

ENVIRONMENTAL FACTORS AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that will require further discussion in an EIR, or could be reduced to a less-than-significant level through incorporation of mitigation.

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

DETERMINATION

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION would be prepared.
- I find that although the proposed project could have a significant effect on the environment, there would not be a significant effect in this case because revisions in the project have been made by or agreed to by the applicant. A MITIGATED NEGATIVE DECLARATION would be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Allison Cook
Principal Planner/Environmental Analyst
City of Agoura Hills

Date



EVALUATION OF ENVIRONMENTAL IMPACTS

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>I. AESTHETICS</u> - Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a, c) The proposed project would alter views from surrounding properties and transportation corridors, resulting in a change in the visual character of the project site and vicinity. All future residential development on the project site would be required to comply with the City Zoning Code, including the Old Agoura Overlay Zone, Equestrian Overlay Zone, Very Low Density Residential Zone, as well as the City's Architectural Design Standards and Guidelines, particularly Section VI. Old Agoura Design Guidelines. The Residential Very Low (RV) zone requires a minimum lot size of one acre and limits building height to two stories or 35 feet, whichever is less. The Old Agoura Overlay Zone requires promotion of a natural environment that is country like while allowing architecturally sensitive developments that perpetuate Old Agoura's unique rural character. For example, solid walls are prohibited in the residential front yard setback areas in favor of fences, while residential development in Old Agoura must embrace an eclectic, rural style that preserves the equestrian nature of the area and must not render the property untenable for horses and other farm animals. All future developments would also be subject to site plan review to ensure consistency with applicable standards. While implementation of existing City standards would likely ensure the change in visual character due to roadway, trail and fence development, and future residential development, would be visually compatible with that of existing development in the area as well as with the City's vision for the Old Agoura area, potential impacts will be further studied in an EIR.

b) The project site does not contain rock outcroppings, historic buildings or other substantial scenic resources. The site and immediate vicinity do contain three black walnut trees along the southeastern property boundary; however, the black walnut trees are located in the portion of the proposed development that would be dedicated to open space. Oak trees, both on- and off-site, may be impacted by the project, although most of these trees are located in the area to be dedicated as open space. The southern boundary of the project site borders U.S. Highway 101. U.S. Highway 101 is eligible for designation as a state scenic highway, but is not an official state scenic highway and so there would be no impacts to aesthetic resources in a state scenic highway. In any case, due to the topography of the project site, the proposed project and potential future development of the residences would not be visible from U.S. Highway 101.



Therefore, **no impact would occur and further analysis of this issue in an EIR is not warranted.**

d) Although no street lights are proposed, the project, particularly the potential future development of the fifteen homes, may create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Lighting of the future homes on the project site would need to comply with all City of Agoura Hills standards in the Old Agoura Overlay zone as well as the City’s Architectural Design Standards and Guidelines. The exterior lighting standards contained in the Architectural Design Standards and Guidelines require lighting to be architecturally compatible with the overall project and limit light levels at the property line to one footcandle, and the OA overlay requires lighting to be directed away from adjacent properties. **While adherence to these standards would likely ensure compatibility with lighting levels on nearby properties, further analysis of this issue in an EIR will occur.**

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

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>



a) The project site is vacant land, and is not Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared by the Farmland Mapping and Monitoring Program (California Department of Conservation, 2008). Construction of the project would not result in the loss of farmland. **No impact would occur and further analysis of this issue in an EIR is not warranted.**

b) The project site is currently zoned A-1-5 (Light Agricultural, Maximum residential density of one dwelling unit per five acres) and designated in the County's North Area Plan (NAP) as Mountain Lands 5 (N5, Not to exceed a maximum residential density of one dwelling per five acres) in unincorporated Los Angeles County. There are no active Williamson Act contracts on this parcel. Therefore, there would be no conflict with zoning for agricultural use or with a Williamson Act contract. **No impact would occur, and further analysis of this issue in an EIR is not warranted.**

c, d) The project site is previously undisturbed, vacant land and is not forested. The site is currently zoned A-1-5 in unincorporated Los Angeles County, and designated as Mountain Lands (N5) in the County NAP. The County does not have timberland zoning. Therefore, **no impact would occur and further analysis of this issue in an EIR is not warranted.**

e) The project site is previously undisturbed, vacant land. The currently proposed project (private street, drainage, utilities, trails) as well as the potential future development of fifteen single-family homes, would not result in the loss of existing farmland or forest land. **No impact would occur and further analysis of this issue in an EIR is not warranted.**

III. 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:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 that exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The project site is within the South Coast Air Basin (the Basin), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). As the local air quality management agency, the SCAQMD is required to monitor air pollutant levels to ensure that



state and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards.

