reduced to 2,250 vehicles per hour. Even assuming this reduced capacity, the level of service is anticipated to remain at (Level of Service) A. Furthermore, utilizing the impact criteria for two-lane roadways from the *Traffic Impact Analysis Report Guidelines, County of Los Angeles Public Works, January 1, 1997*, a project under LOS C conditions is allowed to increase the vehicle to capacity ratio by 4 percent. There are no thresholds for LOS A conditions since roadways are underutilized at less than LOS C conditions. The highest project-related increase of 25 PCE trips during grading, as shown in Table 3, would result in a volume-to-capacity increase of 1.11 percent, which is significantly lower than the allowed threshold of 4 percent under LOS C conditions. Therefore, the project would result in a less than significant impact during construction. Nonetheless, as the proposed project requires partial lane closures during construction, consistent with the approved program, the proposed project would implement mitigation measure TRAF-1, which includes the preparation of a traffic control plan during construction. Potential project-specific elements for the traffic control plan could reduce traveler delay and enhancing traveler safety: Public Awareness Campaign; Motorist Information Strategies; and Incident Management. No additional mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

TRAF-1 For projects that may affect traffic, implementing agencies shall require that contractors prepare a construction traffic control plan. Elements of the plan should include, but are not necessarily limited to, the following:

- Develop circulation and detour plans to minimize impacts to local street circulation. Use haul routes minimizing truck traffic on local roadways to the extent possible.
- To the extent feasible, and as needed to avoid adverse impacts on traffic flow, schedule truck trips outside of peak morning and evening commute hours.
- Install traffic control devices as specified in Caltrans' Manual of Traffic Controls for Construction and Maintenance Work Zones where needed to maintain safe driving conditions. Use flaggers and/or signage to safely direct traffic through construction work zones.
- Coordinate with facility owners or administrators of sensitive land uses such as police and fire stations, hospitals, and schools. Provide

advance notification to the facility owner or operator of the timing, location, and duration of construction activities.

- b. Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?**

The PEIR states that the County of Los Angeles level-of-service standards and congestion management program are intended to monitor and address long-term traffic impacts resulting from future development, but do not apply to temporary impacts associated with construction projects. The proposed project involves the installation of a new median and biofiltration units to improve stormwater runoff quality in the project area, and as such would not generate many trips during operations. It is anticipated that routine maintenance activities would include periodic system cleanout activities, as well as landscaping maintenance, which would either be conducted by the resident/property owner or by the County. Maintenance activities would result in a few trips every few months and operational impacts from the project would be negligible. As such, the proposed project would not conflict with an applicable congestion management program. No impact would occur. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

- c. Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?**

The PEIR determined that no impact would occur related to air traffic patterns. The proposed project involves the installation of a new median and biofiltration units to improve stormwater runoff quality in the project area. Similar to the approved program, there would be no impact to air traffic patterns. No impact would occur. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

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

The PEIR determined that impacts related to hazardous design features would be less than significant. The proposed project would involve installation of a new median and biofiltration units and associated facilities to improve water quality in the project area. There would be no introduction of inconsistent land uses as there would be no change to the existing roadway. A new median would be installed on Viewridge Road east of Heidi Lane; however, the new raised median would occupy a space in the road currently demarcated as a median with striping. Thus, the existing roadway alignment would not be altered. Therefore, the proposed project is not expected to generate any hazards from design features that would result in a safety hazard to pedestrians, personnel, visitors, or nearby neighbors. Similar to the approved program, the impact would be less than significant, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

e. Would the project result in inadequate emergency access?

The PEIR determined that impacts related to inadequate emergency access would be less than significant. During construction activities, temporary partial closures on roadways within the project area would be necessary. As described in threshold (a), the project is anticipated to generate up to 25 PCE trips during peak construction. There is sufficient capacity on the area roadways to accommodate construction traffic. Nonetheless, similar to approved program, the nearest local fire responders and police station would be notified, as appropriate, of traffic control plans during construction so as to coordinate emergency response routing during construction work. Upon completion of construction activities, access to the roadways would be fully restored. Therefore, similar to the approved program, the impact would be less than significant. No mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

f. Would the project conflict with adopted policies, plans, programs, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

The PEIR determined that implementation of the proposed program would not directly or indirectly eliminate existing or planned alternative transportation corridors or facilities (bicycle paths, lanes, bus turnouts, etc.), include changes in policies or programs that support alternative transportation, or construct facilities in locations in which future alternative transportation facilities are planned. There are no bus routes or existing or planned bicycle paths in the vicinity of the project site. Therefore, similar to the proposed project, no impact would occur. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

Updated CEQA Checklist Analysis

The 2019 CEQA Guidelines Appendix G checklist now includes assessment criteria for potential impacts related to CEQA Guidelines section 15064.3. CEQA Guidelines section 15064.3 establishes vehicle miles traveled (VMT) as the most appropriate measure of transportation impacts. VMT refers to the amount and distance of automobile travel attributable to a project. The County establishes instructions and standards for preparation of a transportation impact analysis (TIA) in the project vicinity.⁵⁸ The VMT assessment is intended to focus on the long-term, permanent transportation impacts related to the generation of automobile trips and the opportunities for alternative modes of transportation (public transit, walking, bicycling) associated with a development project. Due to the temporary and relatively low-level nature of traffic generated by the proposed project's construction, VMT assessments are not relevant for the project, especially since the project creates negligible post-construction operational trips. As such, neither construction nor operation of the proposed project would conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). No impact would occur. As such, the proposed project would not have any additional impacts on transportation and circulation, and no new mitigation measures are

⁵⁸ Los Angeles County Public Works, Transportation Impact Analysis Guidelines, September 2020, available at: <https://dpw.lacounty.gov/traffic/trafficreportmsg.cfm>, accessed August 5, 2021.

required. The findings for the proposed project remain consistent with the impact determinations identified in the PEIR for the approved program.

Issues and Supporting Data Sources	Was Impact Analyzed Prior Environmental Document(s)?	Do Project Modifications Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
XIV. UTILITIES, SERVICE SYSTEMS, AND ENERGY. Would the project:					
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board or result in the construction of new treatment facilities or expansion of existing facilities if the wastewater treatment provider has inadequate capacity to serve the proposed project?	Yes	No	No	No	Yes
b. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Yes	No	No	No	N/A
c. Require new or expanded water supply resources or entitlements, or require or result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	Yes	No	No	No	Yes
d. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs, or comply with federal, state, and local statutes and regulations related to solid waste?	Yes	No	No	No	Yes

Issues and Supporting Data Sources	Was Impact Analyzed Prior Environmental Document(s)?	Do Project Modifications Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
XIV. UTILITIES, SERVICE SYSTEMS, AND ENERGY. Would the project:					
e. Require additional energy use that could result in wasteful consumption, affect local and regional energy supplies, or conflict with applicable energy efficiency policies or standards?	Yes	No	No	No	N/A

Discussion:

Environmental Setting:

The Los Angeles County Waterworks District (LACWD) serves the project site. The project site is located specifically within District 29, serving the Malibu and Topanga area, and currently serves approximately 22,300 people through 7,500 metered connections. The LACWD purchases nearly 100 percent of its water supply from the Metropolitan Water District (MWD) through an intermediary wholesaler, the West Basin Municipal Water District.⁵⁹ Surface and groundwater quality in the project area is under the jurisdiction of the LARWQCB

The Consolidated Sewer Maintenance District of Los Angeles County, administered by Los Angeles County Public Works, serves the unincorporated areas of the County. The Districts system includes over 4,600 miles of sanitary sewers, 155 pump stations, and 4 wastewater treatment plants.

The LACFCD is responsible for flood control, water conservation, and drainage infrastructure within the County. It encompasses more than 2,700 square miles and approximately 2.1 million land parcels within 6 major watersheds. It includes drainage infrastructure within 86 incorporated cities as well as the unincorporated County areas, which includes 3,330 miles of underground storm drains and an estimated 82,000 catch basins. Within the project area, there are several existing drains, as depicted in Figure 2.

The County is served by various landfills and recycling centers operated by cities, the County, and private facility operators. The Calabasas landfill is located approximately 9.8 miles driving west of the project site. As of 2012, the Calabasas landfill had a remaining permitted disposal capacity of 5.51 million tons and accepts a maximum of 3,500 tons daily.⁶⁰

⁵⁹ Los Angeles County Public Works, Los Angeles County Waterworks District. District Overview. Available at: <https://dpw.lacounty.gov/wwd/web/About/Overview.aspx>, accessed July 17, 2019.

⁶⁰ County of Los Angeles Department of Regional Planning, County of Los Angeles General Plan, Chapter 13: Public Services and Facilities Element. Available at: http://planning.lacounty.gov/assets/upl/project/gp_final-general-plan-ch6.pdf, accessed July 19, 2019.

Energy for the project site is supplied by Southern California Edison (SCE). SCE serves approximately 15 million people in a 50,000-square-mile service area. In 2018, Los Angeles County used approximately 67,856 million kilowatt-hours.

PEIR Checklist Analysis

- a. **Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board or result in the construction of new treatment facilities or expansion of existing facilities if the wastewater treatment provider has inadequate capacity to serve the proposed project?**

The PEIR determined that impacts associated with the construction or expansion of new wastewater treatment facilities would be less than significant with mitigation, which requires a search for local utilities above and below ground that may be impacted by the project. The implementation of the proposed program would comply with the MS4 Permit issued by the LARWQCB. The main functions of the structural BMPs would be to infiltrate, treat, and store runoff to help reduce the impact of stormwater and non-stormwater discharges on receiving water quality, which would not produce wastewater during operation. Therefore, the structural BMPs, including the proposed project, would be designed to meet wastewater treatment requirements of the LARWQCB permit.

As part of the approved program, the proposed project would install biofiltration units to capture existing runoff and stormwater, which would be pretreated to remove sediments and debris, before being returned to the storm drain. The proposed project would generate a nominal amount of wastewater from construction activities. Runoff would be captured and treated through a pretreatment system and/or filtration/biofiltration unit from operation of the proposed project, thereby improving water quality. As such, the proposed project would not generate additional wastewater that would exceed existing capacity, requiring new or expanded treatment facilities. However, the proposed project would require ground disturbance that may encounter buried utilities that may be impacted by construction. As such, the proposed project would implement mitigation measure UTIL-1 and conduct a search for local utilities above and below ground. Similar to the approved program, impacts would be less than significant with mitigation measure UTIL-1. No new mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

UTIL-1 Prior to implementation of BMPs, the implementing agency shall conduct a search for local utilities above and below ground that could be affected by the project. The implementing agencies shall contact each utility potentially affected to address relocation of the utility if necessary to ensure access and services are maintained.

- b. **Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

The PEIR analyzed impacts associated with improvements to existing storm drainage facilities as well as new storm drain facilities within the EWMP program areas. The

PEIR determined that individual projects would improve existing storm drainage facilities, and impacts would be less than significant.

The proposed project is designed to capture stormwater for treatment and discharge to the existing storm drain at the project site. The proposed project would divert urban and stormwater runoff from local unincorporated communities for flow-through treatment. Additionally, the proposed biofiltration units would direct the pretreated flows to the existing storm drain system in the project area. The proposed project does not include any modifications to existing storm drains. However, the proposed project would divert flows from Heidi Lane and Bellini Drive to the proposed new median on Viewridge Road, which would discharge flows into the existing drainage system at the eastern terminus of Viewridge Road, resulting in a change to the discharge location of those flows. It is not anticipated that the change in discharge locations would result in impacts to the storm drain infrastructure at the new discharge location. Similar to the approved program, impacts would be less than significant, and no new mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

c. Would the project require new or expanded water supply resources or entitlements, or require or result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

The PEIR determined that impacts associated with new or expanded water supply resources or entitlements, or the construction or expansion of new water facilities would be less than significant with mitigation, requiring evaluation of the potential for impacts to downstream beneficial uses, and a search for local utilities above and below ground that could be affected by the project. The proposed project would divert urban and stormwater runoff from local unincorporated communities for treatment and discharge to the existing storm drain. Construction of the majority of the structural BMPs would require some minor water usage for dust control and concrete washout activities; however, water use would be short-term and is not substantial enough to require new or expanded water facilities. Similar to the approved program, any detention of storm flows upstream would not substantially reduce storm flows downstream or significantly impede access to storm flow. Dry-weather flows in the foothills are largely fed by groundwater seepage or wastewater discharges, and these flows would not be affected by infiltration BMPs. Nonetheless, consistent with the approved program, the proposed project would implement mitigation measure UTIL-2 to ensure that downstream water rights would not be affected by upstream diversions. Additionally, construction of the proposed project would require ground disturbing activities. Due to the potential for encountering buried utilities, the proposed project would implement mitigation measure UTIL-1, which requires a search for local utilities above and below ground that could be affected by the project. Similar to the approved program, impacts associated with water supply would be less than significant with mitigation measure UTIL-1 and UTIL-2, and no new mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

UTIL-1 Refer to mitigation measure language above.

UTIL-2 Prior to approval of BMPs, implementing agencies shall evaluate the potential for impacts to downstream beneficial uses, including surface water rights. Implementing agencies shall not approve BMPs that result in preventing access to previously appropriated surface water downstream.

d. Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs, or comply with federal, state, and local statutes and regulations related to solid waste?

The PEIR determined that impacts related to landfill capacity and federal, state, and local statutes and regulations related to solid waste would be less than significant with mitigation, which requires contractors to recycle construction materials as feasible. Construction activities associated with the proposed project would generate construction debris and waste, including excavated soils, asphalt, and concrete. Clean soil would be recycled, reused offsite, or stockpiled and reused as backfill, and any contaminated soil would be disposed of in the nearest landfill. Consistent with the approved program, mitigation measure UTIL-3 would be implemented, requiring demolition debris be recycled where feasible to reduce solid waste generation per the Los Angeles County Construction and Demolition Debris Recycling and Reuse Program. Following construction, the project would generate a nominal amount of solid waste from routine system cleanout activities and periodic replacement of the filter cartridges. As of 2012, the Calabasas landfill had a remaining permitted disposal capacity of 5.51 million tons. It is anticipated that the quantities of solid waste generated by the proposed project would not result in an exceedance of the permitted capacity of local landfills. Therefore, similar to the approved program, the impact would be less than significant with mitigation measure UTIL-3. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

UTIL-3 Implementing agencies shall encourage construction contractors to recycle construction materials and divert inert solids (asphalt, brick, concrete, dirt, fines, rock, sand, soil, and stone) from disposal in a landfill, where feasible.

e. Would the project require additional energy use that could result in wasteful consumption, affect local and regional energy supplies, or conflict with applicable energy efficiency policies or standards?

The PEIR determined that impacts related to energy use, supply, and policies or standards would be less than significant. Similar to the approved program, the proposed project would require the use of non-renewable energy in the form of gasoline and diesel for construction equipment and vehicle trips. Construction would last approximately 9 months. Limitations on idling of vehicles and equipment and requirements that equipment be properly maintained would result in fuel savings. Additionally, California regulations limit idling from both on-road and off-road diesel-powered equipment. Given the cost of fuel, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction. Due to the temporary nature of construction and the financial incentives for developers and contractors to use energy-consuming resources in an efficient manner, the construction phase of the proposed project would not result in wasteful, inefficient, and unnecessary consumption of energy.

During operation, the biofiltration units would primarily be a passive use, conveying water via gravity. However, the proposed project would install two electrical cabinets to control the mechanical equipment in the new median, which includes a pretreatment unit, slide gates, etc. Energy for the mechanical equipment would be provided by SCE. Additionally, similar to the approved program, the proposed project would include implementation of energy efficient equipment to minimize energy requirements. Similar to the approved program, the use of energy anticipated for the proposed project is considered minor when compared to the County-wide use of electricity. As such, the proposed project would not result in wasteful consumption, affect local and regional energy supplies, or conflict with applicable energy efficiency policies or standards. Similar to the approved program, impacts would be less than significant, and no mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

Updated CEQA Checklist Analysis

The 2019 CEQA Guidelines Appendix G checklist has altered the 2015 checklist either by rewording and reorganizing, expanding upon, or adding new thresholds for utilities and service systems. The current CEQA Guidelines Appendix G checklist now includes assessment criteria for potential impacts related to the relocation or construction of new or expanded electric power, natural gas, or telecommunications facilities. Specifically, as detailed in threshold (e) above, the proposed project would install two electrical cabinets to control the mechanical equipment in the new median, which includes a pretreatment unit, slide gates, etc. Energy for the mechanical equipment would be provided by SCE. Natural gas and telecommunications services for the proposed project are not anticipated. As detailed in threshold (a) of the above assessment, the proposed project would implement mitigation measure UTIL-1 and conduct a search for local utilities above and below ground. Similar to the approved program, impacts would be less than significant with implementation of mitigation measure UTIL-1. All other thresholds for utilities and service systems within the 2015 checklist encompass the thresholds within the current checklist. As such, the proposed project would not have any additional impacts on utilities and service systems, and no new mitigation measures are required. The findings for the proposed project remain consistent with the impact determinations identified in the PEIR for the approved program.

UTIL-1 Refer to mitigation measure language above.

Additionally, the 2019 CEQA Guidelines Appendix G checklist now includes thresholds for the assessment of impacts related to wasteful energy use and conflict with state or local plans related to renewable energy or energy efficiency. Although these thresholds were added in the 2019 checklist update, the 2015 PEIR included an analysis of impacts related to energy use under threshold (e) in the utilities, service systems, and energy section. As discussed under threshold (e) above, similar to the approved program, the proposed project would not result in wasteful consumption, affect local and regional energy supplies, or conflict with applicable energy efficiency policies or standards. Similar to the approved program, impacts would be less than significant, and no mitigation measures are required. As such, the proposed project would not have any additional impacts on energy, and no new mitigation measures are required. The findings for the proposed project remain consistent with the impact determinations identified in the PEIR for the approved program.

3.2 New 2019 Checklist Environmental Topics

The 2019 CEQA Guidelines Appendix G checklist includes additional environmental resources not addressed in the 2015 version of the checklist. The current checklist provides thresholds for tribal cultural resources and wildfire, the impacts related to which were not previously assessed in the 2015 PEIR (please see discussion of energy in utilities section above). The following discussion analyzes the proposed project's potential impacts on these resources in order to determine if a Subsequent or Supplemental EIR is required.

Issues and Supporting Data Sources	Was Impact Analyzed Prior Environmental Document(s)?	Do Project Modifications Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
XV. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	No	No	No	No	Yes
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	No	No	No	No	Yes

Discussion:*Environmental Setting:*

This analysis is based on the Cultural Resources Assessment prepared for the proposed project (Appendix C). A records search was conducted at the South Central Coastal Information Center on December 5, 2018, to evaluate the archaeological sensitivity of the project area for cultural resources. The search reviewed lists of California Points of Historical Interest, California Historical Landmarks, and local city and county registries of historic properties. In addition, the Caltrans Historic Highway Bridge Inventory, the Historic Resources Inventory, the CRHR, and the NRHP were consulted.

The records search identified 13 archaeological sites and five isolates within 0.5 mile of the project footprint. Ten of the resources are prehistoric sites, one site includes both prehistoric and historic components, and two sites are historic sites. The remaining five resources are prehistoric isolates. The cultural resources archival research and survey did not identify any archaeological materials or historic buildings or structures within the project site. Based on the results of the archival research and survey, there is low potential that archaeological resources will be encountered during ground disturbing activities for the proposed project.

Study of the California Office of Historic Preservation's Historic Resources Inventory focused on resources located within Woodland Hills. The Historic Resources Inventory lists no historic resources within 0.5 mile of the project footprint within Woodland Hills. A listing of California Points of Historical Interest identified no historic landmarks within 0.5 mile of the project footprint. A listing of California Historical Landmarks identified no historic landmarks within 0.5 mile of the project footprint. Study of the Caltrans Historic Bridge Inventory revealed that no historic state or local agency bridges are located within 0.5 mile of the project area (Caltrans 2015). Los Angeles Historic-Cultural Monuments are sites that have been designated by the City of Los Angeles Cultural Heritage Commission as worthy of preservation based on their architectural, historic, and cultural merits. A search of the Los Angeles Historic-Cultural Monuments found no monuments within 0.5 mile of the project area.

A Sacred Lands File search was conducted for the project area, and that the result of the search was negative. Additionally, a Native American contact program was conducted as part of the proposed project, which involves contacting Native American representatives identified by the NAHC as potentially having knowledge about the project area, in order to solicit comments and concerns regarding the proposed project. Several Native American representatives stated that the area may be sensitive for tribal cultural resources and recommended Native American and archaeological monitoring.

Analysis

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- a. **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?**

Tribal cultural resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe. The PEIR determined that impacts related to historic resources may be significant and unavoidable even with implementation of mitigation measures as it is possible that no mitigation may be available to maintain the historic integrity of the affected resource or its surroundings. The PEIR also determined that the proposed program has the potential to adversely affect archaeological resources and other cultural resources that qualify as historical resources.

Consistent with PEIR mitigation measure CUL-1, a cultural resources inventory was conducted for the proposed project. No cultural resources were identified at the project site that are listed or eligible for listing in the California Register of Historical Resources or local register. No potential tribal cultural resources were identified at the project site based on the Sacred Lands File search conducted by the NAHC, archival research, the field survey, or during consultation with Native American tribal representatives as part of the Native American contact program conducted for the project. Therefore, the proposed project would not result in a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in a state or local register of historical resources. Additionally, as discussed in Section 3.4 (a) above, the proposed project would implement mitigation measures CUL-2, CUL-3, and CUL-4, which require consultation with Native American representatives, to further minimize impacts to historical resources. With implementation of mitigation measures CUL-2, CUL-3, and CUL-4, impacts related to tribal cultural resources would be less than significant. This finding is consistent with the impact determinations in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

CUL-2 Implementing agencies shall ensure that individual EWMP projects that require ground disturbance shall be subject to a Phase I cultural resources inventory on a project-specific basis prior to the implementing agency's approval of project plans. The study shall be conducted or supervised by a qualified archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archaeology, and shall be conducted in consultation with the local Native American representatives expressing interest. The cultural resources inventory shall include a cultural resources records search to be conducted at the South Central Coastal Information Center; scoping with the NAHC and with interested Native Americans identified by the NAHC; a pedestrian archaeological survey where deemed appropriate by the qualified archaeologist; and formal recordation of all identified archaeological

resources on California Department of Parks and Recreation 523 forms and significance evaluation of such resources presented in a technical report following the guidelines in ARMR: Recommended Contents and Format, Department of Parks and Recreation, Office of Historic Preservation, State of California, 1990.

If potentially significant archaeological resources are encountered during the survey, the implementing agency shall require that the resources are evaluated by the qualified archaeologist for their eligibility for listing in the CRHR and for significance as a historical resource or unique archaeological resource per CEQA Guidelines Section 15064.5. Recommendations shall be made for treatment of these resources if found to be significant, in consultation with the implementing agency and the appropriate Native American groups for prehistoric resources. Per CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred manner of mitigation to avoid impacts to archaeological resources qualifying as historical resources. Methods of avoidance may include, but shall not be limited to, project reroute or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, which may include data recovery or other appropriate measures, in consultation with the implementing agency, and any local Native American representatives expressing interest in prehistoric or tribal resources. If an archaeological site does not qualify as an historical resource but meets the criteria for a unique archaeological resource as defined in Section 21083.2, then the site shall be treated in accordance with the provisions of Section 21083.2.

- CUL-3 The implementing agency shall retain archaeological monitors during ground-disturbing activities that have the potential to impact archaeological resources qualifying as historical resources or unique archaeological resources, as determined by a qualified archaeologist in consultation with the implementing agency, and any local Native American representatives expressing interest in the project. Native American monitors shall be retained for projects that have a high potential to impact sensitive Native American resources, as determined by the implementing agency in coordination with the qualified archaeologist.
- CUL-4 During project-level construction, should subsurface archaeological resources be discovered, all activity in the vicinity of the find shall stop and a qualified archaeologist shall be contacted to assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, the archaeologist shall determine, in consultation with the implementing agency and any local Native American groups expressing interest, appropriate avoidance measures or other appropriate mitigation. Per CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred means to avoid impacts to archaeological resources qualifying as historical resources. Methods of avoidance may include, but shall not be limited to, project reroute or redesign, project cancellation, or identification of protection measures such

as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, such as data recovery or other appropriate measures, in consultation with the implementing agency and any local Native American representatives expressing interest in prehistoric or tribal resources. If an archaeological site does not qualify as an historical resource but meets the criteria for a unique archaeological resource as defined in Section 21083.2, then the site shall be treated in accordance with the provisions of Section 21083.2.

- b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?**

The PEIR determined that impacts related to archaeological resources would be less than significant with mitigation measures as known archaeological resources, as well as unknown and unrecorded archaeological resources may be unearthed during construction activities associated with implementation of structural BMPs. As discussed in Section 3.15 (a) above, no tribal cultural resources were identified within the project area and no specific tribal cultural resources were identified during the Native American contact program. Nonetheless, during construction of the proposed project, unknown tribal cultural resources could potentially be encountered, particularly during ground-disturbing activities. As discussed in Section 3.4 (b) above, the proposed project would implement mitigation measures CUL-3 and CUL-4, both of which require consultation with Native American representatives. Additionally, with the proposed project would implement mitigation measure CUL-7, in the event that any human remains or related resources are discovered. With implementation of mitigation measures CUL-3, CUL-4, and CUL-7, impacts related to tribal cultural resources would be less than significant. This finding is consistent with the impact determinations in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

CUL-3 Refer to mitigation measure language above.

CUL-4 Refer to mitigation measure language above.

CUL-7 The implementing agency shall require that, if human remains are uncovered during project construction, work in the vicinity of the find shall cease and the County Coroner shall be contacted to evaluate the remains, following the procedures and protocols set forth in Section 15064.5 (e)(1) of the CEQA Guidelines. If the County Coroner determines that the remains are Native American, the Coroner will contact the Native American Heritage Commission, in accordance with Health and Safety Code Section 7050.5, subdivision (c), and Public Resources Code 5097.98 (as amended by AB 2641). The NAHC will then designate a Most Likely Descendant of the deceased Native American, who will engage in consultation to determine the disposition of the remains.

Issues and Supporting Data Sources	Was Impact Analyzed Prior Environmental Document(s)?	Do Project Modifications Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Prior Environmental Document's Mitigations Implemented or Address Impact?
XVI. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:					
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	No	No	No	No	N/A
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	No	No	No	No	N/A
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	No	No	No	No	N/A
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	No	No	No	No	N/A

Discussion:*Environmental Setting:*

The project site is located in the unincorporated community of Topanga in western Los Angeles County, in the North Santa Monica Bay EWMP and SMMNAP area.⁶¹ The SMMNAP area encompasses 32.2 square miles that consists of a group of communities surrounded by steep mountains, rolling hills, canyons, streams, and oak woodlands.

The project site is located in a Very High Fire Hazard Severity Zone.⁶² Fire protection in the region is provided by the LACFD; however, mutual aid is also given by the Ventura County Fire Department, City of Los Angeles, and California Department of Forestry. The nearest fire station to the project site is LACFD Station 84 (21050 Burbank Blvd. Woodland Hills, CA 91367), which is approximately 4.1 miles north of the project site. Topanga Canyon Boulevard, which provides regional access to the project site and is adjacent to the western boundary of the project site, is considered a freeway disaster route. Additionally, the Topanga Coalition for Emergency Preparedness, a non-governmental organization that gathers and disseminates information to the local population near the project site, identifies Viewridge Road as a Public Safe Refuge Area.⁶³

Analysis**a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?**

The PEIR determined that impacts associated with impairing or interfering with an adopted emergency response or evacuation plan would be less than significant. During construction of the proposed project, partial road closures would be necessary along the Viewridge Road ROW as well as areas along Hodler Drive, Voltaire Drive, Chagall Road, Heidi Lane, and Bellini Drive. These partial closures would be temporary, occurring only for the duration of construction activities. However, these temporary closures could affect emergency response and/or evacuation plans. No partial closures would occur on Topanga Canyon Boulevard, a freeway disaster route. However, partial closures would be required on Viewridge Road, which is identified as a local Public Safe Refuge Area. These areas are identified by the Topanga Coalition for Emergency Preparedness as areas where evacuees may be redirected if evacuation is not possible due to traffic gridlock.⁶⁴ Consistent with the approved program, as discussed further in Section 3.12 (a) below, mitigation measure PS-1 would require the advance notification to emergency services providers and homeowners and residents within the project area to ensure that emergency responsiveness was not impaired during construction work. Additionally, as further discussed in Section 3.13 (a), consistent with the approved program, the proposed project would implement mitigation measure TRAF-1, which includes the preparation

⁶¹ Los Angeles County Department of Regional Planning. Draft Santa Monica Mountains North Area Plan, October 2018. Available at: http://planning.lacounty.gov/assets/upl/project/smmnap_plan-20181001.pdf, accessed July 8, 2019.

⁶² Los Angeles County Office of the Assessor. GIS Viewer. Available at: <http://egisgcx.isd.lacounty.gov/slv/?Viewer=GISViewer>, accessed July 18, 2019.

⁶³ Topanga Coalition for Emergency Preparedness, Public Safe Refuges and Public Temporary Refuge Areas. Available at: PSRTRA1Page (t-cep.org), accessed August 12, 2021.

⁶⁴ Topanga Coalition for Emergency Preparedness, Public Safe Refuges and Public Temporary Refuge Areas. Available at: PSRTRA1Page (t-cep.org), accessed August 12, 2021.

of a traffic control plan during construction. No long-term impacts would result from operation of the proposed project. Similar to the approved program, impacts would be less than significant with implementation of mitigation measures PS-1 and TRAF-1, and no new mitigation measures are required. This finding is consistent with the impact determinations in the PEIR; no new or intensified impacts would occur, and no new mitigation measures are required.

PS-1 The Permittee implementing the EWMP project shall provide reasonable advance notification to service providers such as fire, police, and emergency medical services as well as to local businesses, homeowners, and other residents adjacent to and within areas potentially affected by the proposed EWMP project about the nature, extent, and duration of construction activities. Interim updates should be provided to inform them of the status of the construction activities.

TRAF-1 For projects that may affect traffic, implementing agencies shall require that contractors prepare a construction traffic control plan. Elements of the plan should include, but are not necessarily limited to, the following:

- Develop circulation and detour plans to minimize impacts to local street circulation. Use haul routes minimizing truck traffic on local roadways to the extent possible.
- To the extent feasible, and as needed to avoid adverse impacts on traffic flow, schedule truck trips outside of peak morning and evening commute hours.
- Install traffic control devices as specified in Caltrans' Manual of Traffic Controls for Construction and Maintenance Work Zones where needed to maintain safe driving conditions. Use flaggers and/or signage to safely direct traffic through construction work zones.
- Coordinate with facility owners or administrators of sensitive land uses such as police and fire stations, hospitals, and schools. Provide advance notification to the facility owner or operator of the timing, location, and duration of construction activities.

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

The proposed project would occur within the existing ROW and/or parkways adjacent to the roadway. The eastern end of Viewridge Road is located above a vegetated hillside slope with more undeveloped slope areas occurring further to the south and southeast. Like most areas of southern California, the project area may be susceptible to Santa Ana winds. During construction activities, there is the risk of potential accidental ignition of fire, which could cause a wildland fire as there is abundant vegetation nearby. If accidental ignition of fire occurs, the construction of the project could, due to slope, prevailing winds, and other factors, exacerbate wildfire risks. However, the proposed project would comply with the Los Angeles County Fire Code related to fire safety during construction. Additionally, as discussed in Section 1.6 of the Chapter 1, Project description, the construction crews would have fire suppression equipment to respond to accidental ignition of fire. With adherence to existing

regulations, construction of the proposed project would not exacerbate wildfire risks. Following installation of the proposed project, the project site would be restored similar to its existing conditions, which would not increase wildfire risk. The impact would be less than significant. As such, no new or intensified impacts would occur, and no new mitigation measures are required.

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

No roads, fuel breaks, emergency water sources, or power lines would be installed as part of the proposed project. No impact would occur. As such, no new or intensified impacts would occur, and no new mitigation measures are required.

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

Although a small area in the western portion of the Project site is located within an Earthquake-Induced Landslide Zone,⁶⁵ as discussed in Section 2.5, an erosion control plan would be implemented to control runoff from the project site during construction. As discussed in Section 3.8 (c) above, the proposed project would divert flows from Heidi Lane and Bellini Drive to the proposed new median on Viewridge Road, which would discharge flows into the existing drainage system at the eastern terminus of Viewridge Road. However, it is not anticipated that the change in discharge locations would result in impacts to erosion. Nonetheless, the proposed project would implement mitigation measure HYDRO-4, which requires evaluation of potential hydromodification impacts from the structural BMPs, similar to the approved program, to ensure that impacts related to flooding, erosion, and/or scour would be less than significant. Additionally, as discussed in Section 3.8 (d), By retaining stormwater flows and either infiltrating or releasing these flows closer to the natural hydrograph, the change in drainage patterns would result in reduced peak flows and as a result a reduced potential for flooding. With implementation of mitigation measure HYDRO-4, the impact related to risk of downslope flooding, landslide, post-fire slope instability, or drainage changes would be less than significant. As such, no new or intensified impacts would occur, and no new mitigation measures are required.

HYDRO-4 Prior to approving a structural BMP, the implementing agencies shall conduct an evaluation of the potential hydromodification impacts of the project. The evaluation shall recommend design measures necessary to prevent or minimize any identified impacts, including flooding, erosion and/or scour. Design measures could include velocity dissipaters and bank re-enforcement components. Implementing agencies shall include these measures in project designs.

⁶⁵ State of California Department of Conservation, California Geological Survey. Seismic Hazard Zone Report for the Canoga Park 7.5-Minute Quadrangle, 1997. Available at: <https://maps.conservation.ca.gov/cgs/informationwarehouse/regulatorymaps/>, accessed May 1, 2019.

CHAPTER 4 MITIGATION MEASURES

A listing of applicable mitigation measures from LACFCD EWMP PEIR is presented below. The mitigation measures listed are the same as the measures in the Final EIR and would be applicable to the proposed project. No new mitigation measures are required as a result of implementing the proposed project. The County, as the CEQA lead agency, is responsible for adopting and implementing the approved mitigation.

Aesthetics

- AES-1 Aboveground structures shall be designed to be consistent with local zoning codes and applicable design guidelines and to minimize features that contrast with neighboring development.
- AES-2 Implementing agencies shall develop BMP maintenance plans that are approved concurrently with each structural BMP approval. The maintenance plans must include measures to ensure functionality of the structural BMPs for the life of the BMP. These plans may include general maintenance guidelines that apply to a number of smaller distributed BMPs.

Air Quality

- AIR-4 During planning of structural BMPs, implementing agencies shall assess the potential for nuisance odors to affect a substantial number of people. BMPs that minimize odors shall be considered the priority when in close proximity to sensitive receptors.

Biological Resources

- BIO-5 If construction and vegetation removal is proposed between February 1 and August 31, a qualified biologist shall conduct a pre-construction survey for breeding and nesting birds and raptors within 500-feet of the construction limits to determine and map the location and extent of breeding birds that could be affected by the project. Active nest sites located during the pre-construction surveys shall be avoided until the adults and young are no longer reliant on the nest site for survival as determined by a qualified biologist.
- *The pre-construction nesting survey shall be conducted by a qualified biologist within 3 days prior to the start of construction activities to determine whether active nests are present within or directly adjacent to the construction zone. All nests found shall be recorded.*
 - *If construction activities must occur within 300 feet of an active nest of any passerine bird or within 500 feet of an active nest of any raptor, with the exception of an emergency, a qualified biologist shall monitor the nest on a weekly basis, and the activity shall be postponed until the biologist determines that the nest is no longer active.*

- *If the recommended nest avoidance zone is not feasible, the qualified biologist shall determine whether an exception is possible and obtain concurrence from the resource agencies before construction work can resume within the avoidance buffer zone. All work shall cease within the avoidance buffer zone until either agency concurrence is obtained or the biologist determines that the adults and young are no longer reliant on the nest site.*

The text in *italics* represent project-specific control measures tiered from Mitigation Measure BIO-5 in the PEIR.

Cultural Resources

CUL-2 Implementing agencies shall ensure that individual EWMP projects that require ground disturbance shall be subject to a Phase I cultural resources inventory on a project-specific basis prior to the implementing agency's approval of project plans. The study shall be conducted or supervised by a qualified archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archaeology, and shall be conducted in consultation with the local Native American representatives expressing interest. The cultural resources inventory shall include a cultural resources records search to be conducted at the South Central Coastal Information Center; scoping with the NAHC and with interested Native Americans identified by the NAHC; a pedestrian archaeological survey where deemed appropriate by the qualified archaeologist; and formal recordation of all identified archaeological resources on California Department of Parks and Recreation 523 forms and significance evaluation of such resources presented in a technical report following the guidelines in Archaeological Resource Management Reports (ARMR): Recommended Contents and Format, Department of Parks and Recreation, Office of Historic Preservation, State of California, 1990.

If potentially significant archaeological resources are encountered during the survey, the implementing agency shall require that the resources are evaluated by the qualified archaeologist for their eligibility for listing in the CRHR and for significance as a historical resource or unique archaeological resource per CEQA Guidelines Section 15064.5. Recommendations shall be made for treatment of these resources if found to be significant, in consultation with the implementing agency and the appropriate Native American groups for prehistoric resources. Per CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred manner of mitigation to avoid impacts to archaeological resources qualifying as historical resources. Methods of avoidance may include, but shall not be limited to, project reroute or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, which may include data recovery or other appropriate measures, in consultation with the implementing agency, and any local Native American representatives expressing interest in prehistoric or tribal resources. If an archaeological site

does not qualify as an historical resource but meets the criteria for a unique archaeological resource as defined in Section 21083.2, then the site shall be treated in accordance with the provisions of Section 21083.2.

- CUL-3 The implementing agency shall retain archaeological monitors during ground-disturbing activities that have the potential to impact archaeological resources qualifying as historical resources or unique archaeological resources, as determined by a qualified archaeologist in consultation with the implementing agency, and any local Native American representatives expressing interest in the project. Native American monitors shall be retained for projects that have a high potential to impact sensitive Native American resources, as determined by the implementing agency in coordination with the qualified archaeologist.
- CUL-4 During project-level construction, should subsurface archaeological resources be discovered, all activity in the vicinity of the find shall stop and a qualified archaeologist shall be contacted to assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, the archaeologist shall determine, in consultation with the implementing agency and any local Native American groups expressing interest, appropriate avoidance measures or other appropriate mitigation. Per CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred means to avoid impacts to archaeological resources qualifying as historical resources. Methods of avoidance may include, but shall not be limited to, project reroute or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, such as data recovery or other appropriate measures, in consultation with the implementing agency and any local Native American representatives expressing interest in prehistoric or tribal resources. If an archaeological site does not qualify as an historical resource but meets the criteria for a unique archaeological resource as defined in Section 21083.2, then the site shall be treated in accordance with the provisions of Section 21083.2.
- CUL-5 For individual structural BMP projects that require ground disturbance, the implementing agency shall evaluate the sensitivity of the project site for paleontological resources. If deemed necessary, the implementing agency shall retain a qualified paleontologist to evaluate the project and provide recommendations regarding additional work, potentially including testing or construction monitoring.
- CUL-6 In the event that paleontological resources are discovered during construction, the implementing agency shall notify a qualified paleontologist. The paleontologist will evaluate the potential resource, assess the significance of the find, and recommend further actions to protect the resource.
- CUL-7 The implementing agency shall require that, if human remains are uncovered during project construction, work in the vicinity of the find shall cease and the County Coroner shall be contacted to evaluate the remains, following the procedures and protocols set forth in Section 15064.5 (e)(1) of the CEQA

Guidelines. If the County Coroner determines that the remains are Native American, the Coroner will contact the Native American Heritage Commission, in accordance with Health and Safety Code Section 7050.5, subdivision (c), and Public Resources Code 5097.98 (as amended by AB 2641). The NAHC will then designate a Most Likely Descendant of the deceased Native American, who will engage in consultation to determine the disposition of the remains.

Geologic and Mineral Resources

GEO-1 Prior to approval of infiltration BMPs, implementing agencies shall conduct a geotechnical investigation of each infiltration BMP site to evaluate infiltration suitability. If infiltration rates are sufficient to accommodate an infiltration BMP, the geotechnical investigation shall recommend design measures necessary to prevent excessive lateral spreading that could destabilize neighboring structures. Implementing agencies shall implement these measures in project designs.

Hazards and Hazardous Materials

HAZ-1 Implementing agencies shall prepare and implement maintenance practices that include periodic removal and replacement of surface soils and media that may accumulate constituents that could result in further migration of constituents to sub-soils and groundwater. A BMP Maintenance Plan shall be prepared by Implementing Agencies upon approval of the BMP projects, that identifies the frequency and procedures for removal and/or replacement of accumulated debris, surface soils and/or media (to depth where constituent concentrations do not represent a hazardous conditions and/or have the potential to migrate further and impact groundwater) to avoid accumulation of hazardous concentrations and the potential to migrate further to sub-soils and groundwater. The Maintenance Plan shall include vector control requirements. The BMP Maintenance Plan may consist of a general maintenance guideline that applies to several types of smaller distributed BMPs. For smaller distributed BMPs on private property, these plans may consist of a maintenance covenant that includes requirements to avoid the accumulation of hazardous concentrations in these BMPs that may impact underlying subsoils and groundwater. Structural BMPs shall be designed to prevent migration of constituents that may impact groundwater.

PS-1 The Permittee implementing the EWMP project shall provide reasonable advance notification to service providers such as fire, police, and emergency medical services as well as to local businesses, homeowners, and other residents adjacent to and within areas potentially affected by the proposed EWMP project about the nature, extent, and duration of construction activities. Interim updates should be provided to inform them of the status of the construction activities.

TRAF-1 For projects that may affect traffic, implementing agencies shall require that contractors prepare a construction traffic control plan. Elements of the plan should include, but are not necessarily limited to, the following:

- Develop circulation and detour plans to minimize impacts to local street circulation. Use haul routes minimizing truck traffic on local roadways to the extent possible.
- To the extent feasible, and as needed to avoid adverse impacts on traffic flow, schedule truck trips outside of peak morning and evening commute hours.
- Install traffic control devices as specified in Caltrans' Manual of Traffic Controls for Construction and Maintenance Work Zones where needed to maintain safe driving conditions. Use flaggers and/or signage to safely direct traffic through construction work zones.
- Coordinate with facility owners or administrators of sensitive land uses such as police and fire stations, hospitals, and schools. Provide advance notification to the facility owner or operator of the timing, location, and duration of construction activities.

Hydrology and Water Quality

HYDRO-4 Prior to approving a structural BMP, the implementing agencies shall conduct an evaluation of the potential hydromodification impacts of the project. The evaluation shall recommend design measures necessary to prevent or minimize any identified impacts, including flooding, erosion and/or scour. Design measures could include velocity dissipaters and bank re-enforcement components. Implementing agencies shall include these measures in project designs.

Noise

NOISE-1 The implementing agencies shall implement the following measures during construction as needed:

- Include design measures necessary to reduce the construction noise levels to where feasible. These measures may include noise barriers, curtains, or shields.

(d) Construction equipment shall be properly maintained and equipped with mufflers; and

For equipment activities lasting more than one month in one location and within 500 feet of a sensitive receptor, temporary barriers (e.g., noise blankets) shall be placed between the equipment and sensitive receptor. The barriers shall be at least six feet tall and capable of attenuating noise levels by 35 dBA.

- Place noise-generating construction activities (e.g., operation of compressors and generators, cement mixing, general truck idling) as far as possible from the nearest noise-sensitive land uses.

(e) Equipment shall be located on portions of Viewridge Road and Topanga Canyon Road that do not abut residential properties, if allowed by the construction needs.

- Locate stationary construction noise sources as far from adjacent noise-sensitive receptors as possible.

(f) Equipment shall be located on portions of Viewridge Road and Topanga Canyon Road that do not abut residential properties, if allowed by the construction needs.

- If construction is to occur near a school, the construction contractor shall coordinate the with school administration in order to limit disturbance to the campus. Efforts to limit construction activities to non-school days shall be encouraged.
- For the centralized and regional BMP projects located adjacent to noise-sensitive land uses, identify a liaison for these off-site sensitive receptors, such as residents and property owners, to contact with concerns regarding construction noise and vibration. The liaison's telephone number(s) shall be prominently displayed at construction locations.

(e) Because residences would be located adjacent to construction activities, the construction area shall display the name and phone number of a liaison to contact with concerns regarding construction noise and vibration.

- For the centralized and regional BMP projects located adjacent to noise-sensitive land uses, notify in writing all landowners and occupants of properties adjacent to the construction area of the anticipated construction schedule at least 2 weeks prior to groundbreaking.

NOISE-2 All structural BMPs that employ mechanized stationary equipment that generate noise levels shall comply with the applicable noise standards established by the implementing agency with jurisdiction over the structural BMP site. The equipment shall be designed with noise-attenuating features (e.g., enclosures) and/or located at areas (e.g., belowground) where nearby noise-sensitive land uses would not be exposed to a perceptible noise increase in their noise environment.

The text in *italics* represent project-specific control measures tiered from Mitigation Measure NOISE-1 in the PEIR.

Public Services and Recreation

PS-1 The Permittee implementing the EWMP project shall provide reasonable advance notification to service providers such as fire, police, and emergency medical services as well as to local businesses, homeowners, and other residents adjacent to and within areas potentially affected by the proposed EWMP project about the nature, extent, and duration of construction activities.

Interim updates should be provided to inform them of the status of the construction activities.

Transportation and Circulation

- TRAF-1 For projects that may affect traffic, implementing agencies shall require that contractors prepare a construction traffic control plan. Elements of the plan should include, but are not necessarily limited to, the following:
- Develop circulation and detour plans to minimize impacts to local street circulation. Use haul routes minimizing truck traffic on local roadways to the extent possible.
 - To the extent feasible, and as needed to avoid adverse impacts on traffic flow, schedule truck trips outside of peak morning and evening commute hours.
 - Install traffic control devices as specified in Caltrans' Manual of Traffic Controls for Construction and Maintenance Work Zones where needed to maintain safe driving conditions. Use flaggers and/or signage to safely direct traffic through construction work zones.
 - Coordinate with facility owners or administrators of sensitive land uses such as police and fire stations, hospitals, and schools. Provide advance notification to the facility owner or operator of the timing, location, and duration of construction activities.

Utilities and Service Systems

- UTIL-1 Prior to implementation of BMPs, the implementing agency shall conduct a search for local utilities above and below ground that could be affected by the project. The implementing agencies shall contact each utility potentially affected to address relocation of the utility if necessary to ensure access and services are maintained.
- UTIL-2 Prior to approval of BMPs, implementing agencies shall evaluate the potential for impacts to downstream beneficial uses, including surface water rights. Implementing agencies shall not approve BMPs that result in preventing access to previously appropriated surface water downstream.
- UTIL-3 Implementing agencies shall encourage construction contractors to recycle construction materials and divert inert solids (asphalt, brick, concrete, dirt, fines, rock, sand, soil, and stone) from disposal in a landfill, where feasible.

Tribal Cultural Resources

- CUL-2 Implementing agencies shall ensure that individual EWMP projects that require ground disturbance shall be subject to a Phase I cultural resources inventory on a project-specific basis prior to the implementing agency's approval of project plans. The study shall be conducted or supervised by a qualified archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archaeology, and shall be conducted in consultation with the local Native American representatives

expressing interest. The cultural resources inventory shall include a cultural resources records search to be conducted at the South Central Coastal Information Center; scoping with the NAHC and with interested Native Americans identified by the NAHC; a pedestrian archaeological survey where deemed appropriate by the qualified archaeologist; and formal recordation of all identified archaeological resources on California Department of Parks and Recreation 523 forms and significance evaluation of such resources presented in a technical report following the guidelines in ARMR: Recommended Contents and Format, Department of Parks and Recreation, Office of Historic Preservation, State of California, 1990.

If potentially significant archaeological resources are encountered during the survey, the implementing agency shall require that the resources are evaluated by the qualified archaeologist for their eligibility for listing in the CRHR and for significance as a historical resource or unique archaeological resource per CEQA Guidelines Section 15064.5. Recommendations shall be made for treatment of these resources if found to be significant, in consultation with the implementing agency and the appropriate Native American groups for prehistoric resources. Per CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred manner of mitigation to avoid impacts to archaeological resources qualifying as historical resources. Methods of avoidance may include, but shall not be limited to, project reroute or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, which may include data recovery or other appropriate measures, in consultation with the implementing agency, and any local Native American representatives expressing interest in prehistoric or tribal resources. If an archaeological site does not qualify as an historical resource but meets the criteria for a unique archaeological resource as defined in Section 21083.2, then the site shall be treated in accordance with the provisions of Section 21083.2.

CUL-3 The implementing agency shall retain archaeological monitors during ground-disturbing activities that have the potential to impact archaeological resources qualifying as historical resources or unique archaeological resources, as determined by a qualified archaeologist in consultation with the implementing agency, and any local Native American representatives expressing interest in the project. Native American monitors shall be retained for projects that have a high potential to impact sensitive Native American resources, as determined by the implementing agency in coordination with the qualified archaeologist.

CUL-4 During project-level construction, should subsurface archaeological resources be discovered, all activity in the vicinity of the find shall stop and a qualified archaeologist shall be contacted to assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, the archaeologist shall determine, in consultation with the implementing agency and any local Native American groups expressing interest, appropriate avoidance measures or other appropriate mitigation. Per CEQA Guidelines Section 15126.4(b)(3), preservation in place shall be the preferred means to avoid impacts to archaeological resources qualifying as

historical resources. Methods of avoidance may include, but shall not be limited to, project reroute or redesign, project cancellation, or identification of protection measures such as capping or fencing. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, such as data recovery or other appropriate measures, in consultation with the implementing agency and any local Native American representatives expressing interest in prehistoric or tribal resources. If an archaeological site does not qualify as an historical resource but meets the criteria for a unique archaeological resource as defined in Section 21083.2, then the site shall be treated in accordance with the provisions of Section 21083.2.

CUL-7 The implementing agency shall require that, if human remains are uncovered during project construction, work in the vicinity of the find shall cease and the County Coroner shall be contacted to evaluate the remains, following the procedures and protocols set forth in Section 15064.5 (e)(1) of the CEQA Guidelines. If the County Coroner determines that the remains are Native American, the Coroner will contact the Native American Heritage Commission, in accordance with Health and Safety Code Section 7050.5, subdivision (c), and Public Resources Code 5097.98 (as amended by AB 2641). The NAHC will then designate a Most Likely Descendant of the deceased Native American, who will engage in consultation to determine the disposition of the remains.

Wildfire

PS-1 The Permittee implementing the EWMP project shall provide reasonable advance notification to service providers such as fire, police, and emergency medical services as well as to local businesses, homeowners, and other residents adjacent to and within areas potentially affected by the proposed EWMP project about the nature, extent, and duration of construction activities. Interim updates should be provided to inform them of the status of the construction activities

TRAF-1 For projects that may affect traffic, implementing agencies shall require that contractors prepare a construction traffic control plan. Elements of the plan should include, but are not necessarily limited to, the following:

- Develop circulation and detour plans to minimize impacts to local street circulation. Use haul routes minimizing truck traffic on local roadways to the extent possible.
- To the extent feasible, and as needed to avoid adverse impacts on traffic flow, schedule truck trips outside of peak morning and evening commute hours.
- Install traffic control devices as specified in Caltrans' Manual of Traffic Controls for Construction and Maintenance Work Zones where needed to maintain safe driving conditions. Use flaggers and/or signage to safely direct traffic through construction work zones.

- Coordinate with facility owners or administrators of sensitive land uses such as police and fire stations, hospitals, and schools. Provide advance notification to the facility owner or operator of the timing, location, and duration of construction activities.

HYDRO-4 Prior to approving a structural BMP, the implementing agencies shall conduct an evaluation of the potential hydromodification impacts of the project. The evaluation shall recommend design measures necessary to prevent or minimize any identified impacts, including flooding, erosion and/or scour. Design measures could include velocity dissipaters and bank re-enforcement components. Implementing agencies shall include these measures in project designs.

CHAPTER 5

RESPONSE TO COMMENTS ON THE ADDENDUM TO THE PEIR

The Addendum to the PEIR was distributed for public review on October 15, 2021 through November 15, 2021, and was extended until December 7, 2021, pursuant to CEQA Guidelines Section 15105 (although a public review period is not required for an Addendum). A total of 23 comment letters, including one duplicate letter, were received. According to CEQA Guidelines Section 15088(a), “the Lead Agency shall respond to comments raising significant environmental issues received during the noticed comment period and any extensions and may respond to late comments.” This chapter provides response to written environmental comments received during and after the public comment period.

Written responses are presented for all comment letters received during and after the public review period, including comment letters from agencies, organizations, and individuals. Each letter has been assigned a number code, and individual comments in each letter have also been coded to facilitate responses. For example, the letter from the Homeowner Association Viewridge Estate (H.A.V.E) is identified at Comment Letter 16, with comments noted as 16-1, 16-2, etc. Copies of each comment letter are provided prior to each response. The comment letters are organized chronologically. Comments that present opinions about the project or that raise issues not directly related to the substance of the environmental analysis in the Addendum are noted but, in accordance with CEQA, are not required to receive a detailed response.