Depending on whether or not the standards are met or exceeded, the Basin is classified as being in “attainment” or “nonattainment.” The South Coast Air Basin is in nonattainment for both the federal and state standards for ozone and nitrogen dioxide as well as the state standard for PM₁₀. Thus, the Basin currently exceeds several state and federal ambient air quality standards and is required to implement strategies to reduce pollutant levels to recognized acceptable standards. This non-attainment status is a result of several factors, including the naturally adverse meteorological conditions that limit the dispersion and diffusion of pollutants, the limited capacity of the local air shed to eliminate pollutants from the air, and the number, type, and density of emission sources within the South Coast Air Basin.

The SCAQMD has adopted an Air Quality Management Plan (AQMP) that provides a strategy for the attainment of state and federal air quality standards. The SCAQMD has adopted the following regional thresholds for temporary construction-related pollutant emissions:

- 75 pounds per day of reactive organic gases (ROG)
- 100 pounds per day nitrogen oxides (NO_x)
- 550 pounds per day carbon monoxide (CO)
- 150 pounds per day of sulfur oxides (SO_x)
- 150 pounds per day of particulate matter less than 10 microns in diameter (PM₁₀)
- 55 pounds per day of particulate matter less than 2.5 microns in diameter (PM_{2.5})

The SCAQMD also has established the following regional significance thresholds for project operations within the South Coast Air Basin:

- 55 pounds per day of ROG
- 55 pounds per day of NO_x
- 550 pounds per day of CO
- 150 pounds per day of SO_x
- 150 pounds per day of PM₁₀
- 55 pounds per day of PM_{2.5}

SCAQMD has developed Localized Significance Thresholds (LSTs) in response to the Governing Board’s Environmental Justice Enhancement Initiative (1-4). LSTs were devised in response to concern regarding exposure of individuals to criteria pollutants in local communities. LSTs represent the maximum emissions from a project that would not cause or contribute to an air quality exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest sensitive receptor. However, LSTs only apply to emissions within a fixed stationary location, including idling emissions during project construction, and are not applicable to mobile sources, such as cars on a roadway (Final Localized Significance Threshold Methodology, SCAQMD, June 2003). LSTs have been developed for emissions within areas up to five acres in size, with dispersion modeling recommended for activity within larger areas. The potential area of disturbance for construction of the currently proposed project, as well as for the potential future fifteen single-family units, measures approximately 23 acres, and construction activity would be dispersed over this area, rather than occurring within a fixed stationary location. In addition, the distance between construction activity and nearby receptors



(existing single-family residences to the east and southeast) would range from 50 feet to up to 1,500 feet; therefore, project construction would not result in exceedance of any federal or state ambient air quality standard at nearby receptors.

a) According to SCAQMD Guidelines, to be consistent with the Air Quality Management Plan (AQMP), a project must conform to the local General Plan and must not result in or contribute to an exceedance of the City's projected population growth forecast. Vehicle use, energy consumption, and associated air pollutant emissions are directly related to population growth. A project may be inconsistent with the AQMP if it would generate population, housing or employment growth exceeding the forecasts used in the development of the AQMP. The proposed project (subdivision; annexation; and private road, drainage, trails, utilities construction) would not be expected to cause a significant impact to air quality in terms of conflicting with an air quality plan, since no population would be directly associated with such improvements.

The Southern California Association of Governments (SCAG) projects that the population of Agoura Hills will be 21,400 by 2035 (SCAG, 2012), an increase of 884 over the current City population of 20,516 (California Department of Finance estimate, January 2013). The potential future development of fifteen residential units on the project site would cause a direct increase in the City's population. Using the California State Department of Finance average household size for Agoura Hills of 2.787 persons, the net increase of fifteen dwelling units would generate a resident population of approximately 42 persons (15 units x 2.787 persons/unit). Therefore, the proposed project would result in a citywide population of approximately 20,558 persons (20,516 + 42). This increase in population would be within SCAG's projected Agoura Hills 2035 population of 21,400. The City General Plan and General Plan Final EIR assume a theoretical buildout of 8,139 residential units by 2035, the General Plan horizon year. Assuming the 2.787 population per household factor, this equates to a population of 22,683 by 2035. Since project-related population growth would be within SCAG population growth forecasts and the City General Plan buildout estimates, the project would be consistent with the AQMP. **Impacts would be less than significant.**

b-d) Emissions generated by the proposed project would include temporary construction emissions and long-term operational emissions.

Construction Emissions

Project construction would generate temporary air pollutant emissions. These impacts are associated with fugitive dust (PM₁₀ and PM_{2.5}) and exhaust emissions from heavy construction vehicles, in addition to ROG that would be released during the drying phase upon application of architectural coatings. Assuming the development of the currently proposed project and the potential future development of fifteen homes, construction would generally consist of site preparation, grading, erection of the proposed buildings, paving and architectural coating.

Temporary emissions from construction of the specified street and infrastructure improvements were estimated using the California Emissions Estimator Model (CalEEMod) version 2013.2.2 (refer to Appendix A for air quality modeling assumptions and results). During project site preparation, the soils that underlie portions of the site could be turned over and pushed around, exposing the soil to wind erosion and dust entrainment by onsite operating equipment. The



majority of emissions associated with construction activities on site come from off-road construction equipment, but some emissions are also associated with construction worker trips. For the purposes of modeling, it was assumed that the project would comply with SCAQMD Rule 403, which identifies measures to reduce fugitive dust and is required to be implemented at all construction sites located within the South Coast Air Basin. Therefore, the following conditions, which would be required to reduce fugitive dust in compliance with SCAQMD Rule 403, were included in the CalEEMod model for the site preparation and grading phases of construction.

- 1. Minimization of Disturbance.** Construction contractors should minimize the area disturbed by clearing, grading, earth moving, or excavation operations to prevent excessive amounts of dust.
- 2. Soil Treatment.** Construction contractors should treat all graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways to minimize fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally safe soil stabilization materials, and/or roll compaction as appropriate. Watering shall be done as often as necessary, and at least twice daily, preferably in the late morning and after work is done for the day.
- 3. Soil Stabilization.** Construction contractors should monitor all graded and/or excavated inactive areas of the construction site at least weekly for dust stabilization. Soil stabilization methods, such as water and roll compaction, and environmentally safe dust control materials, shall be applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area shall be seeded and watered until landscape growth is evident, or periodically treated with environmentally safe dust suppressants, to prevent excessive fugitive dust.
- 4. No Grading During High Winds.** Construction contractors should stop all clearing, grading, earth moving, and excavation operations during periods of high winds (20 miles per hour or greater, as measured continuously over a one-hour period).
- 5. Street Sweeping.** Construction contractors should sweep all on-site driveways and adjacent streets and roads at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.

Table 1 summarizes the estimated maximum daily emissions of pollutants during each year of construction. Construction emissions would not exceed SCAQMD regional thresholds related to ROG, NO_x, CO and SO_x. With adherence to the conditions listed above that are required by SCAQMD Rule 403 to reduce fugitive dust during the grading phase of construction, maximum daily emissions of fugitive dust (PM₁₀ and PM_{2.5}) would not exceed applicable regional thresholds. In addition, the non-attainment basin status and the cumulative impact of all construction suggests that all reasonably available control measures for diesel exhaust shall be implemented even if individual thresholds are not exceeded. Implementation of SCAQMD rules would reduce construction impacts to air quality to a **less than significant** level.



Long-term Emissions

Long-term emissions associated with project operation, as shown in Table 2, would include emissions from vehicle trips (Mobile), natural gas and electricity use (Energy), and landscape maintenance equipment, consumer products and architectural coating associated with onsite development (Area). Overall emissions would not exceed SCAQMD thresholds for any of the criteria pollutants. **Consequently, the project's regional air quality impacts under thresholds b, c, and d would be less than significant.**

Table 1
Estimated Construction Maximum Daily Emissions

Year	Maximum Daily Emissions (lbs/day)				
	ROG	NO _x	CO	PM ₁₀	PM _{2.5}
2016	10.9	74.9	50.4	10.8	7.0
<u>Maximum Emissions</u>	10.9	74.9	50.4	10.8	7.0
<u>SCAQMD Thresholds</u>	75	100	550	150	55
<u>Threshold Exceeded?</u>	No	No	No	No	No

All calculations were made using CalEEMod. See Appendix A for CalEEMod winter output. Based on estimated grading quantities provided by the project engineer on the preliminary project grading plan.

Table 2
Estimated Project Maximum Daily Operational Emissions

Sources	Estimated Emissions (lbs/day)				
	ROG	NO _x	CO	PM ₁₀	PM _{2.5}
Area	4.6	0.1	8.8	1.2	1.2
Energy	<0.1	0.1	<0.1	<0.1	<0.1
Mobile	0.6	1.7	6.5	1.1	0.3
<u>Total Emissions (lbs/day)</u>	5.1	1.9	15.3	2.3	1.5
<u>SCAQMD Thresholds</u>	55	55	550	150	55
<u>Threshold Exceeded?</u>	No	No	No	No	No