5.1 Responses to Written Comments Received That Address Environmental Issues Raised in the Addendum to the PEIR

**Table 5-1
List of Comment Letters on Addendum to the PEIR**

Letter No.	Agency/Organization/Individual	Date of Letter	Page # of Response
1	DuKet, Thomas	October 19, 2021	5-4
2	Topanga Town Council <i>Signed: Carrier, Carrie</i>	November 10, 2021	5-7
3	Herron, Liz	November 10, 2021	5-10
4	Viewridge Owners Involved in the Community and Environment (VOICE) <i>Signed: Petermann, Herbert</i>	November 13, 2021	5-13
5	Summit Point Homeowners Association (HOA), <i>Signed: Wagner, Eve</i>	November 18, 2021	5-23
6	Helfer, Joseph	November 24, 2021	5-25
7	Baugh, Alison	November 24, 2021	5-27
8	Du Brin, Susan	November 24, 2021	5-29
9	Shar, Gary	November 24, 2021	5-31
10	Waller, Suzette	November 25, 2021	5-33
11	Benjamin, Mary	December 1, 2021	5-35
12	Robindore, Roger	December 2, 2021	5-38
13	Los Angeles County Sherriff's Department Facilities Planning Bureau <i>Signed: Campomanes, Rochelle</i>	December 2, 2021	5-45
14	Davis, Paul	December 4, 2021	5-49
15	Richards, Judy	December 4, 2021	5-51
16	Viewridge Estates HOA <i>Signed: Olcese, Riccardo</i>	December 6, 2021	5-53
17	Wallsgrove, Robert	December 6, 2021	5-56
18	Herron, Liz	December 6, 2021	5-66
19	Herron, Liz	December 6, 2021	5-69
20	Herron, Liz	December 7, 2021	5-71
21	Waller, Sue	December 7, 2021	5-75
22	Gottfried, Richard	December 7, 2021	5-78
23	Topanga Town Council <i>Signed: Carrier, Carrie</i>	December 8, 2021	5-84

Subject: Viewridge Road Stormwater Improvements Project

Date: Tuesday, October 19, 2021 at 2:04:50 PM Pacific Daylight Time

From: Thomas DuKet

To: Grace Komjakraphan

CAUTION: External Email. Proceed Responsibly.

I own the home at the corner of Chagall and Hodler. I received a notice with a map of the project today. The map shows BMP locations on Hodler all the way up to the corner of Chagall and Hodler. I talked to a representative of the project two weeks ago and expressed my desire that the project would not disturb the parkway from the intersection down 40 feet in order to preserve existing vegetation and landscaping.

1-
1

It makes more sense to install collection equipment as close to Viewridge road as possible in order to maximize the collection of road runoff. Can the project be modified to put the BMPs as far north on Hodler as possible to preserve my landscaping and collect more water?

Also, the map shows a BMP located right where our electrical sewage pump facilities are located on the north corner of Viewridge and Topanga Canyon Boulevard. If this pump facility is compromised sewage will back up in the entire neighborhood, especially affecting my house which is at a low point in the neighborhood.

1-
2

--
Thomas P. DuKet
Topanga, CA 90290

Comment Letter 1: DuKet, Thomas**Response 1-1**

The commenter expresses a preference for the proposed locations of project BMP's so as to not disturb the commenter's home landscaping. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 1-2

The commenter expresses concern regarding the location of a BMP adjacent to an electrical sewage pump facility and the potential for that pump to be compromised. As discussed in Section XIV(a), Utilities, Service Systems, and Energy, of the Addendum, "the proposed project would require ground disturbance that may encounter buried utilities that may be impacted by construction. As such, the proposed project would implement mitigation measure UTIL-1," which details that, "prior to implementation of BMPs, the implementing agency shall conduct a search for local utilities above and below ground that could be affected by the project. The implementing agencies shall contact each utility potentially affected to address relocation of the utility if necessary, to ensure access and services are maintained." As such, impacts would be less than significant. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Subject: Requesting an extension on comment period for Viewridge Stormwater addendum (until December 7, 2021)
Date: Tuesday, November 9, 2021 at 10:19:39 PM Pacific Standard Time
From: Carrie Carrier
To: Bruce Hamamoto, Grace Komjakraphan
CC: Charnofsky, Tessa, Smith, Drew, Alberto Grajeda, Allen Ma, Stacy Sledge, Roger Pugliese, liz herron, Lynn Levitt, robert dampf, Sue Waller, Chris Herron, Joseph Rosendo, Ron Fomalont, Alisa Land Hill
Attachments: Public Works FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT (2).pdf

CAUTION: External Email. Proceed Responsibly.

To whom it may concern,

The Topanga Town Council has just learned about the Oct 15th - Nov. 15th comment period for the addendum to the PEIR for the Viewridge Stormwater Improvement project, which was initially certified in 2015. Since that time, the project has evolved, and as a result of these modifications, an addendum to the original PEIR was issued. I do not believe the Topanga Town Council was notified about this project addendum, and if we were, it seems to have escaped all of our highly attentive members' attention. As a result of our late notice about this addendum, we are requesting an extension of the comment period until December 7, 2021, so that we have sufficient time to review the addendum and prepare comments. In particular, we would like to evaluate potential traffic impacts, as this is one of the most critical issues to residents. We would also like to gain more insight into potential fire risk issues, noise concerns, and the extent of current and future construction along Topanga Canyon Blvd. (and other residential enclaves in the community) related to this project.

COMMUNITY-WIDE CONCERNS: Based on the attached notice, we can see that the current project site comprises several locations along and near *Viewridge Road* between *Topanga Canyon Boulevard* and *Summit Pointe Drive* in Topanga. Work associated with the proposed project would occur on **Chagall Road, Hodler Drive, Viewridge Road,** and **Voltaire Drive,** with temporary construction staging on **Topanga Canyon Boulevard.**

COMMUNITY ROAD-CLOSURE FATIGUE: Residents in the Canyon have been subjected to an inordinate number of road closures, lane winnowing, and construction noise on account of multiple projects along Topanga Canyon Blvd (and other local roads). over the past couple of years. Residents are currently enduring road closures and power shut-offs due to undergrounding work being performed by SCE and Public Works. Further, Caltrans plans to re-pave the entire road from the PCH up to the 118 beginning in 2022. Residents are exhausted, and businesses are reeling. We need more time to review this addendum and seek residents' input before this addendum is finalized.

We also ask that we (the Topanga Town Council) be included on any/all future correspondence and notifications about this project. Our email for such notifications is:

contact@topangatowncouncil.org. The Topanga Chamber of Commerce (Joseph Rosendo, Community Liaison) and Topangans for a Scenic Community (TASC Chair, Roger Pugliese) should also be notified.

2-3
Cont'd

Kind regards,
Carrie L. Carrier

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Carrie L. Carrier
Topanga Town Council, President
NWF Certified Wildlife Habitat - Topanga Leader
Topanga Creek Watershed Committee, Chair
Email: contact@topangatowncouncil.org
Web: onetopanga.com

Comment Letter 2: Topanga Town Council (Signed: Carrier, Carrie)**Response 2-1**

The commenter states that the Topanga Town Council was not made aware of the public review and comment period for the project and requests an extension to the period; the commenter summarizes anticipated impact topics for discussion and acknowledges the project location. It should be noted that in light of this comment letter, the public review and comment period was extended from November 15, 2021 to December 7, 2021. Otherwise, this comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum.

Response 2-2

The commenter states the presence and impact of ongoing road closures in the Viewridge community due to various construction projects in the area. Mitigation Measure TRAF-1 from the Los Angeles County Flood Control District (LACFCD) Enhanced Watershed Management Programs (EWMP) Program Environmental Impact Report (PEIR) would require the preparation of a construction traffic control plan to minimize impacts to local street circulation. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 2-3

The commenter reiterates and concludes that more time is needed to review and comment on the project and provides additional contact information for future notifications related to the project. It should be noted that in light of this comment letter, the public review and comment period was extended from November 15, 2021 to December 7, 2021. The comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum.

Subject: Re: Requesting an extension on comment period for Viewridge Stormwater addendum (until December 7, 2021)

Date: Wednesday, November 10, 2021 at 11:19:37 AM Pacific Standard Time

From: Liz Herron

To: Carrie Carrier, Len Lanzi, Jay Butterfield

CC: Bruce Hamamoto, Grace Komjakraphan, Charnofsky, Tessa, Smith, Drew, Alberto Grajeda, Allen Ma, Stacy Sledge, Roger Pugliese, Lynn Levitt, robert dampf, Sue Waller, Chris Herron, Joseph Rosendo, Ron Fomalont, Alisa Land Hill

CAUTION: External Email. Proceed Responsibly.

Carrie,

Thank you so much for this update and for requesting this extension.

In future emails could you please include two additional Viewridge residents:

Len Lanzi - President: Viewridge Homeowners Association

llanzi@stubbsalderton.com

and

Jay Butterfield

jay.butterfield@gmail.com

I have included them in the address To: bar above.

Best,

Liz Herron

Viewridge Resident

Sent from my iPhone

Comment Letter 3: Herron, Liz**Response 3-1**

The commenter thanks a previous sender in the email thread for requesting an extension to the public review period and provides contact information for other participants for future communication. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Subject: Viewridge Road Stormwater Improvement Project
Date: Saturday, November 13, 2021 at 4:59:23 PM Pacific Standard Time
From: Herbert Petermann
To: Grace Komjakraphan
Attachments: Viewridge Road Stormwater Improvement Project, 11-12-2021.doc

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Grace Kromjakraphan-Tek,

Our homeowners group named VOICE (Viewridge Owners Involved in the Community and Environment) is submitting a comment letter regarding the proposed **Viewridge Road Stormwater Improvement Project – see attachment.**

-
We greatly appreciate the thoughtful work that went into the design phase of this project. You addressed several issues in your latest design addendum such as what to expect during the construction phase of the project, including turn around access for fire trucks, etc. We think it is a well thought out project and will greatly reduce the pollution flowing into Topanga Creek.

Also, the project would greatly reduce the heat island effect of the paved segment of Viewridge Road between Heidi Lane and Summit Pointe entrance by planting trees in the median.

Best regards,
Herbert Petermann, VOICE Chair

+
1



Viewridge Owners Involved in the Community and Environment
3185 Rossini Place, Topanga, CA 90290, Tel: (818) 888-0209
email: hpetermann@charter.net

November 12, 2021

Grace Komjakraphan-Tek
County of Los Angeles Public Works
900 South Fremont Avenue
Alhambra, CA 91803

Re: Viewridge Road Stormwater Improvement Project

Dear Ms. Grace Komjakraphan-Tek,

I am writing you to express my support for the Viewridge Road Stormwater Improvement Project as it is presently designed. I have read the design addendum and it appears the changes are minor in comparison to the initial proposal that was presented to our community in February 2020. The new proposal addresses the construction of the project and how it impacts any disruption this may cause during the building process.

Once completed, the project would greatly improve the water quality for Topanga Creek and ultimately Topanga Beach at the ocean. I went to two meetings at the Topanga Library that Public Works arranged to describe in detail the project and its many environmental benefits to our community. Also, I wrote a letter on August 18th, 2020 to Supervisor Sheila Kuehl in support of the project.

4-1
Cont'd

I am chair of a homeowners group in the Viewridge area of Topanga and our group **strongly** supports this project. There is another homeowners group called HAVE (Homeowners Association of Viewridge Estates) that opposes the project. I think the reasons they give to oppose it are misleading and unfounded.

4-2

We think the Stormwater Improvement Project project should be implemented as it is proposed. It would create a healthier environment that will benefit the residents of our community.

4-3

Yours sincerely

Herbert Petermann

Herbert Petermann, VOICE Chair

Comment Letter 4: VOICE (Signed Petermann, Herbert)**Response 4-1**

The commenter expresses support for the project and proceeds to elaborate on that support in an attached formal letter, specifically acknowledging that the project design described in the Addendum are minor changes from the initial design proposal shared to the community in February 2020, and acknowledges the addendum addresses potential construction impacts and the project will reduce pollution from flowing into Topanga Creek.. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 4-2

The commenter mentions that while the homeowners' group supports the project, there is an opposing homeowners' group in the community that opposes the project, but that their justifications for opposition are unfounded. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 4-3

The commenter concludes by reiterating their support for the project as proposed, citing that it would make improvements to the environment and community. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Subject: Comment Submission: Safety Concerns Re: Viewridge Stormwater Project
Date: Thursday, November 18, 2021 at 8:30:48 AM Pacific Standard Time
From: Eve Wagner
To: Grace Komjakraphan
CC: Nicholas Rumanes, SUZETTE WALLER, viewridgeLen@gmail.com, Alberto Grajeda, Regina Quan, samantha bryant, harlan dworsky
Attachments: image001.png, image002.png, image003.png, image004.png, Storm drain _11162021175100.PDF

CAUTION: External Email. Proceed Responsibly.

I am the president of the Summit Pointe HOA. We were extremely disappointed to receive the Notice of Addendum to the Enhanced Watershed Management Programs (copy attached), which does not reflect the agreement made after numerous emails were sent to LA County Public Works and a meeting was held at the Topanga library (which was attended by residents from both our neighborhood and the adjoining development). At that time, the agreement was the Viewridge Road Medium would NOT be raised and it would be substantially smaller (among other things). I do not recall any discussion about electrical cabinets being located on the north side of Viewridge Road or some of the other items listed in the notice.

5-1

Below are some of the emails that both Nicholas Rumanes (who is also a board member) and I sent back in 2019 outlining several of our concerns.

In short, we are vehemently opposed to the project as outlined in the recent notice. Please include this and the emails below as part of the public record. And, please have someone contact us asap.

Thank you,
Eve Wagner
President, Summit Pointe HOA

From: Nicholas Rumanes <rumanes@gmail.com>
Date: Tuesday, October 22, 2019 at 7:20 PM
To: ALGRAJEDA@dpw.lacounty.gov <ALGRAJEDA@dpw.lacounty.gov>
Cc: RQuan@dpw.lacounty.gov <RQuan@dpw.lacounty.gov>, Eve Wagner <ewagner@summitresolution.com>
Subject: Safety Concerns Re: View Ridge Stormwater Project

Mr. Alberto Grajeda, P.E

Firstly, thank you for your time and our calls today.

While I am sending you this email as an individual, please know Summit Pointe Estate's HOA Board, which I am a member, will be formally addressing their concerns at the appropriate time.

I am unable to attend the Oct 29th meeting and respectfully request we can arrange for another time to connect.

In the meantime, I would like to highlight some of the concerns I have. Please also know my concerns may likely be very similar to those concerns of **Summit Pointe Estates**, the **View Ridge Community** and the **Top-O-Topanga** community.

May I begin with stating my true appreciation of Public Works' efforts with respect to the storm water quality projects. However, we have grave concerns with the proposed project at View Ridge.

As a quick background, my family and I are “life-long-Topangan’s” and have firsthand experience and been impacted by fires in the Santa Monica mountains over the years.

I sit on the HOA Board as the member responsible for Safety and Security concerns for our neighborhood. I also sit on the LAFD Foundation Board and liaise with the County and other governmental agencies, as appropriate, for our communities’ safety and security interests.

After reviewing the diagram in your email, I would like to bring the following points to your attention. Since Public Works is planning to install a BMP and raised, curbed median with landscaping along View Ridge, you should be aware of serious safety concerns. View Ridge cannot accommodate any impediments such as those proposed. Even the slightest modifications by introducing impediments to this roadway may prove detrimental to the community.

- The entire View Ridge Road is designated by the County as a Permanent **PUBLIC SAFE REFUGE (PSR) AREA**. In the event of evacuation View Ridge is the SPR designated for our neighborhoods.
- Additionally, this area is **TACTICAL ZONE 1 COMMUNITY SAFETY AREA**; A pre-identified geographical area used by emergency responders to improve coordination and span of control during a disaster.
- This strategic strip of road is also utilized as a **Fire Staging Location** by emergency responders to enable prevention of fire spread in the canyon and to neighboring structures of **Summit Pointe, View Ridge and Top-O-Topanga**.
- The **View Ridge Staging Location** also anticipates for mobile command centers and communication rigs and planned to accommodate a variety of emergency apparatus to include aero units for times of emergency.
- LA COUNTY 69 also conducts practical application training exercises along View Ridge with their trucks and engines.

For these bullet points alone any impediments to View Ridge, such as a median should be seriously reconsidered. I prefer that View Ridge stay a PSR and Staging Location Area. If this project is introduced, it will greatly hamper the safety features of our community.

Most likely County Fire will need to permit this effort. LA County Fire may not be supportive for impediments to View Ridge. While I have not addressed this officially to County Fire, please know how sensitive this issue truly is.

As I detail the significance of View Ridge, I am hopeful you can relate to our safety concerns with respect to fire prevention and community refuge.

Additionally, a landscaped median may negatively impact our neighborhood by contributing to reduced lateral vehicular mobility and poor pedestrian visibility. According to national traffic guidelines such as Vision Zero we believe having high visibility for motorists and ease of movement for pedestrians is preferred for safety precautions.

This strip of land is highly utilized by cyclists, dog walkers and children, and recreational folks such as hikers and other leisure and sporting activities.

View Ridge has only one narrow strip of sidewalk on the north end and most people mostly walk on the edge of this southern street. Maintaining this strip of road as-is is not only a safety concern, but that of a usage and lifestyle preference. Our community values the ability to walk side-by-side along the 'view ridge' where the street has so fittingly been named after.

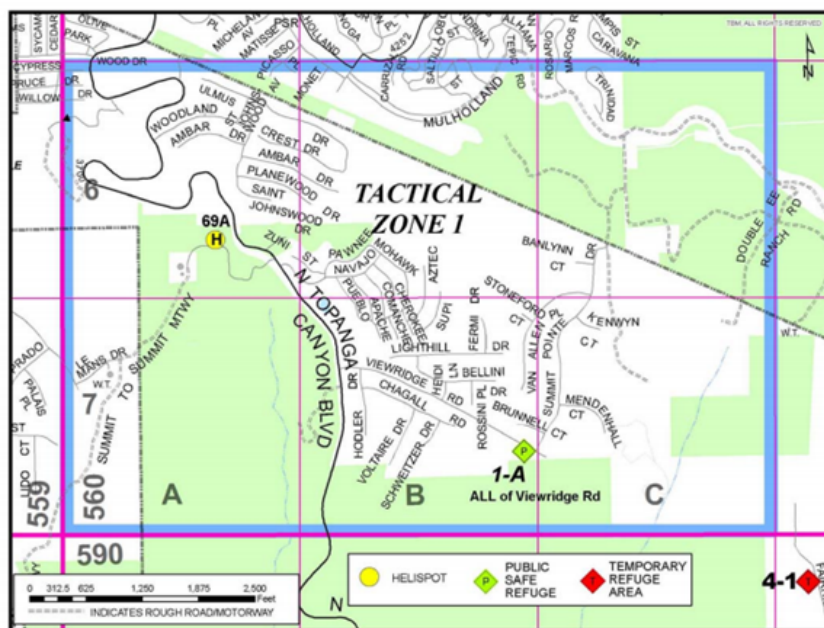
I hope this email and the items I've referenced are just a start of a discussion my community would like to have with your office.

I again thank you for your time and understanding in this sensitive matter.

Enclosed are exhibits from Topanga Coalition for Emergency Preparedness (TCEP) mapping the significance of View Ridge with respect to safety and security in our community.

<https://onetopanga.com/maps/zone-map>

TOPANGA TACTICAL ZONE 1



PUBLIC SAFE REFUGES (PSRs)*

1-A	Viewridge Street	Entire street, preferably along the wall
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TEMPORARY REFUGE AREAS (TRAs)**

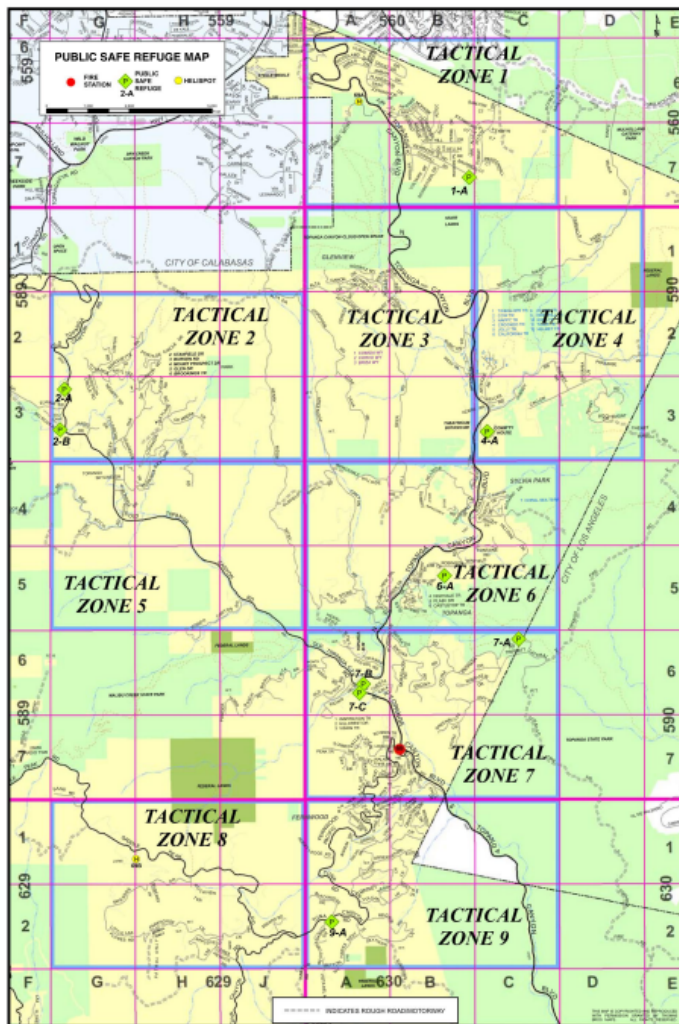
	None	
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PUBLIC SAFE REFUGES (PSRs)*		
ZONE	NAME/ADDRESS	NOTE:
1-A	Viewridge Street	Entire street, preferably along the wall.
2-A	Mill Creek Ranch (1881 Old Topanga)	2 open space areas left of entrance, on either side of the bridge; 1 open space area right of entrance towards rear past the stables. Stay away from tall trees and horses.
2-B	Cali Camp (1717 Old Topanga)	Primary: parking lot away from eucalyptus trees; Secondary: upper corrals.
4-A	Topanga Community House	Shelter area is the ball field.
6-A	Robinson Road (Old Elysium)	Large, grassy open area.
7-A	Entrada Road (State Parks Parking Lot)	Parking Lot.
7-B	Pine Tree Circle	Fire engine NOT present: stay in large, open space Areas of parking lot. Fire engine IS present: follow instructions.
7-C	Topanga Center	Parking lot between the Post Office and the landscaping.
9-A	2300 Tuna Canyon (Water Tank)	Open space nearest the water tank.

*Formerly known as Community Safety/Survival Areas (CSAs). In the event of a real fire and evacuation order, at some point evacuation may be impossible due to traffic gridlock and you may then be redirected to the closest Public Safe Refuge.



TOPANGA TACTICAL ZONE MAP



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Nicholas G. Rumanes
Rumanes@Gmail.com

From: Nicholas Rumanes <rumanes@gmail.com>
Date: Thursday, November 28, 2019 at 10:19 AM
To: Eve Wagner <ewagner@summitresolution.com>, RQuan@dpw.lacounty.gov <RQuan@dpw.lacounty.gov>
Cc: Alberto Grajeda <ALGRAJEDA@dpw.lacounty.gov>, Herbert Peterman <hpetermann@charter.net>, Philip Jobe <philip.jobe@jobecorp.com>, Riccardo Olcese <rolcese@ucla.edu>, Ronald Fomalont <law@fomalont.com>, Sam Bryant <sam@bryantbrown.com>, Stephen (Bruns2009@gmail.com) <Bruns2009@gmail.com>, Sue Waller <sdwall925@aol.com>, edwin ellis <ehe3@msn.com>, jay@butterfield.net <jay@butterfield.net>, viewridgeLen@gmail.com <viewridgeLen@gmail.com>
Subject: Re: Viewridge Community Meeting

Alberto,

You and Public Works are making our community unsafe!

We can not understand why you have settled on plans which will make our community unsafe when there are better ways to accomplish your goals.

We realize that your budget is important to you, but the safety of our community should be your priority.

As you have been made aware and were surprised to hear that this is a PUBLIC SAFE REFUGE AREA. This is also a designated FIRE STAGING AREA for emergency responders.

Why would Public Works spend so much time, effort and costs to hamper our community's safety?

I agree with Eve that you have not given us enough notice. Please note that this is the second time you have sprung this on us, not allowing us to properly prepare. In addition, you sent this notice via email on the eve of the busiest travel day of the year. This is simply unacceptable. This appears a cheap tactic to ramrod your project through an approval process.

Additionally, we would expect Public Works to offer a much wider distribution for this meeting and not just to us on this email chain. Many Topangans benefit from this safety infrastructure. Therefore, you should broaden this meeting's invite list.

Below is my email sent you in October for the benefit of those may not have seen our previous correspondence.

Happy Thanksgiving

.....

From: Nicholas Rumanes <rumanes@gmail.com>
Date: Tuesday, October 22, 2019 at 7:20 PM
To: ALGRAJEDA@dpw.lacounty.gov <ALGRAJEDA@dpw.lacounty.gov>
Cc: RQuan@dpw.lacounty.gov <RQuan@dpw.lacounty.gov>, Eve Wagner <ewagner@summitresolution.com>
Subject: Safety Concerns Re: View Ridge Stormwater Project

Mr. Alberto Grajeda, P.E

Firstly, thank you for your time and our calls today.

While I am sending you this email as an individual, please know Summit Pointe Estate's HOA Board, which I am a member, will be formally addressing their concerns at the appropriate time.

I am unable to attend the Oct 29th meeting and respectfully request we can arrange for another time to connect.

In the meantime, I would like to highlight some of the concerns I have. Please also know my concerns may likely be very similar to those concerns of **Summit Pointe Estates**, the **View Ridge Community** and the **Top-O-Topanga** community.

May I begin with stating my true appreciation of Public Works' efforts with respect to the storm water quality projects. However, we have grave concerns with the proposed project at View Ridge.

As a quick background, my family and I are "life-long-Topangan's" and have firsthand experience and been impacted by fires in the Santa Monica mountains over the years.

I sit on the HOA Board as the member responsible for Safety and Security concerns for our neighborhood. I also sit on the LAFD Foundation Board and liaise with the County and other governmental agencies, as appropriate, for our communities' safety and security interests.

After reviewing the diagram in your email, I would like to bring the following points to your attention. Since Public Works is planning to install a BMP and raised, curbed median with landscaping along View Ridge, you should be aware of serious safety concerns. View Ridge cannot accommodate any impediments such as those proposed. Even the slightest modifications by introducing impediments to this roadway may prove detrimental to the community.

- The entire View Ridge Road is designated by the County as a Permanent **PUBLIC SAFE REFUGE (PSR) AREA**. In the event of evacuation View Ridge is the SPR designated for our neighborhoods.
- Additionally, this area is **TACTICAL ZONE 1 COMMUNITY SAFETY AREA**; A pre-identified geographical area used by emergency responders to improve coordination and span of control during a disaster.
- This strategic strip of road is also utilized as a **Fire Staging Location** by emergency responders to enable prevention of fire spread in the canyon and to neighboring structures of **Summit Pointe, View Ridge** and **Top-O-Topanga**.
- The **View Ridge Staging Location** also anticipates for mobile command centers and communication rigs and planned to accommodate a variety of emergency apparatus to include aero units for times of emergency.

- LA COUNTY 69 also conducts practical application training exercises along View Ridge with their trucks and engines.

For these bullet points alone any impediments to View Ridge, such as a median should be seriously reconsidered. I prefer that View Ridge stay a PSR and Staging Location Area. If this project is introduced, it will greatly hamper the safety features of our community.

Most likely County Fire will need to permit this effort. LA County Fire may not be supportive for impediments to View Ridge. While I have not addressed this officially to County Fire, please know how sensitive this issue truly is.

As I detail the significance of View Ridge, I am hopeful you can relate to our safety concerns with respect to fire prevention and community refuge.

Additionally, a landscaped median may negatively impact our neighborhood by contributing to reduced lateral vehicular mobility and poor pedestrian visibility. According to national traffic guidelines such as Vision Zero we believe having high visibility for motorists and ease of movement for pedestrians is preferred for safety precautions.

This strip of land is highly utilized by cyclists, dog walkers and children, and recreational folks such as hikers and other leisure and sporting activities.

View Ridge has only one narrow strip of sidewalk on the north end and most people mostly walk on the edge of this southern street. Maintaining this strip of road as-is is not only a safety concern, but that of a usage and lifestyle preference. Our community values the ability to walk side-by-side along the 'view ridge' where the street has so fittingly been named after.

I hope this email and the items I've referenced are just a start of a discussion my community would like to have with your office.

I again thank you for your time and understanding in this sensitive matter.

Enclosed are exhibits from Topanga Coalition for Emergency Preparedness (TCEP) mapping the significance of View Ridge with respect to safety and security in our community.

<https://onetopanga.com/maps/zone-map>

From: Nicholas Rumanes <rumanes@gmail.com>

Date: Monday, December 2, 2019 at 6:44 PM

To: Alberto Grajeda <ALGRAJEDA@dpw.lacounty.gov>, Eve Wagner <ewagner@summitresolution.com>

Subject: Re: Viewridge Community Outreach

Thank you Alberto for your email.

We live here every day. We know the importance of having strategic safety and staging zones with refuge areas. We are not NIMBYS. We simply want a safe community. We have experienced too many fires in our community to sit silent on such an important matter.

LA no longer has a "Fire Season." Fire season is 365 days a year now. What was a once-in-a-while event to be evacuated; now, we evacuate multiple times a year. **Any impediment on View Ridge by Public Works will negatively impact our safety.** Unfortunately, its as simple as that.

Have you thought about other methods or ways to implement your plan without disturbing the street? Can you build it in the sloped part of the southern ridge were there is no sidewalk?

Additionally, the entire length of Viewridge has been marked with survey spraypaint and other markings. Are these markings related to your plans?

Please see to it that this project is cancelled in its current form. We believe you have the influence and ability to make the argument that safety should be Public Works' primary mission.

We truly appreciate your outreach and thank you for your responsiveness.

I have to work on the 12th however, i will take your offer to get a copy of the PowerPoint. Preferably, in advance of the meeting.

Sincerely,

Nicholas Rumanes

From: Eve Wagner <ewagner@summitresolution.com>

Date: Wednesday, November 27, 2019 at 5:39 PM

To: Alberto Grajeda <ALGRAJEDA@dpw.lacounty.gov>, Sue Waller <sdwall925@aol.com>, viewridgeLen@gmail.com <viewridgeLen@gmail.com>, jay@butterfield.net <jay@butterfield.net>, Nicholas Rumanes <rumanes@gmail.com>, Philip Jobe <philip.jobe@jobecorp.com>, Stephen (Bruns2009@gmail.com) <Bruns2009@gmail.com>, Sam Bryant <sam@bryantbrown.com>, Herbert Peterman <hpetermann@charter.net>, 'edwin ellis' <ehe3@msn.com>, 'Riccardo Olcese' <rolcese@ucla.edu>, 'Ronald Fomalont' <law@fomalont.com>

Subject: Re: Viewridge Community Meeting

Hi Alberto -- I sincerely hope you are not ignoring the serious concerns that our community has already raised regarding putting any kind of new divider on Viewridge, particularly since this ia staging area for the fire department. Please let me know if you need us to resend the emails.

We will do our best to have a representative of Summit Pointe attend the meeting but this is short notice given the holidays.

Happy Thanksgiving to you as well.

Eve Wagner

From: Eve Wagner <ewagner@summitresolution.com>

Date: Sunday, October 27, 2019 at 11:50 AM

To: Alberto Grajeda <ALGRAJEDA@dpw.lacounty.gov>, Sue Waller <sdwall925@aol.com>, viewridgeLen@gmail.com <viewridgeLen@gmail.com>, jay@butterfield.net <jay@butterfield.net>

Cc: Kevin Chang <KChang@dpw.lacounty.gov>, Allen Ma <AMA@dpw.lacounty.gov>, Regina Quan <RQuan@dpw.lacounty.gov>, Nicholas Rumanes <rumanes@gmail.com>, Philip Jobe <philip.jobe@jobecorp.com>, Stephen (Bruns2009@gmail.com) <Bruns2009@gmail.com>, Sam Bryant <sam@bryantbrown.com>

Subject: Re: Viewridge Stormwater Project

Hi Alberto,

I will try to attend the meeting on Mon but will be coming from downtown so may not be able to make it. I understand from another board member that you were under the impression that I had told your predecessor that I had approved this project. Let me assure you that is NOT the case. All that was agreed upon was that we would be happy to have you make a presentation to our HOA board and members. That meeting was discussed in the first part of the year but never transpired.

Also, now that I have a better understanding of what is intended, please be advised that we are vehemently opposed to any additional divider or obstruction being added to Viewridge. As you may not know, Viewridge has been designated as a staging area and Public Safe Refuse Area by the Los Angeles County Fire Dept. in the unfortunately event of a fire. We live in a high fire area and given what has been occurring over the past several years, we simply cannot risk making it any harder for the fire dept. to use that area, including turning around their trucks etc. Please see the email from my co-board member Nicholas Rumanes, sent to you on 10/22/19, for additional details.

In short, in case our board cannot be represented there in person, please do NOT go forward with any work, including a curbed median, in this area.

Thank you for your consideration and understanding.

If you would like to discuss this further, please do not hesitate to contact me at the number below.

Eve Wagner
310-601-0037

Comment Letter 5: Summit Point HOA (*Signed: Wagner, Eve*)**Response 5-1**

The commenter expresses general opposition to the project, including that the Summit Point HOA has voiced opposition throughout the life of the project planning process (this correspondence occurred outside of the public review period, but is included with the comment letter as part of the public record); the commenter voices that they were under the impression that certain design elements would be changed based on recommendations from the opposing group. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Subject: Topanga Viewridge storm drain project

Date: Tuesday, November 23, 2021 at 8:34:36 PM Pacific Standard Time

From: Joseph Helfer

To: Grace Komjakraphan

CAUTION: External Email. Proceed Responsibly.

I am an environmentally-concerned resident of the Topanga Community- specifically Viewridge Estates and have looked at this project and all that it entails and find it unnecessary and a disruptive waste of taxpayers dollars. Count me among those opposed.

6-1

Comment Letter 6: Helfer, Joseph**Response 6-1**

The commenter expresses opposition to the project. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Subject: Viewridge Estates - Water Project

Date: Wednesday, November 24, 2021 at 8:42:47 AM Pacific Standard Time

From: Alison Baugh

To: Grace Komjakraphan

CC: Susan Du Brin

CAUTION: External Email. Proceed Responsibly.

Hello Grace,

I have lived in Topanga Canyon my entire life and have been a resident in Viewridge Estates now for over twenty-seven years. As an environmentally-concerned resident, I have looked at this project and all that it entails and find it unnecessary and a disruptive waste of taxpayers dollars. Count me among those opposed. | 7-1

Thank you,

Alison Baugh

Alison Baugh

Property Manager

Ethan Christopher, LLC

5363 Balboa Blvd., Suite 227

Encino, CA 91316

(818) 986-9174 x6 office

(818) 445-3811 mobile

(818) 986-1540 fax

abaugh@ethanchristopher.com

Comment Letter 7: Baugh, Alison**Response 7-1**

The commenter expresses opposition to the project. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Subject: FW: Viewridge Estates - Water Project

Date: Wednesday, November 24, 2021 at 8:49:02 AM Pacific Standard Time

From: Susan Du Brin

To: Grace Komjakraphan

CAUTION: External Email. Proceed Responsibly.

Hello Grace,

I have lived in Topanga Canyon for 35 years and have been a resident in Viewridge Estates now for over twenty-seven years. As an environmentally-concerned resident, I have looked at this project and all that it entails and find it unnecessary and a disruptive waste of taxpayers dollars. Count me among those opposed.

8-1

Thank you,

Susan Du Brin
21209 Bellini Drive
Topanga, CA 90290

Comment Letter 8: Du Brin, Susan**Response 8-1**

The commenter expresses opposition to the project. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Subject: I am resident in Viewridge Estates

Date: Wednesday, November 24, 2021 at 1:25:11 PM Pacific Standard Time

From: Gary Shar

To: Grace Komjakraphan

CAUTION: External Email. Proceed Responsibly.

Hi,

Regarding: The project proposes to place a raised median with 18 biofiltration systems in the center of Viewridge Blvd. 850 feet long (approximately 2 1/2 football lengths) just east of Heidi Lane to just west of Summit Point. It will place additional filtration systems in the storm drains at Heidi and Viewridge, Topanga and Viewridge, Hodler, Voltaire and Chagall.

I am an environmentally-concerned resident of the Topanga Community- specifically Viewridge Estates and have looked at this project and all that it entails and find it unnecessary and a disruptive waste of taxpayers dollars. Count me among those opposed.

Please do not waste millions of dollars on a plan that is doomed to fail before it starts will NOT achieve its goals.

Sincerely,

Gary Shar
Topanga Community Resident

9-1

Comment Letter 9: Shar, Gary**Response 9-1**

The commenter summarizes the project description and expresses opposition to the project. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Subject: Viewridge Stormwater Project

Date: Thursday, November 25, 2021 at 9:01:38 AM Pacific Standard Time

From: SUZETTE WALLER

To: Grace Komjakraphan

CAUTION: External Email. Proceed Responsibly.

I am an environmentally concerned resident of the Topanga community, specifically the Viewridge community, and I have a looked at this project and all that it entails and find it unnecessary and destructive WASTE of taxpayer dollars. Those \$\$\$ would be better utilized elsewhere.

Count me among those OPPOSED TO THIS PROJECT.

Suzette Waller
21429 Lighthill Dr
Topanga

Sent from my iPad

10-1

Comment Letter 10: Waller, Suzettle**Response 10-1**

The commenter expresses opposition to the project. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Subject: GREEN STREETS STORM DRAIN PROJECT - VIEWRIDGE ESTATES, TOPANGA
Date: Wednesday, December 1, 2021 at 4:03:26 PM Pacific Standard Time
From: Mary Benjamin
To: Grace Komjakraphan

CAUTION: External Email. Proceed Responsibly.

TO WHOM IT MAY CONCERN:

I am Mary Benjamin, a resident for 20 years on Voltaire Drive in Viewridge and a member of the Viewridge Homeowner's Association.

I, like the HOA Committee of the Viewridge Homeowner's Association, am strongly OPPOSED to the GREEN STREETS STORM DRAIN PROJECT that is being proposed by Public Works.

Members of our committee, HOA President Len Lanzi, Treasurer Sue Waller and residents, Jay Butterfield, Bob Dampf, previous resident Lynn Levitt and Liz Herron have been in endless hours of communication and correspondence with Public Works regarding this matter for the past two years.

11-1

WE ALL FEEL THE PROJECT IS ILL CONCEIVED AND A WASTE OF TAXPAYERS' DOLLARS. IT IS ESTIMATED TO COST 7-8 MILLION DOLLARS AND TAKE AT LEAST A YEAR TO COMPLETE.

Not only that, but I am appalled at the potential for environmental damage of this misguided project and the blatant ignoring of the realities of the drought we are confronting and the negative repercussions with regard to climate change that this proposal represents.

11-2

These aspects of the proposed project are deeply upsetting to me as a citizen, a Viewridge resident and the mother of 20 year-old son.

Every decision we make at this critical time must be made first and foremost with an eye on the effects any environmental action will have on CLIMATE CHANGE. This project seems to turn a blind eye to this larger and most urgent concern that we as environmentally-minded Viewridge residents and parents and grandparents share.

11-3

I want to let my voice be heard to join my neighbors in STRONG OPPOSITION TO THE GREEN STREETS STORM DRAIN PROJECT.

Sincerely,
Mary Benjamin
Academy Award-Nominated Documentary Filmmaker (Feature documentary: EIGHT MINUTES TO MIDNIGHT: A PORTRAIT OF DR. HELEN CALDICOTT)
3122 Voltaire Dr.
Topanga CA 90290
Cell: 310 403-3891

--

Mary Benjamin/Producer
1895 FILMS
Cell: 310 403-3891

Comment Letter 11: Benjamin, Mary**Response 11-1**

The commenter introduces themselves as a member of the Viewridge HOA, and strongly opposes the project. The opposition is based on the alleged expense of the project, which would be funded by taxes. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 11-2

The commenter states that the project would cause environmental damage and does not address local drought conditions or address the larger issue of climate change. As was justified in Section 1.3, Summary of Findings, of the Addendum, “implementation of the modified project would not result in substantial changes requiring major revisions to the previously certified PEIR. Further, the proposed project would not result in any environmental impacts that have not already been addressed in the PEIR or a substantial increase in the severity of previously identified significant impacts. No new mitigation measures are required for the proposed project.” Further, as listed in Chapter 4, Mitigation Measures, of the Addendum, “the mitigation measures listed are the same as the measures in the Final EIR and would be applicable to the proposed project. No new mitigation measures are required as a result of implementing the proposed project.” The mitigation measures provided would ensure that no significant impacts to the environment would occur. As discussed in Section 2.4 of the Addendum, the project would both improve water quality by reducing pollutants and improve habitat by reducing discharged pollutants and reducing the effects of hydromodification. Regarding climate change, the project does not specifically claim to address the causes or propose the solutions to climate change and is not obligated to. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. Further, the Addendum concludes that with implementation of mitigation measures, project impacts to air quality, energy, and greenhouse gas emissions – the environmental resources attributed to climate change – would be less than significant. Finally, regarding local drought, as discussed in Section 2.5 of the Addendum, Description of the Proposed Project, the project would install biofiltration units where stormwater and runoff would flow into a pretreatment chamber that would separate larger sediments and debris before entering a filtration chamber which would reduce the target pollutants before discharging from the unit via gravity into the existing storm drain system; this is a flow-through system that would reduce peak flow rates to prevent flooding and erosion. It would improve the quality of water discharged, not reduce the amount of discharge. Existing landscaping would be replaced with new drought tolerant landscaping once the biofiltration units are installed, and new vegetation will be planted in the new median on Viewridge Road. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 11-3

The commenter reiterates their role within the Viewridge community as well as their opposition to the project and recommends that projects in the community solely focus on addressing climate change. Refer to response 11-2 regarding the project's relationship to climate change. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Subject: Viewridge Estates Filtration project

Date: Thursday, December 2, 2021 at 11:31:11 AM Pacific Standard Time

From: Roger Robindore

To: Grace Komjakraphan

CAUTION: External Email. Proceed Responsibly.

Ms. Komjakraphan-Tek,

Understand that as a resident of Viewridge Estates in Topanga Canyon, I am AGAINST the proposed filtration system proposed for our neighborhood.

After informing myself about the details, the project seems like a complete waste of taxpayer money. While I certainly support the idea to eliminate rain runoff to the Santa Monica bay, it makes no sense that this project will help achieve this goal at all.

| 12-1

Viewridge being the only Topanga community with a sewer system, one would expect that we contribute the least to ocean pollution, given that all other Topanga communities are on septic systems. Also, there's evidence that water entering the ocean at PCH is actually rather clean - it defies common sense that filtration done at the peak of Topanga Canyon would remain clean all the way to the shoreline, if indeed it ever reached it.

| 12-2

Please stop this project that clearly has wide opposition in the Viewridge/Summit Points neighborhoods.

| 12-3

Regards,

Roger Robindoré
3115 Voltaire Dr, Topanga, CA 90290

Comment Letter 12: Robindore, Roger**Response 12-1**

The commenter expresses opposition to the project, claiming that it would not aid in reducing runoff to the Santa Monica Bay. As discussed in Section 2.5 of the Addendum, Description of the Proposed Project, the project would install biofiltration units where stormwater and runoff would flow into a pretreatment chamber that would separate larger sediments and debris before entering a filtration chamber which would reduce the target pollutants before discharging from the unit via gravity into the existing storm drain system; this is a flow-through system that would reduce peak flow rates to prevent flooding and erosion. The project does not propose to install additional storm drains. It would improve the quality of water discharged, not reduce the amount of discharge. No changes to the Addendum are needed and the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 12-2

The commenter claims that the Viewridge community is not the source of ocean water pollution, and that water entering the ocean from Topanga Canyon is relatively clean. As discussed in the Addendum in Section 2.2, Background, and Section 2.5, Project Description, the proposed project location was identified by the Los Angeles County Flood Control District (LACFCD) Enhanced Watershed Management Program (EWMP) Group as a priority multibenefit regional location to implement Best Management Practices (BMPs) to achieve and maintain water quality objectives and protect beneficial uses pursuant to the Municipal Separate Storm Sewer System (MS4). The proposed project would treat flows that drain to Topanga Canyon Creek, which in turn drains to the North Santa Monica Bay – an impaired waterbody assigned Total Maximum Daily Load (TMDL) limits for a number of pollutants originating from urban and stormwater runoff pursuant to the Clean Water Act. Per Section 2.3 of the Addendum, the project would install biofiltration units within the existing storm drain system; the Topanga Canyon watershed is mostly undeveloped other than Topanga Beach Park, a small commercial area, and a small (2-acre) maintenance facility zoned as industrial land use. The central and eastern areas of the subwatershed consist of undeveloped land, rural residential, commercial, public, equestrian, educational, and mixed urban land uses. However, the project location within the Viewridge community provides one of the only locations with a developed right of way (ROW) and existing storm drain systems, making it the optimal location for the project. As part of the EWMP plan development process, various parcels were evaluated and ranked based on their technical feasibility and site ownership. Through this screening process, the proposed project was determined to be a priority multibenefit regional project. No changes to the Addendum are needed and the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 12-3

The commenter concludes by reiterating general opposition to the project. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Subject: Viewridge Road Stormwater Improvements - Addendum to the Final PEIR (LASD Review Comments)
Date: Thursday, December 2, 2021 at 1:45:25 PM Pacific Standard Time
From: Campomanes, Rochelle E.
To: Grace Komjakraphan
Priority: High
Attachments: image.png, Final Program Environmental Report Viewridge Road Stormwater Improvements Project.pdf

Dear Ms. Komjakraphan-Tek:

Please find the attached file for the project mentioned above. Please let me know if you have any comments or questions. Thank you very much.

13-1

Rochelle Campomanes, LEED AP
Departmental Facilities Planner I
Facilities Planning Bureau
Tel: 323-526-5614



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OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ALEX VILLANUEVA, SHERIFF



December 1, 2021

Ms. Grace Komjakraphan-Tek
Los Angeles County Public Works
Stormwater Quality
900 South Fremont Avenue
Alhambra, California 91803

Dear Ms. Komjakraphan-Tek:

**REVIEW COMMENTS
NOTICE OF ADDENDUM TO THE
ENHANCED WATERSHED MANAGEMENT PROGRAMS
FINAL PROGRAM ENVIRONMENTAL REPORT
VIEWRIDGE ROAD STORMWATER IMPROVEMENTS PROJECT
(SCH. NO. 2014081106)**

Thank you for inviting the Los Angeles County Sheriff's Department (Department) to review and comment on the October 2021 Addendum to the Enhanced Watershed Management Programs Final Program Environmental Impact Report (Addendum FPEIR) for the Viewridge Road Stormwater Improvements Project (Project). The proposed Project is located along and near Viewridge Road between Topanga Canyon Boulevard and Summit Pointe Drive in the unincorporated community of Topanga in western Los Angeles County. The proposed Project consists of two parts: Viewridge Road Median which involves construction of an approximately 850-foot-long raised median with approximately 18 biofiltration units, installation of new underground diversion pipeline, installation of a new 18-inch high density polyethylene discharge pipeline, installation of new electrical cabinets, and installation of temporary monitoring cabinets including one rain gage and solar panel; and Biofiltration Units - Chagall Road, Hodler Drive, Viewridge Road and Voltaire Drive which involves installation of approximately 22 biofiltration units below ground and replacement of existing landscaping with new drought tolerant landscaping once the biofiltration units have been installed. The proposed Project is designed to capture stormwater for treatment and discharge to the

13-2

existing storm drain at the Project site. The proposed Project would capture stormwater runoff from an 85th percentile, 24-hour storm event, and would divert urban and stormwater runoff from local unincorporated communities for flow-through treatment and discharge to the existing storm drain.

15-2
Con
t'd

The proposed Project is located within the service area of the Department's Malibu-Lost Hills Sheriff's Station (Station). The proposed Project, as it is described in Section XII Public Services and Recreation on page 3-71 of the Addendum FPEIR, is not expected to significantly impact the current level of service provided by the Station. However, the Station recommends additional mitigation measure such as installation of temporary construction fencing with fence screens and low-level security lighting at areas where construction vehicles, trucks, and equipment are expected to be stored at the Project site as indicated on Table 3 Construction Workers and Equipment Trip Estimates of the Addendum FPEIR on page 3-76 would also deter potential vandalism and theft.

3

Per Section XIII (a) Transportation and Circulation on pages 3-76 to 3-78, a Traffic Control Plan would be prepared by contractors as required by the Los Angeles County Department of Public Works (LADPW) and other implementing agencies as part of the proposed Project to address construction-related traffic congestion and emergency access issues. If temporary lane closures are necessary for the installation of utilities, emergency access should be maintained at all times. Flag persons and/or detours shall be provided as needed to ensure safe traffic operations, and construction signs should be posted to advise motorists of reduced construction zone speed limits. LADPW and its contractors shall coordinate with the Station for proposed emergency access routes for use during the construction activities. The Station also recommends LADPW and its contractors to coordinate with other local agencies for compliance with applicable local and regulatory laws regarding trips for construction haul trucks and sediment transportation.

3

For future reference, the Department provides the following updated address and contact information for all requests for review comments, law enforcement service information, California Environmental Quality Act documents, and other related correspondence:

Tracey Jue, Director
Facilities Planning Bureau
Los Angeles County Sheriff's Department
211 West Temple Street
Los Angeles, California 90012

Attention: Planning Section

3

Ms. Komjakraphan-Tek

- 3 -

December 1, 2021

Should you have any questions regarding this matter, please contact me at (323) 526-5657, or your staff may contact Ms. Rochelle Campomanes of my staff, at (323) 526-5614.

Sincerely,

ALEX VILLANUEVA, SHERIFF



Tracey Jue, Director
Facilities Planning Bureau

13-2
Con
td

TJ:RC:rc/mm

Attachment

c: Salvador Becerra, Captain, Malibu-Lost Hills Station (LHS)
Ashley Turner, Operations Sergeant, LHS
Sergio V. Escobedo, Captain, Contract Law Enforcement Bureau (CLEB)
Bryan Aguilera, Lieutenant, CLEB
Julie Lowe, Sergeant, CLEB
Meghan Wang, Supervising Facilities Project Manager, (FPB)
Rochelle Campomanes, Departmental Facilities Planner I, FPB
Chrono
(EIR-Viewridge Road Stormwater Improvements Project)

Comment Letter 13: Los Angeles County Sherriff's Department Facilities Planning Bureau (Signed: Campomanes, Rochelle)**Response 13-1**

The commenter provides an introduction to an attached letter elaborating on comments to the project. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 13-2

The commenter summarizes the project, including the location, components, and objectives. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 13-3

The commenter summarizes the finding that the project would not significantly impact the level of service of police protection but recommends that the project include security measures such as fencing, lighting, and surveillance during the construction phase in order to deter theft and vandalism. Regarding impacts to police protection, the stance that the project would not require either new or improved facilities or additional personnel as discussed in Section XII(b) of the Addendum, Public Services and Recreation, is maintained, as the project would not result in an increase in population; as such, the existing police protection facilities and personnel would be adequate to service the project during both construction and operation. Additionally, as discussed in this section and in Section 2.6, Construction Schedule and Procedures, as part of the project's BMPs, "[the] County would coordinate with emergency response agencies, including but not limited to the Los Angeles County Fire Department and Los Angeles County Sheriff's Department, during final design to ensure that emergency access is maintained during implementation of the proposed project." During construction, security measures such as fencing would be utilized around any open excavations, and any additional site security measures would be at the sole discretion of the contractor. It should be noted, as discussed in Section I, Aesthetics, that "[the] project area is located in a rural outdoor lighting district, which regulates uses of outdoor lighting for safety and security, promotes dark skies for enjoyment and health of humans and wildlife, and conserves energy and resources." In order to ensure less than significant impacts to Aesthetics, any lighting used for security would need to comply with this ordinance. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 13-4

The commenter recommends that if temporary lane closures are necessary during the construction phase of the project, that the County coordinate with applicable agencies

regarding congestion, emergency access, haul truck trips, and sediment transportation, and makes further recommendations for practices to be implemented as part of the traffic control plan. As discussed in Section XIII(a) of the Addendum, Transportation and Circulation, similar to the approved PEIR, the modified project would implement mitigation measure TRAF-1, which includes the preparation of a traffic control plan during construction. Potential project-specific elements for the traffic control plan could reduce traveler delay and enhancing traveler safety: Public Awareness Campaign; Motorist Information Strategies; and Incident Management.