See Appendix A for CalEEMod winter output, included here because it represents the "worst-case" scenario. Based on Traffic Impact Analysis for the project (KHA, November 2013)



e) The proposed zoning classification, RV-OA-EQ, for the portion of the site to be developed would allow agricultural uses, such as animal husbandry involving raising horses, pigs and chickens. Agriculture is identified in “land uses associated with odor complaints” of the 2005 SCAQMD’s guidance document for addressing air quality issues in general plans and local planning. The project site is bounded by U.S. Highway 101 to the south, open space to the north and east, and open space, residential and commercial-retail uses on the west. Specifically, neighboring west of the project site are single-family residential areas, zoned low density residential (RS)-OA-EQ, which allow a small amount of livestock and poultry raising as an accessory use. The small portion of open space-restricted (OS-R)-OA-EQ area adjacent to the site allows for livestock and poultry raising. All of these zones have an equestrian overlay (EQ), the purpose of which is to create, enhance, and protect the equestrian and rural atmosphere. The project site is adjacent to the Old Agoura community of the city, and, upon its annexation, would become part of Old Agoura. Old Agoura is the primary location where animal keeping, including horse-keeping, is allowed. Therefore, the odors associated with possible horse-keeping on the project site would be consistent with those of adjacent uses, and vice-versa, and within the general character of the locale. Additionally, agricultural uses on the new RV-OA-EQ parcels would be subject to conformance with the City of Agoura Hills Municipal Code, which specifies allowable livestock species, quantities and enclosure requirements (Agoura Hills Municipal Code Section 9224.1). Therefore, the proposed project would not generate objectionable odors out of character with the surrounding land uses. **The impact would be less than significant and further analysis of this issue in an EIR is not warranted.**

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. 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 U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



IV. BIOLOGICAL RESOURCES - Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a, e) Biological surveys were prepared for the project site in 1998 in conjunction with the Heschel West School EIR. Those surveys found several special status plants and wildlife species, and communities are located within and adjacent to the project boundaries. A valley oak (*Quercus agrifolia*) is located just north and offsite of the residential subdivision, and other oaks are located further off-site, away from the residential subdivision. In addition, the 1998 survey found the Mulefat habitat series, which falls under the regulatory jurisdiction of U.S. Army Corp of Engineers (ACOE), California Department of Fish and Wildlife (CDFW), and Regional Water Quality Control Board (RWQCB). Areas of native grassland, coastal sage scrub, and mariposa lilies were also found.

The subdivision as proposed, with the residential lots congregated in a smaller, flatter portion of the overall property, would likely avoid impacts to many of the known sensitive biological species and communities. Nonetheless, biological resources located within and adjacent to the project site boundaries could be adversely affected by the project construction and operation, both the currently proposed project and the ultimate potential construction of fifteen single-family residences. The City’s Oak Tree Preservation Ordinance regulates impacts to oak trees, and the project would need to comply with the Ordinance provisions. Further biological studies will be conducted to ascertain the current status and location of biological species as a part of the EIR. **Impacts to these biological resources would be potentially significant and will be studied in an EIR.**

b, c) According to the biological surveys prepared for the project site in 1998 (County of Los Angeles, Heschel West School Final EIR, June 2006), some areas on the roughly 71-acre project site may qualify as U.S. Army Corps of Engineers’ (ACOE) “waters of the U.S.” per sections 401-404 of the Federal Clean Water Act and “streambeds” per Section 1600-1603 of the California Fish and Game Code. There are also seven potential drainages on-site. Federally protected wetlands, and riparian areas subject to Section 1600-1603 of the Fish and Game Code, located within and adjacent to the project site boundaries could be adversely affected by the project construction and operation, both the currently proposed project and the potential future single-family homes. However, given the current subdivision plan, with the residential lots located in a smaller, flatter area of the overall site, the wetland and riparian resources would likely be avoided by construction. Nonetheless, further biological studies will be conducted to ascertain the current status and proximity of onsite jurisdictional resources and drainages and riparian areas as a part of the EIR. **Impacts to these areas would be potentially significant and will be studied in an EIR.**

d) The closest formal wildlife corridor is the Liberty Canyon Wildlife Corridor, at U.S. Highway 101 and Liberty Canyon Road (City of Agoura Hills General Plan, 2010), which borders the



project site to the east. The Palo Comado Canyon Significant Ecological Area (SEA), located about one mile north of the project site and which leads in the Liberty Canyon Wildlife Corridor, is also viewed as an area for wildlife travel.

The project would retain much of the site (48 acres) that is contiguous to other off-site open space areas and the Liberty Canyon Wildlife Corridor as permanent open space. This would preserve a buffer area between developed areas and the wildlife corridor. The proposed project development area of 23 acres is situated at the northwest corner of the site, adjacent to the existing single-family home development. **While the project would provide a substantial open space buffer from the wildlife corridor, given the project site's proximity to the corridor, impacts to wildlife movement will be analyzed in an EIR.**

f) The project site is not subject to an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan (City of Agoura Hills General Plan, March 2010). No such plans are located within or adjacent to the City of Agoura Hills. **No impact would occur and further analysis of this issue in an EIR is not warranted.**

<u>V. CULTURAL RESOURCES</u> – Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) The project site is currently vacant, and is not known to have been previously developed, or have any historical resources present. **No impact to historical resources would occur and further analysis of this issue in an EIR is not warranted.**

b-d) A cultural resources records search for the entire project area and a 0.5-mile radius around it was conducted at the South Central Coastal Information Center (SCCIC) located at California State University, Fullerton. The records search identified 36 previous studies within a 0.5-mile radius of the site, with two of the studies located on the project site. Six archaeological sites have been identified within a 0.5-mile radius of the project site. However, no identified archaeological or paleontological sites are located within the project site.

The project site does not contain rock outcroppings, trees, knolls, or other features that may indicate archaeological or paleontological sensitivity (Heschel Revised Draft Volume 1 EIR, March 2005) or possible buried human remains. Nevertheless, previously unknown resources may be discovered during construction of both the currently proposed project and future on-



site residences. Implementation of mitigation measures CR-1, CR-2, and CR-3 would reduce this impact to a less than significant level. Further analysis of this topic in an EIR is not warranted; however, measures CR-1, CR-2, and CR-3 will be referenced in the EIR and will be included in the project's Mitigation Monitoring and Reporting Program. **Impacts would be less than significant with mitigation incorporated and further analysis of this issue in an EIR is not warranted.**

Mitigation Measures

Implementation of mitigation measures **CR-1** through **CR-3** would reduce impacts to any unknown archaeological resources, paleontological resources, and human remains to a less than significant level.

- CR-1 Monitoring.** If artifacts are discovered during ground-disturbing construction activities, the developer shall notify the City of Agoura Hills' Environmental Analyst immediately, and construction activities shall cease until a City-approved archaeologist has documented and recovered the resources. If a Native American site is uncovered, construction in that area shall be suspended until a Native American monitor, along with the project archaeologist, can properly assess the resource. Equipment stoppages prescribed by the archaeologist shall only involve those pieces of equipment that have actually encountered significant or potentially significant resources, and shall not require stoppage of all equipment on the site unless the resources are thought by the archaeologist to be distributed throughout the entire site. The purpose of stopping the equipment is to protect cultural/scientific resources that would otherwise be affected, and said equipment may undertake work in other areas of the site away from the discovered resources. If the find is determined by the archaeologist to be a unique archaeological resource, as defined by Section 2103.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of Section 21083.2 of the Public Resources Code, as appropriate. If the find is determined not to be a unique archaeological resource, no further action is necessary and construction may continue.
- CR-2 Evaluation and Notification.** Should archaeological resources be discovered and avoidance proves infeasible, the importance of the site shall be evaluated by an archaeologist and a Native American monitor, where applicable. The archeologist and Native American monitor shall be approved by the City's Environmental Analyst. Depending on the nature of the find, mitigation may include documentation, data collection or other appropriate actions to be determined by the archaeologist, and, where applicable, the Native American monitor.
- CR-3 Discovery of Human Remains.** In accordance with HSC Section 7050.5, PRC Section 5097.98, and the City's General Plan Policy HR-3.3, in the event of discovery of human remains, the City's Environmental Analyst and County Coroner shall be notified immediately by the developer, and no further disturbance shall occur until the County Coroner has determined the origin and disposition of the remains, and that no investigation of the cause of death is



required. If the human remains are determined to be prehistoric, the County Coroner shall notify the Native American Heritage Commission, which will determine and then notify the Most Likely Descendent (MLD) or MLDs. The MLD(s) shall complete and inspection and make a recommendation within 48 hours of the notification. If no recommendation is received, the remains shall be interred with appropriate dignity on the property in a location not subject to future development.

<u>VI. GEOLOGY AND SOILS</u> - Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a, c, d) No faults traverse the project site and no active faults have been mapped within the City of Agoura Hills (USGS mapping system, 2010). The site is not within an Alquist-Priolo mapping area. Active faults that could potentially cause ground-shaking in Agoura Hills are at a distance of seven miles or greater from the City, and include the San Andreas, Oak Ridge, Malibu Coast, San Cayetano, and the Simi-Santa Ana faults. In addition, the Thousand Oaks area contains segments of the potentially active Sycamore Canyon-Boney Mountain fault zone, which lies no closer than five miles from the City of Agoura Hills. The most likely earthquake-generating faults in the geographic region are the San Andreas, San Jacinto, Elsinore-Whittier, and the



Newport-Inglewood faults (City of Agoura Hills, General Plan 2035 EIR, 2010). **No impact** would occur in regard to fault rupture.