- TRAF-1 For projects that may affect traffic, implementing agencies shall require that contractors prepare a construction traffic control plan. Elements of the plan should include, but are not necessarily limited to, the following:
- Develop circulation and detour plans to minimize impacts to local street circulation. Use haul routes minimizing truck traffic on local roadways to the extent possible.
 - To the extent feasible, and as needed to avoid adverse impacts on traffic flow, schedule truck trips outside of peak morning and evening commute hours.
 - Install traffic control devices as specified in Caltrans' Manual of Traffic Controls for Construction and Maintenance Work Zones where needed to maintain safe driving conditions. Use flaggers and/or signage to safely direct traffic through construction work zones.
 - Coordinate with facility owners or administrators of sensitive land uses such as police and fire stations, hospitals, and schools. Provide advance notification to the facility owner or operator of the timing, location, and duration of construction activities.

This finding is consistent with the impact determination in the PEIR; no new or intensified impacts would occur, no new mitigation measures are required, and impacts would remain less than significant.

Additionally, as discussed in Section V(b), Geologic and Mineral Resources, “[during] construction, transport of sediments from the project site would be prevented through the use of appropriate erosion control BMPs, as listed in Section 1.6, including implementation of Rule 403 dust control measures, as required by SCAQMD.”

No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 13-5

The commenter provides contact information should further correspondence be required and closes the letter. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

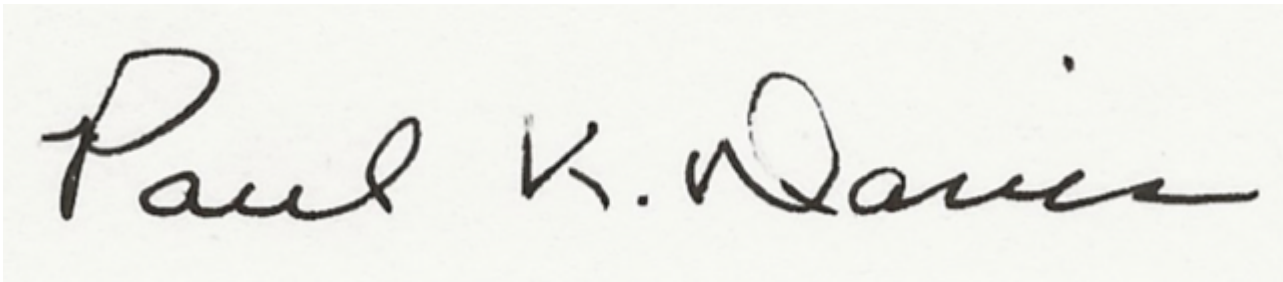
Subject: Opposition to "Viewridge Storm Drain Project"
Date: Saturday, December 4, 2021 at 12:05:28 PM Pacific Standard Time
From: Paul Davis
To: Grace Komjakraphan
CC: Paul K Davis Ph.D.
Attachments: Signature 4.8.21.png

CAUTION: External Email. Proceed Responsibly.

The proposed project to install a raised median strip and a series of biofiltration systems in the middle of Viewridge Blvd. appears to be ill-conceived and would likely be very disruptive. The project of installing it would surely be lengthy and disruptive. I can imagine that something similar would make sense in some areas, but it makes no sense to me for Viewridge. I strongly oppose the project altogether.

14-1

Sincerely,

A photograph of a handwritten signature in black ink on a light-colored background. The signature reads "Paul K. Davis" in a cursive, flowing script.

Paul K. Davis, Ph.D.

Comment Letter 14: Davis, Paul**Response 14-1**

The commenter expresses opposition to the project. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Subject: Viewridge Road Stormwater Improvements Project

Date: Saturday, December 4, 2021 at 7:05:01 PM Pacific Standard Time

From: judy richards

To: Grace Komjakraphan

CAUTION: External Email. Proceed Responsibly.

Dear Ms. Grace Komjakraphan-Tek,

I am vehemently opposed to the Viewridge Road Stormwater Improvement Project. It does not really impact the quality of the water going into the Topanga Creek because the filtered water is going to be dumped into a cesspool of filth at the end of Chagall Road. They have not addressed this at all and because the water is going to be immediately contaminated, I think this project is a complete and total waste of my taxpayers dollars!

If the desired impact is to make the water clean, as it empties into the ocean, why not cleanup the lagoon area?

Please do not go forward with this ill conceived project and waste money, money which could and should be put to better use.

Sincerely,

Judith Richards

3160 Voltaire Dr, Topanga Canyon, Ca 90290

609-273-3255

15-1

Comment Letter 15: Richards, Judy**Response 15-1**

The commenter expresses opposition to the project, claiming that the water treated by the project's proposed components would inevitably become contaminated once it reaches the lagoon area at the end of Chagall Road, concluding that funds should instead be utilized to clean the lagoon area. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. Nevertheless, it should be noted that as discussed in the Addendum, Sections 2.2 and 2.5, the proposed project location was specifically identified by the LACFCD EWMP Group as a priority multibenefit regional location to implement BMPs to achieve and maintain water quality objectives and protect beneficial uses pursuant to the MS4. The proposed project would treat flows that drain to Topanga Canyon Creek, which drains to the North Santa Monica Bay. No further response to this comment is required and no changes to the Addendum are needed. The comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Subject: Viewridge Road Stormwater Improvement Project
Date: Monday, December 6, 2021 at 12:15:21 AM Pacific Standard Time
From: Riccardo Olcese, PhD
To: Grace Komjakraphan
CC: 'MICHELA OTTOLIA', Riccardo Olcese
Attachments: Viewridge Stormwater Improvement_submitted 2021.pdf

CAUTION: External Email. Proceed Responsibly.

Re: Viewridge Road Stormwater Improvement Project

Dear Ms. Grace Komjakraphan-Tek,

We are writing to express our strongest and enthusiastic support in favor of the Viewridge Green Street Stormwater Improvement Project.

(<https://dpw.lacounty.gov/wmd/stwq/Viewridge.aspx>).

Please, help us to support the project.

We are residents of the Viewridge Estates community and members of H.A.V.E. (Home owner Association Viewridge Estate).

While a few H.A.V.E. members oppose the project, we are fully supportive of this improvement for its undeniable environmental benefits, impact on road safety and enrichment of the neighborhood's character. A letter of support is attached.

Thank you for your attention,

Riccardo Olcese
Michela Ottolia

3184 Hedi lane
Topanga, CA 90290

16-1

Comment Letter 16: Viewridge Estates HOA (*Signed Olcese, Riccardo*)**Response 16-1**

The commenter expresses full support for the project, despite opposition from other members of the organization. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. The comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Subject: Viewridge Road Stormwater Improvement Project - Support
Date: Monday, December 6, 2021 at 7:59:21 AM Pacific Standard Time
From: Robert Wallsgrove
To: Grace Komjakraphan

CAUTION: External Email. Proceed Responsibly.

Hello Ms. Komjakraphan -

I'm writing in response to the recent Notice of Addendum to the Enhanced Watershed Management Programs Final Program Environmental Impact Report addressing the Viewridge Road Stormwater Improvement Project.

As a resident of the Topanga community directly impacted by the Viewridge Road Stormwater Improvement Project, I've thoughtfully considered the costs and benefits of the project. I find the positive impacts on environmental health, road safety, and neighborhood character to be compelling. I'm writing to express my support for the project.

Several of my neighbors have organized a committee to engage with the planning process for the project, and they have generated opposition among the Viewridge Estates community that may have resulted in several emails or letters from residents expressing opposition. In some correspondence, that committee may have claimed that they represent our housing association. Their stance does not represent a consensus among our housing association or our community, but rather the amplified voice of a small, vocal minority.

17-1

Over the past couple years, the opposition committee has raised some valid concerns to the project team and county points of contact, and I feel that the county has done a reasonably good job of addressing those concerns. The outstanding concerns cited by the committee relate primarily to (a) the validity of environmental benefits from the project, and (b) concern over temporary disruptions caused by construction of the new filtration units. I find that these lingering concerns lack merit, so I support the project as it stands.

The project would garner even more support from our community if the following valid concerns could be addressed as part of - or in addition to - the proposed project:

1) Remediation of the stagnant degraded area at the bottom of the gully below the north side of Viewridge Road. The point where the new filtration units will release runoff to the steam system is currently in a heavily degraded state, with rampant invasive species and stagnant water. Anything the county can do to help clean up that area - before, during, or after construction of the new filters - would be very valuable.

17-2

2) Local water quality testing. It has been difficult to build resident support for the project in large part because there isn't much data on the local water quality in the upper watershed near our community. The impacts of the new filtration units are hard to quantify. It would be great if a more robust testing program could be established to measure the long-term impacts of the project. That would require measurements prior to construction to establish a baseline, followed by periodic testing over several years.

17-3

I will be reaching out to my local Resource Conservation District and environmental nonprofits to explore options to address the two items above, and I hope to help coordinate community volunteers and resources to help get that done. If there is anything the county can do to support those efforts, my neighbors and I will greatly appreciate it.

17-4

Thanks for your consideration.

Robert Wallsgrove
3118 Hodler Dr., Topanga 90290
512-228-9472

Comment Letter 17: Wallsgrove, Robert**Response 17-1**

The commenter expresses full support for the project, despite opposition from other members of the organization. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 17-2

The commenter implies that those opposed to the project may change to a supportive stance if the County also provided cleanup of allegedly degraded areas and sources of runoff adjacent to the project site. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. The comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 17-3

The commenter implies that those opposed to the project may change to a supportive stance if more data were provided to show the necessity of the project as well as its positive long-term impacts. As discussed in the Addendum in Section 2.2, Background, and Section 2.5, Project Description, the proposed project location was identified by the LACFCD EWMP Group as a priority multi-benefit regional location to implement BMPs to achieve and maintain water quality objectives and protect beneficial uses pursuant to the MS4. The proposed project would treat flows that drain to Topanga Canyon Creek, which drains to the North Santa Monica Bay – an impaired waterbody assigned TMDL limits for a number of pollutants originating from urban and stormwater runoff pursuant to the Clean Water Act. Additionally, as discussed in Section 2.4, Project Objectives, the project would potentially treat up to 33 acre-feet of stormwater per year. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 17-4

The commenter concludes that they will do independent outreach with environmental organizations to address the requests of Comment 17-2 and Comment 17-3 but will continue to support the project in the meantime. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Grace Komjakraphan

From: Liz Herron <herronsintopanga@yahoo.com>
Sent: Monday, December 6, 2021 10:03 PM
To: Grace Komjakraphan
Cc: Liz Herron
Subject: Liz Herron/ HOA Opposition/Viewridge Storm Drain Project/ Petitions

CAUTION: External Email. Proceed Responsibly.

Los Angeles County Public Works

December 6, 2021

Grace Komjakraphan-Tek,

My name is Liz Herron and I have been a resident of the Viewridge Estates neighborhood in Topanga Canyon for 33 years. I am a member of the Homeowner's Association and am writing on behalf of the Viewridge Estates HOA Committee that represents many of the neighbors that are concerned and opposed to the Green Streets Storm Drain Project being proposed by Public Works. We have conducted endless hours of research and analysis and have been in communication and correspondence with Public Works regarding this matter for the past two years but to no avail. It seems our concerns are falling on deaf ears as this project just keeps moving forward. This project is funded by public money and we, the public, are, now, reaching out to our public representatives for assistance.

Basically, the project proposes to place filtration systems in the storm drains in various locations in Viewridge neighborhood, at the entrance near Topanga Canyon Blvd as well as a raised median filtration system- approximately the length of 2 1/2 football fields in the middle of Viewridge Road just East of Heidi Lane towards the entrance of the gated community of Summit Pointe.

The project's intention is to filter and clean the water from this one, single Topanga neighborhood with the hope that by the time it travels nine miles down the Topanga Creek, reaches the Topanga Lagoon and deposits into the Santa Monica Bay- it will be clean.

Originally, and for the past two years of communication with Public Works, this project was estimated to take 1 1/2 -2 years but with this recent Addendum, that number has been reduced to approximately one year. We are skeptical.

We believe that it makes more sense to have a filtration system closer to or near the ocean to better maximize the outcome of having clean water as it exits the Lagoon and is deposited into the ocean.

We feel the proposal is ill conceived and a waste of tax payer dollars (estimated to be \$7-8 million).

Here's why:

- 1) The proposed filtered water would immediately be dumped into three areas. The first depositing on the west side of Topanga Canyon. The other two areas on the south side of Viewridge Road: the first having stagnant contaminated water in its creek bed along with an extensive area of fallen trees and branches on land owned by Summit Pointe that Public Works cannot legally access and the second being a very dry, drought impacted creek down the slope near the trailhead at the end of Viewridge Road. This supposed filtered clean water will never reach the ocean. The water will be either absorbed by the dry creek bed or further re-contaminated by animal urine and feces, litter, and debris as it travels nine miles to the beach.
- 2) Viewridge has the only storm drain system in Topanga. Therefore, our water would be the only water being filtered in the canyon. At inception, it will be immediately mixed with the storm drain water of Summit Pointe which does NOT have this elaborate filtration system and is not part of the project and then join the rest of the canyon's unfiltered water. This seems counterproductive.
- 3) Rose Dagit, a well known and respected fellow Topangan, and Senior Conservation Biologist with the Resources Conservation District of the Santa Monica Mountains (RCDSMM), along with a team of researchers, conducted studies on the contaminants of the Topanga Creek. Their findings demonstrated that the water from Topanga IS clean when it reaches the Topanga Lagoon. Apparently, cleansing takes place as the water travels from the town of Topanga to the Lagoon, making us question the necessity of filtering the water nine miles up at Viewridge. Her findings revealed that it is AT the Lagoon where the seagulls, bird life, dogs, other animals, and human urine and feces contaminate the water before it goes into the ocean. This suggests that a filtration system should be placed at the beach in order to maximize the effectiveness before the water is deposited into the Santa Monica Bay.
- 4) We had an opportunity to meet with Bruce Hamamoto and Melina Watts from Public Works to walk our neighborhood and review these concerns with them last Spring. We shared with them that we were aware that Public Works acquires points or credits for the manner in which they design a system which garners them more credibility and opportunity to be funded for future projects. It raises the question whether a project is being done wisely and correctly or designed to fulfill these requirements and why there may be incentive to do the project whether it's justified or not. They were forthcoming in admitting that our neighborhood was chosen because it is the "low lying fruit" with storm drains already on site, easy access- directly off the canyon boulevard- and a wide street to accommodate their construction vehicles.
- 5) California has been designated as a National emergency with the drought and we do not receive a lot of annual rainfall. In the LA Times on November 10, 2021 there was an insert of an issue of a special 15 page magazine from the Southern California Water Coalition discussing the drought and "all things water" titled California Water 2021. One article mentions the goal of collecting water and re-purposing it. Public Works' project isn't even allowing us to re-purpose this water to water our already established median of large trees and ground cover at the entrance on Viewridge or utilize the water for the recently planted trees by Public Works or to serve the neighborhood but rather deposits it back into the canyon where it will be, immediately, further contaminated.
- 6) This project has the potential to disrupt traffic at the Topanga and Viewridge intersection, create noise for day residents and people working out of their homes (especially since Covid), interfere with the width and length of Viewridge Road that has always served as a staging area for the Fire Department and the fire

18-1

18-2

18-3

18-4

engines during time of fire and evacuation, be an impediment for fire safety during construction and disrupt day hikers, walkers and bicyclists that utilize Viewridge Road for recreation and access to the trailhead.

18-4
Cont'd

Taking all of this into account, if the goal of Public Works is to have the water clean when it enters the Santa Monica Bay- is our money not better spent with a filtration system AT the beach? The majority of all the BMP's in the LA Basin are near to the beach and ocean. Or, perhaps, a better use of these tax payer's dollars would go towards funding for the Topanga Lagoon at PCH and Topanga Blvd.

It is important to note that the members of the HOA at Summit Pointe have expressed their opposition and concerns as well to Public Works. We have presented our concerns to the Topanga Town Council on November 10, 2021. Carrie Carrier, President of the Topanga Town Council, Roger Pugliese, Chair of the Topangans for a Scenic Community (TASC) and Ron Fomalont, an Attorney, all attended and expressed their sympathy and support.

18-5

In the Viewridge community, we are environmentally minded BUT this project does not make sense to us. There are plenty of reasons NOT to do this project and not enough reasons to do it. We are concerned that our officials and representatives may not have a full understanding of the scope of this project and its futility.

We implore you to reconsider this project.

Please see the attached Petition with a list of signatures of 64 residents opposed to this project.

18-6

Thank you for your time.

Liz Herron D.D.S.
A resident of Viewridge for 33 years and member of the Homeowner's Association Committee opposed to the project.

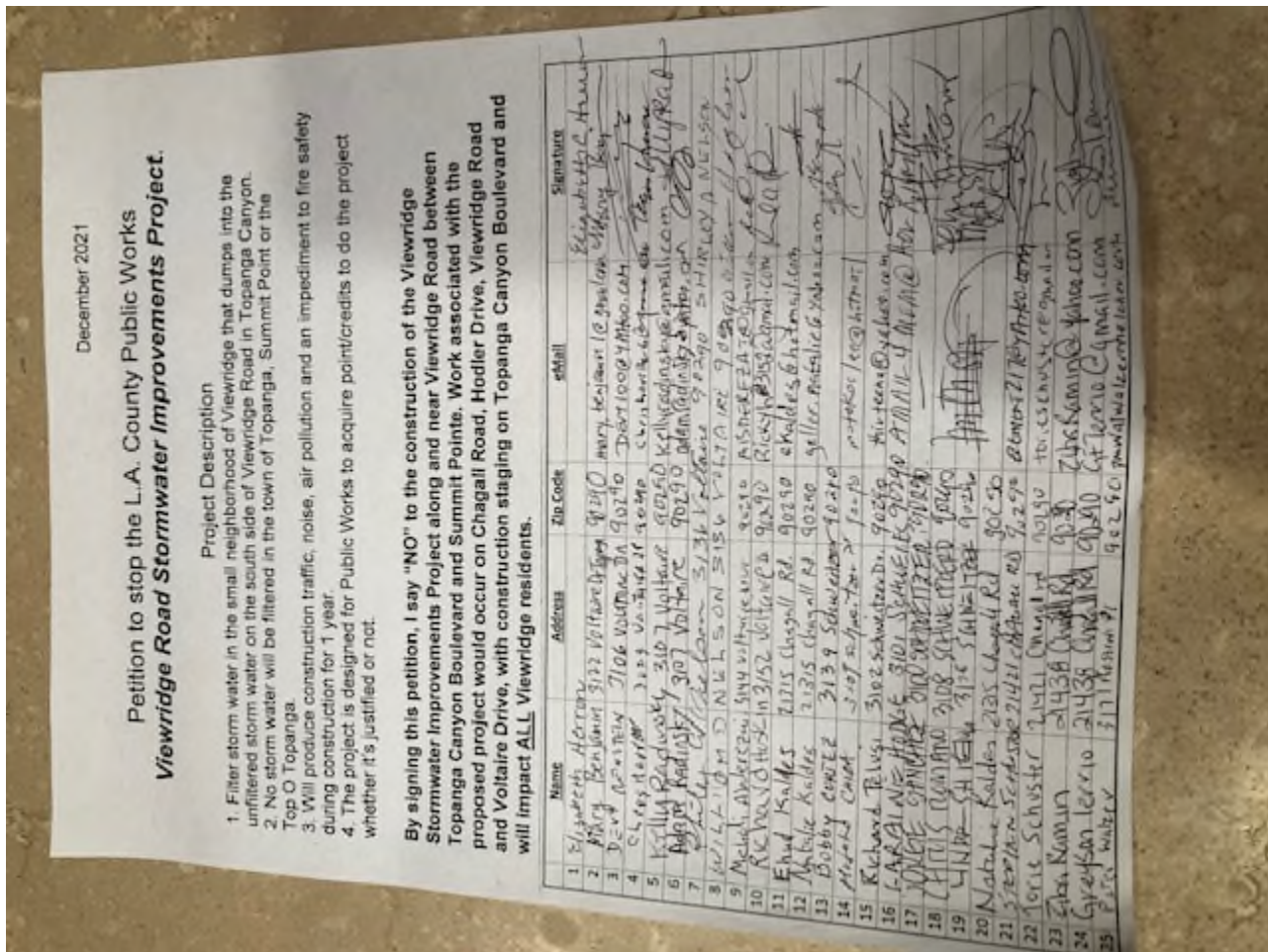
[3123 Voltaire Drive](#)
[Topanga, Ca 90290](#)
Cell- [818-515-2458](#)
Home- [818-887-2456](#)

Len Lanz- President of the Viewridge HOA

Sue Waller- Treasurer of the Viewridge HOA

Jay Butterfield- Secretary of the Viewridge HOA

Bob Dampf- Resident for 20 years



December 2021

Petition to stop the L.A. County Public Works Viewridge Road Stormwater Improvements Project.

Project Description

1. Filter storm water in the small neighborhood of Viewridge that dumps into the unfiltered storm water on the south side of Viewridge Road in Topanga Canyon.
2. No storm water will be filtered in the town of Topanga, Summit Point or the Top O Topanga.
3. Will produce construction traffic, noise, air pollution and an impediment to fire safety during construction for 1 year.
4. The project is designed for Public Works to acquire point/credits to do the project whether it's justified or not.

By signing this petition, I say "NO" to the construction of the Viewridge Stormwater Improvements Project along and near Viewridge Road between Topanga Canyon Boulevard and Summit Pointe. Work associated with the proposed project would occur on Chagall Road, Hodler Drive, Viewridge Road and Voltaire Drive, with construction staging on Topanga Canyon Boulevard and will impact ALL Viewridge residents.

	Name	Address	Zip Code	eMail	Signature
1	Maria Wilson	3117 Voltaire	90230	maria.wilson@comcast.net	[Signature]
2	Wendy Gledhill	3119 Voltaire	90230	Wendy.gledhill@comcast.net	[Signature]
3	Kobayashi	3145 Voltaire	90230	rp.kobayashi@comcast.net	[Signature]
4	Kelly	3137 Voltaire	90230	kelly@comcast.net	[Signature]
5	Lee	3127 Voltaire	90230	lee@comcast.net	[Signature]
6	Tom	31457 Chagall	90230	tom@comcast.net	[Signature]
7	VAN HOLMES	3130 Voltaire	90230	vanholmes@comcast.net	[Signature]
8	Alison Young	3130 Voltaire	90230	alisonyoung@comcast.net	[Signature]
9	Hugh Lewis	3129 Voltaire	90230	hughlewis@comcast.net	[Signature]
10	[Redacted]	3129 Voltaire	90230	[Redacted]	[Redacted]
11	[Redacted]	3129 Voltaire	90230	[Redacted]	[Redacted]
12	[Redacted]	3129 Voltaire	90230	[Redacted]	[Redacted]
13	[Redacted]	3129 Voltaire	90230	[Redacted]	[Redacted]
14	Robert	3141 Voltaire	90230	robert@comcast.net	[Signature]
15	Michael	3150 Voltaire	90230	mic@comcast.net	[Signature]
16	John	3150 Voltaire	90230	john@comcast.net	[Signature]
17	John	3150 Voltaire	90230	john@comcast.net	[Signature]
18	John	3150 Voltaire	90230	john@comcast.net	[Signature]
19	John	3150 Voltaire	90230	john@comcast.net	[Signature]
20	John	3150 Voltaire	90230	john@comcast.net	[Signature]
21	John	3150 Voltaire	90230	john@comcast.net	[Signature]
22	John	3150 Voltaire	90230	john@comcast.net	[Signature]
23	John	3150 Voltaire	90230	john@comcast.net	[Signature]
24	John	3150 Voltaire	90230	john@comcast.net	[Signature]
25	John	3150 Voltaire	90230	john@comcast.net	[Signature]

Petition to stop the L.A. County Public Works Viewridge Road Stormwater Improvements Project.

Project Description

1. Filter storm water in the small neighborhood of Viewridge that dumps into the unfiltered storm water on the south side of Viewridge Road in Topanga Canyon.
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	Name	Address	Zip Code	eMail	Signature
1	Pauja Kenworthy	2123 Hodler Dr	90290	KKKenworthy@icenter.net	<i>[Signature]</i>
2	Linda Kenworthy	3173 Hodler Dr	90290	KKKenworthy@icenter.net	<i>[Signature]</i>
3	Charles Kenworthy	3173 Hodler Dr	90290	KKKenworthy@gmail.com	<i>[Signature]</i>
4	Maurice Kizala	21750 Chagall Pt	90290	mauricekizala@gmail.com	<i>[Signature]</i>
5	Jay Krupke	3141 Hodler Dr	90290	jaykrupke@icenter.net	<i>[Signature]</i>
6	Elias Hiles	5141 Hodler Dr	90290	elijahhiles@gmail.com	<i>[Signature]</i>
7	Amia Teuto	3115 Hodler Dr	90290	claudia@teuto.com	<i>[Signature]</i>
8	Xun Wong	3105 Hodler Dr	90290	xunwong@gmail.com	<i>[Signature]</i>
9	Honey van Buren	" "	90290	honeyvanburen@gmail.com	<i>[Signature]</i>
10	Ronita De Laasman	3101 Hodler			<i>[Signature]</i>
11	Eric Lynn	3156 Kesslin H	90290	ericlynn@icenter.net	<i>[Signature]</i>
12	Eric Lynn	3156 Kesslin H	90290	ericlynn@icenter.net	<i>[Signature]</i>
13	Julie Alice	21217 Bellini Dr	90290	ATHLOVE@icenter.net	<i>[Signature]</i>
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December 2021

Petition to stop the L.A. County Public Works Viewridge Road Stormwater Improvements Project.

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	Name	Address	Zip Code	eMail	Signature
1	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
2	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
3	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
4	Boyer Robinson	3115 Voltaire Dr. Topanga	90260	probabodie@gmail.com	[Signature]
5	Kim Henderson	3115 Voltaire Dr. Topanga	90260	Kim.Henderson@comcast.net	[Signature]
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Petition to stop the L.A. County Public Works Viewridge Road Stormwater Improvements Project.

Project Description

1. Filter storm water in the small neighborhood of Viewridge that dumps into the unfiltered storm water on the south side of Viewridge Road in Topanga Canyon.
2. No storm water will be filtered in the town of Topanga, Summit Point or the Top O Topanga.
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	Name	Address	Zip Code	eMail	Signature
1	Elizabeth Herron				Elizabeth C. Herron
2	Mary Benjamin	3122 Voltaire Dr	90290	mary_benjamin@comcast.net	Mary Benjamin
3	Devin	3106 Voltaire Dr	90290	DEVIN10004@AOL.COM	Devin
4	CLIFF HERRON	3123 Voltaire Dr	90290	cliffh@comcast.net	Cliff Herron
5	Kelly Radinsky	3107 Voltaire	90290	kellyradinsky@gmail.com	Kelly Radinsky
6	Adam Radinsky	3107 Voltaire	90290	adamradinsky@yahoo.com	Adam Radinsky
7	William D. Nelson	3136 Voltaire	90290	SHIRLEY.A.NELSON	William D. Nelson
8	William D. Nelson	3136 Voltaire	90290	SHIRLEY.A.NELSON	William D. Nelson
9	Melinda Anderson	3144 Voltaire Ave	90290	AISHEE@AOL.COM	Melinda Anderson
10	RICHARD HASKIN	3152 Voltaire Dr	90290	RICKY@3152ADMIT.COM	Richard Haskin
11	Ehud Kaldes	2115 Chagall Rd.	90290	ehudes@hotmail.com	Ehud Kaldes
12	Natalie Kaldes	21315 Chagall Rd	90290	geller.natalie@xobee.com	Natalie Kaldes
13	Bobby Cortez	3139 Schwelitzer	90290		Bobby Cortez
14	Miguel Cortez	3107 Schwelitzer	90290	miguelcortez@att.net	Miguel Cortez
15	Richard Telvis	3102 Schwelitzer Dr.	90290	thirteen@yahoo.com	Richard Telvis
16	LARAINIE HONGE	3101 Schwelitzer	90290	AMAIL4MAMA@HOTMAIL.COM	Larainie Honge
17	JONIE GONZALEZ	3100 Schwelitzer	90290		Jonie Gonzalez
18	CHRIS GONZALEZ	3108 Schwelitzer	90290		Chris Gonzalez
19	CHRIS GONZALEZ	3108 Schwelitzer	90290		Chris Gonzalez
20	Natalie Kaldes	2135 Chagall Rd	90290		Natalie Kaldes
21	Stephan Schwelitzer	21421 Chagall Rd	90290	stephan@schwelitzer.com	Stephan Schwelitzer
22	Torrie Schuster	2141 Chagall Rd	90290	torrie@schwelitzer.com	Torrie Schuster
23	Ziba Ruman	21438 Chagall Rd	90290	ziba@ruman.com	Ziba Ruman
24	Greyson Herron	21438 Chagall Rd	90290	Greyson@comcast.net	Greyson Herron
25	Peter Walter	3171 Voltaire Dr	90290	pwalt@voltaire.com	Peter Walter

Petition to stop the L.A. County Public Works Viewridge Road Stormwater Improvements Project.

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	Name	Address	Zip Code	eMail	Signature
1	Morgan Gibson	3117 Voltaire	90290	matanz25@gmail.com	<i>Morgan Gibson</i>
2	Thomas Smith	3117 Voltaire	90290	TG@fip-gibson.com	<i>Thomas Smith</i>
3	Robert Benson	3145 Voltaire Dr.	90290	rpbemp@gmail.com	<i>Robert Benson</i>
4	Keelie Ault	3137 Voltaire Dr.	90290	keelie@voltaire.com	<i>Keelie Ault</i>
5	Lucy E. Nathan	3137 Voltaire	90290	lucywilliams@voltaire.com	<i>Lucy E. Nathan</i>
6	TOM DUKETE	21457 CHAGALL	90290	TOMDUKETE@gmail.com	<i>TOM DUKETE</i>
7	VAN HOLMES	3130 VOLTAIRE	90290	VANR VANHOLMES@voltaire.com	<i>VAN HOLMES</i>
8	Alison Young	3130 Voltaire	90290	alison.young@voltaire.com	<i>Alison Young</i>
9	Haga Lewis	3159 Voltaire Dr	90290	haga.lewis@voltaire.com	<i>Haga Lewis</i>
10	Michelle	3159 Voltaire	90290	mh@voltaire.com	<i>Michelle</i>
11	Michelle	21400 Chagall Rd	90290	hcdressy@gmail.com	<i>Michelle</i>
12	Michelle				<i>Michelle</i>
13	Michelle	21201 Revlin	90290	topanga@voltaire.com	<i>Michelle</i>
14	Patricia	214121 Voltaire	90290	Patricia.Patel@gmail.com	<i>Patricia</i>
15	Samuel Quinn	3114 Voltaire	90290	quinn@voltaire.com	<i>Samuel Quinn</i>
16	Michael Nixon	3152 Voltaire	90290	mic@voltaire.com	<i>Michael Nixon</i>
17	JUDITH RICHARDS	3160 Voltaire Dr	90290	judithrichards@voltaire.com	<i>JUDITH RICHARDS</i>
18	JUDITH RICHARDS	3160 Voltaire Dr	90290	judithrichards@voltaire.com	<i>JUDITH RICHARDS</i>
19	Laura Stein	3123 Chagall	90290	laura@voltaire.com	<i>Laura Stein</i>
20	Laura Dempsey	3145 Voltaire	90290	Laura.Dempsey@voltaire.com	<i>Laura Dempsey</i>
21	Richard Gottlieb	3122 Voltaire Dr	90290	richardgottlieb@voltaire.com	<i>Richard Gottlieb</i>
22	Bruce Swanson	3114 Voltaire Dr	90290	bruce@voltaire.com	<i>Bruce Swanson</i>
23	Leonard Lubin	3126 Hodler Dr	90290	leonard@voltaire.com	<i>Leonard Lubin</i>
24	Russell Nelson	3126 Hodler Dr	90290	Russell@voltaire.com	<i>Russell Nelson</i>
25	JOSEPH HELFER	3108 Hodler Dr	90290	helferjoseph@voltaire.com	<i>JOSEPH HELFER</i>

Petition to stop the L.A. County Public Works Viewridge Road Stormwater Improvements Project.

Project Description

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	Name	Address	Zip Code	eMail	Signature
1	Douglas Kenworthy	3173 Hodler Dr.	90290	HKcaworthy@charter.net	<i>[Signature]</i>
2	Lynnda Kenworthy	3173 Hodler Dr	90290	lkenworthy@charter.net	<i>[Signature]</i>
3	Charles Kenworthy	3173 Hodler Dr.	90290	CKenworthy@gmail.com	<i>[Signature]</i>
4	Maritza Ketzah	2150 Chagall Rd	90290	maritza.choy@gmail.com	<i>[Signature]</i>
5	Jaykratz Miles	3141 Hodler Dr.	90290	jaykratzmiles@gmail.com	<i>[Signature]</i>
6	Elias Miles	3141 Hodler Dr	90290	elias.milers@gmail.com	<i>[Signature]</i>
7	Lynnia Teuto	3115 Hodler Dr	90290	claudia.teuto@gmail.com	<i>[Signature]</i>
8	Rumi van Damme	3103 Hodler Dr.	90290	rumi.vandamme@gmail.com	<i>[Signature]</i>
9	Honey van Damme	" "	90290	honey.vandamme@gmail.com	<i>[Signature]</i>
10	Ronita De Kaasmarker	3101 Hodler		ronita.dekaasmarker@gmail.com	<i>[Signature]</i>
11	Gloria Phil. P. Serradell	3170 Rossini	90290	gloria.p.serradell@gmail.com	<i>[Signature]</i>
12	Eric Lynn	3156 Rossini Pl	90290	eric.lynn@gmail.com	<i>[Signature]</i>
13	Julie Alice	21217 Bellini Dr.	90290	ALTA@VEIClectoral.com	<i>[Signature]</i>
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December 2021

Petition to stop the L.A. County Public Works Viewridge Road Stormwater Improvements Project.

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	Name	Address	Zip Code	eMail	Signature
1					
2					
3					
4	Boyer Robinson	3115 Voltaire Dr	90240	probbndure@gmail.com	[Signature]
5	Kim Henderson	3115 Voltaire Dr	90270	Kim.Ekim-Henderson.com	[Signature]
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Comment Letter 18: Herron, Liz**Response 18-1**

The commenter expresses opposition to the project with the backing of the Viewridge HOA, summarizes the perceived objectives of the project, and introduces the reasons for opposition to further be discussed in the letter. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 18-2

The commenter states that the location of the project would not achieve the objective of treating water that drains into the ocean and that other locations with higher sources of pollutants would be more ideal for a project of this scope. As discussed in the Addendum in Section 2.2, Background, and Section 2.5, Project Description, the proposed project location was identified by the LACFCD EWMP Group as a priority multibenefit regional location to implement BMPs to achieve and maintain water quality objectives and protect beneficial uses pursuant to the MS4. As discussed in Section 2.3, Project Location and Setting, the Topanga Canyon watershed is mostly undeveloped other than Topanga Beach Park, a small commercial area, and a small (2-acre) maintenance facility zoned as industrial land use. The central and eastern areas of the subwatershed consist of undeveloped land, rural residential, commercial, public, equestrian, educational, and mixed urban land uses. However, the project location within the Viewridge community provides one of the only locations with a developed right of way (ROW) and existing storm drain systems, making it the optimal location for the project. As part of the EWMP plan development process, various parcels were evaluated and ranked based on their technical feasibility and site ownership. Through this screening process, the proposed project was determined to be a priority multi-benefit regional project. No changes to the Addendum are needed and the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 18-3

The commenter states that the project does not provide the opportunity to repurpose the treated water to hydrate the planted medians in the community. As discussed in Section 2.5 of the Addendum, Description of the Proposed Project, existing landscaping would be replaced with new drought tolerant landscaping once the biofiltration units are installed and new vegetation will be planted in the new median on Viewridge Road. The Project considered an irrigation reuse feature for the existing and new median along Viewridge Road. Unfortunately, the requirements to treat water for spray irrigation uses are stringent and would render the project infeasible from a cost benefit standpoint. The project now features drip irrigation and removes the necessity to incorporate additional mechanical equipment, such as pumps. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 18-4

The commenter suggests that the project would have negative impacts on traffic in the community, including obstruction to emergency access. As discussed in Section VII(f), Hazards and Hazardous Materials, Section XII(a), Public Services and Recreation, and Section XVI(a), Wildfire, of the Addendum, “[d]uring construction of the proposed project, partial road closures would be necessary along the Viewridge Road ROW as well as areas along Hodler Drive, Voltaire Drive, Chagall Road, Heidi Lane, and Bellini Drive. These partial closures would be temporary, occurring only for the duration of construction activities. However, these temporary closures could affect emergency response and/or evacuation plans. No partial closures would occur on Topanga Canyon Boulevard, a freeway disaster route, although flaggers may be used temporarily to assist with equipment mobilization. However, partial closures would be required on Viewridge Road, which is identified as a local Public Safe Refuge Area. These areas are identified by the Topanga Coalition for Emergency Preparedness as areas where evacuees may be redirected if evacuation is not possible due to traffic gridlock. Consistent with the approved program, as discussed further in Section XII (a)...mitigation measure PS-1 would require the advance notification to emergency services providers and homeowners and residents within the project area to ensure that emergency responsiveness was not impaired during construction work. Additionally, as further discussed in Section XIII (a), consistent with the approved program, the proposed project would implement mitigation measure TRAF-1, which includes the preparation of a traffic control plan during construction. No long-term impacts would result from operation of the proposed project.” No further response to this comment is required and no changes to the Addendum are needed. The comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the proposed Project.

Response 18-5

The commenter reiterates the opposition to the project felt by the Viewridge HOA and others in the community and reestablishes that such a project would be better served in a different location. Refer to Response 18-2. No further response to this comment is required and no changes to the Addendum are needed. The comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the proposed Project.

Response 18-6

The commenter states that a petition with the signatures of others opposing the project is included as part of the comment letter. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Comment Letter 19: Herron, Liz (Duplicate of Comment Letter 18)**Response 19-1**

This comment letter, including attached petition, is a duplicate of Comment Letter 18. See Responses to Comment Letter 18 above.

Grace Komjakraphan

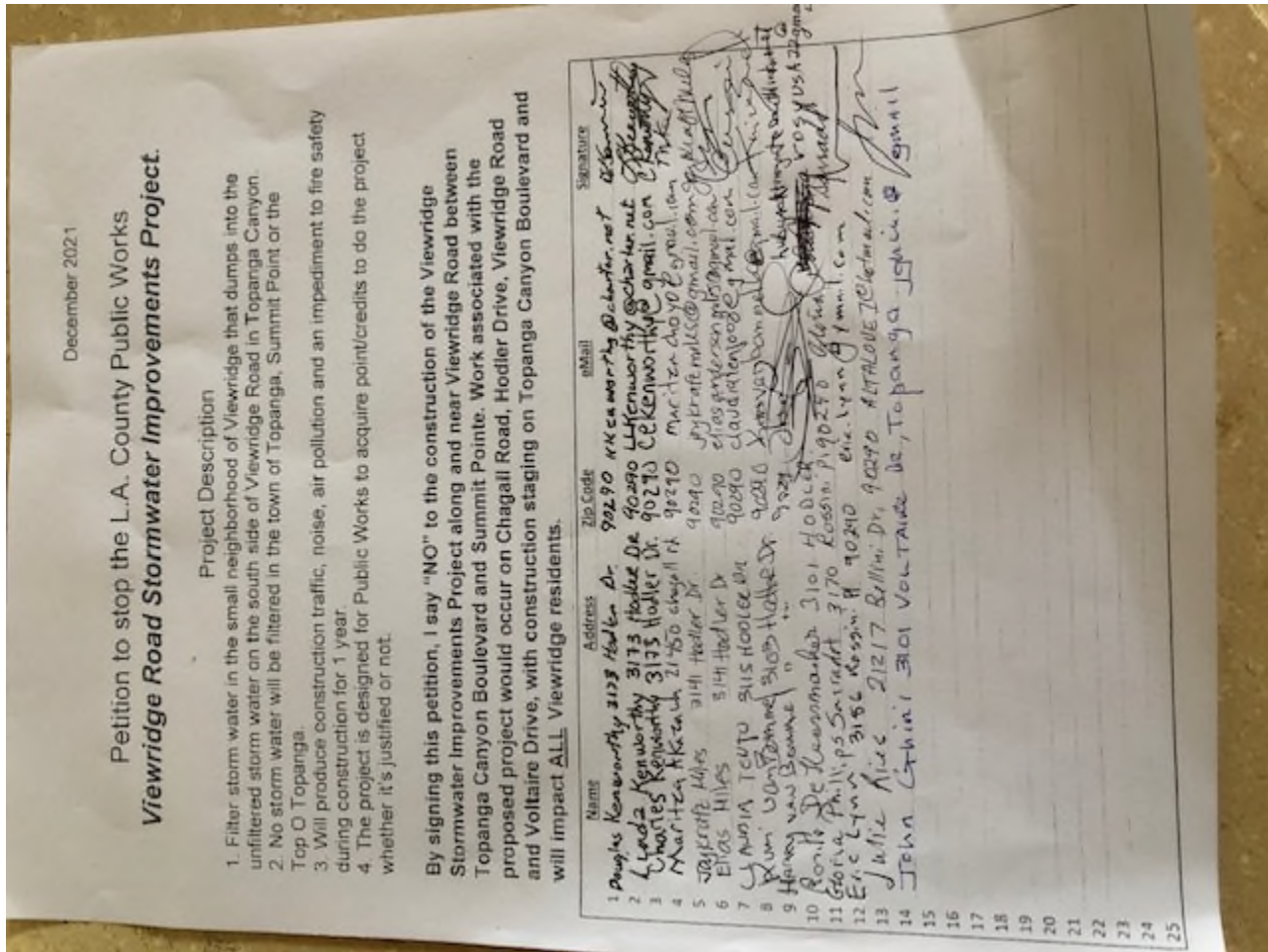
From: Liz Herron <herronsintopanga@yahoo.com>
Sent: Tuesday, December 7, 2021 2:28 PM
To: Grace Komjakraphan
Subject: Viewridge neighbors's petition signature

CAUTION: External Email. Proceed Responsibly.

Grace,

An additional neighbor requested signing the petition today and asked me to send it to you. His name is John Ghini on Voltaire Drive. His name is on line # 14. You have already received the rest of the names #1-13 on the previous petition sent with my letter and other signatures on other petition sheets last night.

Thank you,
 Liz Herron
 Viewridge HOA Committee



Sent from my iPhone

Comment Letter 20: Herron, Liz**Response 20-1**

The commenter, who previously provided a comment letter with a petition attached, provides an additional signature to the petition. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Grace Komjakraphan

From: Sue Waller <sdwall925@aol.com>
Sent: Tuesday, December 7, 2021 3:10 PM
To: Grace Komjakraphan
Subject: Viewridge Road Stormwater Improvements Project
Attachments: img20211207_13054098.pdf

CAUTION: External Email. Proceed Responsibly.

Good afternoon Grace,

Attached are two petitions with signatures of neighbors opposed to the project.

Thank you,
Suzette Waller
21429 Lighthill Dr
Topanga, CA 90290

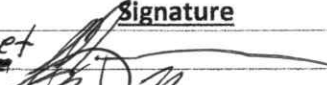

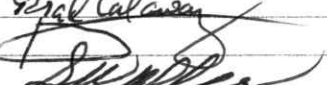
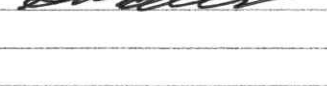


21-1

Petition to stop the L.A. County Public Works *Viewridge Road Stormwater Improvements Project.*

Project Description

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	Name	Address	Zip Code	eMail	Signature
1	JEFF NEUMAN	21321 Light Hill Dr.	90290	neumanjr@pacbell.net	
2	MARJAN NEUMAN	21521 Light Hill Dr	90290	marjan@pacbell.net	
3	CLAUDE MERKEL	21434 LIGHTHILL DR	90290	merkclclaude@gmail.com	
4	BROD CALAWAY	21423 LIGHTHILL DR	90290	bbc@DSL-EXTREME.COM	
5	Ron Fomalont	21415 Light Hill Dr.	90290	law@fomalont.com	
6	SUZETTE WALKER	21429 LIGHTHILL DR	90290	SUZETTE925@AOL.COM	
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Petition to stop the L.A. County Public Works ***Viewridge Road Stormwater Improvements Project.***

Project Description

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	Name	Address	Zip Code	eMail	Signature
1	MOHAMAD VIRANI	21435 LIGHTHILL DR	90290	m3virani@aol.com	Mohammad J. Virani
2	CAROL VIRANI	21435 Lighthill Dr	90290	M3VIRANI@AOL.COM	Carol Virani
3	Vina Divan	21434 Lighthill Dr	90290	vinadiv@gmail.com	Vina Divan
4				tinadix@mail@gmail.com	
5	JAMES CLIBORN	21401 LIGHTHILL DR.	90290	JHCLIBORN@GMAIL	James H. Cliborn
6	KATHY CLIBORN	21401 LIGHTHILL DR	90290	KLCLIBORN@GMAIL	Kathy Cliborn
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Comment Letter 21: Waller, Sue**Response 21-1**

The commenter provides a petition with signatures of those opposing the project. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Subject: Viewridge Road Stormwater Improvements Project

Date: Tuesday, December 7, 2021 at 4:50:32 PM Pacific Standard Time

From: rg@richardgottfried.net

To: Grace Komjakraphan

CAUTION: External Email. Proceed Responsibly.

Dear Ms Komjakraphan-Tek, Los Angeles County Public Works, and County Supervisors:

Allow me to voice my opposition to the proposed Viewridge Road Stormwater Improvements Project.

I am unconvinced that the short and long term benefits of the project outweigh the disruption to the community the project will cause. I question whether there is really a need for this Project.

22-1

Disruption to the Community: It's my understanding that construction will take at least a year. I was told that the original estimate was closer to two years. This is a neighborhood where a considerable number of residents, seniors such as my wife and myself, other adult residents, and families with children, take daily walks or are at play in the area where construction is planned. To be prevented from enjoying the needed exercise, esthetic pleasure, and neighborly interactions for a year or two would be a significant loss and detriment.

22-2

In addition, many of us are retired and are at home most of the day, every day. And some of us work from our homes, more so than before because of the logistic changes brought on by COVID and the emphasis on tele-commuting. The expected increase in noise and air pollution brought on by construction would probably be quite disruptive over the years it takes. Just how disruptive it would be is a question I have.

22-3

Marginal Benefits: Reducing pollutants that are carried from our streets by storm water and deposited into the creeks of Topanga seems like a worthy goal. We live in Topanga because we care about nature and want to preserve it. So I have a bias in favor of such Projects. Yet our neighborhood seems like a relatively low polluting sub-urban area. It is not "industrial," nor "urban" which I understand are the primary target localities for remediation projects. Yes, there probably is a very modest deposit on the streets by the use of our automobiles, along with that of delivery and maintenance vehicles that service us. And there are a few dog owners who don't clean up after their dogs as well as they should. But the rest of us often do it for them. So I am not clear that the problem is serious enough to warrant the remedy.

22-4

I also imagine that whatever pollutants and sediments that occur in the neighborhood are absorbed into the creek beds (following the infrequent rains we have) long before they reach the ocean. And to my knowledge and experience over thirty-five years as a Topanga resident, twenty of which have been in Viewridge, we continue to have a robust watershed and

which have been in viewridge, we continue to have a robust watershed and healthy animal population in the vicinity. I hear the frogs in season, and see the wildlife daily. I suppose that by the time the water of our Viewridge tributaries reach the main Topanga Canyon Creek, the water is fairly clean. Would the Project result in even cleaner water reaching the main Creek? That's debatable in my mind. Is the danger to habitat of not doing the Project real?

22-4 Cont'd

The planned center divider median for the part of Viewridge Drive nearest Summit Pointe neighborhood is attractive and might be welcome after completion. Yet it may also interfere with the fire department's planned use of the Drive as a staging area and the neighbor's use of it as a safe emergency refuge as planned for in the Topanga Township emergency evacuation guidebook. The construction of the median would hamper use of the Drive as our primary walking path for the year(s) it would take to complete. And the median is planned not merely as a stand alone esthetic improvement, but as an integral part of the entire elaborate Stormwater construction Project that I am opposed to.

22-5

22-6

It makes me wonder: if cleaner water in the Creek is the goal, why aren't the funds being made available to homeowners along the Creek who need to upgrade their septic systems and filter or alter their grey water systems so the Creek isn't adversely affected. In other words, focus attention and funds to the worse offenders first.

22-7

I've also learned that as the Creek water enters the Topanga Lagoon at the Ocean, the water is actually in pretty good shape. Perhaps there is a natural cleaning process at work as the water flows down the Canyon.

22-8

Please know that I appreciate your attention and efforts to help our local environment. It just seems like it would be more disruptive than it's worth given the marginal benefits it would produce. If it wasn't so, then I would not be against it.

22-9

Sincerely,

Richard Gottfried
3122 Voltaire Dr.
Topanga, CA 90290
310-612-5742

Comment Letter 22: Gottfried, Richard**Response 22-1**

The commenter expresses opposition for the project. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 22-2

The commenter expresses that the construction period would be disruptive to recreational opportunities in the neighborhood. As discussed in Section XII. Public Services and Recreation, impacts related to the substantial physical deterioration of recreational facilities would be less than significant as all construction equipment and activities would be located in the existing road ROW and/or parkways adjacent to the roadways, and would be temporary in duration. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. The comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 22-3

The commenter suggests that the construction phase of the project would increase air and noise pollution in the neighborhood. As discussed in Section II, Air Quality, and Section X, Noise, while the project may increase air and noise pollution during construction, with implementation of mitigation measures, impacts to these environmental resources would be less than significant. The construction phase would be temporary in duration and no long-term impacts are anticipated. No further response to this comment is required and no changes to the Addendum are needed. The comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 22-4

The commenter suggests that the location of the project is not appropriate, stating that runoff and pollution sourced from the area, as well as the amount that reaches the ocean, is minimal. As discussed in the Addendum in Section 2.2, Background, and Section 2.5, Project Description, the proposed project location was identified by the LACFCD EWMP Group as a priority multibenefit regional location to implement BMPs to achieve and maintain water quality objectives and protect beneficial uses pursuant to the MS4. The proposed project would treat flows that drain to Topanga Canyon Creek, which drains to the North Santa Monica Bay – an impaired waterbody assigned TMDL limits for a number of pollutants originating from urban and stormwater runoff pursuant to the Clean Water Act. Additionally, as discussed in Section 2.4, Project Objectives, the project would potentially treat up to 33 acre-feet of stormwater per year. As discussed in Section 2.3 of the Addendum, Project Location and Setting, the Topanga Canyon watershed is mostly undeveloped other than Topanga Beach Park, a small commercial area, and a small (2-acre) maintenance facility zoned as industrial land use. The

central and eastern areas of the subwatershed consist of undeveloped land, rural residential, commercial, public, equestrian, educational, and mixed urban land uses. However, the project location within the Viewridge community provides one of the only locations with a developed ROW and existing storm drain systems, making it the optimal location for the project. As part of the EWMP plan development process, various parcels were evaluated and ranked based on their technical feasibility and site ownership. Through this screening process, the proposed project was determined to be a priority multibenefit regional project. No changes to the Addendum are needed. The comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 22-5

The commenter suggests that the planned median would interfere with emergency access to the area. As discussed in the Addendum in Section VII(f), Hazards and Hazardous Materials, Section XII(a), Public Services and Recreation, and Section XVI(a), Wildfire, “[during] construction of the proposed project, partial road closures would be necessary along the Viewridge Road ROW as well as areas along Hodler Drive, Voltaire Drive, Chagall Road, Heidi Lane, and Bellini Drive. These partial closures would be temporary, occurring only for the duration of construction activities. However, these temporary closures could affect emergency response and/or evacuation plans. No partial closures would occur on Topanga Canyon Boulevard, a freeway disaster route. However, partial closures would be required on Viewridge Road, which is identified as a local Public Safe Refuge Area. These areas are identified by the Topanga Coalition for Emergency Preparedness as areas where evacuees may be redirected if evacuation is not possible due to traffic gridlock. Consistent with the approved program, as discussed further in Section XII (a)...mitigation measure PS-1 would require the advance notification to emergency services providers and homeowners and residents within the project area to ensure that emergency responsiveness was not impaired during construction work. As further discussed in Section XIII (a), consistent with the approved program, the proposed project would implement mitigation measure TRAF-1, which includes the preparation of a traffic control plan during construction. No long-term impacts would result from operation of the proposed project.” No changes to the Addendum are needed. The comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the proposed project.