c, d) The California Building Code (CBC) and City Building Code control building design and construction. The City of Agoura Hills, along with all of Southern California and the Central Coast, is within Seismic Zone 4, the area of greatest risk and subject to the strictest building standards. New development would conform to the CBC as required by law, as well as the City of Agoura Hills Building Code, and preparation of a geotechnical analysis to investigate the potential for landslide, lateral spreading, subsidence, collapse, expansive soil, and liquefaction would be required prior to project approval. Nevertheless, these geologic issues would remain **potentially significant, and will be addressed in an EIR.**

b) The currently proposed project involves annexation of land; subdivision of land for single-family homes and open space; and construction of a private road, drainage facilities, utilities, a trail on the south side of the property, and a newly aligned multi-use trail in the foothills. During construction of the specified infrastructure improvements, as well as for the potential future residences, soil may erode due to wind entrainment and sediment may travel into storm drainage facilities. To reduce these impacts, standard dust control measures (AQMD Rule 403) and a Stormwater Pollution Prevention Plan (SWPPP) pursuant to the Regional Water Quality Control Board, would be required for project development of the site (refer to sections II, *Air Quality*, and IX, *Hydrology and Water Quality*). **These standard requirements and project components would serve to reduce the potential for soil loss on the project site due to erosion to a less than significant level.**

e) The City and County provide sanitary sewer service, with the Las Virgenes Municipal Water District providing the major sewer trunk lines, and would continue to provide these services to development in the City (City of Agoura Hills, General Plan 2035 Final EIR, 2010). The future proposed residential development would connect to existing sewer service, and would not require the use of septic tanks or alternative wastewater disposal systems. A sewer area study will be required by the County prior to approving the sewer line extension to the project site from Chesebro Road. **Therefore, no impact would occur and no further analysis of this issue is required.**

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

Greenhouse gases (GHGs) are emitted by both natural processes and human activities. Of these gases, carbon dioxide (CO₂) and methane (CH₄) are emitted in the greatest quantities from human activities. Emissions of CO₂ are largely by-products of fossil fuel combustion, whereas CH₄ results



from off-gassing associated with agricultural practices and landfills. Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the 21st century than were observed during the 20th century. Different types of GHGs have varying global warming potentials. The global warming potential of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO₂) is used to relate the amount of heat absorbed to the amount of the gas emissions, referred to as “carbon dioxide equivalent” (CO₂E), and is the amount of a GHG emitted multiplied by its global warming potential.

According to the CalEPA’s 2010 Climate Action Team Biennial Report, potential impacts of climate change in California may include loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years (CalEPA, April 2010). While these potential impacts identify the possible effects of climate change at a global and potentially statewide level, in general, scientific modeling tools are currently unable to precisely predict what impacts would occur locally.

The City of Agoura Hills is within the South Coast Air Basin, which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAQMD has not adopted GHG emissions thresholds that apply to land use projects where the SCAQMD is not the lead agency and the City has not adopted any specific GHG emissions reduction plan or GHG emissions thresholds. Therefore, the currently proposed project (private road, drainage, utilities, trails) and potential future residential development are evaluated based on the SCAQMD’s recommended/preferred option threshold for all land use types of 3,000 metric tons CO₂E per year (SCAQMD, “Proposed Tier 3 Quantitative Thresholds – Option 1”, September 2010), which has been used in past CEQA analyses prepared for projects in the City of Agoura Hills.

a) GHG emissions associated with short-term construction and long-term operation of the project were estimated using the California Emissions Estimator Model (CalEEMod) (see Appendix A for forecast assumptions and results). The estimates assume construction of the currently proposed project and fifteen future homes.

Construction Emissions

Based on the CalEEMod results, construction activity for the proposed project would result in an estimated 340.7 metric tons of CO₂E. Because climate change represents a long-term cumulative impact, emissions associated with construction activity are generally amortized over a 30-year period (the anticipated life of the project) in order to more accurately compare them to the annual threshold. Therefore, the project would result in approximately 11.4 metric tons of CO₂E per year.

Energy Use

Operation of the proposed project would consume both electricity and natural gas. The generation of electricity through combustion of fossil fuels typically yields CO₂, and to a smaller extent, N₂O and CH₄. Electricity and natural gas consumption would generate approximately 53.8 metric tons of CO₂E per year.

Area Sources



Area sources of GHG emissions include consumer products, landscape maintenance, and architectural coating. Area sources would result in approximately 5.0 metric tons of CO₂E per year.

Solid Waste

The proposed project would generate solid waste that would result in approximately 8.0 metric tons of CO₂E per year according to the CalEEMod output, which uses current waste disposal rates provided by CalRecycle.

Water Use

Based on the CalEEMod estimate, water transportation to serve on-site development would generate approximately 6.8 metric tons of CO₂E per year.

Transportation

Mobile source GHG emissions were estimated using total daily trips based on the Institute of Transportation Engineers' *Trip Generation*, 8th Edition, 2008, and by the total vehicle miles traveled (VMT) estimated in CalEEMod, which corresponds to the Traffic Impact Analysis prepared for the project (KHA, November 2013). Based on the CalEEMod model estimate, mobile emissions resulting from on site development would generate an estimated 215.9 metric tons CO₂E per year.

Combined Construction, Stationary and Mobile Source Emissions

Table 3 combines the construction, operational (energy use, area source, solid waste, and water use emissions), and mobile GHG emissions associated with the proposed project.

Table 3
Combined Annual Emissions of Greenhouse Gases

Emission Source	Annual Emissions (CO ₂ E)
Construction	11.4 metric tons
Operational	
Energy	53.8 metric tons
Area Sources	5.0 metric tons
Solid Waste	8.0 metric tons
Water	6.8 metric tons
Mobile	215.9 metric tons
Total	300.9 metric tons

Sources: See Appendix A for CalEEMod annual output.

The combined annual emissions would total approximately 301 metric tons CO₂E per year. This emissions estimate indicates that the majority of the project's GHG emissions are associated with vehicular travel (72 percent). **Based on the 3,000 metric tons CO₂E per year threshold, the**



project's emissions of approximately 301 metric tons of CO₂E per year would have a less than significant impact.

b) CalEPA's Climate Action Team (CAT) published the 2006 CAT Report, which includes GHG emissions reduction strategies intended for projects emitting less than 10,000 tons CO₂E/year. In addition, the California Attorney General's Office has developed Global Warming Measures (2010) and the State Office of Planning and Research's (OPR) 2008 technical advisory CEQA and Climate Change document includes GHG reduction measures intended to reduce GHG emissions in order to achieve statewide emissions reduction goals. These measures aim to curb the GHG emissions through suggestions pertaining to land use, transportation, renewable energy, and energy efficiency. Several of these actions are already required by California regulations, such as:

- *AB 1493 (Pauley) requires the state to develop and adopt regulations that achieve the maximum feasible and cost-effective reduction of climate change emissions emitted by passenger vehicles and light duty trucks.*
- *In 2004, the California Air Resources Board (ARB) adopted a measure to limit diesel-fueled commercial motor vehicle idling.*
- *The Integrated Waste Management Act of 1989, (AB 939, Sher, Chapter 1095, Statutes of 1989) established a 50% waste diversion mandate for California.*
- *Public Resources Code 25402 authorizes the CEC to adopt and periodically update its building energy efficiency standards (that apply to newly constructed buildings and additions to and alterations to existing buildings).*
- *California's Renewable Portfolio Standard (RPS), established in 2002, requires that all load serving entities achieve a goal of 33 percent of retail electricity sales from renewable energy sources by 2020, within certain cost constraints.*
- *Green Building Executive Order, S-20-04 (CA 2004), sets a goal of reducing energy use in public and private buildings by 20 percent by the year 2015, as compared with 2003 levels.*

In addition, future residential development onsite would meet many objectives of the Attorney General and OPR through compliance with City standards. For example, the City enforces the 2010 California Green Building Standards Code on new development. In addition, curbside recycling and green waste services are provided to residential developments in the City.

The Southern California Association of Governments' (SCAG) 2012 Regional Transportation Plan/Sustainable Communities Strategy (2012 RTP/SCS) includes a commitment to reduce emissions from transportation sources by promoting compact and infill development in order to comply with SB 375 (Sustainable Communities and Climate Protection Act of 2008). A goal of the SCS is to, "promote the development of better places to live and work through measures that encourage more compact development, varied housing options, bike and pedestrian improvements, and efficient transportation infrastructure." The proposed project would be consistent with the RTP/SCS in that the subdivision would concentrate the single-family residential lots in the smaller, flatter portion of the overall site (23 acres), leaving the remaining southern and eastern portions of the site (48 acres) at the edge of the City, including hillside areas, as permanent open space. The subdivision, while not infill development, is proposed directly adjacent to existing residential use of a similar, or slightly greater density, so that the project can easily be served by existing infrastructure. Walking and equestrian trails would be created within the project to connect with existing facilities adjacent to the site.



The City of Agoura Hills General Plan 2035 (2010) identifies goals and policies generally related to greenhouse gases. The project would be consistent with these items, including Policy LU-1.2, Development Locations (allowing for growth on the immediate periphery of existing development in limited areas); Policy LU-2.5, Sustainable Land Development Practices (concentrating development to protect open spaces); and Policy LU-4.8, Connectivity (providing for walking and equestrian trails that connect with existing trails).

The currently proposed project and fifteen future single-family homes would be consistent with policies and regulations pertaining to GHG reduction and, therefore, would not conflict with GHG emissions reduction goals. **Therefore, this impact would be less than significant.**