Response 22-6

The commenter expresses that the construction period would be disruptive to recreational opportunities in the neighborhood. As discussed in Section XII. Public Services and Recreation, impacts related to the substantial physical deterioration of recreational facilities would be less than significant as all construction equipment and activities would be located in the existing road ROW and/or parkways adjacent to the roadways, and would be temporary in duration. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 22-7

The commenter states that funding for remediation projects should be used for septic system upgrades in other areas along the Topanga Canyon Creek. Refer to Response 22-4. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 22-8

The commenter expresses belief that the water flowing through Topanga Canyon Creek into the lagoon and ocean is clean. Refer to Response 22-4. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 22-9

The commenter offers concludes the letter by reiterating opposition to the project. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Subject: Topanga Town Council comments on the Green Streets Storm Drain Project Planned for Viewridge Estates in Topanga

Date: Tuesday, December 7, 2021 at 6:49:49 PM Pacific Standard Time

From: Carrie Carrier

To: Bruce Hamamoto, Grace Komjakraphan

CAUTION: External Email. Proceed Responsibly.

Dear Los Angeles County Public Works Department and Relevant Agencies,

The Topanga Town Council has reviewed the addendum to the PEIR for the Viewridge Stormwater Improvement project, which was initially certified in 2015. This addendum was brought to our attention by a group of concerned residents living in the Viewridge area who will be significantly impacted by this project for 1-2 years as it is being constructed. In addition, traffic along Topanga Canyon Boulevard (TCB), which serves as a transportation corridor for roughly 20,00-30,000 vehicles per day, will be impeded for an unknown period of time as this project proceeds. Any lane closures along TCB could pose a serious risk to public safety because this road serves as the main evacuation route for the majority of residents in the event of a wildfire or other disaster. It is unclear to us how often and for how long TCB may need to be winnowed or closed. The current estimated timeframe for implementation of the entire project is approximately one year. Based on our experience with other public agency projects along TCB, the actual time to complete the project could be double to triple the expected duration.

23-1

SIGNIFICANT OPPOSITION in VIEWRIDGE

It must be noted that there is considerable local community opposition to this project in the area where it has been proposed. This opposition appears to have grown over time rather than diminished as more information has become available. The residents of Viewridge have performed extensive research and engaged intensively with Public Works and its consultants over the past two years. The Topanga Town Council has not been present for the majority of this outreach and engagement. We are relying on information provided to us by both Public Works and residents in formulating our own comments and concerns now. It is clear that several Viewridge residents feel that their concerns and objections have not been sufficiently acknowledged or addressed. Because this project is publicly funded and shall be implemented, for the most part, in the public domain, we feel that it is critical to obtain community buy-in and support before proceeding. We shall highlight a few of the issues that seem to be unresolved in the eyes of Viewridge residents and/or the Topanga Town Council.

23-2

NEED for the PROJECT is NOT WELL ESTABLISHED

First and foremost, all of us support and encourage infrastructure that will produce clean water. In general, we are avid supporters of green infrastructure and like the concept of capturing and cleaning contaminated stormwater before it enters the ocean. At the same time, we believe in focusing our limited resources on areas that truly need rehabilitation

23-2

or restoration. We do not feel that the need for this project at this location has been adequately established to justify the cost or disruption to residents. Perhaps we do not fully understand the scope or breadth of the project, but installing a few storm drains in an area where there does not appear to be a contamination issue or risk makes little sense to us. Based on research by the RCDSMM, it would appear that the area where the water pollution is originating occurs much further down the boulevard. Please provide additional evidence to residents of Viewridge that demonstrates why storm drains are needed in their area.

23-3
Cont'
4

WHAT COMES NEXT?

To that end, it would seem that the only way for this Viewridge project to make any sense would be if it were to connect to a much more extensive network of storm drains along most of the length of TCB. On that note, we would like an indication of just how many more storm drains might be in the works and when they might be installed. Among the hundreds of pages we reviewed, there was one map from roughly 5 years ago that depicted a whole series of storm drains along TCB. The map was very bare-bones and did not provide any details into which other types of infrastructure might be installed along with the storm drains. The community is extremely sensitive to anything that might be development-inducing, so we ask for full transparency on any and all infrastructure elements planned for TCB as part of this overarching project. In addition, the map did not indicate how long it might take to implement each potential phase of the TCB storm drain network or how much it might cost. We would like clarification on each of these points.

23-3
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COMMUNITY ROAD-CLOSURE FATIGUE

As we stated in our last email about this issue, residents in the Canyon have been subjected to an inordinate number of road closures, lane winnowing, and construction noise on account of multiple projects along Topanga Canyon Blvd over the past couple of years. Residents are currently enduring road closures and power shut-offs due to undergrounding work being performed by SCE and Public Works. Further, Caltrans plans to re-pave the entire road from the PCH up to the 118 beginning in 2022. Residents are exhausted, and businesses keenly feel the impact of every road closure since they are largely reliant on commuters and visitors from outside the Canyon.

23-3
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As stated at the beginning of this email, the community also has extremely limited ingress and egress options in the event of an emergency. TCB is the main evacuation route for much of the community. Depending on where a fire originates, TCB may be *the only* option for some. Any project that could restrict access to the roadway at any time should be carefully vetted before it is allowed to proceed. We heard from one Viewridge resident that a representative from the Fire Department claimed that they could mitigate fire risk during the construction period with a special "foam" to reduce the chances that a fire would spread rapidly if one were to ignite. That does not sound like a sufficient or palatable mitigation strategy to us. First, the foams may not even work to prevent a fire or slow its spread. The manufacturers of these chemicals tend to wildly overestimate the efficacy of their products while significantly underestimating their toxicity. The majority of these foams are made by a company called Perimeter Solutions-an offshoot of

23-3
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23-3
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Monsanto- and their products have been shown by NOAA research studies to be lethal to multiple species of fish at concentrations well below the prescribed mix ratio. The human health assessment for these products is also woefully incomplete. How ironic would it be to rely on foams [as a mitigation measure] that will contaminate our waterways in the name of trying to purify said waterways?

23-1
Cont'
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PLEASE CONSIDER ALTERNATIVE MEASURES

While we know a lot of work has already gone into proposing and developing this project, we believe that more thought should be given to placing these storm drains, where they are deemed truly necessary, in alternative locations that will not significantly disturb residents or pose emergency evacuation risks. Under no circumstances should fire-fighting foams/retardants/"prevention" chemicals be used as a mitigation measure to greenlight this project. Instead, we ask that you find a way to implement this project in an area that will not block traffic along a major roadway. Much of the land in the Canyon is owned by Conservancies, State Parks, and absentee land-owners who might not object to the installation of such drains on their land, especially if there is some sort of benefit to doing so. Perhaps it is not possible to change course at this juncture, but we are asking you to please consider alternatives that would address some of the points that have been raised by concerned residents and the Town Council.

23-1
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Respectfully,
Carrie L. Carrier

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Carrie L. Carrier
Topanga Town Council, President
NWF Certified Wildlife Habitat - Topanga Leader
Topanga Creek Watershed Committee, Chair
Email: contact@topangatowncouncil.org
Web: onetopanga.com

Comment Letter 23: Topanga Town Council (*Signed Carrier, Carrie*)**Response 23-1**

The commenter states that concerned citizens of the Viewridge community introduced the project to the Topanga Town Council, generally citing apprehensions related to the construction timeline and how this would impact local traffic and evacuation routes; the commenter summarizes these concerns in the form of an introduction to the discussion to follow in the remainder of the letter. As discussed in the Addendum in Section VII(f), Hazards and Hazardous Materials, Section XII(a), Public Services and Recreation, and Section XVI(a), Wildfire, “[during] construction of the proposed project, partial road closures would be necessary along the Viewridge Road ROW as well as areas along Hodler Drive, Voltaire Drive, Chagall Road, Heidi Lane, and Bellini Drive. These partial closures would be temporary, occurring only for the duration of construction activities. However, these temporary closures could affect emergency response and/or evacuation plans. No partial closures would occur on Topanga Canyon Boulevard, a freeway disaster route, although flaggers may be used temporarily to assist with equipment mobilization. However, partial closures would be required on Viewridge Road, which is identified as a local Public Safe Refuge Area. These areas are identified by the Topanga Coalition for Emergency Preparedness as areas where evacuees may be redirected if evacuation is not possible due to traffic gridlock. Consistent with the approved program, as discussed further in Section XII (a)...mitigation measure PS-1 would require the advance notification to emergency services providers and homeowners and residents within the project area to ensure that emergency responsiveness was not impaired during construction work. As further discussed in Section XIII (a), consistent with the approved program, the proposed project would implement mitigation measure TRAF-1, which includes the preparation of a traffic control plan during construction. No long-term impacts would result from operation of the proposed project.” No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 23-2

The commenter relays the feelings of opposition to the project expressed by some members of the Viewridge community. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 23-3

The commenter questions if the project is justified; the commenter believes that the project location is not a source of contamination and asks for clarification regarding the need for new storm drains. As discussed in the Addendum in Section 2.2, Background, and Section 2.5, Project Description, the project location was identified by the Los Angeles County Flood Control District (LACFCD) Enhanced Watershed Management Program (EWMP) Group as a priority multi-benefit regional location to implement Best Management Practices (BMPs) to achieve and maintain water quality objectives and protect beneficial uses pursuant to the Municipal Separate Storm Sewer System (MS4). The project would treat flows that drain to Topanga Canyon Creek, which drains to the North Santa Monica Bay – an impaired waterbody

assigned Total Maximum Daily Load (TMDL) limits for a number of pollutants originating from urban and stormwater runoff pursuant to the Clean Water Act. Further, the project would capture and divert urban and stormwater runoff within the project location for flow-through treatment and discharge to the existing storm drain; no new storm drains are proposed. No changes to the Addendum are needed and the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 23-4

The commenter inquires about the location of new storm drains. As discussed in Section 2.5 of the Addendum, Project Description, the project would capture and divert urban and stormwater runoff within the project location for flow-through treatment and discharge to the existing storm drain; this would include the installation of biofiltration systems solely within the local streets of the Viewridge community, which would intercept and treat urban and stormwater flows from an existing underground storm drain and return cleaner flows to Topanga Creek. This project would not include construction of any new storm drains within Topanga Canyon Boulevard (TCB). No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 23-5

The commenter states the presence and impact of ongoing road closures in the Viewridge community due to various construction projects in the area. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 23-6

The commenter states that TCB is a primary evacuation route for the Viewridge community and opposes restricting access to it. As discussed in Section VII(f), Hazards and Hazardous Materials, and Section XVI(a), Wildfire, of the Addendum, “no partial closures would occur on Topanga Canyon Boulevard” under the project. Further, this comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 23-7

The commenter discusses the use of potential fire hazard mitigation measures used during construction activities, as relayed to the commenter by a representative of local fire services. The commenter claims such practices use toxic materials. As discussed in Section 2.6 of the Addendum, Construction Schedule and Procedures, “the County would ensure all construction crews have fire-suppression equipment (such as fire extinguishers) on site to

respond to the accidental ignition of a fire.” Further, as discussed in Section VII(a) and Section VII(g), Hazards and Hazardous, “the transport, use, and disposal of construction-related hazardous materials would comply with applicable laws and regulations for such activities,” and “the proposed project would be implemented within existing ROW’s and adjacent parkways...Adherence to the requirements of the Department of Transportation and California Vehicle Code for spark arrester protection on vehicles would reduce the potential risk. Furthermore, the proposed project does not include any habitable structures. Similar to the approved program, the proposed project would result in less than significant impacts, and no mitigation measures are required.” No further response to this comment is required and no changes to the Addendum are needed. Notwithstanding, the comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

Response 23-8

The commenter summarizes the statements made throughout the letter which oppose the project; the commenter suggests looking at other locations to install new storm drains. As previously discussed, no new storm drains are proposed. This comment does not identify specific environmental impacts or address the adequacy or accuracy of the Addendum. No further response to this comment is required and no changes to the Addendum are needed. The comment is acknowledged for the record and will be provided to the Los Angeles County Board of Supervisors for consideration as part of the Final Addendum for the project.

CHAPTER 6 LIST OF PREPARERS

LEAD AGENCY

Los Angeles County Public Works
900 South Fremont Avenue
Alhambra, CA 91803

PREPARED BY

Los Angeles County Public Works
Stormwater Quality Division
900 South Fremont Avenue
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TECHNICAL ASSISTANCE PROVIDED BY

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Sam Silverman, Senior Associate (Terry A. Hayes Associates Inc.)
Anders Sutherland, Environmental Scientist (Terry A. Hayes Associates Inc.)
Kieran Bartholow, Assistant Planner (Terry A. Hayes Associates Inc.)
Sandipan Bhattacharjee, Traffic Engineer (Translutions, Inc.)

**Viewridge Road Stormwater Improvements
Project Addendum
Appendices**

APPENDIX A

**Air Quality Impact Assessment
Technical Memorandum**



Technical Memorandum

TO: Fareeha Kibriya, Associate Vice President, Environmental Planning
AECOM

FROM: Terry A. Hayes Associates Inc.
Sam Silverman, Senior Associate
Anders Sutherland, Environmental Scientist

DATE: July 22, 2019

RE: **Viewridge Road Stormwater Improvements Project – Air Quality Impact Assessment**

Introduction

Terry A. Hayes Associates Inc. (TAHA) has completed an Air Quality Impact Assessment for the Viewridge Road Stormwater Improvements Project (proposed project) in accordance with the provisions of the California Environmental Quality Act (CEQA) Statutes and Guidelines. The project site is located in the Los Angeles County portion of the South Coast Air Basin, which falls under the jurisdiction of the South Coast Air Quality Management District (SCAQMD).

Project Description

The following Project Description is summarized from the Initial Study prepared for the proposed project. Refer to the Initial Study for a detailed project information.

Los Angeles County Public Works (LACPW) proposes to implement the Viewridge Road Stormwater Improvements Project, which would implement Best Management Practices (BMPs) identified to achieve and maintain water quality objectives and protect beneficial uses pursuant to the Municipal Separate Storm Sewer System Permit applicable to the project site. The BMPs identified for the proposed project focus on capture and treatment of stormwater along Viewridge Road between Topanga Canyon Boulevard and Summit Pointe Drive. Construction is anticipated to begin in summer 2022 and take approximately nine months, concluding in spring 2023. The proposed project would be constructed completely within the existing road right-of-way and/or parkways adjacent to the roadways. All portions of the project site are owned and maintained by LACPW, with the exception of the temporary construction staging along the east shoulder of Topanga Canyon Boulevard, which is California Department of Transportation right-of-way.

The project site is located within a low-density residential neighborhood characterized by single-family homes. Additionally, there are open space areas on the west side of Topanga Canyon Boulevard and to the south of Viewridge Road east of the Heidi Lane. These open space areas provide recreational opportunities with hiking/walking trails.



LACPW, as the lead agency, has concluded that an addendum to the 2015 Program Environmental Impact Report (PEIR) for the Los Angeles County Flood Control District Enhanced Watershed Management Programs is the proper level of environmental documentation for this project. The PEIR included the following BMPs related to air quality.

An appropriate combination of monitoring and resource impact avoidance would be employed during all the construction activities, including implementation of the following BMPs:

- The proposed project would implement Rule 403 fugitive dust control measures required by the SCAQMD, which requires reasonable precautions to be taken to prevent visible particulate matter from being airborne, under normal wind conditions, beyond the property from which the emission originates. Reasonable precautions include, but are not limited to the following:
 1. Application of water on dirt roads, material stockpiles, and other surfaces that can give rise to airborne dusts; and
 2. Maintenance of roadways in a clean condition.
- The proposed project would implement Rule 402 measures required by the SCAQMD, which prohibits the discharge from any source whatsoever, such quantities of air contaminants or other materials that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such persons or the public or that cause or have a natural tendency to cause injury or damage to business or property.

Significance Thresholds

This Impact Assessment was undertaken to determine whether construction or operation of the proposed project would have the potential to result in significant environmental impacts related to Air Quality in the context of the Appendix G Environmental Checklist criteria of the CEQA Statute and Guidelines. The Initial Study prepared for the Addendum concluded that the proposed project would not generate significant long-term operational emissions or odors. Therefore, this Technical Memorandum does not address these issues. This Technical Memorandum addresses short-term construction emissions.

Implementation of the proposed project may result in a significant environmental impact related to Air Quality if the proposed project would:

- a) Conflict with or obstruct implementation of the applicable air quality plan;
- b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors); and/or
- d) Expose sensitive receptors to substantial pollutant concentrations.

The CEQA Guidelines acknowledge that, where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the above determinations. This analysis uses the CEQA Air Quality Significance Thresholds established by the

SCAQMD to substantiate significance determinations. **Table 1** shows regional and localized significance thresholds for volatile organic compounds (VOC), nitrogen oxides (NO_x), carbon monoxide (CO), sulfur oxides (SO_x), and particulate matter (PM₁₀ and PM_{2.5}). The Localized Significance Threshold (LST) methodology document contains Source Receptor Area (SRA)-specific values for maximum allowable on-site emissions (i.e., construction equipment and fugitive dust) during construction based on locally monitored air quality, the size of maximum daily disturbed area, and the proximity of sensitive receptors. Maximum on-site emissions resulting from construction activities were quantified and assessed against the applicable LST values for a two-acre project site having sensitive receptors within 80 feet (approximately 25 meters) of the project site boundary in SRA 2.

TABLE 1: SCAQMD AIR QUALITY SIGNIFICANCE THRESHOLDS – MASS DAILY EMISSIONS						
Pollutant	VOC	NO_x	CO	SO_x	PM₁₀	PM_{2.5}
Regional Threshold (lb/day)	75	100	550	150	150	55
Localized Threshold (lb/day)	--	147	827	--	6	4
Note: LST values selected for two-acre daily disturbance based on equipment inventory and 25-meter receptor distance in SRA 2. SOURCE: SCAQMD, 2019.						

Methodology

The SCAQMD recommends that air pollutant emissions generated by construction activities be assessed for potentially significant air quality impacts at regional and local scales. Regional emissions include air pollutant emissions from all sources associated with construction activities, while localized emissions refer specifically to those emissions generated by sources on the project site. Maximum daily emissions were quantified for each construction activity based on the number and type of equipment required and daily hours of use, in addition to vehicle trips to and from the project site. The CalEEMod model provides regionally-specific default values for daily equipment usage rates and worker trip lengths, as well as emissions factors for heavy duty equipment and passenger vehicles that have been derived by the California Air Resources Board (CARB) through extensive air quality investigations and surveys. The Draft PEIR included an equipment mix for various BMP Projects, which is shown in **Table 2**. This mix was selected based on the project-specific components.

TABLE 2: MODELING PARAMETERS			
Construction Phase	Construction Equipment Type	Construction Equipment Quantity	Construction Equipment Daily Usage Hours
Site Preparation	Excavator	1	8
	Tractor/Loaders/Backhoes	1	6
	Other General Industrial Equipment	1	8
Grading	Graders	1	4
	Rubber Tired Dozers	1	4
	Tractor/Loaders/Backhoes	1	8
Building Construction	Forklifts	1	8
	Generator Sets	1	8
	Tractor/Loaders/Backhoes	2	8
	Welders	1	8
Acres of Grading	2		
SOURCE: LACPW, <i>Enhanced Watershed Management Programs Draft PEIR</i> , January 2015.			

Air Quality Impact Assessment

a) Would the proposed project conflict with or obstruct implementation of the applicable air quality plan? (Less-Than-Significant Impact)

The PEIR did not identify a significant impact, and mitigation measures were not required to ensure consistency with air quality plans.

The following analysis addresses the consistency with applicable SCAQMD and Southern California Association of Governments (SCAG) policies, including the SCAQMD’s 2016 Air Quality Management Plan (AQMP) and growth projections within the SCAG’s 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). In accordance with the procedures established in the SCAQMD’s CEQA Air Quality Handbook, the following criteria are required to be addressed in order to determine the consistency with applicable SCAQMD and SCAG policies:

- Would the project result in any of the following?
 - An increase in the frequency or severity of existing air quality violations; or
 - Cause or contribute to new air quality violations; or
 - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- Would the project exceed the assumptions utilized in preparing the AQMP?
 - Is the project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
 - Does the project include air quality mitigation measures; or
 - To what extent is project development consistent with the AQMP land use policies?

With respect to the first criterion, as discussed below, localized concentrations of nitrogen dioxide as NO_x, CO, PM₁₀, and PM_{2.5} have been analyzed for the proposed project. Sulfur dioxide (SO₂) emissions, assessed as SO_x within the SCAQMD thresholds, would be negligible during construction, and, therefore, would not have the potential to cause or affect a violation of the SO₂ ambient air quality standard. Since VOCs are not a criteria pollutant, there is no ambient standard or localized threshold for VOCs. Due to the role VOCs play in ozone formation, it is classified as a precursor pollutant, and only a regional emissions threshold has been established.

NO₂, CO, PM₁₀, and PM_{2.5} emissions were analyzed in order to: (1) ascertain potential effects on localized concentrations; and (2) determine if there is a potential for such emissions to cause or affect a violation of the ambient air quality standards. As demonstrated in the analysis below (see **Table 2**), localized emissions would not exceed the SCAQMD-recommended localized thresholds.

With respect to the determination of consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2016–2040 RTP/SCS regarding population, housing, and growth trends. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis with respect to each of these three criteria.

- Is the project consistent with the population, housing, and employment growth projections upon which AQMP forecasted emission levels are based?

Implementation of the proposed project would not introduce new land uses to the project area, and therefore population, housing, and employment projections for the region would not be affected. The proposed project would not have any potential to result in growth that would exceed the projections incorporated into the AQMP or the 2016–2040 RTP/SCS.

- Does the project implement feasible air quality mitigation measures?

The proposed project would comply with all applicable regulatory standards (e.g., SCAQMD Rules 402 and 403) as required by the SCAQMD. As demonstrated in this analysis, the proposed project would not result in significant air quality impacts and no mitigation measures are required to reduce emissions. As such, the proposed project meets this AQMP consistency criterion.

- To what extent is project development consistent with the land use policies set forth by the County of Los Angeles?

The proposed project would be consistent with the Los Angeles County 2035 General Plan, which does not address air quality emissions associated with stormwater infrastructure improvements.

Similar to the PEIR, the proposed project would not interfere with air pollution control measures listed in the 2016 AQMP and would not conflict with the goals of the General Plan Air Quality Element.

Mitigation Measures

No mitigation measures are required beyond what was included in the PEIR.

b) Would the proposed project violate any air quality standard or contribute substantially to an existing or projected air quality violation? (Less-than-Significant Impact)

The PEIR identified a significant and unavoidable impact related to construction emissions. The PEIR included the following mitigation measures:

AIR-1: Implementing agencies shall require for large Regional or Centralized BMPs the use of low-emission equipment meeting Tier II emissions standards at a minimum and Tier III and IV emissions standards where available as CARB-required emissions technologies become readily available to contractors in the region.

AIR-2: For large construction efforts that may result in significant air emissions, implementing agencies shall encourage contractors to use lower-emission equipment through the bidding process where appropriate.

Construction of the proposed project would have a potentially significant air quality impact under this criterion if maximum daily emissions of any regulated pollutant exceeded the applicable SCAQMD air quality significance thresholds presented in **Table 1**. Daily emissions of regulated pollutants were quantified for each phase of construction activity. The estimate of fugitive dust emissions account for Rule 403 compliance. Examples of Rule 403 compliance include: a) All exposed areas will be frequently watered to reduce the generation of dust, and b) Vehicle speed of construction vehicles/equipment in exposed areas (i.e., unpaved access) shall be reduced to reduce the generation of dust.

Table 3 shows a comparison of the maximum daily emissions during each phase of construction to the applicable SCAQMD air quality significance thresholds. Maximum daily emissions of air pollutants that would be generated by proposed project construction activities would not exceed any applicable regional or localized threshold values.

Mitigation Measures

No mitigation measures are required beyond what was included in the PEIR.

TABLE 3: ESTIMATED DAILY CONSTRUCTION EMISSIONS						
Phase	Daily Emissions (Pounds Per Day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
SITE PREPARATION						
On-Site Emissions	0.6	6.1	7.0	<0.1	0.4	0.3
Off-Site Emissions	0.2	5.9	1.7	<0.1	0.5	0.1
<i>Total</i>	0.9	12.0	8.7	<0.1	0.9	0.5
GRADING						
On-Site Emissions	1.0	10.9	5.3	<0.1	3.8	2.2
Off-Site Emissions	0.2	5.9	1.7	<0.1	0.5	0.1
<i>Total</i>	1.2	16.8	6.9	<0.1	4.3	2.3
BUILDING CONSTRUCTION						
On-Site Emissions	1.3	10.6	11.2	<0.1	0.6	0.6
Off-Site Emissions	0.3	5.9	1.9	<0.1	0.5	0.2
<i>Total</i>	1.6	16.5	13.1	<0.1	1.1	0.8
REGIONAL ANALYSIS						
Maximum Regional Daily Emissions	1.6	16.8	13.1	<0.1	4.3	2.3
Regional Significance Threshold	75	100	550	150	150	55
Exceed Regional Threshold?	No	No	No	No	No	No
LOCALIZED ANALYSIS						
Maximum Localized Daily Emissions	--	10.9	11.2	--	3.8	2.2
Localized Significance Threshold	--	147	827	--	6	4
Exceed Localized Threshold?	--	No	No	--	No	No
<p>Note: Emissions modeling files can be found in the Appendix. SOURCE: TAHA, 2019.</p>						

c) *Would the proposed project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)? (Less-than-Significant Impact)*

The PEIR identified a significant and unavoidable impact related to cumulative emissions. The PEIR included Mitigation Measures AIR-1 and AIR-2, shown above, associated with this Impact Statement.

The South Coast Air Basin is designated as nonattainment of the California Ambient Air Quality Standards and National Ambient Air Quality Standards for O₃, PM₁₀, and PM_{2.5}. Therefore, there is an ongoing regional cumulative impact associated with these air pollutants. Taking into account the existing environmental conditions, the SCAQMD propagated guidance that an individual project can emit allowable quantities of these pollutants on a regional scale without significantly contributing to the cumulative impacts. As discussed above and shown in **Table 3**, air pollutant emissions associated with construction of the proposed project would not exceed any applicable SCAQMD air quality thresholds of significance. Despite the region being in nonattainment of the ambient air quality standards for O₃, PM₁₀, and PM_{2.5}, the SCAQMD does not consider individual project emissions of lesser magnitude than the mass daily thresholds to be cumulatively considerable. The proposed project would not result in a cumulatively considerable net increase of nonattainment pollutants. Therefore, this impact would be less than significant.

Mitigation Measures

No mitigation measures are required beyond what was included in the PEIR.

d) Would the proposed project expose sensitive receptors to substantial pollutant concentrations? (Less-Than-Significant Impact)

The PEIR identified a significant impact related to pollutant concentrations and localized significance thresholds (LSTs). The PEIR included the following mitigation measure associated with this Impact Statement:

AIR-3: For large construction efforts associated with Regional or Centralized BMPs, implementing agencies shall conduct a project-specific LST analysis where necessary to determine local health impacts to neighboring land uses. Where it is determined that construction emissions would exceed the applicable LSTs or the most stringent applicable federal or state ambient air quality standards, the structural BMP project shall reduce its daily construction intensity (e.g., reducing the amount of equipment used daily, reducing the amount of soil graded/excavated daily) to a level where the structural BMP project's construction emissions would no longer exceed SCAQMD's LSTs or result in pollutant emissions that would cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards.

The SCAQMD devised its LST values to prevent the occurrence of localized hot spots of criteria pollutant concentrations at sensitive receptor locations surrounding the project site. The LST values were determined using emissions modeling based on ambient air quality measured throughout the SCAB. If maximum daily emissions remain below the LST values during construction activities, it is highly unlikely that air pollutant concentrations in ambient air would reach substantial levels sufficient to create public health concerns for sensitive receptors. As shown in **Table 3**, maximum daily emissions of criteria pollutants and O₃ precursors from sources located on the project site would not exceed any applicable LST values. Therefore, construction of the proposed project would not result in exposure of sensitive receptors to substantial concentrations of criteria pollutants.

With regards to emissions of air toxics, carcinogenic risks, and non-carcinogenic hazards, the use of heavy-duty construction equipment and haul trucks during construction activities would release diesel PM to the atmosphere through exhaust emissions. Diesel PM is a known carcinogen, and extended exposure to elevated concentrations of diesel PM can increase excess cancer risks in individuals. However, carcinogenic risks are typically assessed over timescales of several years to decades, as the carcinogenic dose response is cumulative in nature. Short term exposures to diesel PM would have to involve extremely high concentrations in order to exceed the SCAQMD Air Quality Significance Threshold of 10 excess cancers per million.

Over the course of construction activities, average diesel PM emissions from on-site equipment would be approximately 0.52 pounds per day on workdays, and 0.38 pounds per day including non-workdays. Therefore, it is highly unlikely that diesel PM concentrations would be of any public health concern during the nine-month construction period, and diesel PM emissions would cease upon completion of construction activities. Therefore, this impact would be less than significant.

Mitigation Measures

No mitigation measures are required beyond what was included in the PEIR.

References

California Air Pollution Control Officers Association, *California Emissions Estimator Model (CalEEMod v2016.3.2) User's Guide*, November 2017.

California Air Resources Board, *Ambient Air Quality Standards*, May 2016.

Los Angeles County Public Works, *Enhanced Watershed Management Programs Draft PEIR*, January 2015.

Southern California Association of Governments, *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy*, April 2016.

South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 1993.

South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology Appendix C Mass Rate Lookup Tables*, updated October 21, 2009.

South Coast Air Quality Management District, *Fact Sheet for Applying CalEEMod to Localized Significance Thresholds*, 2013.

South Coast Air Quality Management District, *SCAQMD Air Quality Significance Thresholds*, March 2015.

United States Environmental Protection Agency, *The Green Book Nonattainment Areas for Criteria Pollutants*, <https://www.epa.gov/green-book>, July 2019.

Attachment

LACDPW Viewridge Super Green Streets Regional EWMP - Los Angeles-South Coast County, Winter

LACDPW Viewridge Super Green Streets Regional EWMP
Los Angeles-South Coast County, Winter

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Industrial	1.00	User Defined Unit	2.00	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	8			Operational Year	2020
Utility Company	Southern California Edison				
CO2 Intensity (lb/MW hr)	702.44	CH4 Intensity (lb/MW hr)	0.029	N2O Intensity (lb/MW hr)	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Total Ground Disturbance Area = 2 acres.

No operational component.

Construction Phase - 6 month construction schedule: July - October 2020

Off-road Equipment - LACDPW EWMP DPEIR Jan 2015

Off-road Equipment - LACDPW EWMP DPEIR Jan 2015

Off-road Equipment - LACDPW EWMP DPEIR Jan 2015

Trips and VMT - Approximately 10 truck round trips per day.

Grading -

Construction Off-road Equipment Mitigation -

LACDPW Viewridge Super Green Streets Regional EWMP - Los Angeles-South Coast County, Winter

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	4.00	40.00
tblConstructionPhase	NumDays	2.00	40.00
tblLandUse	LotAcreage	0.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	PhaseName		Site Preparation
tblOffRoadEquipment	PhaseName		BMP Installation
tblOffRoadEquipment	PhaseName		BMP Installation
tblOffRoadEquipment	PhaseName		Site Preparation
tblOffRoadEquipment	PhaseName		BMP Installation
tblOffRoadEquipment	PhaseName		BMP Installation
tblOffRoadEquipment	UsageHours	8.00	4.00
tblOffRoadEquipment	UsageHours	8.00	4.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblOffRoadEquipment	UsageHours	7.00	6.00
tblTripsAndVMT	HaulingTripNumber	0.00	800.00
tblTripsAndVMT	HaulingTripNumber	0.00	800.00
tblTripsAndVMT	HaulingTripNumber	0.00	1,000.00
tblTripsAndVMT	WorkerTripNumber	13.00	14.00

2.0 Emissions Summary

LACDPW Viewridge Super Green Streets Regional EWMP - Los Angeles-South Coast County, Winter

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2020	1.5546	16.7883	13.1280	0.0340	3.7153	0.6660	4.2464	1.8033	0.6360	2.2926	0.0000	3,417.307 1	3,417.307 1	0.4585	0.0000	3,428.152 2
Maximum	1.5546	16.7883	13.1280	0.0340	3.7153	0.6660	4.2464	1.8033	0.6360	2.2926	0.0000	3,417.307 1	3,417.307 1	0.4585	0.0000	3,428.152 2

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2020	1.5546	16.7883	13.1280	0.0340	3.7153	0.6660	4.2464	1.8033	0.6360	2.2926	0.0000	3,417.307 1	3,417.307 1	0.4585	0.0000	3,428.152 2
Maximum	1.5546	16.7883	13.1280	0.0340	3.7153	0.6660	4.2464	1.8033	0.6360	2.2926	0.0000	3,417.307 1	3,417.307 1	0.4585	0.0000	3,428.152 2

LACDPW Viewridge Super Green Streets Regional EWMP - Los Angeles-South Coast County, Winter

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	1.0000e-005	0.0000	1.0000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000	0.0000	2.3000e-004

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Total	1.0000e-005	0.0000	1.0000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000	0.0000	2.3000e-004

LACDPW Viewridge Super Green Streets Regional EWMP - Los Angeles-South Coast County, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	5/4/2020	6/26/2020	5	40	
2	Grading	Grading	6/29/2020	8/21/2020	5	40	
3	BMP Installation	Trenching	8/24/2020	10/30/2020	5	50	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 10

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

LACDPW Viewridge Super Green Streets Regional EWMP - Los Angeles-South Coast County, Winter

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Excavators	1	8.00	158	0.38
Site Preparation	Other General Industrial Equipment	1	8.00	88	0.34
Site Preparation	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Grading	Graders	1	4.00	187	0.41
Grading	Rubber Tired Dozers	1	4.00	247	0.40
Grading	Tractors/Loaders/Backhoes	1	8.00	97	0.37
BMP Installation	Forklifts	1	8.00	89	0.20
BMP Installation	Generator Sets	1	8.00	84	0.74
BMP Installation	Tractors/Loaders/Backhoes	2	8.00	97	0.37
BMP Installation	Welders	1	8.00	46	0.45

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	3	8.00	0.00	800.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	3	8.00	0.00	800.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
BMP Installation	5	14.00	0.00	1,000.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

LACDPW Viewridge Super Green Streets Regional EWMP - Los Angeles-South Coast County, Winter

3.2 Site Preparation - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Off-Road	0.6375	6.1344	6.9674	0.0101		0.3728	0.3728		0.3430	0.3430		973.7130	973.7130	0.3149		981.5859
Total	0.6375	6.1344	6.9674	0.0101	0.0000	0.3728	0.3728	0.0000	0.3430	0.3430		973.7130	973.7130	0.3149		981.5859

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1789	5.8253	1.3543	0.0155	0.3497	0.0186	0.3683	0.0959	0.0178	0.1137		1,682.1881	1,682.1881	0.1207		1,685.2067
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0409	0.0290	0.3208	8.9000e-004	0.0894	7.5000e-004	0.0902	0.0237	6.9000e-004	0.0244		88.5936	88.5936	2.7900e-003		88.6634
Total	0.2198	5.8543	1.6751	0.0164	0.4391	0.0194	0.4585	0.1196	0.0185	0.1381		1,770.7818	1,770.7818	0.1235		1,773.8701

LACDPW Viewridge Super Green Streets Regional EWMP - Los Angeles-South Coast County, Winter

3.2 Site Preparation - 2020

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Off-Road	0.6375	6.1344	6.9674	0.0101		0.3728	0.3728		0.3430	0.3430	0.0000	973.7130	973.7130	0.3149		981.5859
Total	0.6375	6.1344	6.9674	0.0101	0.0000	0.3728	0.3728	0.0000	0.3430	0.3430	0.0000	973.7130	973.7130	0.3149		981.5859

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1789	5.8253	1.3543	0.0155	0.3497	0.0186	0.3683	0.0959	0.0178	0.1137		1,682.1881	1,682.1881	0.1207		1,685.2067
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0409	0.0290	0.3208	8.9000e-004	0.0894	7.5000e-004	0.0902	0.0237	6.9000e-004	0.0244		88.5936	88.5936	2.7900e-003		88.6634
Total	0.2198	5.8543	1.6751	0.0164	0.4391	0.0194	0.4585	0.1196	0.0185	0.1381		1,770.7818	1,770.7818	0.1235		1,773.8701

LACDPW Viewridge Super Green Streets Regional EWMP - Los Angeles-South Coast County, Winter

3.3 Grading - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.2762	0.0000	3.2762	1.6837	0.0000	1.6837			0.0000			0.0000
Off-Road	0.9872	10.9340	5.2527	0.0107		0.5117	0.5117		0.4708	0.4708		1,035.799 1	1,035.799 1	0.3350		1,044.174 1
Total	0.9872	10.9340	5.2527	0.0107	3.2762	0.5117	3.7879	1.6837	0.4708	2.1545		1,035.799 1	1,035.799 1	0.3350		1,044.174 1

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1789	5.8253	1.3543	0.0155	0.3497	0.0186	0.3683	0.0959	0.0178	0.1137		1,682.188 1	1,682.188 1	0.1207		1,685.206 7
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0409	0.0290	0.3208	8.9000e-004	0.0894	7.5000e-004	0.0902	0.0237	6.9000e-004	0.0244		88.5936	88.5936	2.7900e-003		88.6634
Total	0.2198	5.8543	1.6751	0.0164	0.4391	0.0194	0.4585	0.1196	0.0185	0.1381		1,770.781 8	1,770.781 8	0.1235		1,773.870 1

LACDPW Viewridge Super Green Streets Regional EWMP - Los Angeles-South Coast County, Winter

3.3 Grading - 2020

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					3.2762	0.0000	3.2762	1.6837	0.0000	1.6837			0.0000			0.0000
Off-Road	0.9872	10.9340	5.2527	0.0107		0.5117	0.5117		0.4708	0.4708	0.0000	1,035.799 1	1,035.799 1	0.3350		1,044.174 1
Total	0.9872	10.9340	5.2527	0.0107	3.2762	0.5117	3.7879	1.6837	0.4708	2.1545	0.0000	1,035.799 1	1,035.799 1	0.3350		1,044.174 1

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1789	5.8253	1.3543	0.0155	0.3497	0.0186	0.3683	0.0959	0.0178	0.1137		1,682.188 1	1,682.188 1	0.1207		1,685.206 7
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0409	0.0290	0.3208	8.9000e-004	0.0894	7.5000e-004	0.0902	0.0237	6.9000e-004	0.0244		88.5936	88.5936	2.7900e-003		88.6634
Total	0.2198	5.8543	1.6751	0.0164	0.4391	0.0194	0.4585	0.1196	0.0185	0.1381		1,770.781 8	1,770.781 8	0.1235		1,773.870 1

LACDPW Viewridge Super Green Streets Regional EWMP - Los Angeles-South Coast County, Winter

3.4 BMP Installation - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.3042	10.5577	11.2122	0.0169		0.6460	0.6460		0.6170	0.6170		1,580.080 1	1,580.080 1	0.3082		1,587.784 5
Total	1.3042	10.5577	11.2122	0.0169		0.6460	0.6460		0.6170	0.6170		1,580.080 1	1,580.080 1	0.3082		1,587.784 5

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1789	5.8253	1.3543	0.0155	0.3497	0.0186	0.3683	0.0959	0.0178	0.1137		1,682.188 1	1,682.188 1	0.1207		1,685.206 7
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0715	0.0508	0.5614	1.5600e-003	0.1565	1.3100e-003	0.1578	0.0415	1.2100e-003	0.0427		155.0389	155.0389	4.8900e-003		155.1610
Total	0.2505	5.8760	1.9157	0.0171	0.5062	0.0200	0.5261	0.1374	0.0190	0.1564		1,837.227 0	1,837.227 0	0.1256		1,840.367 7

LACDPW Viewridge Super Green Streets Regional EWMP - Los Angeles-South Coast County, Winter

3.4 BMP Installation - 2020

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	1.3042	10.5577	11.2122	0.0169		0.6460	0.6460		0.6170	0.6170	0.0000	1,580.080 1	1,580.080 1	0.3082		1,587.784 5
Total	1.3042	10.5577	11.2122	0.0169		0.6460	0.6460		0.6170	0.6170	0.0000	1,580.080 1	1,580.080 1	0.3082		1,587.784 5

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.1789	5.8253	1.3543	0.0155	0.3497	0.0186	0.3683	0.0959	0.0178	0.1137		1,682.188 1	1,682.188 1	0.1207		1,685.206 7
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0715	0.0508	0.5614	1.5600e-003	0.1565	1.3100e-003	0.1578	0.0415	1.2100e-003	0.0427		155.0389	155.0389	4.8900e-003		155.1610
Total	0.2505	5.8760	1.9157	0.0171	0.5062	0.0200	0.5261	0.1374	0.0190	0.1564		1,837.227 0	1,837.227 0	0.1256		1,840.367 7

4.0 Operational Detail - Mobile

LACDPW Viewridge Super Green Streets Regional EWMP - Los Angeles-South Coast County, Winter

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
User Defined Industrial	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
User Defined Industrial	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
User Defined Industrial	0.547726	0.045437	0.201480	0.122768	0.016614	0.006090	0.019326	0.029174	0.002438	0.002359	0.005005	0.000677	0.000907

LACDPW Viewridge Super Green Streets Regional EWMP - Los Angeles-South Coast County, Winter

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

LACDPW Viewridge Super Green Streets Regional EWMP - Los Angeles-South Coast County, Winter

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

6.0 Area Detail

6.1 Mitigation Measures Area

LACDPW Viewridge Super Green Streets Regional EWMP - Los Angeles-South Coast County, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Unmitigated	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Total	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004

LACDPW Viewridge Super Green Streets Regional EWMP - Los Angeles-South Coast County, Winter

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Total	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004

7.0 Water Detail

7.1 Mitigation Measures Water

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment

Fire Pumps and Emergency Generators

LACDPW Viewridge Super Green Streets Regional EWMP - Los Angeles-South Coast County, Winter

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

APPENDIX B

**Biological and Water Resources Reviews
Technical Memorandum**

Memorandum

To	Fareeha Kibriya (AECOM)	Page	1 of 20
Subject	Viewridge Road Stormwater Improvements Project, Biological and Water Resources Reviews		
From	Arthur Popp		
Date	July 25, 2019		

1. INTRODUCTION

Los Angeles County Public Works (LACPW) Stormwater Quality Division retained AECOM to conduct a biological resources investigation to identify potential impacts to biological resources for the Viewridge Road Stormwater Improvements Project in accordance with the California Environmental Quality Act (CEQA). The proposed project is designed to capture stormwater for treatment and discharge to the existing storm drain at the project site. The proposed project would capture stormwater runoff from an 85th percentile, 24-hour storm event, and would divert urban and stormwater runoff from local unincorporated communities for flow-through treatment and discharge to the existing storm drain. The proposed project would treat flows that drain to Topanga Canyon Creek, which drains to the North Santa Monica Bay.

The County's intent through preparation of an addendum is to demonstrate whether the previously adopted CEQA document (Los Angeles County Flood Control District Enhanced Watershed Management Programs Final Program Environmental Impact Report, 2015), including mitigation measures, remains adequate and valid for the proposed project. Pursuant to the CEQA Guidelines, the County, as the lead agency, must conduct an evaluation of proposed changes to the project in order to determine whether further environmental analysis is required, pursuant to Public Resources Code Section 21166 and CEQA Guidelines Section 15162. For a proposed modified project, CEQA Guidelines Sections 15162 and 15164 provide that an Addendum to an adopted Final EIR may be prepared if only minor technical changes or additions are necessary. This document reports on biological resources and jurisdictional waters database searches conducted in support of the addendum.

2. PROJECT DESCRIPTION

2.1 Project Location

The proposed project is located in an unincorporated area of Topanga in western Los Angeles County, within Township 1 North, Range 16 West, Section 30 on the Canoga Park (1952) 1:24000 U.S. Geologic Survey (USGS) topographic map. The project site comprises several locations along and near Viewridge Road between Topanga Canyon Boulevard and Summit

Pointe Drive. Work associated with the proposed project would occur on Viewridge Road, Hodler Drive, Chagall Road, and Voltaire Drive. In the project area, Viewridge Road contains a landscaped median between Hodler Drive and just west of Heidi Lane. The remainder of the roadways contains landscaped parkways. All project components would be located within the existing road rights-of-way (ROW) and/or parkways adjacent to the roadways. All portions of the project site are owned and maintained by LACPW, with the exception of the temporary construction staging along the east shoulder of Topanga Canyon Boulevard, which is California Department of Transportation (Caltrans) ROW.

Areas surrounding the project elements are developed with single-family residential homes. Additionally, there are open space areas on the west side of Topanga Canyon Boulevard and to the south of Viewridge Road, east of the Heidi Lane. Topanga Canyon Creek and riparian habitat along it occur approximately 150 feet south of Viewridge Boulevard; however, no elements of the project coincide with the stream and riparian habitat.

2.2 Project Objectives

The objectives of the proposed project are to comply with the MS4 Permit through the following:

- Water Quality: reduce bacteria and trash and create the potential to treat 33.46 acre-feet of stormwater per year.
- Environment: improve habitat by reducing discharged pollutants and reducing the effects of hydromodification.

2.3 Description of the Proposed Project

The MS4 Permit became effective in December 2012 with the purpose of maintaining water quality objectives to protect beneficial uses of the receiving waters in the Los Angeles region. As a result of the 2012 MS4 Permit, 19 watershed groups were formed by 80 permittees. Permittees were given the opportunity to comply with permit requirements through the development of EWMPs formed to identify potential and priority structural and non-structural BMPs within the region's stormwater collection system to improve runoff water quality.¹ A total of 12 watershed groups were formed through this process. The project site is located within the North Santa Monica Bay Coastal Watershed EWMP Group, which was formed by the City of Malibu, Los Angeles County, and the Los Angeles County Flood Control District (LACFCD).

The proposed project was identified by the EWMP Group as a priority regional project to reach permit compliance. The proposed project would help achieve permit compliance for Total Maximum Daily Loads (TMDLs), Receiving Water Limitations (RWL), and Water Quality-Based Effluent Limitations (WQBELs) through implementation of BMPs designed to capture stormwater for treatment. The proposed project is designed to capture stormwater for treatment and discharge to the existing storm drain at the project site. The proposed project

¹ Los Angeles County Flood Control District, Enhanced Watershed Management Programs, Final Program Environmental Impact Report, May 2015.

would capture stormwater runoff from an 85th percentile, 24-hour storm event and would divert urban and stormwater runoff from local unincorporated communities for flow-through treatment and discharge to the existing storm drain. The proposed project would also include Low Impact Development landscaping features and educational signage. The BMP components identified as part of the proposed project are described below.

Viewridge Road Median

As previously discussed, Viewridge Road currently contains a landscaped median between Hodler Drive and just west of Heidi Lane. The proposed project would create a new, approximately 850-foot-long median starting east of Heidi Lane to just west of Summit Pointe Drive. Approximately 18 biofiltration units would be incorporated into the median to capture runoff and stormwater. Water would reach the new median via a new diversion pipeline that would convey flows from Bellini Drive and Heidi Lane via a connection to the existing drain on Viewridge Road just east of its intersection with Heidi Lane. The new diversion line would convey water via gravity to a pretreatment system that would be installed on the west end of the new median to pretreat the water by removing trash, sediment, and debris. Water would then flow through the biofiltration units to an 18-inch reinforced concrete pipe via gravity and discharge into an existing storm drain system located at the east end of Viewridge Road. Two electrical cabinets would be installed on the north side of Viewridge Road. The electrical cabinet located on the north side of Viewridge Road, east of Heidi Lane, would control the mechanical equipment in the new median, which includes a trash rack, slide gate, etc. All components of this portion of the proposed project would be installed below ground with the exception of the median structure itself (curbs, etc.), electrical cabinets, and the landscaping elements (i.e., vegetation). To support monitoring equipment for sampling, two temporary cabinets would be installed aboveground within the new median, one of which will be equipped with a pole containing a rain gage and solar panel, and flow sensors and pressure transducers will be installed below ground. Temporary monitoring activities would occur during the first 3 to 5 years of project operations and monitoring will only be conducted for wet weather (storm) events. Routine maintenance activities would include periodic system cleanout activities, as well as landscaping maintenance, which would be conducted by LACPW.

Biofiltration Units – Viewridge Road, Hodler Drive, Chagall Road, and Voltaire Drive

Approximately 22 biofiltration units would be installed below ground at identified locations on the parkways along Viewridge Road, Hodler Drive, Chagall Road, and Voltaire Drive. One of the proposed 22 biofiltration units will be installed in the road ROW on Viewridge Road just east of Topanga Canyon Boulevard. Runoff and stormwater entering these units would flow into a pretreatment chamber that would separate larger sediments and debris before entering a filtration chamber which would reduce the target pollutants before discharging from the unit via gravity into the existing storm drain system. Existing landscaping would be replaced with new drought tolerant landscaping once the biofiltration units are installed. Temporary monitoring cabinets for stormwater sampling equipment would be installed at four locations: one approximately 6-foot long by 3-foot wide and 3-foot high cabinet would be installed on the southeast corner of Viewridge Road and Hodler Drive; one approximately 4-foot long by 3-foot

wide and 4-foot high cabinet on the south side of Viewridge Road just east of Topanga Canyon Boulevard; one approximately 4-foot long by 3-foot wide and 4-foot high cabinet on the south side of Chagall Road just west of Schweitzer Drive; and one approximately 4-foot long by 3-foot wide by 4-foot high cabinet would be installed on the south side of Chagall Road just east of Schweitzer Drive. These cabinets would be removed by the County after the monitoring activities are completed (3 to 5 years). In addition, two permanent electrical cabinets would be installed to provide power for the temporary monitoring cabinets: one electrical cabinet would be installed on the south side of Viewridge Road just east of Topanga Canyon Boulevard, and one electrical cabinet would be installed on the south side of Chagall Road just west of Voltaire Drive. Maintenance of the biofiltration units would require routine system cleanout activities and periodic replacement of the filter cartridges, which would be conducted by LACPW.

2.4 Construction Schedule and Procedures

Construction of the proposed project is anticipated to begin in summer 2022 and take approximately 9 months to complete, concluding in spring 2023. Construction is anticipated to occur Monday through Friday from 7:00 a.m. to 3:30 p.m. (one shift per day). No construction is expected on weekends or holidays. This construction schedule may differ from the selected contractor's schedule depending on the contractor's equipment and personnel resources, and the construction contractor would be responsible for coordinating with County prior to and during construction.

The proposed project would be constructed completely within the existing road ROW and/or parkways adjacent to the roadways. All portions of the project site are owned and maintained by LACPW, with the exception of landscaped parkways which is owned by the County but may be maintained by the homeowners. Construction staging is expected to occur on the east shoulder of Topanga Canyon Road within Caltrans ROW. The project footprint is estimated to be approximately 0.50 acres.

Viewridge Road Median

Installation of the new median on Viewridge Road would occupy a space in the road currently demarcated as a median with striping. The existing asphalt would be removed and the area would be excavated up to approximately 20 feet below the ground surface to accommodate the installation of the pretreatment unit, the biofiltration units, and associated connecting drains.

The approximately 18-inch diversion pipeline would require excavation of a trench approximately 5 feet wide by 20 feet deep within the existing ROW on Viewridge Road. As partial lane closures would be needed to install the diversion line and construct the new median, development and implementation of a traffic control plan would be required.

Biofiltration Units – Viewridge Road, Hodler Drive, Chagall Road, and Voltaire Drive

Approximately 22 biofiltration units would be installed at various locations on Viewridge Road, Hodler Drive, Chagall Road, and Voltaire Drive. Installation of these units would require excavation of pits. The proposed locations and dimensions of the BMPs from west to east within the project footprint are as follows:

Viewridge Road:

- North side of Viewridge Road just east of Topanga Canyon Boulevard: 2 units – approximately 10 feet wide by 26 feet long by 10 feet deep
- South side of Viewridge Road just west of Hodler Drive: 1 unit – approximately 5 feet wide by 20 feet long by 6 feet deep
- South side of Viewridge Road just east of Hodler Drive: 1 unit - approximately 5 feet wide by 30 feet long by 8 feet deep

Hodler Drive:

- East side of Hodler Drive between Viewridge Road and Chagall Road: 5 units – approximately 5 feet wide by 22 feet long by 8 feet deep
- West side of Hodler Drive between Viewridge Road and Chagall Road: 1 unit – approximately 5 feet wide by 20 feet long by 6 feet deep
- West side of Hodler Drive across from the corner of Chagall Road and Hodler Drive: 1 unit – approximately 5 feet wide by 20 feet long by 6 feet deep

Voltaire Drive:

- West side of Voltaire Drive just south of Chagall Road: 3 units (at 2 locations) – approximately 5 feet wide by 22 feet long by 3 feet deep
- East side of Voltaire Drive south of Chagall Road: 2 units (at 2 locations) – 1 unit approximately 5 feet wide by 20 feet long by 5 feet deep; and 1 unit approximately 5 feet wide by 22 feet long by 8 feet deep

Chagall Road:

- South side of Chagall Road just west of Schweitzer Drive (2 units): 1 unit approximately 5 feet wide by 16 feet long by 6 feet deep; and 1 unit approximately 5 feet wide by 18 feet long by 6 feet deep
- North side of Chagall Road at its eastern terminus just west of the cul-de-sac: 2 units approximately 5 feet wide by 14 feet long by 6 feet deep

- South side of Chagall Road at its eastern terminus just west of the cul-de-sac: 2 units- 1 unit approximately 5 feet wide by 20 feet long by 6 feet deep, and 1 unit approximately 5 feet wide by 22 feet long by 6.5 feet deep

Existing landscaping and/or vegetation in the parkways would be removed prior to excavation. The biofiltration units would connect to the existing storm drain system or adjacent catch basin. A hatch would be installed at grade level above the unit to provide access for maintenance purposes. Once the biofiltration units are installed, existing landscaping on the parkway would be replaced with new drought tolerant landscaping. No permanent modifications to the roads, sidewalks, or curbs would be required for this component of the proposed project.

2.5 Best Management Practices

An appropriate combination of monitoring and resource impact avoidance would be employed during all construction activities, including implementation of the following BMPs:

- The proposed project would implement Rule 403 fugitive dust control measures required by the South Coast Air Quality Management District (SCAQMD), which requires reasonable precautions to be taken to prevent visible particulate matter from being airborne, under normal wind conditions, beyond the property from which the emission originates. Reasonable precautions include, but are not limited to the following:
 1. Application of water on dirt roads, material stockpiles, and other surfaces that can give rise to airborne dusts; and
 2. Maintenance of roadways in a clean condition.
- The proposed project would implement erosion control BMPs where necessary that may include, but not be limited to, the following:
 1. Minimizing the extent of disturbed areas and duration of exposure
 2. Stabilizing and protecting disturbed areas
 3. Keeping runoff velocities low
 4. Retaining sediment within the construction area
 5. Use of silt fences or straw wattles
 6. Temporary soil stabilization
 7. Temporary drainage inlet protection
 8. Temporary water diversion around immediate work area
 9. Minimizing debris from construction vehicles on roads providing construction access

- The proposed project would implement Rule 402 measures required by the South Coast AQMD, which prohibits the discharge from any source whatsoever, such quantities of air contaminants or other materials that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such persons or the public or that cause or have a natural tendency to cause injury or damage to business or property.
- LACPW would ensure all construction crews have fire-suppression equipment (such as fire extinguishers) on site to respond to the accidental ignition of a fire.
- Spill kits will be available onsite for potential leaks or spills of hazardous materials.
- Per Municipal Code Section 12.08.570(H), the improvements proposed for the project would be exempt from the County's noise ordinance. Nonetheless, LACPW would minimize short-term construction noise through: (1) proper maintenance and tuning of all construction equipment engines to minimize noise emissions; and (2) proper maintenance and functioning of the mufflers on all internal combustion and equipment engines.

3. METHODS FOR ASSESSING BIOLOGICAL RESOURCES

The California Natural Diversity Data Base (CNDDB) (CDFW 2019) and the California Native Plant Society's (CNPS) on-line Inventory of Rare and Endangered Plants of California (CNPS 2019) were reviewed for the most recent distribution information for special-status plant and wildlife species and sensitive natural communities within the Canoga Park quadrangle and surrounding eight quadrangles including: Beverly Hills, Calabasas, San Fernando, Malibu Beach, Topanga, Santa Susana, Oat Mountain and Van Nuys. Additionally, the U.S. Fish and Wildlife Service's Information for Planning and Conservation (IPaC) on-line environmental review process (USFWS 2019) was queried for the project area. The results of these database reviews are included in Attachment A and represent the regional special-status species that were evaluated for the project.

On April 30, 2019, a field assessment of the project site was conducted by AECOM biologist John Parent to review the locations of the proposed project elements and document existing biological resources that occur or have the potential to occur on-site. This report presents the results of this survey and background review and is intended to assist Public Works during the environmental review process for the proposed Project. The survey was intended as an evaluation of vegetation in the project area and an assessment of the potential for occurrence of special-status plant and wildlife species.

Plant and wildlife species observed in the project area and surrounding area were noted. Binoculars were utilized to scan for evidence of wildlife activity. Seasonal, species-specific botanical and wildlife surveys were not conducted as part of this evaluation. The field methods employed would not necessarily rule out the potential for some special-status species to occur

in the project area; however, based on the survey conducted and an assessment of on-site conditions, it is apparent that special-status plant and wildlife species are not expected to occur in the project area.

4. EXISTING CONDITIONS

4.1 Vegetation Communities and Plants

Vegetation communities are assemblages of plant species that commonly coexist. The classification of vegetation communities is based on the life form of the dominant species within that community and the associated species. No native plant communities occur where proposed project elements would be installed. Plants occurring around the project elements are generally common southern California ornamental species associated with residential development, including native and nonnative trees and shrubs such as pine, palm, eucalyptus, cypress, olive, oak, pepper, and bottle-brush trees.

4.2 Wildlife

Wildlife species observed within the project site and surrounding area included California towhee (*Melospiza crissalis*), house finch (*Haemorhous mexicanus*), house wren (*Troglodytes aedon*), collared dove (*Streptopelia decaocto*), rock pigeon (*Columba livia*), western gull (*Larus occidentalis*), Cooper's hawk (*Accipiter cooperii*), red-tailed hawk (*Buteo jamaicensis*), red-shouldered hawk (*Buteo lineatus*), turkey vulture (*Cathartes aura*), desert cottontail (*Sylvilagus audubonii*), western fence lizard (*Sceloporus occidentalis*), and alligator lizard (*Elgaria multicarinata*).

4.3 Wildlife Corridor

In an urban context, a wildlife migration corridor can be defined as a linear landscape feature of sufficient width and buffer to allow animal movement between two comparatively undisturbed habitat fragments, or between a habitat fragment and some vital resource that encourages population growth and diversity. Habitat fragments are isolated patches of habitat separated by otherwise foreign or inhospitable areas, such as urban tracts or highways. Two types of wildlife migration corridors seen in urban settings are regional corridors, defined as those linking two or more large areas of natural open space, and local corridors, defined as those allowing resident wildlife to access critical resources (food, cover, and water) in a smaller area that might otherwise be isolated by urban development.

Proposed project elements occur in a developed area and do not coincide with an established regional wildlife corridor, nor does the project area likely serve as a significant local corridor. Riparian habitat occurring along Topanga Canyon Creek south of Viewridge Road may provide a corridor for local movement between the project area and the coastline approximately 6.5 miles to the south, and open/green space between the project and coastline. The riparian corridor likely provides suitable opportunities for wildlife cover, resting,

foraging, and nesting. Ornamental trees surrounding the project elements may also provide some opportunities for cover, resting, foraging, and nesting to localized bird populations; however, they do not provide functions as a significant wildlife movement corridor.

5. SPECIAL-STATUS SPECIES

5.1 Special-Status Plant Species

Special-status plant species include those listed as Endangered, Threatened, Rare or those species proposed for listing by the USFWS under the federal Endangered Species Act (FESA) and CDFW under the California Endangered Species Act (CESA). The CNPS inventory is sanctioned by the CDFW and serves essentially as the list of candidate plant species for state listing. CNPS's California Rare Plant Ranks (CRPR) 1B and 2 species are considered eligible for state listing as endangered or threatened.

A total of 54 special-status plant species were identified from a search of the CNDDDB (CDFW 2019a) and CNPS (CNPS 2019) databases for the Canoga Park and surrounding eight quadrangles, and from the IPaC environmental review (USFWS 2019). These species, their status, and habitat requirements are provided in Attachment B, Table A. Fifteen plant species identified from the CNDDDB, CNPS inventory, and IPaC are protected under FESA and/or CESA including:

- Braunton's milk-vetch (*Astragalus brauntonii*), federally-listed endangered
- Ventura marsh milk-vetch (*Astragalus pycnostachyus* var. *lanosissimus*), federally and state-listed endangered
- coastal dunes milk-vetch (*Astragalus tener* var. *titi*), federally and state-listed endangered
- salt marsh bird's beak (*Chloropyron maritimum maritimum*), federally and state-listed endangered
- San Fernando Valley spineflower (*Chorizanthe parryi* var. *fernandina*), federal candidate and state-listed endangered
- beach spectaclepod (*Dithyrea maritima*), state-listed threatened
- slender-horned spineflower (*Dodecahema leptoceras*), federally and state-listed endangered
- marcescent dudleya (*Dudleya cymosa* ssp. *marcescens*), federally-listed threatened
- Santa Monica dudleya (*Dudleya cymosa* ssp. *ovatifolia*), federally-listed threatened
- California Orcutt grass (*Orcuttia californica*), federally and state-listed endangered
- Gambel's watercress (*Rorippa gambellii*), federally-listed endangered

- spreading Nararretia (*Navarretia fossalis*), federally-listed threatened
- Nevin's barberry (*Berberis nevinii*), federally and state-listed endangered
- marsh sandwort (*Arenaria paludicola*), federally-listed endangered
- Lyon's pentachaeta (*Pentachaeta lyonii*), federally and state-listed endangered

No historical records of any special-status plant species coincide directly with the project; however, two records in the CNDDDB coincide with Topanga Canyon Creek, which lies just west of the project, along the west side of Topanga Canyon Road. Included are a record of Braunton's milk-vetch and white-veined monardella (*Monardella hypoleuca* ssp. *hypoleuca*; CRPR 1B.3), both of which stretch along Topanga Canyon Creek from the project area south for approximately 6.5 miles to the canyon's estuary at the coastline. Records of Santa Monica dudleya and slender mariposa-lily (*Calochortus clavatus* var. *gracilis*; CRPR 1B.2) also coincide with Topanga Canyon Creek; however, these occurrences are from 4 plus miles south of the project.

No USFWS-designed critical habitat for plants listed under the FESA coincide with the project. The nearest critical habitat is for Braunton's milk-vetch, which lies nearly 4 miles southeast of the project, in the vicinity of Santa Ynez Reservoir. Additional critical habitat areas for the species occurs 7 plus miles to the northwest, in the Simi Hills. Additionally, numerous critical habitat areas for Lyon's pentachaeta occur 10 plus miles west of the project, in the vicinity of the unincorporated community of Cornell (USFWS 2018). No plant species listed under FESA or CESA, or any non-listed special-status plants were observed during the survey. Cooper's hawk, observed flying over the project area during the field survey, is designated by CDFW as a Watch List species. No other special-status wildlife species were observed during the survey.

5.2 Special-Status Wildlife Species

Special-status wildlife species include those listed as Endangered, Threatened, or those species proposed for listing by the USFWS under FESA and CDFW under CESA. Additional species receive federal protection under the Bald Eagle Protection Act (e.g., bald eagle, golden eagle), the Migratory Bird Treaty Act (MBTA), and state protection under the California Environmental Quality Act (CEQA) Section 15380(d).

All birds, except European starlings, English house sparrows, rock doves (pigeons), and non-migratory game birds such as quail, pheasant, and grouse are protected under the MBTA. However, non-migratory game birds are protected under California Fish and Game Code (CFG) Section 3503. Many other species are considered by CDFW to be California species of special concern (SSC), listed in Remsen (1978), Williams (1986) and CDFW (2018), and others are on a CDFW Watch List (WL) (CDFW 2018). The CNDDDB tracks species within California for which there is conservation concern, including many that are not formally listed, and assigns them a CNDDDB Rank (CDFW 2018). Although SSC and WL species, and species

that are tracked by the CNDDDB but are not formally listed, are afforded no official legal status, they may receive special consideration during the CEQA review process.

CDFW further classifies some species under the following categories: "Fully Protected", "Protected birds" (CDFW Code §3511), "Protected mammals" (CDFW Code §4700), "Protected amphibian" (CDFW Code §5050 and Chapter 5, §41), "Protected reptile" (CDFW Code §5050 and Chapter 5, §42), and "Protected fish" (CDFW Code §5515). The designation "Protected" indicates that a species may not be taken or possessed except under special permit from CDFW; "Fully Protected" indicates that a species can be taken for scientific purposes by permit only (CDFW 2018). CDFW Code §3503, 3505, and 3800 prohibit the take, destruction or possession of any bird, nest or egg of any bird except English house sparrows and European starlings unless express authorization is obtained from CDFW.

A total of 52 special-status wildlife species were identified from a search of the CNDDDB (CDFW 2019) database for the Canoga Park and surrounding eight quadrangles, and the IPaC (USFWS 2019). These species, their status, and habitat requirements are provided in Attachment B, Table B. Fifteen wildlife species identified during reviews of the CNDDDB and IPaC are protected under FESA and/or CESA including:

- southern California steelhead Distinct Population Segment (DPS) (*Oncorhynchus mykiss irideus*), federally-listed endangered
- tidewater goby (*Eucyclogobius newberryi*), federally-listed endangered
- Santa Ana sucker (*Catostomus santaanae*), federally-listed threatened
- Riverside fairy shrimp (*Streptocephalus woottoni*), federally-listed endangered
- Vernal pool fairy shrimp (*Bramchinecta lynchi*), federally-listed threatened
- arroyo toad (*Anaxyrus californicus*), federally-listed endangered
- California red-legged frog (*Rana draytonii*), federally-listed threatened
- southern mountain yellow-legged frog (*Rana muscosa*), federally and state-listed endangered
- California condor (*Gymnogyps californianus*), federally and state-listed endangered
- Swainson's hawk (*Buteo swainsonii*), state-listed threatened
- western yellow-billed cuckoo (*Coccyzus americanus occidentalis*), federally-listed threatened, state-listed endangered
- coastal California gnatcatcher (*Polioptila californica californica*), federally-listed threatened

- southwestern willow flycatcher (*Empidonax traillii extimus*), federally-listed endangered
- bank swallow (*Riparia riparia*), state-listed threatened
- least Bell's vireo (*Vireo bellii pusillus*), federally and state-listed endangered

No historical records of any special-status wildlife species coincide directly with the project; however, wildlife records from within Topanga Canyon, from approximately 3 miles downstream of the project south to the coastline, were identified in the CNDDDB. Included are records of southern California steelhead (federally-listed endangered), western pond turtle (*Emys marmorata*; SSC), two-striped garter snake (*Thamnophis hammondi*; SSC), Crotch bumble bee (*Bombus crotchii*; tracked in CNDDDB), San Bernardino ringnecked snake (*Diadophis punctatus modestus*; tracked in CNDDDB), and Gertsch's socialchemmis spider (*Socalchemmis gertschi*; tracked in CNDDDB),

No USFWS-designated critical habitat for wildlife listed under FESA coincides with the project. Critical habitat occurs approximately 3.5 miles south of the project along Topanga Canyon Creek for southern California steelhead DPS and approximately 6.5 miles south of the project within the canyon's estuary for tidewater goby (federally-listed endangered) (USFWS 2018).

No wildlife species listed under FESA or CESA were observed during the survey. Cooper's hawk, observed flying over the project area during the field survey, is designated by CDFW as a Watch List species. No other special-status wildlife species were observed during the survey.

6. SENSITIVE NATURAL COMMUNITIES

Sensitive natural communities are those that are designated as rare in the region by the CNDDDB, support special-status plant or wildlife species, or receive regulatory protection (*i.e.*, §404 of the Clean Water Act and/or §1600 *et seq.* of the CFGC). Rare communities are given the highest inventory priority (Holland 1986, CDFW 2010). Thirteen sensitive natural communities have been documented in the Canoga Park and surrounding eight quadrangles (CDFW 2019), including: California Walnut Woodland, Riversidian Alluvial Fan Sage Scrub, Southern California Coastal Lagoon, Southern California Steelhead Stream, Southern Coast Live Oak Riparian Forest, Southern Mixed Riparian Forest, Southern Willow Scrub, Cismontane Alkali Marsh, Southern Coastal Salt Marsh, Southern Sycamore Alder Riparian Woodland, Southern Cottonwood Willow Riparian Forest, Valley Needlegrass Grassland, and Valley Oak Woodland.

Based on the field survey, these communities, or any other sensitive natural communities, do not coincide with the project. Natural habitats have been disturbed by urban development and are no longer present. Sensitive riparian habitat in the form of Southern Coast Live Oak Riparian Forest occurs outside the project footprint along Topanga Canyon Creek, approximately 150 feet south of Viewridge Road.

No streams or wetlands coincide directly with the project footprint; however, as previously introduced, Topanga Canyon Creek occurs just south of Viewridge Road. The creek lies within the Santa Monica Bay Watershed Management Area and has a Hydrologic Unit Code (HUC) of 180701040401, which is contained in the Watershed Boundary Dataset, the most recent HUC delineation effort completed by the US Geological Survey (USGS 2018). With direct hydrology to the Pacific Ocean, the creek falls under the jurisdiction of the US Army Corps of Engineers, with CDFW and the Los Angeles Regional Water Quality Control Board (LARWQCB) exerting State jurisdiction over the creek.

7. APPLICABLE REGULATIONS

As referenced in some of the previous sections, several regulations and standards have been established by federal, state, and local agencies to protect and conserve biological resources. The Project's compliance with the regulations and standards listed below were assessed.

Federal Regulations and Standards:

- Federal Endangered Species Act (FESA)
- Migratory Bird Treaty Act (MBTA)
- Clean Water Act (CWA)
- National Environmental Policy Act (NEPA)

State Regulations and Standards

- California Fish and Game Code (CFGF)
- California Endangered Species Act (CESA)
- Porter-Cologne Water Quality Control Act
- California Environmental Quality Act (CEQA)

Local Regulations and Standards

- Significant Ecological Areas (SEA) Program
- City of Los Angeles Tree Ordinance

The proposed project is not anticipated to conflict with any of these regulations and standards and many are not applicable to the project. This memo report is being prepared in support of compliance with CEQA, and LACPW will adhere to standard mitigation protocols regarding the avoidance and minimization of potential project impacts to birds to comply with the MBTA and CFGF.

8. IMPACTS ON BIOLOGICAL RESOURCES

Biological resources may be either directly or indirectly impacted by a project. Direct and indirect impacts may be either permanent or temporary in nature. These impact categories are defined below.

- Direct: Any alteration, physical disturbance, or destruction of biological resources that would result from project-related activities is considered a direct impact. Examples include clearing vegetation, encroaching into wetlands or a stream, and the loss of individual species and/or their habitats.
- Indirect: As a result of project-related activities, biological resources may also be affected in a manner that is ancillary to physical impacts. Examples include elevated noise and dust levels, soil compaction, increased human activity, decreased water quality, and the introduction of invasive wildlife (domestic cats and dogs) and plants.
- Permanent: All impacts that result in the long-term or irreversible removal of biological resources are considered permanent. Examples include constructing a building or permanent road on an area containing biological resources
- Temporary: Any impacts considered to have reversible effects on biological resources can be viewed as temporary. Examples include the generation of fugitive dust during construction; or removing vegetation, and either allowing the natural vegetation to recolonize or actively revegetating the impact area. Surface disturbance that removes vegetation and disturbs the soil is considered a long-term temporary impact because of slow natural recovery in arid ecosystems.\

Impacts on biological resources due to project construction are described in this section. They could include such impacts as elevated noise and dust levels during construction. Potential direct and indirect impacts from construction and operations activities to vegetation, wildlife, special-status plant and wildlife species, sensitive natural communities, wildlife movement corridors, and potential jurisdictional features are presented in the following sections.

8.1 Construction

The anticipated impacts of proposed Project construction on biological resources are described below.

8.1.1 Vegetation

The project would be implemented within the footprint of existing paved roadways surrounded by residential development with ornamental vegetation. No native vegetation communities coincide with components of the project. Additionally, no vegetation would be removed during project construction. Riparian habitat in the form of Southern Live Oak Riparian Forest occurs along Topanga Canyon Creek, approximately 150 feet south of Viewridge Road. The project will utilize existing stormwater outfalls that occur within the riparian habitat and discharge into Topanga Canyon Creek; however, no work associated with the project would occur at the discharge points. As a result, no direct impacts to natural vegetation communities would occur.

With the implementation of BMP presented in Section 2.5, potential indirect impacts to the riparian habitat and special-status wildlife species it may support would be avoided.

Indirect impacts to vegetation surrounding project elements could include the accumulation of fugitive dust, and the colonization of nonnative, invasive plant species. Other indirect impacts could include an increase in the amount of compacted or modified surfaces that, if not controlled, could increase the potential for surface runoff, increased erosion, and sediment deposition beyond the proposed project's footprint. With implementation of the BMPs outlined in Section 2.5 related to fugitive dust and erosion control, significant indirect impacts to vegetation are not anticipated.

8.1.2 Special Status Plant Species

Individual special-status plant species could be damaged or destroyed from crushing or trampling during construction activities; however, no federal or State-listed plant species were identified on-site and the project would be implemented within the footprint of existing paved roadways. As a result, special-status plants are not expected to coincide with project elements due to a lack of suitable habitat. Since no special-status plants were observed during the field survey and the site is not suitable for them, significant direct impacts to special-status plants are not anticipated.

Indirect impacts to special-status plant species occurring outside the project site could result from construction-related habitat loss and modification of sensitive natural communities related to dust, noise, stormwater runoff, and through the potential spread of noxious and invasive plant species into these communities. Such impacts would be considered significant. The riparian habitat south of Viewridge Road may provide suitable habitat for special-status plants; however, by implementing the BMP outlined in Section 2.5 related to fugitive dust and erosion control, the potential for indirect impacts to special-status plants occurring in the riparian habitat would be reduced. As a result, indirect impacts to special-status plants are not anticipated.

8.1.3 Special-Status Wildlife Species

The project would be implemented within the footprint of existing paved roadways surrounded by residential development with ornamental vegetation. No native vegetation communities that may provide potentially suitable habitat for special-status wildlife species coincide with components of the project. Southern Live Oak Riparian Forest habitat along Topanga Canyon Creek is potentially suitable for special-status wildlife species; however, no project activities are proposed to occur within the riparian habitat and as a result, direct impacts to special-status wildlife and habitat that potentially supports such species would be avoided.

Four raptor species, Cooper's hawk, red-tailed hawk, red shouldered hawk, and turkey vulture, were detected flying over the project area. Since trees potentially suitable for nesting raptors would not be removed by the project, and by adhering to avoidance and minimization measures BIO-1 below, direct impacts to special-status and common raptor species during project implementation would be less than significant. Construction noise may; however,

indirectly affect raptor species if they are present in the vicinity, causing them to change their behavior and move out of the area. If raptors are detected nesting in the vicinity of the project prior or during construction, noise-reduction measures may need to be implemented to reduce construction noise levels to acceptable levels, or work discontinued until the young have fledged. By implementing BMP presented in Section 2.5 and adhering to avoidance and minimization measure BIO-1 presented in Section 9, indirect impacts to special-status and common raptor species are not anticipated and would be less than significant.

Ornamental trees in areas surrounding the proposed project elements provide potentially suitable nesting habitat for bird species. As a result, birds protected by the MBTA and the CFGC have the potential to nest in the vicinity of where project elements would be constructed. Although no vegetation would be removed by the project, should construction occur during the nesting bird season, indirect impacts from construction noise, dust, increased human presence, and vibrations could significantly impact birds protected by the MBTA and CFGC causing them to change their behavior and potentially move out of the area. Increased nestling mortality due to nest abandonment or decreased feeding frequency could occur, resulting in significant indirect impacts. By implementing the BMP presented in Section 2.5 and by avoiding project construction during the nesting bird season, or adhering to avoidance and minimization measure BIO-1 presented in Section 9, the indirect impacts of construction on nesting birds and their associated habitat would be reduced to less than significant.

8.1.4 Sensitive Natural Communities

Implementation of the proposed Project would not result in direct or indirect impacts to any sensitive natural communities. As presented in Section 6, no sensitive natural communities occur within the project site. Additionally, sensitive aquatic habitats under regulatory jurisdiction of USACE, CDFW, and RWQCB do not occur in the project site. As a result, direct impacts to sensitive natural communities would not occur.

Indirect impacts to riparian habitat along Topanga Canyon Creek could occur and include the accumulation of fugitive dust, increase of surface runoff, increase of erosion, and increase of sediment deposition within vegetation beyond the project footprint. However, by adhering to BMP presented in Section 2.5, the potential for indirect impacts to natural communities would be reduced to a level below significance.

8.1.5 Wildlife Movement Corridor

The project area does not serve as a regional wildlife corridor. As a result, impacts to a regional wildlife movement corridor would not occur. Potential direct and indirect impacts related to birds protected by the MBTA and the CFGC are discussed in Section 8.1.3. As a result, impacts to a wildlife movement corridor are not anticipated.

8.1.6 Local Policies and Ordinances

The project does not coincide with a SEA and no trees would be removed by the project. As such, the project would not conflict with any local policies and ordinances that protect biological resources.

8.2 Operation

Significant impacts to vegetation, special-status plant and wildlife species, and sensitive natural communities during operations and routine maintenance of the project elements are not anticipated. Activities would be conducted within previously disturbed and developed surfaces and would not change conditions from those present prior to and after project construction.

9. AVOIDANCE, MINIMIZATION, AND MITIGATION MEASURES

With the potential for nesting birds protected under the MBTA and CFGC to occur in ornamental trees around the project elements and in the riparian corridor along Topanga Canyon Creek south of Viewridge Road, implementation of the avoidance and minimization measure presented below would mitigate potential impacts to nesting birds should construction be initiated during the bird breeding season, generally February 1 through September 1.

BIO-1. If it is not practicable to avoid the nesting season during construction of project elements, the following measure would be employed:

- A pre-construction nesting survey shall be conducted by a qualified biologist within 3 days prior to the start of construction activities to determine whether active nests are present within or directly adjacent to the construction zone. All nests found shall be recorded.
- If construction activities must occur within 300 feet of an active nest of any passerine bird or within 500 feet of an active nest of any raptor, with the exception of an emergency, a qualified biologist shall monitor the nest on a weekly basis, and the activity shall be postponed until the biologist determines that the nest is no longer active.
- If the recommended nest avoidance zone is not feasible, the qualified biologist shall determine whether an exception is possible and obtain concurrence from the resource agencies before construction work can resume within the avoidance buffer zone. All work shall cease within the avoidance buffer zone until either agency concurrence is obtained or the biologist determines that the adults and young are no longer reliant on the nest site.

10. CONCLUSIONS

Based on the analysis presented above regarding anticipated effects of the proposed project, significant impacts to nesting birds protected under the MBTA and by CFGC could occur. However, with implementation of Mitigation Measure BIO-1 presented in Section 9 above, impacts to nesting birds would be less than significant. No other significant impacts to biological resources are anticipated, and implementation of the BMP outlined in Section 2.5 would further reduce the potential for significant impacts.

11. REFERENCES CITED

California Department of Fish and Wildlife (CDFW)

- 2019 *California Natural Diversity Data Base (CNDDDB)*. Full condensed report for Canoga Park, Beverly Hills, Calabasas, San Fernando, Malibu Beach, Topanga, Santa Susana, Oat Mountain, and Van Nuys quadrangles. Generated July 26, 2019.
- 2018 Special Animals. California Natural Diversity Database (CNDDDB). November.
- 2010 List of California Terrestrial Natural Communities Recognized by the Natural Diversity Data Base. Natural Heritage Division. The Resources Agency. September. Available at <http://www.dfg.ca.gov/biogeodata/vegcamp/pdfs/natcomlist.pdf> . Accessed July 18 2016.

California Native Plant Society (CNPS)

- 2019 Rare Plant Program. Inventory of Rare and Endangered Plants (online edition, v8-02). California Native Plant Society. Sacramento, CA. Available at <http://www.cnps.org/inventory>. Accessed July 26, 2019.

Holland, R.

- 1986 *Preliminary Descriptions of the Terrestrial Natural Communities of California*. California Department of Fish and Game, The Resources Agency. 156 pp.

Remsen, H.V.

- 1978 *Bird Species of Special Concern in California: an Annotated List of Declining or Vulnerable Bird Species*. California Department of Fish and Game, The Resources Agency.

U.S. Fish and Wildlife Service (USFWS)

- 2019 Information for Planning and Conservation (IPaC). Available at <https://ecos.fws.gov/ipac/>. Accessed November 28, 2018.

2018 Environmental Conservation Online System (ECOS). Critical Habitat Portal. Available at <http://ecos.fws.gov/crithab/>. Accessed November 28, 2018.

U.S. Geological Survey (USGS)

2018 Hydrologic Unit Maps. Available at <https://water.usgs.gov/GIS/huc.html>. Accessed December 3, 2018.

Williams, D. F. 1986. Mammalian Species of Special Concern in California. California Department of Fish and Game. Wildlife Management Division Administrative Report 86-1. 112 pp.

Should you have any questions or comments regarding this memo, or if additional information is required, please feel free to contact me.

Sincerely,

Arthur Popp

Senior Biologist

ATTACHMENT A**Biological Resources Data Base Reviews**

California Natural Diversity Database

Rare and Endangered Plants of California

Information for Planning and Conservation

California Natural Diversity Database



Selected Elements by Scientific Name

California Department of Fish and Wildlife

California Natural Diversity Database



Query Criteria: Quad (Canoga Park (3411825) OR Beverly Hills (3411814) OR Calabasas (3411826) OR San Fernando (3411834) OR Malibu Beach (3411816) OR Topanga (3411815) OR Santa Susana (3411836) OR Oat Mountain (3411835) OR Van Nuys (3411824))

Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
<i>Agelaius tricolor</i> tricolored blackbird	ABPBXB0020	None	Threatened	G2G3	S1S2	SSC
<i>Aglaothorax longipennis</i> Santa Monica shieldback katydid	IIORT32020	None	None	G1G2	S1S2	
<i>Aimophila ruficeps canescens</i> southern California rufous-crowned sparrow	ABPBX91091	None	None	G5T3	S3	WL
<i>Anaxyrus californicus</i> arroyo toad	AAABB01230	Endangered	None	G2G3	S2S3	SSC
<i>Anniella sp.</i> California legless lizard	ARACC01070	None	None	G3G4	S3S4	SSC
<i>Anniella stebbinsi</i> southern California legless lizard	ARACC01060	None	None	G3	S3	SSC
<i>Antrozous pallidus</i> pallid bat	AMACC10010	None	None	G5	S3	SSC
<i>Aquila chrysaetos</i> golden eagle	ABNKC22010	None	None	G5	S3	FP
<i>Aspidoscelis tigris stejnegeri</i> coastal whiptail	ARACJ02143	None	None	G5T5	S3	SSC
<i>Astragalus brauntonii</i> Braunton's milk-vetch	PDFAB0F1G0	Endangered	None	G2	S2	1B.1
<i>Astragalus pycnostachyus var. lanosissimus</i> Ventura Marsh milk-vetch	PDFAB0F7B1	Endangered	Endangered	G2T1	S1	1B.1
<i>Astragalus tener var. titi</i> coastal dunes milk-vetch	PDFAB0F8R2	Endangered	Endangered	G2T1	S1	1B.1
<i>Athene cunicularia</i> burrowing owl	ABNSB10010	None	None	G4	S3	SSC
<i>Atriplex coulteri</i> Coulter's saltbush	PDCHE040E0	None	None	G3	S1S2	1B.2
<i>Atriplex pacifica</i> south coast saltscale	PDCHE041C0	None	None	G4	S2	1B.2
<i>Atriplex parishii</i> Parish's brittlescale	PDCHE041D0	None	None	G1G2	S1	1B.1
<i>Atriplex serenana var. davidsonii</i> Davidson's saltscale	PDCHE041T1	None	None	G5T1	S1	1B.2
<i>Baccharis malibuensis</i> Malibu baccharis	PDAST0W0W0	None	None	G1	S1	1B.1



Selected Elements by Scientific Name
California Department of Fish and Wildlife
California Natural Diversity Database



Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
<i>Berberis nevinii</i> Nevin's barberry	PDBER060A0	Endangered	Endangered	G1	S1	1B.1
<i>Bombus crotchii</i> Crotch bumble bee	IIHYM24480	None	None	G3G4	S1S2	
<i>Buteo swainsoni</i> Swainson's hawk	ABNKC19070	None	Threatened	G5	S3	
California Walnut Woodland California Walnut Woodland	CTT71210CA	None	None	G2	S2.1	
<i>Calochortus clavatus var. gracilis</i> slender mariposa-lily	PMLIL0D096	None	None	G4T2T3	S2S3	1B.2
<i>Calochortus fimbriatus</i> late-flowered mariposa-lily	PMLIL0D1J2	None	None	G3	S3	1B.3
<i>Calochortus plummerae</i> Plummer's mariposa-lily	PMLIL0D150	None	None	G4	S4	4.2
<i>Carolella busckana</i> Busck's gallmoth	IILEM2X090	None	None	G1G3	SH	
<i>Catostomus santaanae</i> Santa Ana sucker	AFCJC02190	Threatened	None	G1	S1	
<i>Centromadia parryi ssp. australis</i> southern tarplant	PDAST4R0P4	None	None	G3T2	S2	1B.1
<i>Chloropyron maritimum ssp. maritimum</i> salt marsh bird's-beak	PDSCR0J0C2	Endangered	Endangered	G4?T1	S1	1B.2
<i>Chorizanthe parryi var. fernandina</i> San Fernando Valley spineflower	PDPGN040J1	Proposed Threatened	Endangered	G2T1	S1	1B.1
<i>Cicindela hirticollis gravida</i> sandy beach tiger beetle	IICOL02101	None	None	G5T2	S2	
Cismontane Alkali Marsh Cismontane Alkali Marsh	CTT52310CA	None	None	G1	S1.1	
<i>Coccyzus americanus occidentalis</i> western yellow-billed cuckoo	ABNRB02022	Threatened	Endangered	G5T2T3	S1	
<i>Coelus globosus</i> globose dune beetle	IICOL4A010	None	None	G1G2	S1S2	
<i>Corynorhinus townsendii</i> Townsend's big-eared bat	AMACC08010	None	None	G3G4	S2	SSC
<i>Danaus plexippus pop. 1</i> monarch - California overwintering population	IILEPP2012	None	None	G4T2T3	S2S3	
<i>Deinandra minthornii</i> Santa Susana tarplant	PDAST4R0J0	None	Rare	G2	S2	1B.2
<i>Diadophis punctatus modestus</i> San Bernardino ringneck snake	ARADB10015	None	None	G5T2T3	S2?	
<i>Dithyrea maritima</i> beach spectaclepod	PDBRA10020	None	Threatened	G1	S1	1B.1



Selected Elements by Scientific Name
California Department of Fish and Wildlife
California Natural Diversity Database



Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
<i>Dodecahema leptoceras</i> slender-horned spineflower	PDPGN0V010	Endangered	Endangered	G1	S1	1B.1
<i>Dudleya blochmaniae ssp. blochmaniae</i> Blochman's dudleya	PDCRA04051	None	None	G3T2	S2	1B.1
<i>Dudleya cymosa ssp. marcescens</i> marcescent dudleya	PDCRA040A3	Threatened	Rare	G5T2	S2	1B.2
<i>Dudleya cymosa ssp. ovatifolia</i> Santa Monica dudleya	PDCRA040A5	Threatened	None	G5T1	S1	1B.1
<i>Dudleya multicaulis</i> many-stemmed dudleya	PDCRA040H0	None	None	G2	S2	1B.2
<i>Emys marmorata</i> western pond turtle	ARAAD02030	None	None	G3G4	S3	SSC
<i>Eucyclogobius newberryi</i> tidewater goby	AFCQN04010	Endangered	None	G3	S3	SSC
<i>Euderma maculatum</i> spotted bat	AMACC07010	None	None	G4	S3	SSC
<i>Eumops perotis californicus</i> western mastiff bat	AMACD02011	None	None	G5T4	S3S4	SSC
<i>Euphydryas editha quino</i> quino checkerspot butterfly	IILEPK405L	Endangered	None	G5T1T2	S1S2	
<i>Falco peregrinus anatum</i> American peregrine falcon	ABNKD06071	Delisted	Delisted	G4T4	S3S4	FP
<i>Gila orcuttii</i> arroyo chub	AFCJB13120	None	None	G2	S2	SSC
<i>Harpagonella palmeri</i> Palmer's grapplinghook	PDBOR0H010	None	None	G4	S3	4.2
<i>Horkelia cuneata var. puberula</i> mesa horkelia	PDR0S0W045	None	None	G4T1	S1	1B.1
<i>Isocoma menziesii var. decumbens</i> decumbent goldenbush	PDAST57091	None	None	G3G5T2T3	S2	1B.2
<i>Lampropeltis zonata (pulchra)</i> California mountain kingsnake (San Diego population)	ARADB19063	None	None	G4G5	S1S2	WL
<i>Lasionycteris noctivagans</i> silver-haired bat	AMACC02010	None	None	G5	S3S4	
<i>Lasiurus blossevillii</i> western red bat	AMACC05060	None	None	G5	S3	SSC
<i>Lasiurus cinereus</i> hoary bat	AMACC05030	None	None	G5	S4	
<i>Lasthenia glabrata ssp. coulteri</i> Coulter's goldfields	PDAST5L0A1	None	None	G4T2	S2	1B.1
<i>Lepidium virginicum var. robinsonii</i> Robinson's pepper-grass	PDBRA1M114	None	None	G5T3	S3	4.3



Selected Elements by Scientific Name
California Department of Fish and Wildlife
California Natural Diversity Database



Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
<i>Lupinus paynei</i> Payne's bush lupine	PDFAB2B580	None	None	G1Q	S1	1B.1
<i>Macrotus californicus</i> California leaf-nosed bat	AMACB01010	None	None	G4	S3	SSC
<i>Malacothamnus davidsonii</i> Davidson's bush-mallow	PDMAL0Q040	None	None	G2	S2	1B.2
<i>Microtus californicus stephensi</i> south coast marsh vole	AMAFF11035	None	None	G5T1T2	S1S2	SSC
<i>Monardella hypoleuca ssp. hypoleuca</i> white-veined monardella	PDLAM180A5	None	None	G4T3	S3	1B.3
<i>Myotis ciliolabrum</i> western small-footed myotis	AMACC01140	None	None	G5	S3	
<i>Myotis yumanensis</i> Yuma myotis	AMACC01020	None	None	G5	S4	
<i>Nama stenocarpa</i> mud nama	PDHYD0A0H0	None	None	G4G5	S1S2	2B.2
<i>Navarretia ojaiensis</i> Ojai navarretia	PDPLM0C130	None	None	G2	S2	1B.1
<i>Neotoma lepida intermedia</i> San Diego desert woodrat	AMAFF08041	None	None	G5T3T4	S3S4	SSC
<i>Nolina cismontana</i> chaparral nolina	PMAGA080E0	None	None	G3	S3	1B.2
<i>Oncorhynchus mykiss irideus pop. 10</i> steelhead - southern California DPS	AFCHA0209J	Endangered	None	G5T1Q	S1	
<i>Orcuttia californica</i> California Orcutt grass	PMPOA4G010	Endangered	Endangered	G1	S1	1B.1
<i>Pentachaeta lyonii</i> Lyon's pentachaeta	PDAST6X060	Endangered	Endangered	G1	S1	1B.1
<i>Perognathus longimembris brevinasus</i> Los Angeles pocket mouse	AMAFD01041	None	None	G5T1T2	S1S2	SSC
<i>Phrynosoma blainvillii</i> coast horned lizard	ARACF12100	None	None	G3G4	S3S4	SSC
<i>Polioptila californica californica</i> coastal California gnatcatcher	ABPBJ08081	Threatened	None	G4G5T2Q	S2	SSC
<i>Quercus dumosa</i> Nuttall's scrub oak	PDFAG050D0	None	None	G3	S3	1B.1
<i>Rana draytonii</i> California red-legged frog	AAABH01022	Threatened	None	G2G3	S2S3	SSC
<i>Rana muscosa</i> southern mountain yellow-legged frog	AAABH01330	Endangered	Endangered	G1	S1	WL
<i>Rhinichthys osculus ssp. 3</i> Santa Ana speckled dace	AFCJB3705K	None	None	G5T1	S1	SSC



Selected Elements by Scientific Name
California Department of Fish and Wildlife
California Natural Diversity Database



Species	Element Code	Federal Status	State Status	Global Rank	State Rank	Rare Plant Rank/CDFW SSC or FP
<i>Riparia riparia</i> bank swallow	ABPAU08010	None	Threatened	G5	S2	
<i>Riversidian Alluvial Fan Sage Scrub</i> Riversidian Alluvial Fan Sage Scrub	CTT32720CA	None	None	G1	S1.1	
<i>Sidalcea neomexicana</i> salt spring checkerbloom	PDMAL110J0	None	None	G4	S2	2B.2
<i>Socalchemmis gertschi</i> Gertsch's socalchemmis spider	ILARAU7010	None	None	G1	S1	
<i>Southern California Coastal Lagoon</i> Southern California Coastal Lagoon	CALE1220CA	None	None	GNR	SNR	
<i>Southern California Steelhead Stream</i> Southern California Steelhead Stream	CARE2310CA	None	None	GNR	SNR	
<i>Southern Coast Live Oak Riparian Forest</i> Southern Coast Live Oak Riparian Forest	CTT61310CA	None	None	G4	S4	
<i>Southern Coastal Salt Marsh</i> Southern Coastal Salt Marsh	CTT52120CA	None	None	G2	S2.1	
<i>Southern Cottonwood Willow Riparian Forest</i> Southern Cottonwood Willow Riparian Forest	CTT61330CA	None	None	G3	S3.2	
<i>Southern Mixed Riparian Forest</i> Southern Mixed Riparian Forest	CTT61340CA	None	None	G2	S2.1	
<i>Southern Sycamore Alder Riparian Woodland</i> Southern Sycamore Alder Riparian Woodland	CTT62400CA	None	None	G4	S4	
<i>Southern Willow Scrub</i> Southern Willow Scrub	CTT63320CA	None	None	G3	S2.1	
<i>Spea hammondi</i> western spadefoot	AAABF02020	None	None	G3	S3	SSC
<i>Spermolepis lateriflora</i> western bristly scaleseed	PDAP123080	None	None	G5	SH	2A
<i>Symphotrichum greatae</i> Greata's aster	PDASTE80U0	None	None	G2	S2	1B.3
<i>Taricha torosa</i> Coast Range newt	AAAAF02032	None	None	G4	S4	SSC
<i>Thamnophis hammondi</i> two-striped gartersnake	ARADB36160	None	None	G4	S3S4	SSC
<i>Thelypteris puberula var. sonorensis</i> Sonoran maiden fern	PPTHE05192	None	None	G5T3	S2	2B.2
<i>Valley Needlegrass Grassland</i> Valley Needlegrass Grassland	CTT42110CA	None	None	G3	S3.1	
<i>Valley Oak Woodland</i> Valley Oak Woodland	CTT71130CA	None	None	G3	S2.1	
<i>Vireo bellii pusillus</i> least Bell's vireo	ABPBW01114	Endangered	Endangered	G5T2	S2	

Record Count: 102

Rare and Endangered Plants of California

California Native Plant Society
Inventory of Rare and Endangered Plants

9-Quad Search: Canoga Park, Beverly Hills, Calabasas, San Fernando, Malibu Beach, Topanga, Santa Susana, Oat Mountain, Van Nuys

Scientific Name	Common Name	Rare Plant Rank	State Listing (CESA)	Federal Listing (FESA)
<i>Astragalus brauntonii</i>	Braunton's milk-vetch	1B.1	None	Endangered
<i>Astragalus pycnostachyus</i> var. <i>lanosissimus</i>	Ventura marsh milk-vetch	1B.1	Endangered	Endangered
<i>Astragalus tener</i> var. <i>titi</i>	coastal dunes milk-vetch	1B.1	Endangered	Endangered
<i>Atriplex coulteri</i>	Coulter's saltbush	1B.2	None	None
<i>Atriplex pacifica</i>	South Coast saltscale	1B.2	None	None
<i>Atriplex parishii</i>	Parish's brittle-scale	1B.1	None	None
<i>Atriplex serenana</i> var. <i> davidsonii</i>	Davidson's saltscale	1B.2	None	None
<i>Baccharis malibuensis</i>	Malibu baccharis	1B.1	None	None
<i>Berberis nevinii</i>	Nevin's barberry	1B.1	Endangered	Endangered
<i>Calandrinia breweri</i>	Brewer's calandrinia	4.2	None	None
<i>Calochortus catalinae</i>	Catalina mariposa lily	4.2	None	None
<i>Calochortus clavatus</i> var. <i> gracilis</i>	slender mariposa lily	1B.2	None	None
<i>Calochortus fimbriatus</i>	late-flowered mariposa lily	1B.3	None	None
<i>Calochortus plummerae</i>	Plummer's mariposa lily	4.2	None	None
<i>Calystegia peirsonii</i>	Peirson's morning-glory	4.2	None	None
<i>Camissoniopsis lewisii</i>	Lewis' evening-primrose	3	None	None
<i>Canbya candida</i>	white pygmy-poppy	4.2	None	None
<i>Centromadia parryi</i> ssp. <i> australis</i>	southern tarplant	1B.1	None	None
<i>Cercocarpus betuloides</i> var. <i> blancheae</i>	island mountain-mahogany	4.3	None	None
<i>Chloropyron maritimum</i> ssp. <i> maritimum</i>	salt marsh bird's-beak	1B.2	Endangered	Endangered
<i>Chorizanthe parryi</i> var. <i> fernandina</i>	San Fernando Valley spineflower	1B.1	Endangered	Candidate
<i>Convolvulus simulans</i>	small-flowered morning-glory	4.2	None	None
<i>Deinandra minthornii</i>	Santa Susana tarplant	1B.2	Rare	None
<i>Dithyrea maritima</i>	beach spectaclepod	1B.1	Threatened	None
<i>Dodecahema leptoceras</i>	slender-horned spineflower	1B.1	Endangered	Endangered
<i>Dudleya blochmaniae</i> ssp. <i> blochmaniae</i>	Blochman's dudleya	1B.1	None	None
<i>Dudleya cymosa</i> ssp. <i> agouensis</i>	Agoura Hills dudleya	1B.2	None	Threatened
<i>Dudleya cymosa</i> ssp. <i> marcescens</i>	marcescent dudleya	1B.2	Rare	Threatened
<i>Dudleya cymosa</i> ssp. <i> ovatifolia</i>	Santa Monica dudleya	1B.1	None	Threatened
<i>Dudleya multicaulis</i>	many-stemmed dudleya	1B.2	None	None
<i>Hordeum intercedens</i>	vernal barley	3.2	None	None
<i>Horkelia cuneata</i> var. <i> puberula</i>	mesa horkelia	1B.1	None	None
<i>Isocoma menziesii</i> var. <i> decumbens</i>	decumbent goldenbush	1B.2	None	None
<i>Juglans californica</i>	Southern California black walnut	4.2	None	None
<i>Lasthenia glabrata</i> ssp. <i> coulteri</i>	Coulter's goldfields	1B.1	None	None
<i>Lepidium virginicum</i> var. <i> robinsonii</i>	Robinson's pepper-grass	4.3	None	None
<i>Lilium humboldtii</i> ssp. <i> ocellatum</i>	ocellated Humboldt lily	4.2	None	None

Scientific Name	Common Name	Rare Plant Rank	State Listing (CESA)	Federal Listing (FESA)
<i>Lupinus paynei</i>	Payne's bush lupine	1B.1	None	None
<i>Malacothamnus davidsonii</i>	Davidson's bush-mallow	1B.2	None	None
<i>Monardella hypoleuca ssp. hypoleuca</i>	white-veined monardella	1B.3	None	None
<i>Nama stenocarpa</i>	mud nama	2B.2	None	None
<i>Navarretia ojaiensis</i>	Ojai navarretia	1B.1	None	None
<i>Nolina cismontana</i>	chaparral nolina	1B.2	None	None
<i>Pentachaeta lyonii</i>	Lyon's pentachaeta	1B.1	Endangered	Endangered
<i>Phacelia hubbyi</i>	Hubby's phacelia	4.2	None	None
<i>Quercus dumosa</i>	Nuttall's scrub oak	1B.1	None	None
<i>Sidalcea neomexicana</i>	salt spring checkerbloom	2B.2	None	None
<i>Spermolepis lateriflora</i>	western bristly scaleseed	2A	None	None
<i>Symphyotrichum greatae</i>	Greata's aster	1B.3	None	None
<i>Thelypteris puberula var. sonorensis</i>	Sonoran maiden fern	2B.2	None	None

CNPS, Rare Plant Program. 2019. Inventory of Rare and Endangered Plants (online edition, v8-02). California Native Plant Society, Sacramento, CA. Website <http://www.rareplants.cnps.org> [accessed 26 July 2019].

Information for Planning and Conservation

IPaC Information for Planning and Consultation U.S. Fish & Wildlife Service

Last login May 20, 2019 05:15 PM MDT

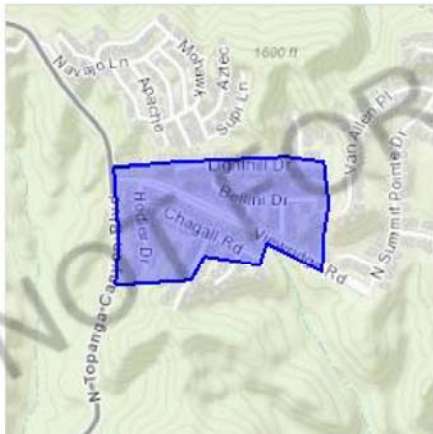
IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Los Angeles County, California



Local office

Ventura Fish And Wildlife Office

☎ (805) 644-1766

📅 (805) 644-3958

2493 Portola Road, Suite B
Ventura, CA 93003-7726

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population, even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species

¹ and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries²).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact [NOAA Fisheries](#) for [species under their jurisdiction](#).

1. Species listed under the [Endangered Species Act](#) are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the [listing status page](#) for more information.
2. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Birds

NAME	STATUS
California Condor <i>Gymnogyps californianus</i> There is final critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/8193	Endangered
Coastal California Gnatcatcher <i>Polioptila californica californica</i> There is final critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/8178	Threatened
Least Bell's Vireo <i>Vireo bellii pusillus</i> There is final critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/5945	Endangered
Southwestern Willow Flycatcher <i>Empidonax traillii extimus</i> There is final critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/6749	Endangered

Amphibians

NAME	STATUS
California Red-legged Frog <i>Rana draytonii</i> There is final critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/2891	Threatened

Crustaceans

NAME	STATUS
Riverside Fairy Shrimp <i>Streptocephalus woottoni</i> There is final critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/8148	Endangered
Vernal Pool Fairy Shrimp <i>Branchinecta lynchi</i> There is final critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/498	Threatened

Flowering Plants

NAME	STATUS
Braunton's Milk-vetch <i>Astragalus brauntonii</i> There is final critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/5674	Endangered
California Orcutt Grass <i>Orcuttia californica</i> No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/4923	Endangered
Gambel's Watercress <i>Rorippa gambellii</i> No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/4201	Endangered
Lyon's Pentachaeta <i>Pentachaeta lyonii</i> There is final critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/4699	Endangered
Marsh Sandwort <i>Arenaria paludicola</i> No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/2229	Endangered
Spreading Navarretia <i>Navarretia fossalis</i> There is final critical habitat for this species. Your location is outside the critical habitat. https://ecos.fws.gov/ecp/species/1334	Threatened

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

THERE ARE NO CRITICAL HABITATS AT THIS LOCATION.

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act

¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern <http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>
- Measures for avoiding and minimizing impacts to birds <http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>
- Nationwide conservation measures for birds <http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern](#) (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME

BREEDING SEASON (IF A BREEDING SEASON IS INDICATED FOR A BIRD ON YOUR LIST, THE BIRD MAY BREED IN YOUR PROJECT AREA SOMETIME WITHIN THE TIMEFRAME SPECIFIED, WHICH IS A VERY LIBERAL ESTIMATE OF THE DATES INSIDE WHICH THE BIRD BREEDS ACROSS ITS ENTIRE RANGE. "BREEDS ELSEWHERE" INDICATES THAT THE BIRD DOES NOT LIKELY BREED IN YOUR PROJECT AREA.)

Allen's Hummingbird *Selasphorus sasin*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9637>

Breeds Feb 1 to Jul 15

California Thrasher *Toxostoma redivivum*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Breeds Jan 1 to Jul 31

Common Yellowthroat *Geothlypis trichas sinuosa*

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

<https://ecos.fws.gov/ecp/species/2084>

Breeds May 20 to Jul 31

Lawrence's Goldfinch *Carduelis lawrencei*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9464>

Breeds Mar 20 to Sep 20

Lewis's Woodpecker *Melanerpes lewis*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9408>

Breeds Apr 20 to Sep 30

Nuttall's Woodpecker *Picoides nuttallii*

This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

<https://ecos.fws.gov/ecp/species/9410>

Breeds Apr 1 to Jul 20

Oak Titmouse *Baeolophus inornatus*

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9656>

Breeds Mar 15 to Jul 15

Rufous Hummingbird <i>Trochilorus rufus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8002	Breeds elsewhere
Song Sparrow <i>Melospiza melodia</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds Feb 20 to Sep 5
Spotted Towhee <i>Pipilo maculatus clementae</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/4243	Breeds Apr 15 to Jul 20
Wrentit <i>Chamaea fasciata</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Mar 15 to Aug 10

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (-)

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.





Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) and/or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [AKN Phenology Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS AT THIS LOCATION.

Fish hatcheries

THERE ARE NO FISH HATCHERIES AT THIS LOCATION.

Wetlands in the National Wetlands Inventory

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

THERE ARE NO KNOWN WETLANDS AT THIS LOCATION.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

ATTACHMENT B

Regional Special-Status Species and Sensitive Natural Communities

Table A – Special-Status Plants and Sensitive Natural Communities

Table B – Special Status Wildlife

Table A. Special-Status Plants and Sensitive Natural Communities

Common Name Scientific Name²	Status³	General Habitat Description⁴
Plants		
Braunton's milk- vetch <i>Astragalus brauntonii</i>	Federal: FE State: None CRPR 1B.1	Closed-cone coniferous forest, chaparral, coastal scrub, and valley and foothill grassland. Prefers recent burns or disturbed areas, in stiff gravelly clay soils overlying granite or limestone. Occurs between 4-640 meters (13-2,100 feet). Blooms January-August.
Ventura Marsh milk-vetch <i>Astragalus pycnostachyus</i> <i>var. lanosissimus</i>	Federal: FE State: SE CRPR 1B.1	Coastal dunes, coastal scrub, and edges of coastal salt or brackish marshes and swamps. Occurs between 1-35 meters (3-115 feet). Blooms June-October.
coastal dunes milk-vetch <i>Astragalus tener</i> <i>var. titi</i>	Federal: FE State: SE Other: CRPR 1B.1	Often vernal mesic areas in sandy coastal bluff scrub, coastal dunes, and mesic coastal prairie. Occurs between 1-50 meters (3-165 feet). Blooms March-May.
Coulter's saltbush <i>Atriplex coulteri</i>	Federal: None State: None CRPR: 1B.2	Often in alkaline or clay habitats of coastal bluff scrub, coastal dunes, coastal scrub and valley and foothill grasslands. Occurs between 3-460 meters (10-1,510 feet). Blooms March-October.
south coast saltscale <i>Atriplex pacifica</i>	Federal: None State: None CRPR: 1B.2	Alkali sink, coastal sage scrub, wetland-riparian playas and coastal habitats. Occurs between 0-140 meters (0-460 feet). Blooms March-October.
Parish's brittlescale <i>Atriplex parishii</i>	Federal: None State: None CRPR: 1B.1	Alkaline chenopod scrub, playas, and vernal pools. Occurs between 25-1,900 meters (80-6,230 feet). Blooms June-October.
Davidon's saltscale <i>Atriplex serenana</i> <i>var. davidsonii</i>	Federal: None State: None CRPR: 1B.2	Coastal bluff scrub and coastal scrub. Prefers alkaline soil. Occurs between 10-200 meters (30-660 feet). Blooms April-October.
Malibu baccharis <i>Baccharis malibuensis</i>	Federal: None State: None CRPR 1B.1	Chaparral, cismontane woodland, coastal scrub, and riparian woodland. Occurs between 150–305 meters (500-1,000 feet). Blooms in August.
Brewer's calandrinia <i>Calandrinia breweri</i>	Federal: None State: None CRPR 4.2	Sandy or loamy, disturbed sites and burns in chaparral and coastal scrub. Occurs between 10–1220 meters (33–4,025 feet). Blooms January–June.

Table A. Special-Status Plants and Sensitive Natural Communities

Common Name Scientific Name²	Status³	General Habitat Description⁴
Catalina mariposa lily <i>Calochortus catalinae</i>	Federal: None State: None CRPR 4.2	Chaparral, cismontane woodland, coastal scrub, and valley and foothill grasslands. Occurs at 15-700 meters (50-2,300 feet). Blooms February-June.
slender mariposa-lily <i>Calochortus clavatus</i> var. <i>gracilis</i>	Federal: None State: None CRPR 1B.2	Chaparral and coastal scrub, in shaded foothill canyons, often on grassy slopes within other habitats. Occurs between 320-1,000 meters (1,050-3,280 feet). Blooms March-June.
Plummer’s mariposa-lily <i>Calochortus plummerae</i>	Federal: None State: None CRPR 4.2	Coastal scrub, chaparral, valley and foothill grassland, cismontane woodland, lower montane coniferous forest, on rocky and sandy sites (granitic or alluvial material). Occurs between 100–1,700 meters (330-5,580 feet). Blooms May-July.
Lewis’ evening-primrose <i>Camissoniopsis lewisii</i>	Federal: None State: None CRPR 3	Sandy or clay soils in coastal bluff scrub, Cismontane woodland, coastal dunes, coastal scrub and valley and foothill grasslands. Occurs between 0–300 meters (0–985 feet). Blooms March-June.
southern tarplant <i>Centromadia parryi</i> ssp. <i>australis</i>	Federal: None State: None CRPR 1B.1	Found in margins of marshes and swamps, valley and foothill grassland and vernal pools. Occurs between 0–480 meters (0-1,570 feet). Blooms May-November.
island mountain-mahogany <i>Cercocarpus betuloides</i> var. <i>blancheae</i>	Federal: None State: None CRPR 4.3	Closed-cone coniferous forests and chaparral. Occurs from 30–600 meters (99–1980 feet). Blooms February–May.
salt marsh bird’s-beak <i>Chloropyron maritimum</i> ssp. <i>maritimum</i>	Federal: FE State: SE CRPR 1B.2	Coastal dunes and coastal salt marshes and swamps. Occurs between 0-30 meters (0-100 feet). Blooms May-October.
San Fernando Valley spineflower <i>Chorizanthe parryi</i> var. <i>fernandina</i>	Federal: FC State: SE CRPR 1B.1	Sandy coastal scrub and valley and foothill grasslands. Occurs 150-1,220 meters (490-4,000 feet). Blooms April - July
small-flowered morning-glory <i>Convolvulus simulans</i>	Federal: None State: None CRPR 4.2	Prefers clay, serpentine seeps. Chaparral, coastal scrub and valley and foothill grassland. Occurs between 30-700 meters (100-2,300 feet). Blooms March-July.
Santa Susana tarplant <i>Deinandra minthornii</i>	Federal: None State: SR CRPR 1B.2	Rocky soils within chaparral and coastal scrub. Occurs between 280–760 meters (925–2,510 feet). Blooms July–November.

Table A. Special-Status Plants and Sensitive Natural Communities

Common Name Scientific Name²	Status³	General Habitat Description⁴
beach spectaclepod <i>Dithyrea maritima</i>	Federal: None State: ST CRPR 1B.1	Coastal dunes and sandy coastal scrub. Occurs between 3–50 meters (10–165 feet). Blooms March-May.
slender-horned spineflower <i>Dodecahema leptoceras</i>	Federal: FE State: SE CRPR 1B.1	Sandy chaparral, cismontane woodland, and alluvial fan coastal scrub. Occurs between 200-760 meters (890–2,510 feet). Blooms April–June.
Blochman’s dudleya <i>Dudleya blochmaniae</i> ssp. <i>blochmaniae</i>	Federal: None State: None CRPR 1B.1	Rocky, often clay or serpentinite soils in coastal bluff scrub, chaparral, coastal scrub, and valley and foothill grasslands. Occurs between 5-450 meters (15-1,485 feet). Blooms April–June.
Agoura Hills dudleya <i>Dudleya cymosa</i> ssp. <i>agourensis</i>	Federal: FT State: None CRPR: 1B.2	Rocky, volcanic substrates in chaparral and cismontane woodlands. Occurs between 200-500 meters (660-1,649 feet). Blooms May-June.
marcescent dudleya <i>Dudleya cymosa</i> ssp. <i>marcescens</i>	Federal: FT State: SR CRPR 1B.2	Volcanic or rocky soils in chaparral. Occurs between 150–52 meters (495–1,700 feet). Blooms April-July.
Santa Monica dudleya <i>Dudleya cymosa</i> ssp. <i>ovatifolia</i>	Federal: FT State: None CRPR 1B.1	Volcanic or sedimentary, rocky soils in chaparral and coastal scrub. Occurs between 150–1675 meters (495–5,525 feet). Blooms March–June.
many-stemmed dudleya <i>Dudleya multicaulis</i>	Federal: None State: None CRPR 1B.2	Chaparral, coastal scrub, valley and foothill grassland. Often in clay soils. Occurs between 15-790 meters (50-2,520 feet). Blooms April-July.
vernal barley <i>Hordeum intercedens</i>	Federal: None State: None CRPR 3.2	Coastal dunes, coastal scrub, valley and foothill grasslands in saline flats and depressions, and vernal pools. Occurs between 5-1,000 meters (15-3,280 feet). Blooms March–June.
mesa horkelia <i>Horkelia cuneata</i> var. <i>puberula</i>	Federal: None State: None CRPR 1B.1	Prefers sandy or gravelly sites in chaparral, cismontane woodland, and coastal scrub. Occurs between 70-810 meters (230-2,660 feet). Blooms from February-September.
decumbent goldenbush <i>Isocoma menziesii</i> var. <i>decumbens</i>	Federal: None State: None CRPR 1B.2	Prefers chaparral and coastal scrub (sandy, often in disturbed areas). Occurs between 10-135 meters (30-450 feet). Blooms April-November.
Southern California black walnut <i>Juglans californica</i>	Federal: None State: None CRPR 4.2	Prefers alluvial sites in chaparral, cismontane woodlands, coastal scrub, and riparian woodland. Occurs between 50-900

Table A. Special-Status Plants and Sensitive Natural Communities

Common Name Scientific Name²	Status³	General Habitat Description⁴
		meters (160-2,950 feet). Blooms March-August.
Coulter's goldfields <i>Lasthenia glabrata</i> ssp. <i>coulteri</i>	Federal: None State: None CRPR 1B.1	Coastal salt marshes, playas, and vernal pools. Occurs between 1-1,220 meters (3-4,000 feet). Blooms February-June.
ocellated Humboldt lily <i>Lilium humboldtii</i> ssp. <i>ocellatum</i>	Federal: None State: None CRPR 4.2	Prefers openings in chaparral, cismontane woodland, coastal scrub, lower montane coniferous forest, and riparian woodland. Occurs between 30-1,800 meters (100-5,900 feet). Blooms March-August.
Davidson's bush-mallow <i>Malacothamnus davidsonii</i>	Federal: None State: None CRPR 1B.2	Chaparral, cismontane woodland, coastal scrub, and riparian woodland. Occurs between 185-855 meters (610-2,800 feet). Blooms June-January.
white-veined monardella <i>Monardella hypoleuca</i> ssp. <i>Hypoleuca</i>	Federal: FT State: None CRPR 1B.3	Lower montane coniferous forest in scree, disturbed areas, rocky or gravelly areas, and roadside habitats. Occurs between 975-2,920 meters (3,200-9,580 feet). Blooms May-August.
mud nama <i>Nama stenocarpa</i>	Federal: None State: None CRPR 2B.2	Marshes and swamps; lake margins and riverbanks. Occurs between 5-500 meters (15-1,640 feet). Blooms January-July.
Ojai navarretia <i>Navarretia ojaiensis</i>	Federal: None State: None CRPR 1B.1	Prefers openings in chaparral and coastal scrub, valley and foothill grasslands. Occurs between 275-620 meters (920-2,030 feet). Blooms May-July.
chaparral nolina <i>Nolina cismontana</i>	Federal: None State: None Other: CRPR 1B.2	Prefers sandstone or gabbro chaparral and coastal scrub. Occurs between 140-1,275 meters (460-4,180 feet). Blooms (March) May-July.
Lyon's pentachaeta <i>Pentachaeta lyonii</i>	Federal: FE State: SE CRPR 1B.1	Prefers rocky, clay sites in chaparral, coastal scrub and valley and foothill grasslands. Occurs between 30-690 meters (98-2264 feet). Blooms February-August.
Hubby's phacelia <i>Phacelia hubbyi</i>	Federal: None State: None CRPR 4.2	Prefers gravelly, rocky, or talus sites in chaparral, coastal scrub, and valley and foothill grasslands. Occurs between 0-1,000 meters (0-3,280 feet). Blooms April-July.
Nuttall's scrub oak <i>Quercus dumosa</i>	Federal: None State: None CRPR 1B.1	Prefers sandy or clay loam sites in closed-cone coniferous forest, chaparral, and coastal scrub. Occurs between 15-400

Table A. Special-Status Plants and Sensitive Natural Communities

Common Name Scientific Name²	Status³	General Habitat Description⁴
		meters (50-1,310 feet). Blooms February-August.
Salt Spring checkerbloom <i>Sidalcea neomexicana</i>	Federal: None State: None CRPR 2B.2	Prefers alkaline or mesic sites in chaparral, coastal scrub, lower montane coniferous forest, Mojavean desert scrub, and playas. Occurs between 15-1,530 meters (50-5,020 feet). Blooms March-June.
western bristly scaleseed <i>Spermolepis lateriflora</i>	Federal: None State: None CRPR 2A	Rocky or sandy. Sonoran desert scrub. Occurs between 365–670 meters (1,205–2,210 feet). Blooms March–April.
Greata’s aster <i>Symphotrichum greatae</i>	Federal: None State: None CRPR 1B.3	Mesic sites in broad-leaved upland forest, chaparral, cismontane woodland, lower montane coniferous forest, and riparian woodland. Occurs between 300-2,010 meters (980-6,590 feet). Blooms June-October.
Sonoran maiden fern <i>Thelypteris puberula</i> var. <i>sonorensis</i>	Federal: None State: None CRPR 2B.2	Meadows and seeps (seeps and streams). Occurs between 50–610 meters (165–2,015 feet). Blooms January–September.
Nevin’s barberry <i>Berberis nevinii</i>	Federal: FE State: SE CRPR 1B.1	Prefers sandy or gravelly. Chaparral, cismontane woodland, coastal scrub, and riparian scrub. Occurs between 70- 825 meters (229-2,706 feet). Blooms (February) March-June.
Palmer’s grapplinghook <i>Harpagonella palmeri</i>	Federal: None State: None CRPR 4.2	Prefers clay; open grassy areas within shrubland. Chaparral, coastal scrub, valley and foothill grassland. Occurs between 20-955 meters (65-3,236 feet). Blooms March-May.
Payne’s bush lupine <i>Lupinus paynei</i>	Federal: None State: None CRPR 1B.1	Prefers sandy. Coastal scrub, riparian scrub, valley and foothill grassland. Occurs between 220-420 meters (721-1,377 feet). Blooms March- April (May-July).
Robertson’s pepper-grass <i>Lepidium virginicum</i> L. var. <i>robinsonii</i>	Federal: None State: None CRPR 4.3	Chaparral and coastal scrub. Occurs between 1-855 meters (3-2,805 feet). Blooms January-July.
California Orcutt grass <i>Orcuttia californica</i>	Federal: FE State: SE CRPR: 1B.1	Vernal pools. Occurs between 50-2,170 feet. Blooms April - August.
late-flowered mariposa-lily <i>Calochortus fimbriatus</i>	Federal: None State: None CRPR 1B.3	Often serpentinite. Chaparral, cismontane woodland, and riparian woodland. Occurs

Table A. Special-Status Plants and Sensitive Natural Communities

Common Name Scientific Name²	Status³	General Habitat Description⁴
		between 275- 1905 meters (902-6,250 feet). Blooms June- August.
white pygmy-poppy <i>Canbya candida</i>	Federal: None State: None CRPR 4.2	Gravelly, sandy, granitic. Joshua tree woodland, Mojavean desert scrub, Pinyon and juniper woodland. Occurs between 600-1460 meters (1,968-4,790 feet). Blooms March- June.
Gambel's watercress <i>Rorippa gambellii</i>	Federal: FE State: ST CRPR 1B.1	Marshes and swamps (freshwater or brackish). Occurs between 5-330 meters (16-1,082 feet). Blooms April-October.
marsh sandwort <i>Arenaria paludicola</i>	Federal: FE State: SE CRPR 1B.1	Prefers sandy, openings. Marshes and swamps (freshwater or brackish). Occurs between 3-170 meters (9-557 feet). Blooms May- August.
spreading Navarretia <i>Navarretia fossalis</i>	Federal: FT State: None CRPR: 1B.1	Prefers coastal scrub, valley and foothill grassland, vernal pools, meadows and seeps. San Diego hardpan and San Diego claypan vernal pools; in swales & vernal pools, often surrounded by other habitat types. Occurs between 49 – 2,789 feet. Blooms April – June.
Sensitive Natural Communities		
California Walnut Woodland		
Riversidian Alluvial Fan Sage Scrub		
Southern California Coastal Lagoon		
Cismontane Alkali Marsh		
Southern California Steelhead Stream		
Southern Coast Live Oak Riparian Forest		
Southern Coastal Salt Marsh		
Southern Mixed Riparian Forest		
Southern Sycamore Alder Riparian Woodland		
Southern Willow Scrub		
Southern Cottonwood Willow Riparian Forest		

Table A. Special-Status Plants and Sensitive Natural Communities

Common Name Scientific Name²	Status³	General Habitat Description⁴
Valley Needlegrass Grassland		
Valley Oak Woodland		

¹ Special-Status species known from the CNDDDB and CNPS to occur on the Canoga Park, Beverly Hills, Calabasas, Malibu Beach, Topanga, Santa Susana, Oat Mountain, San Fernando and Van Nuys quadrangles.

² Nomenclature for special-status plant species conforms to CNPS.

³ Sensitivity Status Codes

- Federal **FT** - Federally Threatened under the Federal Endangered Species Act
- FE** - Federally Endangered under the Federal Endangered Species Act
- FC** – A Federal Candidate for listing under the Federal Endangered Species Act
- State **ST** - State Threatened under the California Endangered Species Act
- SE** - State Endangered under the California Endangered Species Act
- CRPR CNPS California Rare Plant Rank (CRPR)
- 1A:** Plants presumed extinct in California
- 1B:** Plants rare, threatened, or endangered in California and elsewhere
- 2:** Plants rare, threatened, or endangered in California, but more common elsewhere
- 3:** Plants more information is needed for
- 4:** Plants of limited distribution – a watch list
- 0.1:** Seriously threatened in California
- 0.2:** Fairly endangered in California
- 0.3:** Not very endangered in California

⁴ General Habitat Descriptions from CNPS (2018).

Table B. Regional Special-Status Wildlife Species¹

Common Name Scientific Name²	Status³	General Habitat Description⁴
Invertebrates		
Santa Monica shieldback katydid <i>Aglaothorax longipennis</i>	Federal: None State: None Other: CNDDB	Endemic to the Santa Monica mountains, specifically to one known population at the mouth of Big Rock Canyon. Inhabits chaparral and streambeds, as well as introduced iceplants.
crotch bumble bee <i>Bombus crotchii</i>	Federal: None State: None Other: CNDDB	Occurs at relatively warm and dry sites, including the inner Coast Range of California and the margins of the Mojave Desert.
Busck's gallmoth <i>Carolella busckana</i>	Federal: None State: None Other: CNDDB	Coastal scrub dune. More specific habitat requirements are currently unknown.
sandy beach tiger beetle <i>Cicindela hirticollis grvida</i>	Federal: None State: None Other: CNDDB	Inhabits areas adjacent to non-brackish water along the coast of California from San Francisco bay to northern Mexico. Inhabits clean, dry, light-colored sand in the upper zone. Subterranean larvae prefer moist sand not affected by wave action.
globose dune beetle <i>Coelus blobosus</i>	Federal: None State: None Other: CNDDB	Inhabits coastal sand dune habitats, from Bodega Head in Sonoma County, south to Ensenada, Mexico. Found in foredunes and sand hummocks, burrowing beneath the sand surface. Most common beneath dune vegetation.
monarch butterfly-California overwintering population <i>Danaus plexippus pop. 1</i>	Federal: None State: None Other: CNDDB	Winter roosts occur along California coast from Mendocino County, south to Baja California, Mexico. Roosts in wind-protected tree groves (eucalyptus, Monterey pine, cypress) with nectar and water sources nearby.
Gertsch's socialchemmis spider <i>Socalchemmis gertschi</i>	Federal: None State: None Other: CNDDB	Inhabits sage scrub, chaparral, oak woodland, and coniferous forest, generally in rocky outcrops or talus slopes in non-arid climates. Known only from Brentwood and Topanga Canyon.
Riverside fairy shrimp <i>Streptocephalus woottoni</i>	Federal: FE State: None	Lives in vernal pools of at least 30 centimeters in depth, from January through March. Found in Riverside and San Diego counties. Also found in northern Baja California.
vernal pool fairy shrimp <i>Branchinecta lynchi</i>	Federal: FT State: None	Occur primarily in vernal pools, seasonal wetlands that fill with water during fall and winter rains and dry up in spring and summer. The majority of pools in any vernal pool complex are not inhabited by the species at

Common Name Scientific Name ²	Status ³	General Habitat Description ⁴
		any one time. Different pools within or between complexes may provide habitat for the fairy shrimp in alternative years, as climatic conditions vary.
Fish		
steelhead – southern California DPS <i>Oncorhynchus mykiss irideus</i>	Federal: FE State: None	Found in Pacific Ocean tributaries from Aleutian Islands in Alaska south to Southern California. Anadromous forms are known as steelhead, freshwater forms as rainbow trout.
Santa Ana speckled dace <i>Rhinichthys osculus ssp.</i> 3	Federal: None State: None	Small springs or streams to large rivers and dep lakes. Prefer clear, well oxygenated water, with movement due to currents or waves. Deep cover and overhead protection are also preferred.
Santa Ana sucker <i>Catostomus santaanae</i>	Federal: FT State: None	Permanent streams and rivers, with depths from a few centimeters to over a meter. Water must be cool with variable flows. Substrates of gravel, rubble and boulders are preferred for foraging and required for breeding.
tidewater goby <i>Eucyclogobius newberryi</i>	Federal: FE State: None Other: SSC	Benthic fish that occurs in small coastal lagoons, lower reaches of streams, and uppermost portions of large bays. It is most abundant in the upper ends of lagoons created by small coastal streams. In lower sections of coastal streams, it occurs in fresh to brackish water (preferably less than 10 ppt).
arroyo chub <i>Gila orcuttii</i>	Federal: FE State: None Other: SSC	Habitat includes headwaters, creeks, and small to medium rivers, often intermittent streams; permanent, small to moderate-sized, moderate to high gradient streams with more than 50% of the habitat as runs and pools < 10 cm deep and reaches of permanent water more than 2 km long; requires some flow.
Amphibians		
arroyo toad <i>Anaxyrus californicus</i>	Federal: FE State: None Other: SSC	Federal listing refers to populations in the San Gabriel, San Jacinto, and San Bernardino Mountains only. Always encountered within a few feet of water. Tadpoles may require 2-4 years to complete their aquatic development.
California red-legged frog <i>Rana draytonii</i>	Federal: FT State: None Other: SSC	Occurs in the vicinity of quiet, permanent pools of streams, marshes, and occasionally ponds. Occurs along the Coast Ranges from Mendocino County south and in portions of the Sierra Nevada and Cascades ranges, usually below 1200 meters (3,935 ft).

Common Name Scientific Name²	Status³	General Habitat Description⁴
southern mountain yellow legged frog <i>Rana muscosa</i>	Federal: FE State: SE	Found in the southern Sierra Nevada mountains in lakes, ponds, and streams. Requires breeding habitat that does not dry out year round.
western spadefoot <i>Spea hammondi</i>	Federal: None State: None Other: SSC	Grasslands with shallow temporary pools are optimal habitats for the western spadefoot. Elevations of occurrence extend from near sea level to 1363 m (4460 ft). This species occurs primarily in grasslands, but occasional populations also occur in valley-foothill hardwood woodlands.
coast range newt <i>Taricha torosa</i>	Federal: None State: None	Endemic to California. Found in wet forests, oak forests, chaparral, and rolling grasslands. In southern California, drier chaparral, oak woodland, and grasslands are used.
Reptiles		
California legless lizard <i>Anniella sp.</i>	Federal: None State: None	Prefer coastal dune, valley foothill grassland, chaparral, and coastal scrub habitats. Found primarily in areas with moist, loose sandy or organic soils where there is plenty of leaf litter for cover.
southern California legless lizard <i>Anniella stebbinsi</i>	Federal: None State: None Other: SSC	Found in a broader range of habitats than any of the other species in the genus. Often locally abundant, specimens are found in coastal sand dunes and a variety of interior habitats, including sandy washes and alluvial fans.
coastal whiptail <i>Aspidoscelis tigris stejnegeri</i>	Federal: None State: None Other: CNDDDB	Found in deserts and semiarid areas with sparse vegetation and open areas. Also in woodland and riparian areas. Substrate may be firm soils, sandy, or rocky.
San Bernardino ringneck snake <i>Diadophis punctatus modestus</i>	Federal: None State: None Other: CNDDDB	Prefers moist habitats, including wet meadows, rocky hillsides, gardens, farmland, grassland, chaparral, mixed coniferous forests and woodlands.
western pond turtle <i>Emys marmorata pallida</i>	Federal: None State: None Other: SSC	Inhabits permanent or nearly permanent bodies of water in many habitat types, below 6,000 feet (1,830 meters). This species requires basking sites such as partially submerged logs, vegetation mats, or open mud banks. Also needs suitable nesting sites.
California mountain kingsnake (San Diego population) <i>Lampropeltis zonata (pulchra)</i>	Federal: None State: None	Occurs in a variety of habitats including valley-foothill hardwood, and hardwood-conifer, mixed and montane chaparral, valley-foothill riparian, coniferous forests, and wet meadows. An uncommon resident occurring throughout the length of the

Common Name Scientific Name ²	Status ³	General Habitat Description ⁴
		Sierra and Cascades and locally in the Coast Range the entire length of the state. Elevational range from near sea level coastally to 2450 m (8036 ft), or above, in the southern mountains.
coast horned lizard <i>Phrynosoma blainvillii</i>	Federal: None State: None Other: SSC	Inhabits coastal sage scrub and chaparral in arid and semiarid climates. Prefers friable, rocky, or shallow sandy soils.
two-striped garter snake <i>Thamnophis hammondi</i>	Federal: None State: None Other: SSC	Highly aquatic, found in or near permanent freshwater, often along streams with rocky beds and riparian growth. Known from coastal California from the vicinity of Salinas to northwest Baja California, from sea to about 7,000 feet (2,135 meters).
Birds		
tricolored blackbird <i>Agelaius tricolor</i>	Federal: None State: None Other: SSC	Inhabits annual grasslands, wet and dry vernal pools, seasonal wetlands. Frequently found in and around agricultural areas.
southern California rufous-crowned sparrow <i>Aimophila ruficeps</i>	Federal: None State: None Other: WL	Resident in southern California coastal sage scrub and sparse mixed chaparral. Frequents relatively steep, often rocky hillsides with grass and forb patches.
golden eagle <i>Aquila chrysaetos</i>	Federal: None State: None Other: WL	Uses rolling foothills and mountain terrain, wide arid plateaus deeply cut by streams and canyons, open mountain slopes, and cliffs and rock outcrops. Uncommon permanent resident and migrant throughout California, except center of Central Valley. Ranges from sea level up to 3833 m (0-11,500 ft). Habitat typically rolling foothills, mountain areas, sage-juniper flats, desert.
burrowing owl <i>Athene cunicularia</i>	Federal: None State: None Other: SSC, BCC	Inhabits open, dry annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, California ground squirrel.
Swainson's hawk <i>Buteo swainsoni</i>	Federal: None State: ST Other: BCC	Breeds in grasslands with scattered trees, juniper-sage flats, riparian areas, savannahs, & agricultural or ranch lands with groves or lines of trees.
western yellow-billed cuckoo <i>Coccyzus americanus occidentalis</i>	Federal: FT State: SE	Breeds in low to moderate elevation native forests lining the rivers and streams of western United States. Prefers cottonwood-willow

Common Name Scientific Name²	Status³	General Habitat Description⁴
		forests. Migrate to wintering grounds in South America.
southwestern willow flycatcher <i>Empidonax traillii extimus</i>	Federal: FE State: SE	Found in riparian woodlands in Southern California.
American peregrine falcon <i>Falco peregrinus anatum</i>	Federal: Delisted State: Delisted Other: FP	Frequents bodies of water in open areas with cliffs and canyons nearby for cover and nesting.
California condor <i>Gymnogyps californianus</i>	Federal: FE State: SE	Aerial, cliff, grassland/herbaceous, savanna, shrubland/chaparral, conifer woodland, hardwood woodland, mixed woodlands, standing snag/hollow tree. Usual habitat is mountainous country at low and moderate elevations, especially rocky and brushy areas with cliffs available for nest sites, with foraging habitat encompassing grasslands, oak savannas, mountain plateaus, ridges, and canyons. Condors often roost in snags or tall open-branched trees near important foraging grounds.
coastal California gnatcatcher <i>Poliptila californica californica</i>	Federal: FT State: None Other: SSC	Obligate, permanent resident of coastal sage scrub below 2,500 feet (760 meters) in southern California. Inhabits low, coastal sage scrub in arid washes, on mesas and slopes.
bank swallow <i>Riparia riparia</i>	Federal: None State: ST	Colonial nester; nests primarily in riparian and other lowland habitats west of the desert. Requires vertical banks/cliffs with fine-textured/sandy soils near streams, rivers, lakes, and ocean to dig nesting hole.
least Bell's vireo <i>Vireo bellii pusillus</i>	Federal: FE State: SE	Summer resident of southern California in low riparian habitat in vicinity of water or in dry river bottoms, below 2,000 feet (610 meters).
Mammals		
pallid bat <i>Antrozous palidus</i>	Federal: None State: None Other: SCC, WBWG-H	Deserts, grasslands, shrublands, woodlands and forests. Most common in open, dry habitats with rock areas for roosting. Roosts must protect bats from high temperatures; very sensitive to disturbance of roosting sites.
spotted bat <i>Euderma maculatum</i>	Federal: None State: None Other: SCC, WBWG-H	Prefers sites with adequate roosting habitat, such as cliffs. Feeds over water and along washes. May move from forests to lowlands in autumn. The spotted bat has been found at a small number of localities, mostly in

Common Name Scientific Name²	Status³	General Habitat Description⁴
		the foothills, mountains and desert regions of southern California. Habitats occupied include arid deserts, grasslands and mixed conifer forests. Elevational range extends from below sea level in California to above 3000 m (10000 ft).
western mastiff bat <i>Eumops perotis californicus</i>	Federal: None State: None Other: SCC, WBWG-H	Known from open semiarid to arid habitats, including conifer and deciduous woodlands, coastal scrub, grassland, and chaparral. Roosts in crevices in cliff faces, high buildings, trees, and tunnels. Roost locations are generally high above the ground providing a 3-meter minimum clearance below the entrance for flight. Requires large open-water drinking sites.
Townsend's big eared bat <i>Corynorhinus townsendii</i>	Federal: None State: None	Broadleaved upland forest, Chaparral, Chenopod scrub, Great Basin grassland, Great Basin scrub, Joshua tree woodland, Lower montane coniferous forest, Meadow & seep, Mojavean desert scrub, Riparian forest, Riparian woodland, Sonoran desert scrub, Sonoran thorn woodland, Upper montane coniferous forest, Valley & foothill grassland
silver-haired bat <i>Lasionycteris noctivagans</i>	Federal: None State: None Other: CNDDDB, WBWG-M	Common, but erratic in abundance. During spring and fall migrations the silver-haired bat may be found anywhere in California. Primarily a coastal and montane forest dweller feeding over streams, ponds, and open brushy areas. Roosts in hollow trees, beneath exfoliating bark, abandoned woodpecker holes and rarely under rocks. Needs drinking water.
western red bat <i>Lasiurus blossevillii</i>	Federal: None State: None Other: SCC, WBWG-H	Prefers edges or habitat mosaics that have trees for roosting and open areas for foraging. Roosting habitat includes forests and woodlands from sea level up through mixed conifer forests. Feeds over a wide variety of habitats including grasslands, shrublands, open woodlands and forests, and croplands. Not found in desert areas
hoary bat <i>Lasiurus cinereus</i>	Federal: None State: None Other: CNDDDB, WBWG-M	May be found at any location in California. Winters along the coast and in southern California, breeding inland and north of the winter range. During migration, may be found at locations far from the normal range. Prefers open habitats or habitat mosaics, with access

Common Name Scientific Name ²	Status ³	General Habitat Description ⁴
		to trees for cover and open areas or habitat edges for feeding. Roosts in dense foliage of medium to large trees, feeds primarily on moths; requires water.
California leaf-nosed bat <i>Macrotus californicus</i>	Federal: None State: None Other: SCC, WBWG-H	Roosts in rocky, rugged terrain with mines and caves. Forages over nearby flats and washes. Habitats occupied include desert riparian, desert wash, desert scrub, desert succulent shrub, alkali desert scrub, and palm oasis. California records are below 600 m (2000 ft).
south coast marsh vole <i>Microtus californicus stephensi</i>	Federal: None State: None Other: SCC	Tidal marshes in Los Angeles, Orange and southern Ventura Counties.
western small-footed myotis <i>Myotis ciliolabrum</i>	Federal: None State: None Other:WBWG-MH	The small-footed myotis is a bat of arid, upland habitats. It prefers open stands in forests and woodlands as well as brushy habitats. Streams, ponds, springs, and stock tanks are used for drinking and feeding. It occurs in a wide variety of habitats, primarily in relatively arid wooded and brushy uplands near water. This species is found from sea level to at least 2700 m (8900 ft.).
Yuma myotis <i>Myotis yumanensis</i>	Federal: None State: None Other:WBWG-LM	Distribution is closely tied to bodies of water, which it uses as foraging sites and sources of drinking water. Found in a wide variety of habitats ranging from sea level to 3300 m (11,000 ft), but it is uncommon to rare above 2560 m (8000 ft). Optimal habitats are open forests and woodlands with sources of water over which to feed.
San Diego desert woodrat <i>Neotoma lepida intermedia</i>	Federal: None State: None Other: SCC	Coastal scrub of southern California from San Diego County to San Luis Obispo County. Moderate to dense canopies preferred. They are particularly abundant in rock outcrops and rocky cliffs and slopes.
Los Angeles pocket mouse <i>Perognathus longimembris brevinasus</i>	Federal: None State: None Other: SCC	Lower elevation grasslands and coastal sage communities in and around the Los Angeles Basin; open ground with fine sandy soils; may not dig extensive burrows, instead may be found hiding under weeds and dead leaves.

¹ Special-Status species known from the CNDDDB to occur on the Canoga Park, Beverly Hills, Calabasas, Malibu Beach, Topanga, Santa Susana, Oat Mountain, San Fernando and Van Nuys quadrangles.

² Nomenclature for special-status wildlife conforms to CNDDDB.

³ Sensitivity Status Codes

<u>Federal</u>	FT - Federally Threatened under Federal Endangered Species Act (FESA) FE - Federally Endangered under FESA
<u>State</u>	ST - State Threatened under California Endangered Species Act (CESA) SE - State Endangered under CESA SC - State Candidate for listing under CESA
<u>Other</u> (CDFW)	SSC - Designated as a Species of Special Concern by California Fish & Wildlife (CDFW) WL - Designated as a Watch List species by CDFW CNDDDB - Tracked by CDFW in the California Natural Diversity Data Base or considered locally sensitive WBWG-H - Designated by the Western Bat Working Group (WBWG 2015) as High Priority - species that are imperiled or are at high risk of imperilment WBWG-M - Designated by the WBWG (2015) as Medium Priority – a level of concern that should warrant closer evaluation, more research, and conservation actions of both species and possible threats. WBWG-L - Designated by the WBWG (2017) as Low Priority – an indication that existing data supports stable populations for the species and that the potential for major changes in status in the future is considered unlikely.

⁴ General Habitat Descriptions from CNDDDB (CDFW 2019).

⁵ Historical occurrence data from CDFW (2019), unless otherwise noted.

APPENDIX C

**Cultural Resources Assessment
Technical Memorandum**

Memorandum

To	Fareeha Kibriya (AECOM)	Page	1 of 20
Subject	Viewridge Road Stormwater Improvements Project Cultural Resources Assessment		
From	Marc A. Beherec, Ph.D., RPA		
Date	July 23, 2019		

Los Angeles County Public Works (LACPW) Stormwater Quality Division retained AECOM to conduct a Phase I cultural resources investigation to identify potential impacts to cultural resources for the Viewridge Road Stormwater Improvements Project in accordance with the California Environmental Quality Act (CEQA). The proposed project is designed to capture stormwater for treatment and discharge to the existing storm drain at the project site. The proposed project would capture stormwater runoff from an 85th percentile, 24-hour storm event, and would divert urban and stormwater runoff from local unincorporated communities for flow-through treatment and discharge to the existing storm drain. The proposed project would treat flows that drain to Topanga Canyon Creek, which drains to the North Santa Monica Bay.

The proposed project is located in an unincorporated area of Topanga. The project is located in Township 1 North, Range 16 West, Section 30 on the Canoga Park (1952) 1:24000 U.S. Geologic Survey (USGS) topographic map.

The County's intent through preparation of an addendum is to demonstrate whether the previously adopted CEQA document (Los Angeles County Flood Control District Enhanced Watershed Management Programs Final Program Environmental Impact Report, 2015), including mitigation measures, remains adequate and valid for the proposed project. Pursuant to the CEQA Guidelines, the County, as the lead agency, must conduct an evaluation of proposed changes to the project in order to determine whether further environmental analysis is required, pursuant to Public Resources Code Section 21166 and CEQA Guidelines Section 15162. For a proposed modified project, CEQA Guidelines Sections 15162 and 15164 provide that an Addendum to an adopted Final EIR may be prepared if only minor technical changes or additions are necessary. This document reports on a cultural resources study completed in support of the addendum.

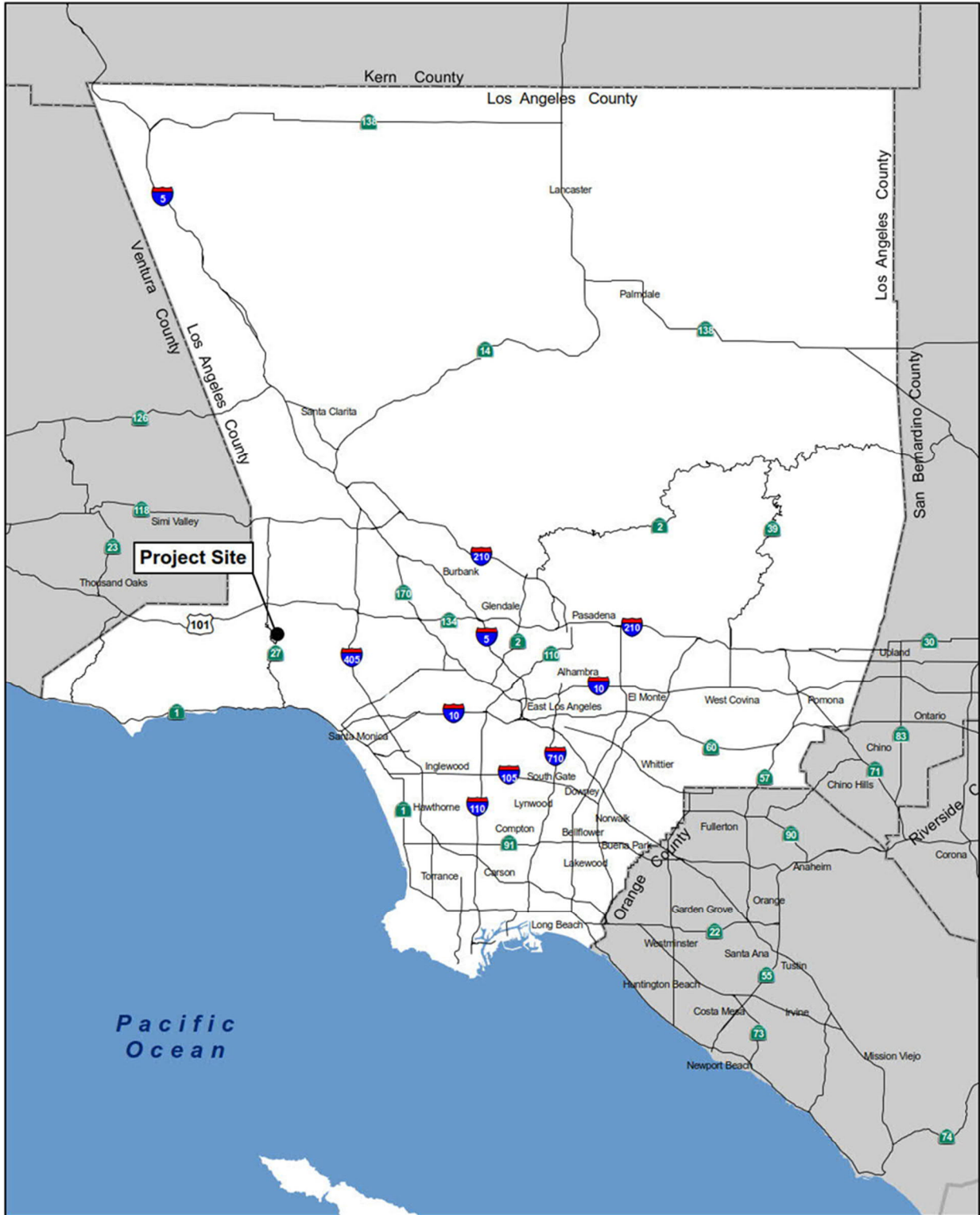
This study includes archival research, a Native American contact program, and an archaeological survey.

PROPOSED PROJECT

Los Angeles County Public Works (LACPW) proposes to implement the Viewridge Road Stormwater Improvements Project (proposed project), which would implement Best Management Practices (BMPs) identified to achieve and maintain water quality objectives and protect beneficial uses pursuant to the Municipal Separate Storm Sewer System (MS4) Permit applicable to the project site. The BMPs identified for the proposed project focus on capture and treatment of stormwater along Viewridge Road between Topanga Canyon Boulevard and Summit Pointe Drive (Figure 1).

The MS4 Permit became effective in December 2012 with the purpose of maintaining water quality objectives to protect beneficial uses of the receiving waters in the Los Angeles region. As a result of the 2012 MS4 Permit, 19 watershed groups were formed by 80 permittees. Permittees were given the opportunity to comply with permit requirements through the development of EWMPs formed to identify potential and priority structural and non-structural BMPs within the region's stormwater collection system to improve runoff water quality. A total of 12 watershed groups were formed through this process. The project site is located within the North Santa Monica Bay Coastal Watershed EWMP Group, which was formed by the City of Malibu, Los Angeles County, and the Los Angeles County Flood Control District (LACFCD).

The proposed project would divert urban and stormwater runoff from local unincorporated communities for flow-through treatment and discharge to the existing storm drain. The proposed project would also include Low Impact Development landscaping features and educational signage. The BMP components identified as part of the proposed project are described below, and are shown in Figure 2. The proposed project would be constructed completely within the existing road ROW and/or parkways adjacent to the roadways. All portions of the project site are owned and maintained by LACPW, with the exception of the temporary construction staging along the east shoulder of Topanga Canyon Boulevard, which is California Department of Transportation (Caltrans) ROW.



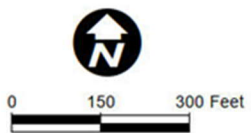
Source: Esri Maps & Data, 2018



Figure 1
Regional Vicinity Map



Source: Esri, 2020



- Diversion Line to BMP
- Gravity Main
- Outlet to PD 2270
- Approximate BMP Location
- Electrical Controller
- Temporary Monitoring Equipment

Figure 2
Project Location Map

Viewridge Road Median

Viewridge Road currently contains a landscaped median between Hodler Drive and just west of Heidi Lane. The proposed project would create a new, approximately 850-foot-long median starting east of Heidi Lane to just west of Summit Pointe Drive. Approximately 18 biofiltration units would be incorporated into the median to capture runoff and stormwater. Water would reach the new median via a new diversion pipeline that would convey flows from Bellini Drive and Heidi Lane via a connection to the existing drain on Viewridge Road just east of its intersection with Heidi Lane. The new diversion line would convey water via gravity to a pretreatment system that would be installed on the west end of the new median to pretreat the water by removing trash, sediment, and debris. Water would then flow through the biofiltration units to an 18-inch reinforced concrete pipe via gravity and discharge into an existing storm drain system located at the east end of Viewridge Road. Two electrical cabinets would be installed on the north side of Viewridge Road. The electrical cabinet located on the north side of Viewridge Road, east of Heidi Lane, would control the mechanical equipment in the new median, which includes a trash rack, slide gates, etc. The electrical cabinet located on the north side of Viewridge Road, west of Heidi Lane, would provide power to the electrical cabinet that controls the mechanical equipment.

All components of this portion of the proposed project would be installed below ground with the exception of the median structure itself (curbs, etc.), electrical cabinets, and the landscaping elements (i.e., vegetation). Routine maintenance activities would include periodic system cleanout activities, as well as landscaping maintenance, which would be conducted by LACPW.

Installation of the new median on Viewridge Road would occupy a space in the road currently demarcated as a median with striping. The existing asphalt would be removed and the area would be excavated up to approximately 20 feet below the ground surface to accommodate the pretreatment unit, the biofiltration units, and associated connecting drains.

The approximately 18-inch diversion pipeline would require excavation of a trench approximately 5 feet wide by 20 feet deep within the existing ROW on Viewridge Road. As partial lane closures would be needed to install the diversion line and construct the new median, development and implementation of a traffic control plan would be required.

Biofiltration Units – Viewridge Road, Hodler Drive, Chagall Road, and Voltaire Drive

Approximately 22 biofiltration units would be installed at various locations on Viewridge Road, Hodler Drive, Chagall Road, and Voltaire Drive. Installation of these units would require excavation of pits. The proposed locations and dimensions of the BMPs from west to east within the project footprint are as follows:

Viewridge Road:

- North side of Viewridge Road just east of Topanga Canyon Boulevard: 1 unit – approximately 10 feet wide by 26 feet long by 10 feet deep
- South side of Viewridge Road just west of Hodler Drive: 1 unit – approximately 5 feet wide by 20 feet long by 6 feet deep
- South side of Viewridge Road just east of Hodler Drive: 1 unit - approximately 5 feet wide by 30 feet long by 8 feet deep.

Hodler Drive:

- East side of Hodler Drive between Viewridge Road and Chagall Road: 5 units – approximately 5 feet wide by 22 feet long by 8 feet deep
- West side of Hodler Drive between Viewridge Road and Chagall Road: 1 unit – approximately 5 feet wide by 20 feet long by 6 feet deep
- West side of Hodler Drive across from the corner of Chagall Road and Hodler Drive: 1 unit – approximately 5 feet wide by 20 feet long by 6 feet deep

Voltaire Drive:

- West side of Voltaire Drive just south of Chagall Road: 3 units (at 2 locations) – approximately 5 feet wide by 22 feet long by 3 feet deep
- East side of Voltaire Drive south of Chagall Road: 2 units (at 2 locations) – 1 unit approximately 5 feet wide by 20 feet long by 5 feet deep; and 1 unit approximately 5 feet wide by 22 feet long by 8 feet deep

Chagall Road:

- South side of Chagall Road just west of Schweitzer Drive (2 units): 1 unit approximately 5 feet wide by 16 feet long by 6 feet deep; and 1 unit approximately 5 feet wide by 18 feet long by 6 feet deep
- North side of Chagall Road at its eastern terminus just west of the cul-de-sac: 2 units approximately 5 feet wide by 14 feet long by 6 feet deep
- South side of Chagall Road at its eastern terminus just west of the cul-de-sac: 2 units- 1 unit approximately 5 feet wide by 20 feet long by 6 feet deep, and 1 unit approximately 5 feet wide by 22 feet long by 6.5 feet deep

Existing landscaping and/or vegetation in the parkways would be removed prior to excavation. The biofiltration unit would connect to the existing storm drain system or adjacent catch basin.. A hatch would be installed at grade level above the unit to provide access for maintenance purposes. Once the biofiltration unit is installed, existing landscaping on the parkway would be replaced with new drought tolerant landscaping. No permanent modifications to the roads, sidewalks, or curbs would be required for this component of the proposed project.

ARCHIVAL RESEARCH

A records search was conducted by Marc A. Beherec, Ph.D., RPA, at the South Central Coastal Information Center (SCCIC) on December 5, 2018, to evaluate the archaeological sensitivity of the project area for cultural resources. The SCCIC is the regional Information Center of the California Historical Resources Information System that archives documentation related to the cultural resources located in Los Angeles County, California. The purpose of this records search was to review previously recorded cultural resources and previous investigations completed within a 0.5-mile search radius of the project area (Figure 1). Information reviewed included location maps for all previously recorded trinomial and primary prehistoric and historic archaeological sites and isolates, site record forms and updates for all cultural resources previously identified, previous investigation boundaries and National Archaeological Database citations for associated reports, technical reports, historic maps, and historic addresses. The search reviewed lists of California Points of Historical Interest, California Historical Landmarks, and local city and county registries of historic properties. In addition, the Caltrans Historic Highway Bridge Inventory, the Historic Resources Inventory (HRI), the California Register of Historical Resources (CRHR), and the National Register of Historic Places (NRHP) were consulted.

Archaeological Records Search

The research focused on the identification of previously recorded cultural resources within a 0.5-mile radius of the proposed project footprint. Archival research involved review of cultural resources site records, historic maps, and historic site and building inventories. The NRHP database and listings for the HRI and the California Historical Landmarks were examined to determine whether any resources in this radius were listed in or had been determined eligible for these registers. The California Points of Historical Interest and CRHR also were reviewed for resources located within or adjacent to the project site.

The records search revealed that 17 archaeological studies have been undertaken within a 0.5-mile radius of the project area (Table 1). These include 16 reports documenting archaeological surveys and one report documenting test excavations of a known site. Four of the surveys overlap the project footprint. Approximately 60% of the project footprint has been surveyed in previous studies.

Table 1. Previous Studies Conducted within 0.5 Mile of the Project

Report # (LA-)	Author(s)	Description	Date
00146	Padon, Beth	An Archaeological Assessment of the Tentative Tract No. 33454, Los Angeles, California	1988
00258*	Raab, L. Mark	Evaluation of Archaeological Resources Recorded within Tentative Tract No. 45360 (Nettleship Ranch), Woodland Hills, California	1988
00647	Walsh, Michael R.	Evaluation of the Archaeological Resources and Potential Impact of Proposed Development of “Tentative Tract 35999” in the County of Los Angeles	1979
01203	Padon, Beth	An Archaeological Assessment of a Portion of Tentative Tract No. 35999 in Topanga Canyon, Los Angeles County, California	1982
01929*	Raab, L. Mark, and Roy A. Salls	Evaluation of Archaeological Resources Recorded within Tract 45360, Nettleship Ranch, Woodland Hills, California	1989
02075	Singer, Clay A.	Archaeological Survey and Cultural Resource Assessment of the Southeast Quarter of Section 25, T1N, R17W, Los Angeles County, California	1976
02092	Raab, L. Mark, and Roy A. Salls	Report of Archaeological Testing of Locus 4, Site LAN-1424, Tract 45360, Woodland Hills, Los Angeles County, California	1990
02770	Singer, Clay A., J. Atwood, and S. Gomes	Cultural Resources Survey and Impact Assessment for The New Summit Tanks Site Access Road, Los Angeles County, California	1992

Report # (LA-)	Author(s)	Description	Date
02858	Anonymous (Michael Brandman Associates)	Draft Supplemental Environmental Impact Report for Canyon Oaks Residential Development and Golf Course, Tentative Tract No. 35999, Conditional Use Permit No. 2178, Oak Tree Permit No. 84-023, Sch. No. 85021320	1992
02889	McKenna, Jeanette A.	A Phase I Cultural Resource Investigation of the Weiss Property, Tentative Map 50992 in the Woodland Hills/Topanga Canyon Area of Los Angeles County, California	1993
03188	Atwood, John E., and Barbie L. Stevenson	Cultural Resources Survey and Impact Assessment for a 9+ Acre Property, Known As "Top-of-Topanga Overlook, Located at 3400 Topanga Canyon Blvd., Los Angeles County, California	1995
03587	King, Chester	Prehistoric Native American Cultural Sites in the Santa Monica Mountains	1994
04872*	Duke, Curt	Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 374-02, County of Los Angeles, California	2000
04873*	Duke, Curt	Cultural Resource Assessment for AT&T Wireless Services Facility Number, C926.1, County of Los Angeles, California	2000
04892*	Smith, Philomene C.	Road Safety Improvements along Route 27, Topanga Canyon Highway, Los Angeles County, California	2000
04893*	Sylvia, Barbara	Addendum to: Road Safety Improvements Along Route 27, Topanga Canyon Highway, Los Angeles County, California	2000

Report # (LA-)	Author(s)	Description	Date
12699	Hoffman, Laura	Archaeological Survey Report for Southern California Edison's Replacement of One Deteriorated Pole (TD713594/IO301903) on the Vicasa 16 kV Distribution Circuit on Lands Administered by the Santa Monica Mountains Conservancy, Los Angeles County, California	2014

*Indicates a report that partially overlaps the project footprint

The records search identified 13 archaeological sites and five isolates within 0.5 mile of the project footprint (Table 2). Ten of the resources are prehistoric sites, one site includes both prehistoric and historic components, and two sites are historic sites. The remaining five resources are prehistoric isolates.

Table 2. Previously Recorded Archaeological Sites within 0.5 Mile of the Project Footprint

Permanent Trinomial (CA-LAN)	Primary Number (P-19)	Other Identifier	Description	Date Recorded/ Revisited
1036	001036	None	Lithic scatter/ concentration; possible limited use quarry/ rough flaking station	1979; 1999
1423	001423	Temp No. TASC 1988-1	Lithic concentration	1988
1424	001424	Temp No. TASC 1988-2	Prehistoric habitation site including fire altered rock, lithic tools and debitage, portable groundstone, bedrock mortar	1988; 1989; 1999
3568	003568	Temp No. 7-9:2	Lithic concentration	1999
3569	003569	Temp No. 7-12:1	Lithic scatter	1999
3570	003570	Temp No. 7-13:1	Lithic concentration	1999
3571	003571	Temp No. 7-14:1; Shark Tooth Site	Lithic scatter, localized midden	1999

Permanent Trinomial (CA-LAN)	Primary Number (P-19)	Other Identifier	Description	Date Recorded/ Revisited
3572	003572	Temp No. 7-19:1	Bedrock mortar	1999
3573	003573	Temp No. 7-20:1	Prehistoric component includes lithics, small bedrock mortar, mammal bones, and an isolated human skull fragment; historic components include glass and metal	1999
3574	003574	Temp No. 7-20:2	Lithic concentration, bedrock mortar, possible midden	1999
3575	003575	Temp No. 7-22:1	Lithic concentration	1999
4456	004456	Temp No. 7-21:1H	Historic foundations, structure pads, berm and access road	1999
4457	004457	Temp No. 7-22:2/H	Historic foundations, walls, refuse deposits	1999
None	100586	Temp No. 7-9: isol 1	Chalcedony flake	1999
None	100587	Temp No. 7-14: isol 1	Chalcedony core	1999
None	100588	Temp No. 7-19: isol 1	Chert chunk	1999
None	100589	Temp No. 7-21: isol 1	Chunk, core, and flake	1999
None	100591	Temp No. 9-24: isol 1	Stone bowl fragment	1999

Site CA-LAN-1036 is a prehistoric archaeological site located southeast of the project footprint. The site was first recorded by Terence N. D’Altroy in 1979. D’Altroy notes a quartzite site with “thin lithic scatter” a site representing a “limited use quarry and/ or rough flaking station.” The site was later recorded by Chester King of the Topanga Anthropological Consultants, California in 1999. He reports a lithic concentration including rhyolite chunk, core tools of quartzite and rhyolite, battered sandstone cobble, and a sandstone mano fragment. King refers to a possible connection to other sites outside the records search buffer.

Site CA-LAN-1423 is a prehistoric archaeological site located northeast of the project footprint. The site was first recorded by C. King, D. Larson, L. Gamble, B. Bates, D. Huntley, and K. Huntley of the Topanga Association for a Scenic Community (TASC) in 1988. They record chipped stone tools and flakes.

Site CA-LAN-1424 is a prehistoric archaeological site located east of the project footprint. The site was first recorded by C. King, D. Larson, L. Gamble, B. Bates, D. Huntley, and K. Huntley of the TASC in 1988. They record chipped stone tools (including an abrader and scraper), cores, hammerstone fragments, groundstone, fire altered rock, sandstone manos, and mortar fragments. The surface artifacts are observed at three loci, each containing a high concentration of (1) chert flakes in dark midden soil, (2) basalt artifacts (including hammerstones) with heavy patina, and (3) basalt flakes, cores, and other artifacts. They suggest this is a group of sites occupied at different time periods with the most occupation during the Early or Early Middle Period. In 1989, the site was revisited by R. A. Salls and J. Budd of the Northridge Center for Public Archaeology, California State University Northridge (CSUN). Salls and Budd noted general deterioration of the site and failed to relocate Locus 1. King revisited the site in 1999 and relocated Locus 1; he also notes destruction of the northern part of the site by housing development.

CA-LAN-3568 is a prehistoric archaeological site located southeast of the project footprint. The site was first recorded by King in 1999. Lithic concentrations of flakes, chunks, tools, and a burin were observed.

CA-LAN-3569 is a prehistoric archaeological site located immediately southeast of the project footprint. The site was recorded by King in 1999. It is a lithic site with thick chaparral and plants making observations and measurements difficult. Two core tools and few flakes were observed.

CA-LAN-3570 is a prehistoric archaeological site located southeast of the project footprint. The site was first recorded by King in 1999. King reports a lithic concentration of core tools, bowl fragment, manos and mano fragments, tool fragments, chunks, flakes, and pieces of groundstone. The site has been surface collected and pot hunted.

CA-LAN-3571, also known as the Shark Tooth Site, is a prehistoric archaeological site located southeast of the project footprint. The site was first recorded by King in 1999. He reports a lithic scatter of various tools, fragments, and flakes as well as a schist pendant, a polished groundstone fragment that may be a pendant, and a fossil shark tooth. Burned mammal bone fragments and a localized midden were also observed.

CA-LAN-3572 is a prehistoric archaeological site located south of the project footprint. The site was first recorded by King in 1999. He reports a single isolated bedrock mortar on a small sandstone boulder.

CA-LAN-3573 is a prehistoric archaeological site with a historic component located south of the project footprint. The site was first recorded by King in 1999. He reports numerous lithic

tools and fragments of tools and flakes as well as one bedrock mortar. Historic artifacts were observed including metal, glass, and porcelain. Mammal bone fragments, some burned, were also recorded. King identified an isolated human skull fragment at the site.

CA-LAN-3574 is a prehistoric archaeological site located southeast of the project footprint. The site was first recorded by King in 1999. The site was reported to include lithic concentrations including tools and flakes, bone fragments, and a small bedrock mortar. In addition, King notes, "There is an interesting natural snake pattern in the largest boulder at the site which the Indians may have assigned special significance. We did not photograph it."

CA-LAN-3575 is a prehistoric archaeological site located southeast of the project footprint. The site was first recorded by King in 1999. He reported lithic concentrations including tools, tool fragments, cores, chunks, and flakes. The site is near a historic site (CA-LAN-4457, described below) and a recent house. King suggests the prehistoric site was probably surface collected by historic and recent inhabitants of the nearby site and house.

CA-LAN-4456 is a historic site located south of the project footprint. The site was first recorded by King in 1999. King reported remnants of a historic structure, including foundations, pads, berm, and access road.

CA-LAN-4457 is a historic site located southeast of the project footprint. The site was first recorded by King in 1999. King documented the remaining foundations of a historic structure, including down walls; concrete structure ruins; and debris deposits containing metal, wood, and broken bottle glass.

Resource P-19-100586 is a prehistoric isolate located southeast of the project footprint. The resource was first recorded by King in 1999 and consists of a single chalcedony flake that may have eroded from fill placed during construction of nearby dirt roads.

Resource P-19-100587 is a prehistoric isolate located southeast of the project footprint. The resource was first recorded by King in 1999 and consists of a single chalcedony core.

Resource P-19-100588 is a prehistoric isolate located southeast of the project footprint. The resource was first recorded by King in 1999 and consists of an isolated chert chunk.

Resource P-19-100589 is an isolate located east of the project footprint. The resource was first recorded by King in 1999. The resource consists of one chert chunk, one quartzite core or chunk, and one quartzite flake. King suggests that these artifacts are part of a portion of CA-LAN-1424 that was destroyed by housing development.

P-19-0591 is an isolate located southeast of the project footprint. The resource was first recorded by King in 1999 and consists of an isolated stone bowl fragment.

California State Historic Resources Inventory

Study of the California Office of Historic Preservation's HRI focused on resources located within Woodland Hills. The HRI lists no historic resources within 0.5 mile of the project footprint within Woodland Hills.

California Points of Historical Interest

A listing of California Points of Historical Interest identified no historic landmarks within 0.5 mile of the project footprint.

California Historical Landmarks

A listing of California Historical Landmarks identified no historic landmarks within 0.5 mile of the project footprint.

Caltrans Bridge Survey

Study of the California Department of Transportation (Caltrans) Historic Bridge Inventory revealed that no historic state or local agency bridges are located within 0.5 mile of the project area (Caltrans 2015).

City of Los Angeles Historic-Cultural Monuments

Los Angeles Historic-Cultural Monuments (LAHCMs) are sites that have been designated by the City of Los Angeles Cultural Heritage Commission as worthy of preservation based on their architectural, historic, and cultural merits. Most LAHCMs are located within the boundaries of the City of Los Angeles, but in rare cases sites with historic ties to Los Angeles that are outside city limits may also be so designated. A search of the LAHCMs found no monuments within 0.5 mile of the project area.

Historic Map Research

Appropriate historic maps held by the SCCIC and other repositories were examined for this study. These are discussed below.

Maps prepared by anthropologists or at the direction of local tribes were consulted. These include maps published by A. L. Kroeber and William McCawley (Kroeber 1925; McCawley 1996); *Tongva Villages: Gabrieleno-Fernandeno of the Los Angeles Basin*, prepared by Keepers of Indigenous Ways (Sutimiv-Pa'alat 2010); *Kizh Tribal Territory (Gabrieleno Indian Lands)*, prepared by archaeologist Gary Stickel for the Gabrieleno Band of Mission Indians-Kizh Nation (Flaherty 2016); and *Native California: Los Angeles County* (Fernandeno Tataviam Band of Mission Indians 2014). These maps do not show any tribal villages within or near the project area. The closest village shown on these maps is Topanga, located near the coast in the mouth of Topanga Canyon. Nearby, in Chumash territory, the town of Humaliwo is located near Malibu, and Talepop is located in Malibu Canyon.

The project area is shown on the 1903 USGS Calabasas 1:62500 quadrangle topographic map. Topanga Canyon Boulevard already appears in this map, but it is west of its current location, more closely following Topanga Canyon. A trail follows an alignment that approximates the future route of Viewridge Road. From Topanga Canyon Boulevard, the trail continues east to a spring and two buildings located a short distance east of the project area before turning north and proceeding downhill to where it connects to Santa Maria Road and ends. No buildings or structures stand within or adjacent to the project area itself. In the 1928 Reseda USGS 1:24000 map, the trail shown in the earlier Calabasas map no longer follows the future route of Viewridge Road. Instead, another trail north of the project area connects to Topanga Canyon Boulevard. This changed road alignment also appears in the 1944 Calabasas USGS 1:62500 map.

By the time of the 1952 Canoga Park USGS 1:24000 map, Topanga Canyon Boulevard has been realigned to its present alignment and Viewridge Road has been established along the trail shown in the 1903 Calabasas map. In the 1968 revision to the 1952 map, the roads in the project area and surrounding area approximate modern alignments. Individual buildings and structures are not shown in the project vicinity, but the neighborhood is colored red, which indicates that the area is developed.

Sacred Lands File Search and Native American Contact Program

As part of this investigation, AECOM conducted a Native American contact program to inform interested parties of the proposed project and to request any information that may indicate an impact to cultural resources within the project area. The program involved contacting Native American representatives identified by the Native American Heritage Commission (NAHC) as potentially having knowledge about the project area, in order to solicit comments and concerns regarding the proposed project.

A letter was prepared and mailed to the NAHC on October 11, 2018. The letter requested that a Sacred Lands File check be conducted for the proposed project and that contact information be provided for Native American groups or individuals that may have concerns about cultural resources in the project area.

The NAHC responded in a letter sent via email and dated October 29, 2018. The letter stated that a Sacred Lands File search had been conducted of the project area, and that the result of the search was negative. However, the letter included a list of Native American representatives who may have knowledge of and interest in the project area.

Letters were prepared and mailed on February 15, 2019, to individuals anticipated to be interested parties in advance of the NAHC response. Maps depicting the project area, and response forms to streamline responses, were attached to each letter. Follow-up phone calls were made on March 1, 2019, to each party who had not yet responded (Table 3).

Table 3. Native American Contact Program

Native American Contact	Letter Sent	Date of Reply	Follow-Up Phone Call	Notes
Chairperson Julie Lynn Tumamait-Stenslie, Barbareno/Ventureno Band of Mission Indians	02/15/2019	None	03/01/2019	Left a voicemail briefly describing the project and location and requesting comment.
Patrick Tumamait, Barbareno/Ventureno Band of Mission Indians	02/15/2019	None	03/01/2019; 03/06/2019	Mr. Tumamait asked about the results of the CHRIS records search. He stated that the area is definitely sensitive for tribal cultural resources. He requested I check the documentation and let him know whether past archaeologists suggested the local population was Chumash or Gabrielino. I did so and got back to him that the reports on file at the SCCIC indicate that the project area is roughly on the border of the two groups, and that both groups or either group could have left archaeological remains in the area. He stated that project excavations should be monitored, either by a member of his tribe (Chumash) or by Chairperson Andrew Salas' tribe (Gabrielino).
Eleanor Arrellanes, Barbareno/Ventureno Band of Mission Indians	02/15/2019	None	03/01/2019; 03/04/2019	Initially left a voicemail, and Ms. Arrellanes called back. She asked about the project location, and stated that she believes the project is likely outside Chumash territory. She stated that Chairperson Tumamait-Stenslie would

Native American Contact	Letter Sent	Date of Reply	Follow-Up Phone Call	Notes
				contact us if the tribe determined otherwise.
Raudel Joe Banuelos, Jr., Barbareno/Ventureno Band of Mission Indians	02/15/2019	None	03/01/2019	Left a voicemail briefly describing the project and location and requesting comment.
Andrew Salas, Gabrieleno Band of Mission Indians - Kizh Nation	02/15/2019	None	03/01/2019	Left a voicemail briefly describing the project and location and requesting comment.
Chairperson Anthony Morales, Gabrieleno/Tongva San Gabriel Band of Mission Indians	02/15/2019	None	03/01/2019; 03/11/2019	Left a voicemail briefly describing the project and location and requesting comment. Chairperson Morales called back on March 11. He asked the results of the CHRIS search. He also wanted to know if the area was considered Gabrieleno or Chumash, and I informed him that it is on the border of the two groups and that the NAHC includes both in its contact list. Mr. Morales stated that the CHRIS result “speaks for itself” showing the sensitivity of the project area. He said that he recommends Native American and archaeological monitoring.
Chairperson Sandonne Goad, Gabrielino/ Tongva Nation	02/15/2019	None	03/01/2019	Left a voicemail briefly describing the project and location and requesting comment.
Chairman Robert F. Dorame, Gabrielino Tongva Indians of California Tribal Council	02/15/2019	None	03/01/2019	Mr. Dorame stated he would review the letter and get back to us if he has comments.

Native American Contact	Letter Sent	Date of Reply	Follow-Up Phone Call	Notes
Chairperson Linda Candelaria, Gabrielino-Tongva Tribe	02/15/2019	None	None	No phone number provided by NAHC.
Councilmember Charles Alvarez, Gabrielino-Tongva Tribe	02/15/2019	None	03/01/2019	Mr. Alvarez states that his tribe may be interested in monitoring work in the area if monitoring is determined necessary. He requested I email him the letter, which was done.
Chief Mark Steven Vigil, San Luis Obispo County Chumash Council	02/15/2019	None	03/01/2019	A recorded message stated that the phone number provided by the NAHC has been disconnected.
Chairperson Kenneth Kahn, Santa Ynez Band of Chumash Indians	02/15/2019	None	03/01/2019	The phone number provided by the NAHC goes to the tribal office. Administrator Karen Keeves informed me that the letter was passed on to their cultural resources team, who would decide whether or not to comment on the project.

ARCHAEOLOGICAL SURVEY

A field survey was conducted as part of this assessment to identify the presence of any cultural resources in the proposed project area and to help determine the archaeological sensitivity for the project area. An archaeological field survey of the project area was conducted by Marc Beherec, Ph.D., RPA, on July 23, 2019. Survey methodology was tailored according to the degree of ground visibility.

Viewridge Road Median

As previously described, the location of the planned median and biofiltration units is currently paved beneath asphalt concrete paving. However, the approximately 0.25-mile-long shoulder of the road south of the planned new road median was walked over in order to understand past disturbances and potentially identify archaeological sites that may extend beneath the pavement.

Viewridge Road was constructed on the edge of a steep ravine. The shoulder measures approximately 15 to 20 feet wide.

From Heidi Drive east to a point approximately 250 feet east of Heidi Drive the road appears to have been cut into the hillside, artificially widening an existing pass. Bedrock can be seen in the roadcut.

Between this point and the eastern end of the alignment the road appears to be partially built up with artificial fill. To the south of the road shoulder is a steep descent to the ravine below. The visible soil consists of a homogenous hard-packed silty sand, probably imported fill. Although the road formerly descended into the canyon, that is no longer the case. The road grade has been raised to an artificial level, and the road terminates in a cul-de-sac.

Biofiltration Units – Viewridge Road, Hodler Drive, Chagall Road, and Voltaire Drive

Each of the locations described above for planned biofiltration units and electric boxes was visited and examined for cultural resources. Ground visibility ranged from zero percent, where the ground surface was completely covered by paving or landscaping pebbles, to approximately 50 percent where landscaped vegetation was thin. All the biofiltration unit locations were heavily disturbed by modern storm drains and landscaping.

No above-ground powerlines or other utilities were observed along any of the roads, indicating that all the utilities serving the surrounding neighborhood, including electrical, water, sanitary sewer, storm drain, and fiber optic are all buried, most likely within the roads.

Results

The majority of the project area is located on ridgetops. Geologically these ridgetops have erosional regimes, and there is little visible naturally deposited soil. The entire project area shows numerous signs of recent disturbances including roadbuilding and the installation of utilities. No cultural resources were observed in any of the planned work locations.

RECOMMENDATIONS

The cultural resources archival research and survey did not identify any archaeological materials or historic buildings or structures within the project.

Based on the results of the archival research and survey, there is low potential that archaeological resources will be encountered during ground disturbing activities for the proposed project.

The project area is located on ridgetops, and bedrock is visible in some locations. Little soil accumulation is expected in such an environment, and therefore the possibility of buried sites is decreased. Much of the visible soil, particularly along Viewridge Road, appears to be artificial fill brought to the location within the recent past in order to grade the road.

Moreover, much of the ground disturbance for the required project will take place in soils already disturbed for the construction and maintenance of the roadways and subsurface utilities. The roads were in places cut into bedrock. All the utilities serving the surrounding neighborhood, including electrical, water, sanitary sewer, storm drain, and fiber optic are all

buried within the roads. Any archaeological sites that may have existed within the project area are likely to have been destroyed during the construction of the Viewridge neighborhood.

However, in the event any archaeological resources (such as chipped or ground stone lithics, modified animal bone, ashy midden soil, structural remains, historic glass or ceramics, etc.) are encountered during the course of construction, it is recommended that work be temporarily halted in the vicinity of the find and a qualified archaeologist be contacted to evaluate and determine appropriate treatment for the resource in accordance with California Public Resource Code (PRC) Section 21083.2(i). Depending on the significance of the discovery, a program of monitoring and/or mitigation may be necessary. If any Native American cultural material is encountered within the project site, consultation with interested Native American parties is recommended in order to apprise them of the findings and solicit any comments they may have regarding appropriate treatment and disposition of the resources. If human remains are discovered, work in the immediate vicinity of the discovery will be suspended and the Los Angeles County Coroner contacted. If the remains are deemed Native American in origin, the Coroner will contact the NAHC and identify a Most Likely Descendant (MLD) pursuant to Public Resources Code Section 5097.98 and California Code of Regulations Section 15064.5. Work may be resumed at the landowner's discretion but will only commence after consultation and treatment have been concluded. Work may continue on other parts of the project while consultation and treatment are conducted.

References Cited

California Department of Transportation (Caltrans)

- 2015 *Historic Bridge Inventory*. Available online:
<http://www.dot.ca.gov/hq/structur/strmaint/historic.htm>. Accessed June 24, 2015.

Caltrans—see California Department of Transportation

Fernandeno Tataviam Band of Mission Indians

- 2014 Map: *Native California: Los Angeles County*. San Fernando: Fernandeno Tataviam Band of Mission Indians.

Flaherty, James

- 2016 Map: *Kizh Tribal Territory (Gabrielino Indian Lands)*. Covina, CA: Kizh Tribal Press.

Kroeber, A. L.

- 1925 Handbook of Indians of California. *Bureau of American Ethnology Bulletin* 78, Smithsonian Institution, Washington D.C.

McCawley, William

- 1996 *The First Angelinos: The Gabrielino Indians of Los Angeles*. Banning, CA: Malki Museum Press.

Sutimiv-Pa'alat

2010 Map: *Tongva Villages: Gabrieleno-Fernandeno of the Los Angeles Basin*. San Pedro, CA: Keepers of Indigenous Ways.

Attachment

AECOM Inc
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T 213.593.7700 www.AECOM.com

December 3, 2018

Native American Heritage Commission
1550 Harbor Blvd, Suite 100
West Sacramento, CA 95691

Subject: Viewridge Super Green Streets Project

Dear Commissioners:

AECOM was retained by the City of Los Angeles Department of Public Works Bureau of Engineering (LABOE) to conduct a Phase I cultural resources investigation to identify potential impacts to cultural resources in compliance with the California Environmental Quality Act for the Los Angeles County Department of Public Works (LACDPW) Stormwater Quality Division Viewridge Super Green Streets Regional Enhanced Watershed Management Project. The proposed project is a large-scale green street project to capture and treat stormwater flow up to the 85th percentile storm event from approximately 81.4 acres of single family residential neighborhoods which are tributary to the project area. The main green street project elements include the installation of two structures to divert the dry and wet weather flows from existing storm drains to new biofiltration units, the installation of a 5,200 cubic foot underground cistern to store captured water for irrigation of the existing Viewridge Road median, and modular biofiltration units to capture and treat road flows prior to discharging them into existing catch basins and directly to Topanga Canyon Creek and the North Santa Monica Bay. Other components include recreational enhancements (i.e. walkway, bike path, and native/drought tolerant landscaping) and educational signage.

The Project is located in unincorporated area of Topanga. The modular wetlands will be installed along Viewridge Road, North Topanga Canyon Boulevard, Chagall Road, and Bellini Drive in the upper portion of the Topanga Creek subwatershed. **The project is located in Township 1 North, Range 16 West, Section 30 on the Canoga Park (1952) 1:24000 USGS topographic map.**

The goal of this letter, in addition to acquainting you with this project, is to request that you check the Sacred Lands File records to identify any previously recorded tribal cultural resources in the project area. In addition, please provide a CEQA Tribal Consultation List, which we will use for contact and LACDPW will use for tribal consultation.

Please respond both to myself and to our Agency contact, whose contact information is as follows:

Ms. Grace Komjakraphan
Environmental Engineering Specialist
Los Angeles County Public Works
gkomjakraphan@dpw.lacounty.gov
(626) 458-4330

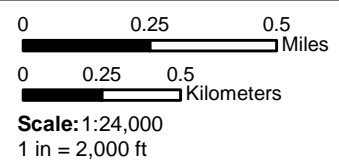
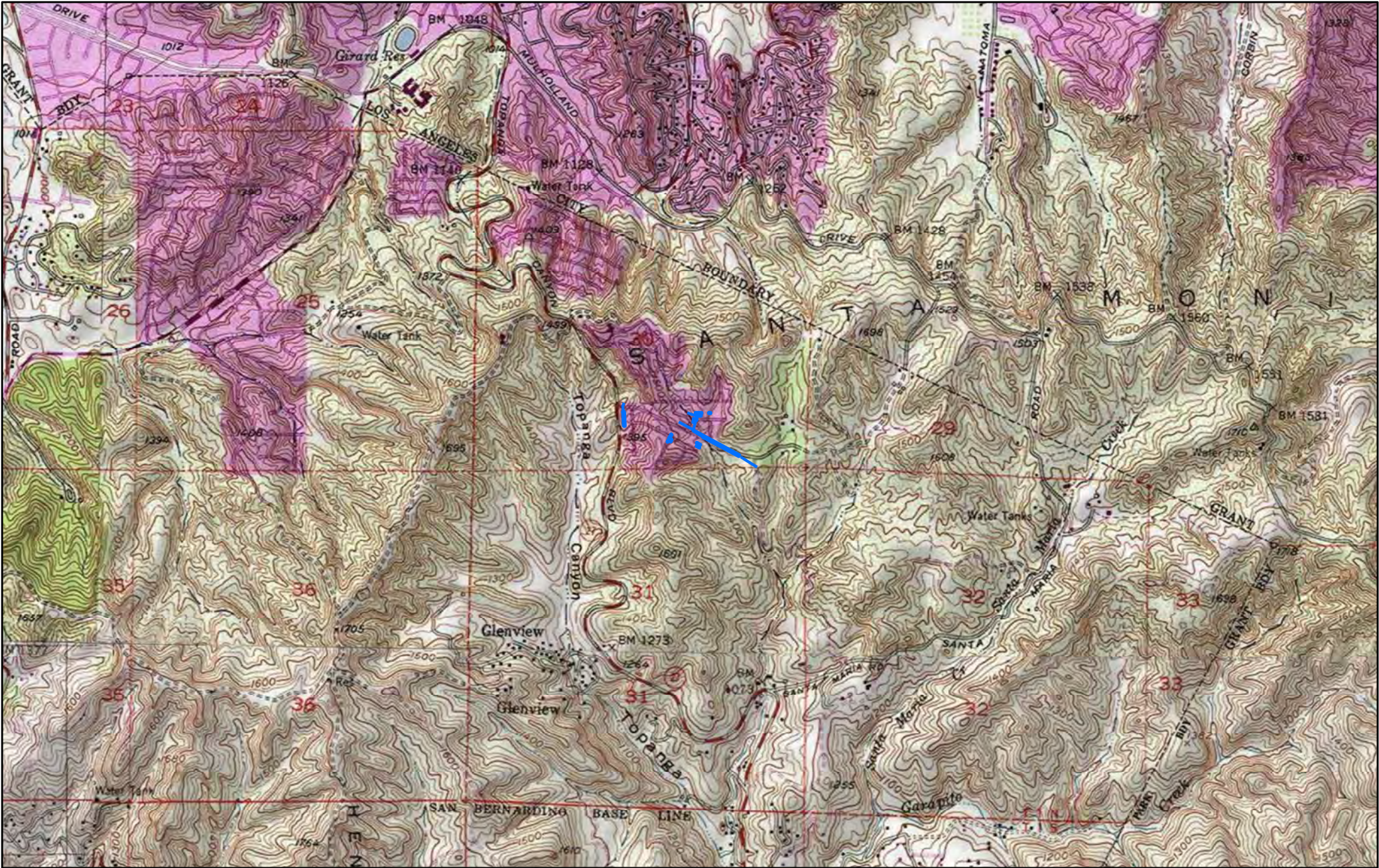
AECOM Inc
300 S. Grand Ave., Suite 200, Los Angeles, CA 90071
T 213.593.7700 www.AECOM.com

Thank you for your assistance. Please feel free to contact me if you have any questions about this project.

Sincerely,


A handwritten signature in black ink, appearing to read 'Marc A. Beherec'.

Marc A. Beherec, Ph.D., RPA
Archaeologist
Desk: 213.593.8481
Cell: 951.296.7561
email: marc.beherec@aecom.com



Date: 12/3/2018
 Projection: NAD 1983 UTM Zone 11N

NAHC Map
 Viewridge Road
 Super Green Streets Regional
 Enhanced Watershed Management
 Program Project
 Quadrant:
 Canoga Park, Ca.
 PLSS:
 T10N, R160W, Section 30

Legend:
 Project Area



NATIVE AMERICAN HERITAGE COMMISSION
Cultural and Environmental Department
1550 Harbor Blvd., Suite 100 West Sacramento, CA 95691 Phone: (916) 373-3710
Email: nahc@nahc.ca.gov
Website: <http://www.nahc.ca.gov>
Twitter: @CA_NAHC



December 19, 2018

Marc Beherec
AECOM

VIA Email to: marc.beherec@aecom.com

RE: Viewridge Super Green Streets Project, Los Angeles County.

Dear Mr. Beherec:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. I suggest you contact all of those indicated; if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance we are able to assure that our lists contain current information. If you have any questions or need additional information, please contact me at my email address: katy.sanchez@nahc.ca.gov.
Sincerely,

A handwritten signature in blue ink that reads "Katy Sanchez".

KATY SANCHEZ
Associate Environmental Planner

Attachment



AECOM Inc.
300 South Grand Avenue, Suite 200, Los Angeles, CA 90071
T 213.593.7700 www.aecom.com

February 15, 2019

Councilmember Charles Alvarez
Gabrielino-Tongva Tribe
23454 Vanowen St.
West Hills, CA 91307

Subject: Viewridge Super Green Streets Regional Enhanced Watershed Management Project

Dear Councilmember Charles Alvarez,

The Los Angeles County Department of Public Works (LACDPW) Stormwater Quality Division has retained AECOM to conduct a Phase I cultural resources investigation to identify potential impacts to cultural resources for the Viewridge Super Green Streets Regional Enhanced Watershed Management Project in compliance with the California Environmental Quality Act (CEQA). The proposed project is a large-scale green street project intended to capture and treat stormwater flow from approximately 81.4 acres of single family residential neighborhoods which are tributary to the project area. The main green street project elements include the installation of two structures to divert the dry and wet weather flows from existing storm drains to new biofiltration units, the installation of a 5,200 cubic foot underground cistern to store captured water for irrigation of the existing Viewridge Road median, and modular biofiltration units to capture and treat road flows prior to discharging them into existing catch basins and directly to Topanga Canyon Creek and the North Santa Monica Bay. Other components include recreational enhancements (i.e. walkway, bike path, and native/drought tolerant landscaping) and educational signage. Most of the planned project improvements will be installed beneath existing roadways and medians.

The Project is located in unincorporated area of Topanga. The modular wetlands will be installed along Viewridge Road, North Topanga Canyon Boulevard, Chagall Road, and Bellini Drive in the upper portion of the Topanga Creek subwatershed. **The project is located in Township 1 North, Range 16 West, Section 30 on the Canoga Park (1952) 1:24000 USGS topographic map.**

A California Historical Resources Information System (CHRIS) records search was conducted at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton. The records search focused on the project area and a 0.5-mile buffer.

No resources are documented within the project area. However, there are twelve (12) archaeological sites of Native American origin documented within 0.5 mile of the project area. One (1) site with both prehistoric and historic components, two (2) historic sites, and five (5) prehistoric isolates are also documented within the 0.5-mile buffer. None of the documented resources will be impacted by the proposed project.

A cultural resources survey has not yet been conducted for the project.



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Thank you very much for your assistance in this study. Please feel free to contact me directly with any questions or comments.

Sincerely,

Marc A. Beherec, Ph.D., RPA
AECOM
Archaeologist
marc.beherec@aecom.com
Desk: 213-593-8481 Cell: 951-296-7561

Enclosure:

- 1) Project Area Map
- 2) Response Form
- 3) Self-Addressed Stamped Envelope

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February 15, 2019

Ms. Eleanor Arrellanes
Barbareno/Ventureno Band of Mission Indians
P.O. Box 5687
Ventura, CA 93005

Subject: Viewridge Super Green Streets Regional Enhanced Watershed Management Project

Dear Ms. Eleanor Arrellanes,

The Los Angeles County Department of Public Works (LACDPW) Stormwater Quality Division has retained AECOM to conduct a Phase I cultural resources investigation to identify potential impacts to cultural resources for the Viewridge Super Green Streets Regional Enhanced Watershed Management Project in compliance with the California Environmental Quality Act (CEQA). The proposed project is a large-scale green street project intended to capture and treat stormwater flow from approximately 81.4 acres of single family residential neighborhoods which are tributary to the project area. The main green street project elements include the installation of two structures to divert the dry and wet weather flows from existing storm drains to new biofiltration units, the installation of a 5,200 cubic foot underground cistern to store captured water for irrigation of the existing Viewridge Road median, and modular biofiltration units to capture and treat road flows prior to discharging them into existing catch basins and directly to Topanga Canyon Creek and the North Santa Monica Bay. Other components include recreational enhancements (i.e. walkway, bike path, and native/drought tolerant landscaping) and educational signage. Most of the planned project improvements will be installed beneath existing roadways and medians.

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February 15, 2019

Mr. Raudel Joe Banuelos, Jr.
Barbareno/Ventureno Band of Mission Indians
331 Mira Flores Court
Camarillo, CA 93012

Subject: Viewridge Super Green Streets Regional Enhanced Watershed Management Project

Dear Mr. Raudel Joe Banuelos, Jr.,

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February 15, 2019

Chairperson Linda Candelaria
Gabrielino-Tongva Tribe
80839 Camino Santa Juliana
Indio, CA 92203

Subject: Viewridge Super Green Streets Regional Enhanced Watershed Management Project

Dear Chairperson Linda Candelaria,

The Los Angeles County Department of Public Works (LACDPW) Stormwater Quality Division has retained AECOM to conduct a Phase I cultural resources investigation to identify potential impacts to cultural resources for the Viewridge Super Green Streets Regional Enhanced Watershed Management Project in compliance with the California Environmental Quality Act (CEQA). The proposed project is a large-scale green street project intended to capture and treat stormwater flow from approximately 81.4 acres of single family residential neighborhoods which are tributary to the project area. The main green street project elements include the installation of two structures to divert the dry and wet weather flows from existing storm drains to new biofiltration units, the installation of a 5,200 cubic foot underground cistern to store captured water for irrigation of the existing Viewridge Road median, and modular biofiltration units to capture and treat road flows prior to discharging them into existing catch basins and directly to Topanga Canyon Creek and the North Santa Monica Bay. Other components include recreational enhancements (i.e. walkway, bike path, and native/drought tolerant landscaping) and educational signage. Most of the planned project improvements will be installed beneath existing roadways and medians.

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February 15, 2019

Chairman Robert F. Dorame
Gabrielino Tongva Indians of California Tribal Council
P.O. Box 490
Bellflower, CA 90707

Subject: Viewridge Super Green Streets Regional Enhanced Watershed Management Project

Dear Chairman Robert F. Dorame,

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February 15, 2019

Chairperson Sandonne Goad
Gabrielino /Tongva Nation
106 1/2 Judge John Aiso St., #231
Los Angeles, CA 90012

Subject: Viewridge Super Green Streets Regional Enhanced Watershed Management Project

Dear Chairperson Sandonne Goad,

The Los Angeles County Department of Public Works (LACDPW) Stormwater Quality Division has retained AECOM to conduct a Phase I cultural resources investigation to identify potential impacts to cultural resources for the Viewridge Super Green Streets Regional Enhanced Watershed Management Project in compliance with the California Environmental Quality Act (CEQA). The proposed project is a large-scale green street project intended to capture and treat stormwater flow from approximately 81.4 acres of single family residential neighborhoods which are tributary to the project area. The main green street project elements include the installation of two structures to divert the dry and wet weather flows from existing storm drains to new biofiltration units, the installation of a 5,200 cubic foot underground cistern to store captured water for irrigation of the existing Viewridge Road median, and modular biofiltration units to capture and treat road flows prior to discharging them into existing catch basins and directly to Topanga Canyon Creek and the North Santa Monica Bay. Other components include recreational enhancements (i.e. walkway, bike path, and native/drought tolerant landscaping) and educational signage. Most of the planned project improvements will be installed beneath existing roadways and medians.

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February 15, 2019

Chair Julie Lynn Tumamait-Stenslie
Barbareno/Ventureno Band of Mission Indians
365 North Poli Ave
Ojai, CA 93023

Subject: Viewridge Super Green Streets Regional Enhanced Watershed Management Project

Dear Chair Julie Lynn Tumamait-Stenslie,

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February 15, 2019

Chairperson Kenneth Kahn
Santa Ynez Band of Chumash Indians
P.O. Box 517
Santa Ynez, CA 93460

Subject: Viewridge Super Green Streets Regional Enhanced Watershed Management Project

Dear Chairperson Kenneth Kahn,

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February 15, 2019

Chairperson Anthony Morales
Gabrieleno/Tongva San Gabriel Band of Mission Indians
P.O. Box 693
San Gabriel, CA 91778

Subject: Viewridge Super Green Streets Regional Enhanced Watershed Management Project

Dear Chairperson Anthony Morales,

The Los Angeles County Department of Public Works (LACDPW) Stormwater Quality Division has retained AECOM to conduct a Phase I cultural resources investigation to identify potential impacts to cultural resources for the Viewridge Super Green Streets Regional Enhanced Watershed Management Project in compliance with the California Environmental Quality Act (CEQA). The proposed project is a large-scale green street project intended to capture and treat stormwater flow from approximately 81.4 acres of single family residential neighborhoods which are tributary to the project area. The main green street project elements include the installation of two structures to divert the dry and wet weather flows from existing storm drains to new biofiltration units, the installation of a 5,200 cubic foot underground cistern to store captured water for irrigation of the existing Viewridge Road median, and modular biofiltration units to capture and treat road flows prior to discharging them into existing catch basins and directly to Topanga Canyon Creek and the North Santa Monica Bay. Other components include recreational enhancements (i.e. walkway, bike path, and native/drought tolerant landscaping) and educational signage. Most of the planned project improvements will be installed beneath existing roadways and medians.

The Project is located in unincorporated area of Topanga. The modular wetlands will be installed along Viewridge Road, North Topanga Canyon Boulevard, Chagall Road, and Bellini Drive in the upper portion of the Topanga Creek subwatershed. **The project is located in Township 1 North, Range 16 West, Section 30 on the Canoga Park (1952) 1:24000 USGS topographic map.**

A California Historical Resources Information System (CHRIS) records search was conducted at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton. The records search focused on the project area and a 0.5-mile buffer.

No resources are documented within the project area. However, there are twelve (12) archaeological sites of Native American origin documented within 0.5 mile of the project area. One (1) site with both prehistoric and historic components, two (2) historic sites, and five (5) prehistoric isolates are also documented within the 0.5-mile buffer. None of the documented resources will be impacted by the proposed project.

A cultural resources survey has not yet been conducted for the project.



AECOM Inc.
300 South Grand Avenue, Suite 200, Los Angeles, CA 90071
T 213.593.7700 www.aecom.com

At our request, the Native American Heritage Commission (NAHC) conducted a Sacred Lands File search of the project area. The results of the SLF search were negative. The NAHC identified you as a tribal representative who may have interest in or knowledge of the area.

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Thank you very much for your assistance in this study. Please feel free to contact me directly with any questions or comments.

Sincerely,

Marc A. Beherec, Ph.D., RPA
AECOM
Archaeologist
marc.beherec@aecom.com
Desk: 213-593-8481 Cell: 951-296-7561

Enclosure:

- 1) Project Area Map
- 2) Response Form
- 3) Self-Addressed Stamped Envelope

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T 213.593.7700 www.aecom.com

February 15, 2019

Chairperson Andrew Salas
Gabrieleno Band of Mission Indians - Kizh Nation
P.O. Box 393
Covina, CA 91723

Subject: Viewridge Super Green Streets Regional Enhanced Watershed Management Project

Dear Chairperson Andrew Salas,

The Los Angeles County Department of Public Works (LACDPW) Stormwater Quality Division has retained AECOM to conduct a Phase I cultural resources investigation to identify potential impacts to cultural resources for the Viewridge Super Green Streets Regional Enhanced Watershed Management Project in compliance with the California Environmental Quality Act (CEQA). The proposed project is a large-scale green street project intended to capture and treat stormwater flow from approximately 81.4 acres of single family residential neighborhoods which are tributary to the project area. The main green street project elements include the installation of two structures to divert the dry and wet weather flows from existing storm drains to new biofiltration units, the installation of a 5,200 cubic foot underground cistern to store captured water for irrigation of the existing Viewridge Road median, and modular biofiltration units to capture and treat road flows prior to discharging them into existing catch basins and directly to Topanga Canyon Creek and the North Santa Monica Bay. Other components include recreational enhancements (i.e. walkway, bike path, and native/drought tolerant landscaping) and educational signage. Most of the planned project improvements will be installed beneath existing roadways and medians.

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T 213.593.7700 www.aecom.com

February 15, 2019

Mr. Patrick Tumamait
Barbareno/Ventureno Band of Mission Indians
992 El Camino Corto
Ojai, CA 93023

Subject: Viewridge Super Green Streets Regional Enhanced Watershed Management Project

Dear Mr. Patrick Tumamait,

The Los Angeles County Department of Public Works (LACDPW) Stormwater Quality Division has retained AECOM to conduct a Phase I cultural resources investigation to identify potential impacts to cultural resources for the Viewridge Super Green Streets Regional Enhanced Watershed Management Project in compliance with the California Environmental Quality Act (CEQA). The proposed project is a large-scale green street project intended to capture and treat stormwater flow from approximately 81.4 acres of single family residential neighborhoods which are tributary to the project area. The main green street project elements include the installation of two structures to divert the dry and wet weather flows from existing storm drains to new biofiltration units, the installation of a 5,200 cubic foot underground cistern to store captured water for irrigation of the existing Viewridge Road median, and modular biofiltration units to capture and treat road flows prior to discharging them into existing catch basins and directly to Topanga Canyon Creek and the North Santa Monica Bay. Other components include recreational enhancements (i.e. walkway, bike path, and native/drought tolerant landscaping) and educational signage. Most of the planned project improvements will be installed beneath existing roadways and medians.

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T 213.593.7700 www.aecom.com

February 15, 2019

Chief Mark Steven Vigil
San Luis Obispo County Chumash Council
1030 Ritchie Road
Grover Beach, CA 93433

Subject: Viewridge Super Green Streets Regional Enhanced Watershed Management Project

Dear Chief Mark Steven Vigil,

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Contact Report Form

AECOM Contact: Marc BeherecDate: March 1, 2019Project # 60592600Individual Contacted: Charles AlvarezPhone # 310-403-6048

Contact Information

Subject of Contact: Viewridge

Items Discussed

I briefly described the project for Mr. Alvarez, who said he remembered seeing our letter. He stated that someone in his tribe may be available for monitoring if monitoring is required. He asked me to email a copy of the letter to him at calvarez1956@gmail.com This was done.

Follow Up

Emailed Mr. Alvarez a copy of the letter.

Contact Report Form

AECOM Contact: Marc BeherecDate: March 1, 2019Project # 60592600Individual Contacted: Elanor ArrellanesPhone # 805-701-3246

Contact Information

Subject of Contact: Viewridge

Items Discussed

I briefly described the project for Ms. Arrellanes, who said she would look for our letter and email us with comment.

Follow Up

None needed.

Contact Report Form

AECOM Contact: Marc BeherecDate: March 4, 2019Project # 60592600Individual Contacted: Elanor ArrellanesPhone # 805-701-3246

Contact Information

Subject of Contact: Viewridge

Items Discussed

Ms. Arrellanes called back to discuss Viewridge. She stated that the project appears to be outside of Chumash territory and therefore she would not have comment. She said however that if the tribe decided otherwise Chaiperson Julie Lynn Tumamait-Stenslie would contact us.

Follow Up

None needed.

Contact Report Form

AECOM Contact: Marc Beherec

Date: March 1, 2019

Project # 60592600

Individual Contacted: Raudel Joe Banuelos, Jr.

Phone # 805-427-0015

Contact Information

Subject of Contact: Viewridge

Items Discussed

Left a voicemail briefly describing the project and requesting comment.

Follow Up

None needed.

Contact Report Form

AECOM Contact: Marc BeherecDate: March 1, 2019Project # 60592600Individual Contacted: Robert DoramePhone # 562-761-6417

Contact Information

Subject of Contact: Viewridge

Items Discussed

I briefly described the project for Mr. Dorame, who said he would check for our letter and get back to us.

Follow Up

None needed.

Contact Report Form

AECOM Contact: Marc BeherecDate: March 1, 2019Project # 60592600Individual Contacted: Sandonne GoadPhone # 951-807-0479

Contact Information

Subject of Contact: Viewridge

Items Discussed

Left a voicemail briefly describing the project and requesting comment.

Follow Up

None needed.

Contact Report Form

AECOM Contact: Marc BeherecDate: March 1, 2019Project # 60592600Individual Contacted: Karen Keeves for Kenneth KahnPhone # 805-688-7997

Contact Information

Subject of Contact: Viewridge

Items Discussed

The phone number provided by the NAHC goes to the tribal office. I spoke first to a receptionist and then Cody in their cultural resources department before being transferred to an administrator. Administrator Karen Keeves informed me that the letter was passed on to their cultural resources team, who would decide whether or not to comment on the project.

Follow Up

None needed.

Contact Report Form

AECOM Contact: Marc Beherec

Date: March 1, 2019

Project # 60592600

Individual Contacted: Anthony Morales

Phone # 626-483-3564

Contact Information

Subject of Contact: Viewridge

Items Discussed

Left a voicemail briefly describing the project and requesting comment.

Follow Up

None needed.

Contact Report Form

AECOM Contact: Marc BeherecDate: March 11, 2019Project # 60592600Individual Contacted: Anthony MoralesPhone # 626-483-3564

Contact Information

Subject of Contact: Viewridge

Items Discussed

Mr. Morales returned my phone message and apologized for taking so long to get back to us. He asked about the basic project description and the results of the CHRIS records search and I informed him of the number of prehistoric sites recorded within the 0.5-mile buffer. He told me the result of the CHRIS records search "speaks for itself" as to the sensitivity of the project area. He wanted to know if the project area is considered Gabrielino or Chumash territory. I informed him that I'd gone through the reports and both groups are mentioned as possible occupants of the area, which is roughly on the border anthropologists assign to the two groups.

Mr. Morales stated that the area is sensitive for buried cultural resources. He said that he recommends both archaeological and Native American monitoring for the proposed project, and requests that a member of his tribe be contracted for the monitoring.

Follow Up

None needed.

Contact Report Form

AECOM Contact: Marc Beherec

Date: March 1, 2019

Project # 60592600

Individual Contacted: Andrew Salas

Phone # 626-926-4131

Contact Information

Subject of Contact: Viewridge

Items Discussed

Left a voicemail briefly describing the project and requesting comment.

Follow Up

None needed.

Contact Report Form

AECOM Contact: Marc BeherecDate: March 1, 2019Project # 60592600Individual Contacted: Patrick TumamaitPhone # 805-216-1253

Contact Information

Subject of Contact: Viewridge

Items Discussed

Initially I left a voicemail, but Mr. Tumamait called back immediately. He said he knew the Topanga area was very sensitive for cultural resources and asked about the CHRIS records search. I briefly informed him of the results. He said he definitely recommends monitoring, but wanted to be sure the project lay in Chumash, not Gabrielino, territory. He informed me that he coordinates with Chairperson Andrew Salas of the Kizh Nation, and he didn't want to "step on any toes" if the area is claimed by the Kizh. However, he said he is interested in monitoring for the project if the area is in Chumash territory. Mr. Tumamait asked me to check the reports and site records and let him know whether the previous archaeologists said the area is Chumash or Gabrielino.

Follow Up

Will check the documentation and get back to Mr. Tumamait.

Contact Report Form

AECOM Contact: Marc BeherecDate: March 6, 2019Project # 60592600Individual Contacted: Patrick TumamaitPhone # 805-216-1253

Contact Information

Subject of Contact: Viewridge

Items Discussed

Mr. Tumamait asked me to check the site records and reports to see whether previous archaeologists called the project area Chumash or Gabrielino territory. After doing so, I found that most of the archaeologists did not venture an opinion. Those who did discuss the ethnographic background stated that the vicinity lay on the border of the two groups and may have been used by both or either one. I informed Mr. Tumamait of this. He thanked me for the information and asked me to include his recommendation for monitoring in the report and state that he was available for and interested in monitoring.

Follow Up

None needed.

Contact Report Form

AECOM Contact: Marc BeherecDate: March 1, 2019Project # 60592600Individual Contacted: Julie Lynn Tumamait-StensliePhone # 805-646-6214

Contact Information

Subject of Contact: Viewridge

Items Discussed

Left a voicemail briefly describing the project and requesting comment.

Follow Up

None needed.

Contact Report Form

AECOM Contact: Marc Beherec

Date: March 1, 2019

Project # 60592600

Individual Contacted: Mark Vigil

Phone # 805-481-2461

Contact Information

Subject of Contact: Viewridge

Items Discussed

A recording states that the number provided by the NAHC has been disconnected or is no longer in service.

Follow Up

None needed.

APPENDIX D

Greenhouse Gas Impact Assessment Technical Memorandum

Technical Memorandum

TO: Fareeha Kibriya, Associate Vice President, Environmental Planning
AECOM

FROM: Terry A. Hayes Associates Inc.
Sam Silverman, Senior Associate
Anders Sutherland, Environmental Scientist

DATE: July 22, 2019

RE: **Viewridge Road Stormwater Improvements Project – Greenhouse Gas Impact Assessment**

Introduction

Terry A. Hayes Associates Inc. (TAHA) has completed a Greenhouse Gas Impact Assessment for the Viewridge Road Stormwater Improvements Project (proposed project) in accordance with the provisions of the California Environmental Quality Act (CEQA) Statutes and Guidelines. The project site is located in the Los Angeles County portion of the South Coast Air Basin, which falls under the jurisdiction of the South Coast Air Quality Management District (SCAQMD).

Project Description

The following Project Description is summarized from the Initial Study prepared for the proposed project. Refer to the Initial Study for a detailed project information.

Los Angeles County Public Works (LACPW) proposes to implement the Viewridge Road Stormwater Improvements Project, which would implement Best Management Practices (BMPs) identified to achieve and maintain water quality objectives and protect beneficial uses pursuant to the Municipal Separate Storm Sewer System Permit applicable to the project site. The BMPs identified for the proposed project focus on capture and treatment of stormwater along Viewridge Road between Topanga Canyon Boulevard and Summit Pointe Drive. Construction is anticipated to begin in summer 2022 and take approximately nine months, concluding in spring 2023. The proposed project would be constructed completely within the existing road right-of-way and/or parkways adjacent to the roadways. All portions of the project site are owned and maintained by LACPW, with the exception of the temporary construction staging along the east shoulder of Topanga Canyon Boulevard, which is California Department of Transportation right-of-way.

The project site is located within a low-density residential neighborhood characterized by single-family homes. Additionally, there are open space areas on the west side of Topanga Canyon Boulevard and to the south of Viewridge Road east of the Heidi Lane. These open space areas provide recreational opportunities with hiking/walking trails.



LACPW, the lead agency, has concluded that an addendum to the 2015 Program Environmental Impact Report (PEIR) for the Los Angeles County Flood Control District Enhanced Watershed Management Programs is the proper level of environmental documentation for this proposed project.

Significance Thresholds

This Assessment was undertaken to determine whether construction or operation of the proposed project would have the potential to result in significant environmental impacts related to GHG emissions in the context of the Appendix G Environmental Checklist criteria of the CEQA Statute and Guidelines. Implementation of the proposed project may result in a significant environmental impact related to GHG emissions if the proposed project would:

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

The Los Angeles County Flood Control District has not adopted any thresholds for GHG emissions. Additionally, while South Coast Air Quality Management District (SCAQMD) has issued proposed standards and guidelines, there is no adopted state or local standard for determining the significance of the proposed project's GHG emissions on global climate change. In December 2008, SCAQMD adopted an annual interim quantitative threshold value of 10,000 metric tons of carbon dioxide (CO₂) equivalents (MTCO_{2e})/year for industrial facilities, but only with respect to projects where SCAQMD is the lead agency. Additionally, SCAQMD has proposed, but not adopted, a 3,000 MTCO_{2e}/year threshold for mixed use developments, a 3,500 MTCO_{2e}/year threshold for residential developments, and a 1,400 MTCO_{2e}/year threshold for commercial developments. As an alternative to the aforementioned proposed thresholds for residential, commercial, and mixed-use developments, SCAQMD has also recommended the use of a single numerical threshold of 3,000 MTCO_{2e}/year for all non-industrial projects. For the purposes of this analysis, because the BMPs (structural and non-structural) associated with the proposed program are not residential, commercial, mixed-use, or industrial projects, the most appropriate threshold that would apply to the proposed program would be, although not formally adopted, the 3,000 MTCO_{2e}/year criteria recommended by SCAQMD.

Methodology

GHG emissions were estimated using California Emissions Estimator Model (CalEEMod), as recommended by the SCAQMD. CalEEMod provides regionally-specific default values for daily equipment usage rates and worker trip lengths, as well as emissions factors for heavy duty equipment and passenger vehicles that have been derived by the California Air Resources Board (CARB) through extensive air quality investigations and surveys. The Draft PEIR included an equipment mix for various BMP projects, which is shown in **Table 1**. This mix was selected based on the project-specific components. In accordance with SCAQMD methodology, the total amount of GHG emissions that would be generated by construction of the proposed project was amortized over a 30-year operational period to represent long-term impacts.

TABLE 1: MODELING PARAMETERS			
Construction Phase	Construction Equipment Type	Construction Equipment Quantity	Construction Equipment Daily Usage Hours
Site Preparation	Excavator	1	8
	Tractor/Loaders/Backhoes	1	6
	Other General Industrial Equipment	1	8
Grading	Graders	1	4
	Rubber Tired Dozers	1	4
	Tractor/Loaders/Backhoes	1	8
Building Construction	Forklifts	1	8
	Generator Sets	1	8
	Tractor/Loaders/Backhoes	2	8
	Welders	1	8

SOURCE: LACPW, *Enhanced Watershed Management Programs Draft PEIR*, January 2015.

Greenhouse Gas Emissions Impact Assessment

a) Would the proposed project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment? (Less-than-Significant Impact)

The PEIR did not identify a significant impact, and mitigation measures were not required to reduce GHG emissions.

The proposed project would generate GHG emissions from construction equipment and vehicular traffic. CalEEMod was used to prepare estimates of annual GHG emissions. Construction of the proposed project would produce approximately 180.0 MTCO₂e, or 6.0 MTCO₂e annually over a 30-year period. This mass rate is substantially below the most applicable quantitative draft interim threshold of 3,000 MTCO₂e per year as recommended by the SCAQMD, representing only 0.2 percent of the limit designed to capture 90 percent of CEQA projects within the SCAQMD jurisdiction. Therefore, implementation of the proposed project would result in a less-than-significant impact related to GHG emissions.

Mitigation Measure

No mitigation measures are required.

b) Would the proposed project or its alternatives conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs? (Less-than-Significant Impact)

The PEIR did not identify a significant impact, and mitigation measures were not required to ensure consistency with GHG reduction plans.

The following analysis is consistent with the Draft PEIR. The analysis discusses Assembly Bill (AB) 32, the CARB Scoping Plan, and the County of Los Angeles Community Climate Action Plan.

As discussed above, GHG emissions would not exceed the SCAQMD's recommended threshold of 3,000 MTCO₂e/year for non-industrial projects. GHG emissions would occur only during construction, which would be temporary in nature. Consequently, the implementation of these structural BMPs in the Enhanced Watershed Management Program (EWMP) areas under the program would not generate substantial amounts of GHG emissions that would hinder the State's ability to achieve AB 32's goal of achieving 1990 levels of GHG emissions by 2020.

Out of the Recommended Actions contained in CARB's Scoping Plan (see Table 3.6-1 of the Draft PEIR), the actions that are most applicable to the proposed project would be Action W-4 (Reuse Urban Runoff), which aims to reduce urban runoff by capturing and treating the runoff. The proposed project would contribute to reducing and treating urban runoff throughout the County of Los Angeles to comply with the MS4 Permit. Implementation of the proposed project would serve as GHG emission reduction measures that are consistent with this recommended action from the Scoping Plan. Therefore, the program would not conflict with the CARB scoping plan.

The County of Los Angeles Community Climate Action Plan (CCAP) serves to mitigate and avoid GHG emissions associated with community activities in unincorporated Los Angeles County. The CCAP establishes a GHG reduction target that is consistent with AB 32. As part of the CCAP, 26 local actions have been identified to reduce GHG emissions in the unincorporated areas of the County. In particular, Mitigation Measure **WAW-2** (Recycled Water Use, Water Supply Improvement Programs, and Stormwater Runoff) from the CCAP specifically aims to promote recycled water use and policies to better manage stormwater to protect local groundwater supplies. A part of the goal for this measure is to manage stormwater and protect local groundwater supplies. A specific implementation step associated with this measure identified in the CCAP is to expand the Low Impact Development stormwater catchment to more facilities where feasible in the County. The proposed project would be consistent with this GHG reduction measure of the CCAP. Therefore, the proposed project would not conflict with the County's CCAP.

Mitigation Measures

No mitigation measures are required.

References

California Air Pollution Control Officers Association, *California Emissions Estimator Model (CalEEMod v2016.3.2) User's Guide*, November 2017.

California Environmental Quality Act Guidelines Section 15064.4.

Los Angeles County Public Works, *Enhanced Watershed Management Programs Draft PEIR*, January 2015.

Southern California Association of Governments, *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy*, April 2016.

South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 1993.

South Coast Air Quality Management District, *SCAQMD Air Quality Significance Thresholds*, March 2015.

Attachment

LACDPW Viewridge Super Green Streets Regional EWMP - Los Angeles-South Coast County, Annual

LACDPW Viewridge Super Green Streets Regional EWMP
Los Angeles-South Coast County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
User Defined Industrial	1.00	User Defined Unit	2.00	0.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	33
Climate Zone	8			Operational Year	2020
Utility Company	Southern California Edison				
CO2 Intensity (lb/MW hr)	702.44	CH4 Intensity (lb/MW hr)	0.029	N2O Intensity (lb/MW hr)	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Total Ground Disturbance Area = 2 acres.

No operational component.

Construction Phase - 6 month construction schedule: July - October 2020

Off-road Equipment - LACDPW EWMP DPEIR Jan 2015

Off-road Equipment - LACDPW EWMP DPEIR Jan 2015

Off-road Equipment - LACDPW EWMP DPEIR Jan 2015

Trips and VMT - Approximately 10 truck round trips per day.

Grading -

Construction Off-road Equipment Mitigation -

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Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	4.00	40.00
tblConstructionPhase	NumDays	2.00	40.00
tblLandUse	LotAcreage	0.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	PhaseName		Site Preparation
tblOffRoadEquipment	PhaseName		BMP Installation
tblOffRoadEquipment	PhaseName		BMP Installation
tblOffRoadEquipment	PhaseName		Site Preparation
tblOffRoadEquipment	PhaseName		BMP Installation
tblOffRoadEquipment	PhaseName		BMP Installation
tblOffRoadEquipment	UsageHours	8.00	4.00
tblOffRoadEquipment	UsageHours	8.00	4.00
tblOffRoadEquipment	UsageHours	7.00	8.00
tblOffRoadEquipment	UsageHours	7.00	6.00
tblTripsAndVMT	HaulingTripNumber	0.00	800.00
tblTripsAndVMT	HaulingTripNumber	0.00	800.00
tblTripsAndVMT	HaulingTripNumber	0.00	1,000.00
tblTripsAndVMT	WorkerTripNumber	13.00	14.00

2.0 Emissions Summary

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2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2020	0.0797	0.9939	0.6374	1.9300e-003	0.0952	0.0351	0.1303	0.0418	0.0329	0.0747	0.0000	179.3403	179.3403	0.0260	0.0000	179.9897
Maximum	0.0797	0.9939	0.6374	1.9300e-003	0.0952	0.0351	0.1303	0.0418	0.0329	0.0747	0.0000	179.3403	179.3403	0.0260	0.0000	179.9897

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2020	0.0797	0.9939	0.6374	1.9300e-003	0.0952	0.0351	0.1303	0.0418	0.0329	0.0747	0.0000	179.3402	179.3402	0.0260	0.0000	179.9896
Maximum	0.0797	0.9939	0.6374	1.9300e-003	0.0952	0.0351	0.1303	0.0418	0.0329	0.0747	0.0000	179.3402	179.3402	0.0260	0.0000	179.9896

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	5-4-2020	8-3-2020	0.4764	0.4764
2	8-4-2020	9-30-2020	0.3580	0.3580
		Highest	0.4764	0.4764

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005

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2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	5/4/2020	6/26/2020	5	40	
2	Grading	Grading	6/29/2020	8/21/2020	5	40	
3	BMP Installation	Trenching	8/24/2020	10/30/2020	5	50	

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Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 10

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Site Preparation	Excavators	1	8.00	158	0.38
Site Preparation	Other General Industrial Equipment	1	8.00	88	0.34
Site Preparation	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Grading	Graders	1	4.00	187	0.41
Grading	Rubber Tired Dozers	1	4.00	247	0.40
Grading	Tractors/Loaders/Backhoes	1	8.00	97	0.37
BMP Installation	Forklifts	1	8.00	89	0.20
BMP Installation	Generator Sets	1	8.00	84	0.74
BMP Installation	Tractors/Loaders/Backhoes	2	8.00	97	0.37
BMP Installation	Welders	1	8.00	46	0.45

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	3	8.00	0.00	800.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	3	8.00	0.00	800.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
BMP Installation	5	14.00	0.00	1,000.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

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3.2 Site Preparation - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0128	0.1227	0.1394	2.0000e-004		7.4600e-003	7.4600e-003		6.8600e-003	6.8600e-003	0.0000	17.6668	17.6668	5.7100e-003	0.0000	17.8096
Total	0.0128	0.1227	0.1394	2.0000e-004	0.0000	7.4600e-003	7.4600e-003	0.0000	6.8600e-003	6.8600e-003	0.0000	17.6668	17.6668	5.7100e-003	0.0000	17.8096

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	3.5300e-003	0.1188	0.0262	3.1000e-004	6.8700e-003	3.7000e-004	7.2400e-003	1.8900e-003	3.5000e-004	2.2400e-003	0.0000	30.8313	30.8313	2.1500e-003	0.0000	30.8850
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.4000e-004	6.0000e-004	6.5900e-003	2.0000e-005	1.7500e-003	1.0000e-005	1.7700e-003	4.7000e-004	1.0000e-005	4.8000e-004	0.0000	1.6342	1.6342	5.0000e-005	0.0000	1.6355
Total	4.2700e-003	0.1194	0.0328	3.3000e-004	8.6200e-003	3.8000e-004	9.0100e-003	2.3600e-003	3.6000e-004	2.7200e-003	0.0000	32.4655	32.4655	2.2000e-003	0.0000	32.5204

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3.2 Site Preparation - 2020

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0128	0.1227	0.1394	2.0000e-004		7.4600e-003	7.4600e-003		6.8600e-003	6.8600e-003	0.0000	17.6667	17.6667	5.7100e-003	0.0000	17.8096
Total	0.0128	0.1227	0.1394	2.0000e-004	0.0000	7.4600e-003	7.4600e-003	0.0000	6.8600e-003	6.8600e-003	0.0000	17.6667	17.6667	5.7100e-003	0.0000	17.8096

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	3.5300e-003	0.1188	0.0262	3.1000e-004	6.8700e-003	3.7000e-004	7.2400e-003	1.8900e-003	3.5000e-004	2.2400e-003	0.0000	30.8313	30.8313	2.1500e-003	0.0000	30.8850
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.4000e-004	6.0000e-004	6.5900e-003	2.0000e-005	1.7500e-003	1.0000e-005	1.7700e-003	4.7000e-004	1.0000e-005	4.8000e-004	0.0000	1.6342	1.6342	5.0000e-005	0.0000	1.6355
Total	4.2700e-003	0.1194	0.0328	3.3000e-004	8.6200e-003	3.8000e-004	9.0100e-003	2.3600e-003	3.6000e-004	2.7200e-003	0.0000	32.4655	32.4655	2.2000e-003	0.0000	32.5204

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3.3 Grading - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0655	0.0000	0.0655	0.0337	0.0000	0.0337	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0197	0.2187	0.1051	2.1000e-004		0.0102	0.0102		9.4200e-003	9.4200e-003	0.0000	18.7932	18.7932	6.0800e-003	0.0000	18.9452
Total	0.0197	0.2187	0.1051	2.1000e-004	0.0655	0.0102	0.0758	0.0337	9.4200e-003	0.0431	0.0000	18.7932	18.7932	6.0800e-003	0.0000	18.9452

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	3.5300e-003	0.1188	0.0262	3.1000e-004	6.8700e-003	3.7000e-004	7.2400e-003	1.8900e-003	3.5000e-004	2.2400e-003	0.0000	30.8313	30.8313	2.1500e-003	0.0000	30.8850
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.4000e-004	6.0000e-004	6.5900e-003	2.0000e-005	1.7500e-003	1.0000e-005	1.7700e-003	4.7000e-004	1.0000e-005	4.8000e-004	0.0000	1.6342	1.6342	5.0000e-005	0.0000	1.6355
Total	4.2700e-003	0.1194	0.0328	3.3000e-004	8.6200e-003	3.8000e-004	9.0100e-003	2.3600e-003	3.6000e-004	2.7200e-003	0.0000	32.4655	32.4655	2.2000e-003	0.0000	32.5204

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3.3 Grading - 2020

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0655	0.0000	0.0655	0.0337	0.0000	0.0337	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0197	0.2187	0.1051	2.1000e-004		0.0102	0.0102		9.4200e-003	9.4200e-003	0.0000	18.7932	18.7932	6.0800e-003	0.0000	18.9452
Total	0.0197	0.2187	0.1051	2.1000e-004	0.0655	0.0102	0.0758	0.0337	9.4200e-003	0.0431	0.0000	18.7932	18.7932	6.0800e-003	0.0000	18.9452

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	3.5300e-003	0.1188	0.0262	3.1000e-004	6.8700e-003	3.7000e-004	7.2400e-003	1.8900e-003	3.5000e-004	2.2400e-003	0.0000	30.8313	30.8313	2.1500e-003	0.0000	30.8850
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	7.4000e-004	6.0000e-004	6.5900e-003	2.0000e-005	1.7500e-003	1.0000e-005	1.7700e-003	4.7000e-004	1.0000e-005	4.8000e-004	0.0000	1.6342	1.6342	5.0000e-005	0.0000	1.6355
Total	4.2700e-003	0.1194	0.0328	3.3000e-004	8.6200e-003	3.8000e-004	9.0100e-003	2.3600e-003	3.6000e-004	2.7200e-003	0.0000	32.4655	32.4655	2.2000e-003	0.0000	32.5204

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3.4 BMP Installation - 2020

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0326	0.2639	0.2803	4.2000e-004		0.0162	0.0162		0.0154	0.0154	0.0000	35.8356	35.8356	6.9900e-003	0.0000	36.0104
Total	0.0326	0.2639	0.2803	4.2000e-004		0.0162	0.0162		0.0154	0.0154	0.0000	35.8356	35.8356	6.9900e-003	0.0000	36.0104

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	4.4100e-003	0.1485	0.0327	3.9000e-004	8.5900e-003	4.6000e-004	9.0500e-003	2.3600e-003	4.4000e-004	2.8000e-003	0.0000	38.5391	38.5391	2.6800e-003	0.0000	38.6062
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.6200e-003	1.3000e-003	0.0144	4.0000e-005	3.8400e-003	3.0000e-005	3.8700e-003	1.0200e-003	3.0000e-005	1.0500e-003	0.0000	3.5747	3.5747	1.1000e-004	0.0000	3.5775
Total	6.0300e-003	0.1498	0.0471	4.3000e-004	0.0124	4.9000e-004	0.0129	3.3800e-003	4.7000e-004	3.8500e-003	0.0000	42.1138	42.1138	2.7900e-003	0.0000	42.1838

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3.4 BMP Installation - 2020

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0326	0.2639	0.2803	4.2000e-004		0.0162	0.0162		0.0154	0.0154	0.0000	35.8356	35.8356	6.9900e-003	0.0000	36.0103
Total	0.0326	0.2639	0.2803	4.2000e-004		0.0162	0.0162		0.0154	0.0154	0.0000	35.8356	35.8356	6.9900e-003	0.0000	36.0103

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	4.4100e-003	0.1485	0.0327	3.9000e-004	8.5900e-003	4.6000e-004	9.0500e-003	2.3600e-003	4.4000e-004	2.8000e-003	0.0000	38.5391	38.5391	2.6800e-003	0.0000	38.6062
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.6200e-003	1.3000e-003	0.0144	4.0000e-005	3.8400e-003	3.0000e-005	3.8700e-003	1.0200e-003	3.0000e-005	1.0500e-003	0.0000	3.5747	3.5747	1.1000e-004	0.0000	3.5775
Total	6.0300e-003	0.1498	0.0471	4.3000e-004	0.0124	4.9000e-004	0.0129	3.3800e-003	4.7000e-004	3.8500e-003	0.0000	42.1138	42.1138	2.7900e-003	0.0000	42.1838

4.0 Operational Detail - Mobile

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4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
User Defined Industrial	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
User Defined Industrial	16.60	8.40	6.90	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
User Defined Industrial	0.547726	0.045437	0.201480	0.122768	0.016614	0.006090	0.019326	0.029174	0.002438	0.002359	0.005005	0.000677	0.000907

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5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

6.0 Area Detail

6.1 Mitigation Measures Area

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005
Unmitigated	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005
Total	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005

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6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005
Total	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	3.0000e-005

7.0 Water Detail

7.1 Mitigation Measures Water

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	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

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7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
User Defined Industrial	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

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8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
User Defined Industrial	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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User Defined Equipment

Equipment Type	Number
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11.0 Vegetation

APPENDIX E

**Noise and Vibration Impact Assessment
Technical Memorandum**

Technical Memorandum

TO: Fareeha Kibriya, Associate Vice President, Environmental Planning
AECOM

FROM: Terry A. Hayes Associates Inc.
Sam Silverman, Senior Associate
Kieran Bartholow, Planner

DATE: July 22, 2019

RE: **Viewridge Road Stormwater Improvements Project – Noise and Vibration Impact Assessment**

Introduction

Terry A. Hayes Associates Inc. (TAHA) has completed a Noise and Vibration Impact Assessment for the Viewridge Road Stormwater Improvements Program Project (proposed project) in accordance with the provisions of the California Environmental Quality Act (CEQA) Statutes and Guidelines.

Project Description

The following Project Description is summarized from the Initial Study prepared for the proposed project. Refer to the Initial Study for a detailed project information.

Los Angeles County Public Works (LACPW) proposes to implement the Viewridge Road Stormwater Improvements Project, which would implement Best Management Practices (BMPs) identified to achieve and maintain water quality objectives and protect beneficial uses pursuant to the Municipal Separate Storm Sewer System Permit applicable to the project site. The BMPs identified for the proposed project focus on capture and treatment of stormwater along Viewridge Road between Topanga Canyon Boulevard and Summit Pointe Drive. Construction is anticipated to begin in summer 2022 and take approximately nine months, concluding in spring 2023. The proposed project would be constructed completely within the existing road right-of-way and/or parkways adjacent to the roadways. All portions of the project site are owned and maintained by LACPW, with the exception of the temporary construction staging along the east shoulder of Topanga Canyon Boulevard, which is California Department of Transportation right-of-way.

The project site is located within a low-density residential neighborhood characterized by single-family homes. Additionally, there are open space areas on the west side of Topanga Canyon Boulevard and to the south of Viewridge Road east of the Heidi Lane. These open space areas provide recreational opportunities with hiking/walking trails.

LACPW, the lead agency, has concluded that an addendum to the 2015 Program Environmental Impact Report (PEIR) for the Los Angeles County Flood Control District Enhanced Watershed Management Programs is the proper level of environmental documentation for this proposed project.

Noise Basics

The standard unit of measurement for noise is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The A-weighted scale, abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately 3 to 140 dBA.

The noise analysis discusses sound levels in terms of Equivalent Noise Level (L_{eq}). L_{eq} is the average noise level on an energy basis for any specific time period. The L_{eq} for one hour is the energy average noise level during the hour. The average noise level is based on the energy content (acoustic energy) of the sound. L_{eq} can be thought of as the level of a continuous noise which has the same energy content as the fluctuating noise level. The equivalent noise level is expressed in units of dBA.

Noise levels decrease as the distance from the noise source to the receiver increases. Noise generated by a stationary noise source, or “point source,” decreases by approximately 6 dBA over hard surfaces (e.g., reflective surfaces such as parking lots or smooth bodies of water) and 7.5 dBA over soft surfaces (e.g., absorptive surfaces such as soft dirt, grass, or scattered bushes and trees) for each doubling of the distance. For example, if a noise source produces a noise level of 89 dBA at a reference distance of 50 feet, then the noise level is 83 dBA at a distance of 100 feet from the noise source, 77 dBA at a distance of 200 feet.

Noise generated by a mobile source decreases by approximately 3 dBA over hard surfaces and 4.8 dBA over soft surfaces for each doubling of the distance. Generally, noise is most audible when the source is in a direct line-of-sight of the receiver. Barriers, such as walls, berms, or buildings that break the line-of-sight between the source and the receiver greatly reduce noise levels from the source since sound can only reach the receiver by bending over the top of the barrier. However, if a barrier is not sufficiently high or long to break the line-of-sight from the source to the receiver, its effectiveness is greatly reduced.

Studies have shown that the smallest perceptible change in sound level for a person with normal hearing sensitivity is approximately 3 dBA. A change of at least 5 dBA would be noticeable and may evoke a community reaction. A 10-dBA increase is subjectively heard as a doubling in loudness and would likely cause a negative community reaction.

Vibration Basics

Vibration is an oscillatory motion through a solid medium in which the motion’s amplitude can be described in terms of displacement, velocity, or acceleration. Vibration can be a serious concern, causing buildings to shake and rumbling sounds to be heard. In contrast to noise, vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Some common sources of vibration are trains, buses on rough roads, and construction activities, such as rock blasting, pile driving, and heavy earth-moving equipment. High levels of vibration may cause physical personal injury or damage to buildings. However, vibration levels rarely affect human health. Instead, most people consider vibration to be an annoyance that may affect concentration or disturb sleep. In addition, high levels of vibration may damage fragile buildings or interfere with equipment that is

highly sensitive to vibration (e.g., electron microscopes). The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings and is usually measured in inches per second.¹

Significance Thresholds

This Assessment was undertaken to determine whether construction or operation of the proposed project would have the potential to result in significant environmental impacts related to noise or vibration in the context of the Appendix G Environmental Checklist criteria of the CEQA Statute and Guidelines. The Initial Study prepared for the Addendum concluded that the proposed project would not generate significant long-term operational noise or vibration and would not expose people to excessive aircraft noise. Therefore, this Technical Memorandum does not address these issues. This Technical Memorandum addresses short-term construction noise and vibration.

Implementation of the proposed project may result in a significant environmental impact related to noise and vibration if the proposed project would:

- a) Result in the exposure of persons to or generation of noise in levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- b) Result in exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels; and/or
- c) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the proposed project.

Noise. Chapter 12.08, Noise Control, of the County of Los Angeles Municipal Code serves as the Noise Ordinance for the County and establishes noise standards to control unnecessary, excessive, and annoying noise and vibration in the County. Section 12.08.440 of the Noise Ordinance prohibits the operation of any tools or equipment used between weekday hours of 7:00 p.m. and 7:00 a.m., or at any time on Sundays or holidays, that creates a noise disturbance across a residential or commercial real-property line. The only exceptions would be emergency work or public safety projects (Section 12.08.0570, part 5, exemption H, Public Health and Safety Activities) or by variance issued by the health officer. Additionally, both the working hours and maximum levels of equipment and activity noise that are allowable from both mobile and stationary equipment in the County are defined by land use and shown in **Table 1**. Equipment noise at business structures is permitted a maximum noise level of 85 dBA daily, including Sunday and legal holidays during all hours.

¹Federal Transit Administration (FTA), *Transit Noise and Vibration Impact Assessment*, May 2006.

TABLE 1: COUNTY OF LOS ANGELES CONSTRUCTION NOISE LIMITS			
Allowable Work Dates & Hours	Single-Family Residential	Multi-Family Residential	Semi-Residential and Commercial
MOBILE EQUIPMENT (LESS THAN 10 DAYS OF EQUIPMENT OPERATION)			
Daily, except Sundays and legal holidays, 7:00 a.m. to 8:00 p.m.	75 dBA	80 dBA	85 dBA
Daily, 8:00 p.m. to 7:00 a.m. and all day Sunday and legal holidays	60 dBA	64 dBA	70 dBA
STATIONARY EQUIPMENT (MORE THAN 10 DAYS OF EQUIPMENT OPERATION)			
Daily, except Sundays and legal holidays, 7:00 a.m. to 8:00 p.m.	60 dBA	65 dBA	70 dBA
Daily, 8:00 p.m. to 7:00 a.m. and all day Sunday and legal holidays	50 dBA	55 dBA	60 dBA
SOURCE: County of Los Angeles Municipal Code, Section 12.08.440 Construction Noise, June 26 th , 2019.			

Vibration. The Los Angeles County Noise Ordinance identifies a presumed perception threshold of 0.01 inches per second over the range of 1 to 100 hertz. Section 12.08.560 of the Noise Ordinance prohibits the operation of any device that creates vibration above the vibration perception threshold of any individual at or beyond the property boundary of the source if on private property, or at 150 feet (46 meters) from the source if on a public space or public right-of-way. The proposed project would be constructed completely within the existing road right-of-way and/or parkways adjacent to the roadways. All portions of the project site are owned and maintained by LACPW.

Methodology

Noise. The projected noise level during the construction period at each receptor location was calculated by (1) making a distance adjustment to the construction source sound level and (2) logarithmically adding the adjusted construction noise source level to the ambient noise level. Operational noise levels were calculated based on traffic volumes in the traffic study and the stationary noise sources located on the project site (e.g., mechanical equipment). According to California Department of Transportation (Caltrans) guidance, air temperature and humidity affect molecular absorption differently depending on the frequency spectrum and can vary significantly over long distances in a complex manner. Molecular absorption in air also reduces noise levels with distance. According to Caltrans, this process only accounts for about 1 dBA per 1,000 feet, which is an inaudible and negligible difference in noise levels. Noise levels have been estimated using a decrease of 6 dBA over hard surfaces for each doubling of the distance. The methodology and formulas obtained from the Caltrans Technical Noise Supplement can be viewed below.

$$(1) \text{ Noise Distance Attenuation Formula: } dBA_2 = dBA_1 + 20 \times LOG_{10} (D_1/D_2)$$

Where:

dBA_1 = Noise level at the reference distance of 50 feet

dBA_2 = Noise level at the receptor

D_1 = Reference distance (50 feet)

D_2 = Distance from source to receptor (measured distance)

(2) *Logarithmic Noise Level Addition Formula: $N_c = 10 \times \text{LOG}_{10} ((10^{(N_1/10)}) + (10^{(N_2/10)}))$*

Where:

N_c = Combined noise level

N₁ = Noise level one

N₂ = Noise level two

Vibration. Vibration levels were estimated using the following propagation formulas.² Vibration damage is assessed using formula and vibration annoyance is assessed using formula. Construction activity was considered to be a frequent vibration event resulting in over 30 vibration exposures per day. In addition, the annoyance analysis accounted for a 7-VdB reduction related to propagation loss associated with a low-level masonry building.

Vibration Damage Attenuation Formula: $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$

Where:

PPV_{equip} = Peak particles velocity in inches per second of the equipment adjusted for distance

PPV_{ref} = Reference vibration level in inches per second at 25 feet

D = Distance from the equipment to the receptor in feet

Vibration Annoyance Attenuation Formula: $Lv_{equip} = Lv_{ref} - 30 \times \text{LOG} (D/25)$

Where:

Lv_{equip} = Vibration level in vibration decibels of equipment adjusted for distance

Lv_{ref} = Reference vibration level in vibration decibels at 25 feet

D = Distance from the equipment to the receptor in feet

²FTA, *Transit Noise and Vibration Impact Assessment*, September 2018.

Noise and Vibration Impact Assessment

a) Would the proposed project result in the exposure of persons to or generation of noise in levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? (Significant and Unavoidable Impact)

The PEIR identified a significant unavoidable impact related to construction noise. The following mitigation measure related to construction noise was included in the PEIR.

NOISE-1: The implementing agencies shall implement the following measures during construction as needed:

- Include design measures necessary to reduce the construction noise levels where feasible. These measures may include noise barriers, curtains, or shields.
- Place noise-generating construction activities (e.g., operation of compressors and generators, cement mixing, general truck idling) as far as possible from the nearest noise-sensitive land uses.
- Locate stationary construction noise sources as far from adjacent noise-sensitive receptors as possible.
- If construction is to occur near a school, the construction contractor shall coordinate the with school administration in order to limit disturbance to the campus. Efforts to limit construction activities to non-school days shall be encouraged.
- For the centralized and regional BMP projects located adjacent to noise-sensitive land uses, identify a liaison for these off-site sensitive receptors, such as residents and property owners, to contact with concerns regarding construction noise and vibration. The liaison's telephone number(s) shall be prominently displayed at construction locations.
- For the centralized and regional BMP projects located adjacent to noise-sensitive land uses, notify in writing all landowners and occupants of properties adjacent to the construction area of the anticipated construction schedule at least two weeks prior to groundbreaking.

The impact analysis is predicated on the location of noise- and vibration-sensitive land uses and the existing setting. Sensitive receptors are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. They typically include residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas. Sensitive receptors within the project area include single-family residences located adjacent to proposed construction activities.

Construction activity is anticipated to begin in summer 2022 and take approximately nine months to complete, concluding in spring 2023. The County of Los Angeles Municipal Code allow construction activity to occur Monday through Friday between the hours of 7:00 a.m. and 7:00 p.m. Daily construction would not likely occur after 6:00 p.m. There would be no construction activities on Sundays or federal holidays, and no construction would occur during prohibited hours.

Per County of Los Angeles Municipal Code Section 12.08.570(H), the improvements proposed for the project would be exempt from the Noise Ordinance. Conservatively, construction noise has been assessed at sensitive receptors near the project site per the County of Los Angeles construction noise limits listed in **Table 1**.

Typical noise levels from various types of equipment that may be used during construction are listed in **Table 2**. The table shows noise levels at distances of 50 from the construction noise source. Construction activities typically require the use of numerous pieces of noise-generating equipment. **Table 3** presents noise levels by construction phase. When considered as an entire process with multiple pieces of equipment, project-related activity the loudest construction phase is anticipated to be site preparation which typically generates a noise level of 83.5 dBA L_{eq} at 50 feet.

TABLE 2: NOISE LEVEL RANGES OF TYPICAL CONSTRUCTION EQUIPMENT	
Noise Source	Noise Level (dBA) L_{eq} at 50 Feet
Backhoe	73.6
Excavator	76.7
Generator	77.6
Grader	81.0
Jackhammer	81.9
Forklift	79.4
Welder	70.0
SOURCE: Federal Highway Administration, <i>Roadway Construction Noise Model (RCNM) Version 1.1.</i>	

TABLE 3: CONSTRUCTION NOISE LEVEL BY PHASE	
Noise Source	Noise Level (dBA) L_{eq} at 50 Feet
SITE PREPARATION	
Backhoe	73.6
Excavator	76.7
Jackhammer	81.9
Site Preparation Combined Noise Level	83.5
GRADING	
Grader	81.0
Backhoe	73.6
Dozer	77.7
Grading Combined Noise Level	83.2
BUILDING CONSTRUCTION	
Forklift	79.4
Generator	77.6
Backhoe	73.6
Welder	70.0
Building Construction Combined Noise Level	82.5
SOURCE: Federal Highway Administration, <i>Roadway Construction Noise Model (RCNM) Version 1.1.</i>	

Table 4 presents construction noise levels at residences near construction activity. Residences would typically be located approximately 50 feet from construction activity related to the Viewridge Road median. Biofiltration unit installation along Viewridge Road, Holder Drive, Chagall Road, and Voltaire Drive would typically occur approximately 15 feet from residences. Electrical cabinet installation along Viewridge Road would typically occur approximately 15 feet from residences. Construction noise levels would exceed the 60 dBA daytime construction noise limit established for single-family residences in the Noise Ordinance. Therefore, without mitigation, the proposed project would result in a significant impact related to construction noise.

TABLE 4: MAXIMUM CONSTRUCTION NOISE LEVELS AT RECEPTORS - UNMITIGATED				
Sensitive Receptor	Distance (feet)	Maximum Noise Level (dBA)	Threshold (dBA)	Exceeds?
VIEWRIDGE ROAD MEDIAN CONSTRUCTION				
Residences along Viewridge Rd.	50	83.5	60	Yes
ELECTRICAL CABINET INSTALLATION				
Residences along Viewridge Rd.	15	94.0	60	Yes
BIOFILTRATION UNIT INSTALLATION				
Residences along Viewridge Rd., Holder Dr., Chagall Rd., and Voltaire Dr.	15	94.0	60	Yes
SOURCE: TAHA, 2019.				

Mitigation Measures

The following mitigation measures are project-specific control measures tiered from Mitigation Measure **NOISE-1** in the PEIR. The discussion presents the control measures included in the PEIR and the related project-specific control measures denoted as **NOISE-1a**, **NOISE-1b**, and so on.

NOISE-1: The implementing agencies shall implement the following measures during construction as needed:

- Include design measures necessary to reduce the construction noise levels where feasible. These measures may include noise barriers, curtains, or shields.
 - **NOISE-1a:** Construction equipment shall be properly maintained and equipped with mufflers; and
 - For equipment activities lasting more than one month in one location and within 500 feet of a sensitive receptor, temporary barriers (e.g., noise blankets) shall be placed between the equipment and sensitive receptor. The barriers shall be at least six feet tall and capable of attenuating noise levels by 35 dBA.
- Place noise-generating construction activities (e.g., operation of compressors and generators, cement mixing, general truck idling) as far as possible from the nearest noise-sensitive land uses.
 - **NOISE-1b:** Equipment shall be located on portions of Viewridge Road and Topanga Canyon Road that do not abut residential properties, if allowed by the construction needs.
- Locate stationary construction noise sources as far from adjacent noise-sensitive receptors as possible.

- **NOISE-1c:** Equipment shall be located on portions of Viewridge Road and Topanga Canyon Road that do not abut residential properties, if allowed by the construction needs.
- If construction is to occur near a school, the construction contractor shall coordinate the with school administration in order to limit disturbance to the campus. Efforts to limit construction activities to non-school days shall be encouraged.
 - This measure is not applicable because construction would not occur near a school.
- For the centralized and regional BMP projects located adjacent to noise-sensitive land uses, identify a liaison for these off-site sensitive receptors, such as residents and property owners, to contact with concerns regarding construction noise and vibration. The liaison’s telephone number(s) shall be prominently displayed at construction locations.
 - **NOISE-1d:** Because residences would be located adjacent to construction activities, the construction area shall display the name and phone number of a liaison to contact with concerns regarding construction noise and vibration.

Significance After Mitigation

Mitigation Measures **NOISE-1a** through **NOISE-1d** are designed to reduce construction noise levels. The equipment mufflers associated with Mitigation Measure **NOISE-1a** would reduce construction noise levels by approximately 3 dBA. The sound blankets associated with Mitigation Measure **NOISE-1b** would reduce construction noise levels by approximately 35 dBA at locations with equipment activities lasting more than one month at the same location. Mitigation Measures **NOISE-1c** and **NOISE-1d**, although difficult to quantify, would also reduce and/or control construction noise levels. As shown in **Table 5**, mitigated equipment noise levels would still exceed the County of Los Angeles Municipal Code’s noise standard of 60 dBA for residential uses. Therefore, similar to the PEIR, the proposed project would result in a significant-and-unavoidable impact related to construction noise.

TABLE 5: MAXIMUM CONSTRUCTION NOISE LEVELS AT RECEPTORS - MITIGATED						
Sensitive Receptor	Distance (feet)	Threshold (dBA)	Mitigated Noise Level with Muffler /a/	Exceeds?	Mitigated Noise Level with Mufflers and Noise Blanket /a/ /b/	Exceeds?
VIEWRIDGE ROAD MEDIAN CONSTRUCTION						
Residences along Viewridge Rd.	50	60	80.5	Yes	45.5	No
ELECTRICAL CABINET INSTALLATION						
Residences along Viewridge Rd.	15	60	91.0	Yes	56.0	No
BIOFILTRATION UNIT INSTALLATION						
Residences along Viewridge Rd., Holder Dr., Chagall Rd., and Voltaire Dr.	15	60	91.0	Yes	56.0	No
/a/ Includes a 3 dBA reduction for equipment mufflers/ /b/ Includes a 35 dBA reduction for noise blankets.						
SOURCE: TAHA, 2019.						

b) Would the proposed project result in exposure of people to or generation of excessive ground-borne vibration or ground-borne noise levels? (Less-Than-Significant Impact)

The PEIR did not identify a significant vibration impact, and mitigation measures were not required to reduce vibration levels.

Construction activity can generate varying degrees of vibration, depending on the procedure and equipment. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of a construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, and to slight damage at the highest levels. In most cases, the primary concern regarding construction vibration relates to damage.

The proposed project would require equipment similar to bulldozers and excavators, in addition to equipment with smaller engines. All portions of the project site are owned and maintained by LACPW. Therefore, the significance threshold established in the Noise Ordinance is 0.01 inches per second at 150 feet. Bulldozers and excavators generate vibration levels of approximately 0.089 inches per second at 25 feet.³ At 150 feet, the vibration level from bulldozers and excavators would be approximately 0.006 inches per second. Project-related vibration levels would not exceed the standard in the Noise Ordinance.

Similar to the PEIR, the proposed project would not result in a significant impact related to vibration.

Mitigation Measures

No significant impacts have been identified related to the proposed project. Therefore, no mitigation measures are required.

c) Would the proposed project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the proposed project? (Significant and Unavoidable Impact)

As discussed above, nearby sensitive receptors would experience increased noise levels associated with construction. Construction noise would be temporary but would exceed the standards established in the Los Angeles County Noise Ordinance. Therefore, without mitigation, the proposed project would result in a significant impact related to temporary and periodic construction activity.

Mitigation Measures

Refer to Mitigation Measures **Noise-1a** through **Noise -1d**, above.

Significance After Mitigation

Mitigation measures would reduce noise levels but not to below the County standards. Therefore, similar to the PEIR, the proposed project would result in a significant impact related to temporary and periodic construction activity.

³FTA, *Transit Noise and Vibration Impact Assessment*, September 2018.

References

County of Los Angeles Municipal Code, *Section 12.08.440 Construction Noise*, June 26, 2019.

California Department of Transportation, *Technical Noise Supplement*, September 2013.

Federal Highway Administration, *Roadway Construction Noise Model, Software Version 1.1*, 2008.

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

United States Environmental Protection Agency, *Noise from Construction Equipment and Operations, Building Equipment and Home Appliances*, PB 206717, 1971.

Noise Formulas

Noise Distance Attenuation

Hard Site

Equation: $N_i = N_o - 20 X (\log D_i/D_o)$

Di = distance to receptor ($D_i > D_o$)

Ni = attenuated noise level of interest

Do = reference distance

No = reference noise level

Source: (Bolt, Beranek, and Newman, 1971)

Summation of Noise Levels

Equation: $N_s = 10 \times \text{LOG}_{10}((10^{(N_1/10)}) + (10^{(N_2/10)}) + (10^{(N_3/10)}) + (10^{(N_4/10)}))$

Ns = Noise Level Sum

N1 = Noise Level 1

N2 = Noise Level 2

N3 = Noise Level 3

N4 = Noise Level 4

Source: California Department of Transportation, *Technical Noise Supplement*, 2013

Construction Noise Analysis

Phased Construction Noise Levels	
Construction Equipment	feet (dBA)
Site Preparation	
Backhoe	73.6
Excavator	76.7
Jackhammer	81.9
Site Preparation Combined	83.5
Grading	
Grader	81.0
Backhoe	73.6
Dozer	77.7
Grading Combined	83.2
Building Construction	
Forklift	79.4
Generator	77.6
Backhoe	73.6
Welder	70.0
Building Construction Combined	82.5

On-Site Construction Noise: Resulting Noise Level Increases - Unmitigated					
Sensitive Receptor	Distance (feet) /a/	Reference Noise Level (dBA)	Max Construction Noise (dBA, Leq)	Threshold	Exceed
Viewridge Road Median Construction					
Residences along Viewridge Road	50	83.5	83.5	75	Yes
Electrical Cabinet Installation					
Residences along Viewridge Road	15	83.5	94.0	75	Yes
Biofiltration Unit Installation					
Residences along Viewridge Road, Holder Drive, Chagall Road, and Voltaire Drive	15	83.5	94.0	75	Yes

On-Site Construction Noise: Resulting Noise Level Increases - Mitigated

Sensitive Receptor	Distance (feet)	Threshold (dBA)	Mitigated Noise Level with Muffler /a/	Exceeds?	Mitigated Noise Level with Mufflers and Noise Blanket /a/ /b/	Exceeds?
Viewridge Road Median Construction						
Residences along Viewridge Road	50	60	80.5	Yes	45.5	No
Electrical Cabinet Installation						
Residences along Viewridge Road	15	60	91.0	Yes	56	No
Biofiltration Unit Installation						
Residences along Viewridge Road, Holder Drive, Chagall Road, and Voltaire Drive	15	60	91.0	Yes	56	No

/a/ Includes a 3 dBA reduction for equipment mufflers/

/b/ Includes a 35 dBA reduction for noise blankets.

Vibration Formulas

Vibration PPV Attenuation

Equation: $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$

PPV (equip) is the peak particle velocity in in/sec of the equipment adjusted for distance

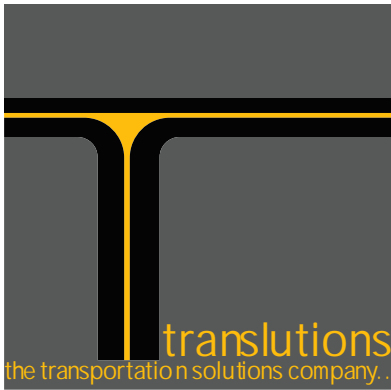
PPV (ref) is the reference vibration level in in/sec at 25 feet from Table 12-2

D is the distance from the equipment to the receiver.

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, September 2018.

APPENDIX F

**Construction Traffic Evaluation
Technical Memorandum**



memorandum

DATE: August 5, 2019

TO: Cristina Lowery, Project Manager, AECOM
Fareeha Kibriya, Principal, AECOM

FROM: Sandipan Bhattacharjee

SUBJECT: Viewridge Road – Construction Traffic Evaluation

Translutions, Inc. (Translutions) is pleased to provide this memorandum discussing the potential traffic impacts for the Viewridge Road Stormwater Improvements Project. Los Angeles County Public Works (LACPW) proposes to implement the Viewridge Road Stormwater Improvements Project (proposed project), which would implement Best Management Practices (BMPs) identified to achieve and maintain water quality objectives and protect beneficial uses pursuant to the Municipal Separate Storm Sewer System (MS4) Permit applicable to the project site. The BMPs identified for the proposed project focus on capture and treatment of stormwater along Viewridge Road between Topanga Canyon Boulevard and Summit Pointe Drive. The purpose of this memorandum is to disclose potential traffic and transportation related impacts that could occur during construction and operation of the proposed project. Construction of the proposed project is anticipated to begin in summer 2022 and take approximately 9 months to complete, concluding in spring 2023.

PROJECT DESCRIPTION

The project site comprises several locations along and near Viewridge Road between Topanga Canyon Boulevard and Summit Pointe Drive in the unincorporated community of Topanga in western Los Angeles County. Work associated with the proposed project would occur on Viewridge Road, Hodler Drive, Chagall Road, and Voltaire Drive. In the project area, Viewridge Road contains a landscaped median between Hodler Drive and just west of Heidi Lane. The remainder of the roadway contains landscaped parkways. All project components would be located within the existing road rights-of-way (ROW) and/or parkways adjacent to the roadways. All portions of the project site are owned and maintained by LACPW, with the exception of the temporary construction staging along the east shoulder of Topanga Canyon Boulevard, which is California Department of Transportation (Caltrans) ROW. The project site is located within a low-density residential neighborhood characterized by single-family homes. Additionally, there are open space areas on the west side of Topanga Canyon Boulevard and to the south of Viewridge Road east of the Heidi Lane. These open space areas provide recreational opportunities with hiking/walking trails. The project includes the following components:

Viewridge Road Median. As previously discussed, Viewridge Road currently contains a landscaped median between Hodler Drive and just west of Heidi Lane. The proposed project would create a new, approximately 500-foot-long median starting east of Heidi Lane to just west of Summit Pointe Drive. Approximately 18 biofiltration units would be incorporated into the median to capture runoff and stormwater. Water would reach the new median via a new diversion pipeline that would convey flows from Bellini Drive and Heidi Lane via a connection to the existing drain on Viewridge Road just east of its intersection with Heidi Lane. The new diversion line would convey water via gravity to a pretreatment system that would be installed on the west end of the new median to pretreat the water by removing trash, sediment, and debris. Water would then flow through the biofiltration units to an 18-inch high density polyethylene pipe via gravity and discharge into an existing storm drain system located at the east end of Viewridge Road. Two electrical cabinets would be installed on the north side of Viewridge Road. The electrical cabinet located on the north side of Viewridge Road, west of Heidi Lane, would provide power to the electrical cabinet that controls the mechanical equipment. All components of this portion of the proposed project would be installed below ground.

with the exception of the median structure itself (curbs, etc.), electrical cabinets, and the landscaping elements (i.e., vegetation). To support monitoring equipment for sampling, two temporary cabinets would be installed aboveground within the new median, one of which will be equipped with a pole containing a rain gage and solar panel, and flow sensors and pressure transducers will be installed below ground. Temporary monitoring activities would occur during the first 3 to 5 years of project operations and monitoring will only be conducted for wet weather (storm) events. Routine maintenance activities would include periodic system cleanout activities, as well as landscaping maintenance, which would be conducted by LACPW.

Installation of the new median on Viewridge Road would occupy a space in the road currently demarcated as a median with striping. The existing asphalt would be removed, and the area would be excavated up to approximately 20 feet below the ground surface to accommodate the installation of the pretreatment unit, the biofiltration units, and associated connecting drains. The approximately 18-inch diversion pipeline would require excavation of a trench approximately 5 feet wide by 20 feet deep within the existing ROW on Viewridge Road. As partial lane closures would be needed to install the diversion line and construct the new median, development and implementation of a traffic control plan would be required.

Biofiltration Units – Viewridge Road, Hodler Drive, Chagall Road, and Voltaire Drive. Approximately 22 biofiltration units would be installed below ground at identified locations on the parkways along Viewridge Road, Hodler Drive, Chagall Road, and Voltaire Drive. One of the proposed 22 biofiltration units will be installed in the road ROW on Viewridge Road just east of Topanga Canyon Boulevard. Runoff and stormwater entering these units would flow into a pretreatment chamber that would separate larger sediments and debris before entering a filtration chamber which would reduce the target pollutants before discharging from the unit via gravity into the existing storm drain system. Existing landscaping would be replaced with new drought tolerant landscaping once the biofiltration units are installed. Maintenance of the units would require routine system cleanout activities and periodic replacement of the filter cartridges, which would be conducted by LACPW.

Installation of these biofiltration units would require excavation of pits. Existing landscaping and/or vegetation in the parkways would be removed prior to excavation. The biofiltration units would connect to the storm drain system or adjacent catch basin. A hatch would be installed at grade level above the unit to provide access for maintenance purposes. Once the biofiltration units are installed, landscaping on the parkway would be replaced with new drought tolerant landscaping. No permanent modifications to the roads, sidewalks, or curbs would be required for this component of the proposed project.

EXISTING CONDITIONS

The following roadways are included within the project limits:

- Viewridge Road. Viewridge Road connects the neighborhood to Topanga Canyon Boulevard, the main thoroughfare in the area. Viewridge Road is generally a 60-foot wide, two lane roadway in the vicinity of the project. A landscaped median is present between Hodler Drive and Heidi Lane, while a painted median exists from Heidi Lane to the easterly terminus of the project. The posted speed limit is 40 miles per hour. Translutions staff visited the area and traffic volumes on Viewridge Road during the p.m. peak hour was approximately 200 vehicles. Using the capacity of a two-lane roadway (2,500 vehicles per hour using a 70-30 directional split) from the *Traffic Impact Analysis Report Guidelines, County of Los Angeles Public Works, January 1, 1997*, Viewridge Road currently operates at level of service (LOS) A.
- Hodler Drive. Hodler Drive is a 30-foot wide residential street and connects to Viewridge Road. It provides access to approximately 60 homes via Chagall Road, Voltaire Drive and Schweitzer Drive.
- Chagall Road and Voltaire Drive. Chagall Road and Voltaire Drive are approximately 33-foot wide residential streets.

PROJECT TRIPS

The project is an infrastructure project and as such will not generate many trips during operations. It is anticipated that routine maintenance activities would include periodic system cleanout activities, as well as landscaping maintenance, which would either be conducted by the resident/property owner or will be conducted by LACPW. Maintenance activities are likely to result in a few trips every few months and operational impacts from the project are likely to be negligible.

During construction, construction workers, equipment and haul trucks will travel to and from the site. Table A shows the anticipated number of workers and equipment during each phase of construction.

Table A - Construction Workers and Employee Estimates

Construction Phase	Classification	Vehicle Type	Construction Equipment Quantity	Construction Equipment Daily Usage Hours
Site Preparation	Employees	Automobile	7	-
	Excavator*	Truck	1	8
	Tractor/Loaders/Backhoes*	Truck	1	6
	Other General Industrial Equipment	Truck	1	8
Grading	Employees	Automobile	7	-
	Graders*	Truck	1	4
	Rubber Tired Dozers*	Truck	1	4
	Tractor/Loaders/Backhoes*	Truck	1	8
	Haul Trips	Truck	N/A	8
Construction	Employees	Automobile	7	-
	Forklifts*	Truck	1	8
	Generator Sets*	Truck	1	8
	Tractor/Loaders/Backhoes*	Truck	2	8
	Welders*	Truck	1	8

* Likely to be stored on site.

Table B shows the resulting trips based on Table A. While it is anticipated that on-site equipment such as excavators, graders, tractors, etc. will remain on site, the trip generation estimates include such trips each day to present a conservative worst-case analysis. It is anticipated that each phase of construction will have 7 employees and during grading as excavation, up to 10 truckloads of excavated material will be hauled away from the project site resulting in 20 daily trips. The daily trips have been converted to peak hour trips by dividing the daily trips with the hours of construction. Construction workers are likely to arrive and depart before the peak hours of adjacent street traffic but have been included during the peak hour to present a worst-case evaluation. To account for the slower acceleration/deceleration of trucks trips, the trip generation converts truck traffic to Passenger Car Equivalents (PCE). A PCE factor of 3.0 has been used for all construction equipment and haul trucks.

Table B - Construction Workers and Equipment Trip Estimates

Construction Phase	Construction Equipment Type	Vehicle Type	PCE Factor	Daily Trip Generation			AM/PM Peak Hour		
				Trips	PCE Trips	Total PCE for Phase	Trips	PCE Trips	Total PCE for Phase
Site Preparation	Employees	Automobile	1	14	14	32	7	7	16
	Excavator*	Truck	3	2	18		1	9	
	Tractor/Loaders/Backhoes*	Truck		2			1		
	Other General Industrial Equipment	Truck		2			1		
Grading	Employees	Automobile	1	14	14	92	7	7	25
	Graders*	Truck	3	2	78		1	18	
	Rubber Tired Dozers*	Truck		2			1		
	Tractor/Loaders/Backhoes*	Truck		2			1		
	Haul Trips	Truck		20			3		
Construction	Employees	Automobile	1	14	14	44	7	7	22
	Forklifts*	Truck	3	2	30		1	15	
	Generator Sets*	Truck		2			1		
	Tractor/Loaders/Backhoes*	Truck		4			2		
	Welders*	Truck		2			1		

* Likely to be stored on site. However, trips have been included to provide a worst-case evaluation.

As seen in Table B, the Site Preparation phase is anticipated to generate 6 daily truck trips and 14 passenger car trips (32 PCE trips), of which 16 PCE trips are anticipated during the peak hours. The Grading phase is anticipated to generate 26 daily truck trips and 14 passenger car trips (92 PCE trips), of which 25 PCE trips are anticipated during the peak hours. The Construction phase is anticipated to generate 10 daily truck trips and 14 passenger car trips (44 PCE trips), of which 22 PCE trips are anticipated during the peak hours.

CONSTRUCTION ROADWAY CONDITIONS

During construction, lane narrowing, temporary blockages, and driver behavior reduce the carrying capacity of roadways. Based on research conducted by the Transportation Research Board, the saturation flow rate during construction is approximately 10 percent lower than under normal operations. Since the carrying capacity of Viewridge Road is currently 2,500 passenger cars per hour, this will be reduced to 2,250 vehicles per hour. Even using this reduced capacity, the level of service is anticipated to remain at LOS A.

IMPACT EVALUATION

The Los Angeles County Public Works (LACPW) guidelines uses a sliding scale to determine impacts during construction. Table C shows the impact criteria for two-lane roadways from the *Traffic Impact Analysis Report Guidelines, County of Los Angeles Public Works, January 1, 1997*.

Table C - Impact Criteria for Two-Lane Roadways

Directional Split	Total Capacity (PCPH)	Percentages Increase in V/C by Project		
		Pre-Project LOS		
		C	D	E/F
50/50	2,800	4	2	1
60/40	2,650	4	2	1
70/30	2,500	4	2	1
80/20	2,300	4	2	1
90/10	2,100	4	2	1
100/0	2,000	4	2	1

Source: Traffic Impact Analysis Report Guidelines, Los Angeles County Public Works

As seen on Table C, a project under LOS C conditions is allowed to increase the vehicle to capacity ratio by 4 percent. There are no thresholds for LOS A conditions since roadways are underutilized at less than LOS C conditions. The highest project related increase of 25 PCE trips during grading will result in a v/c increase of 1.11 percent, which is significantly lower than the allowed threshold of 4 percent under LOS C conditions. Therefore, the project will have a less than significant impact during construction.

SUMMARY AND CONCLUSIONS

The project is likely to generate up to 25 PCE trips during peak construction. There is sufficient capacity on the area roadways to accommodate construction traffic. Therefore, the project will result in a less than significant impact. It is recommended that a Traffic Management Plan (TMP) be prepared for the project. The following TMP elements should be included with respect to reducing traveler delay and enhancing traveler safety:

- Public Awareness Campaign;
- Motorist Information Strategies; and
- Incident Management.