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



a, b) Neither the currently proposed project nor the potential future residential uses would involve the routine transport, use or disposal of hazardous substances, other than minor amounts used for maintenance and landscaping characteristic of a single family residential development. As such, the project would not have the potential to release substantial quantities of hazardous materials into the environment. **Impacts would be less than significant and further analysis of these issues in an EIR is not warranted.**

c) The closest school is the Partners in Learning Pre-school and Kindergarten located at 5251 Chesebro Rd., 0.1 miles to the west of the proposed project parcel, beyond which is a Montessori school. However, as stated above, the proposed project and the future potential fifteen residences would result in a minor increase in typical household and landscaping chemicals commonly used in residential neighborhoods (including those currently existing in and around the nearest school), and would not involve the use, generation, storage, or transport of large quantities of hazardous materials, substances, or waste. Therefore, **impacts would be less than significant and further analysis of this issue in an EIR is not warranted.**

d) The eastern boundary of the project site is located 0.5 miles from the western boundary of the Calabasas Sanitary Landfill. The eastern edge of the portion of the site where the residential subdivision would occur is located more than one-half mile from the western boundary of the landfill. The Calabasas Sanitary Landfill, operated by the Los Angeles County Sanitation Districts, is located at 5300 Lost Hills Road in Calabasas. The total remaining capacity of the Calabasas Sanitary Landfill is 15.6 million cubic yards, or 7 million tons (Gwen Tantoco, February 2013). The facility is permitted to accept up to 3,500 tons per day. The average daily tonnage of waste received during the previous four quarters was 643 tons per day. Development of this site, which is located near the landfill, may result in potential human health issues related to both landfill gas emissions and potential surface and groundwater contamination associated with landfill runoff. **Therefore, impacts would be potentially significant and will be discussed further in an EIR.**

e, f) There are no airports or airstrips located within the project site vicinity. The closest airport is the Van Nuys Airport, situated about eighteen miles east of the project site. The site is not within an area covered by an airport land use plan, nor is it located in the vicinity of a private air strip. Therefore, **no impact would occur and further analysis of this issue in an EIR is not warranted.**

g) Implementation of the project would not interfere with existing emergency evacuation plans, or emergency response plans in the area. There is an emergency evacuation plan for the Old Agoura community, adjacent to the project site on the west, south and north. There are many identified pathways in the plan, and more than one exit area from the Old Agoura community. One of the pathways is adjacent to the project site on the west. The currently proposed project (annexation; subdivision; and development of a private road, drainage improvements, trails, and utilities) would not result in additional residences that would contribute to the demand for evacuation, and the design of the subdivision and proposed improvements, including the private road, would not impair or interfere with the existing evacuation plan. Additionally, potential future residential development on the site (as part of a separately reviewed and permitted project) is estimated to result in 42 persons (see Section XIII, *Population and Housing*), along with their potential horses and other animals, which would utilize the emergency



evacuation plan. This additional demand for evacuation is not expected to impair or interfere with the plan. Moreover, the project would be required to comply with the State Fire Code, City Municipal Code, and Los Angeles County Fire Department (LACFD) standards, including specific construction specifications, access design, location of fire hydrants, and other design requirements. **This impact would be less than significant, and further analysis of this issue in an EIR is not warranted.**

h) The City of Agoura Hills General Plan and Municipal Code classify the City as a “Very High Fire Hazard Severity Zone” (formerly Fire Zone 4). The City of Agoura Hills Uniform Fire Code, found in Section 8200 of the City of Agoura Hills Municipal Code, includes modifications to the California Building Code (CBC) that intend to prevent loss during a wildland fire, including design and installation standards. “Where required by the fire code official, a fuel modification plan, a landscape plan and an irrigation plan prepared by a registered landscape architect, landscape designer, landscape contractor, or an individual with expertise acceptable to the building official shall be submitted ... prior to any new construction” (Agoura Hills Municipal Code Section 704A.6). The currently proposed project does not include any structures that would require preparation of a fuel modification plan. In the future, as individual homes are proposed and site plans are created as part of a separate project and permit process, a fuel modification plan would need to be prepared for each home and must be reviewed and approved by the Los Angeles County Fire Department Fuel Modification Unit. **Therefore, impacts related to wildland fire would be less than significant with mandatory compliance with the City’s building standards and County of Los Angeles Fire Department fuel modification regulations. Further analysis of this issue in an EIR is not warranted.**

<u>IX. HYDROLOGY AND WATER QUALITY</u> - Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



IX. HYDROLOGY AND WATER QUALITY – Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Construction activities and operation of the project (both the currently proposed project and the potential future construction of fifteen homes) could result in an increase in pollutants in runoff during storm events. If large amounts of bare soil are exposed during the rainy season, or in the event of a storm, finely grained soils could be entrained, eroded from the site, and transported to drainages. The amount of material that could potentially erode from the site during temporary construction activities would be greater than under existing conditions due to the loss of vegetation and movement of soils. The developer would be required to obtain a National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges associated with Construction and Disturbance Activities (Order No. 2009-0009-DWQ) (State Water Resources Control Board) (City of Agoura Hills Ordinance No. 97-272), which would require the preparation of a Storm Water Pollution Prevention Plan (SWPPP) that addresses potential pollutants during construction, and a Standard Urban Storm Water Mitigation Plan (SUSMP) to address pollutants during the life of the project. Components of a SWPPP typically include, but are not limited to, Best Management Practices (BMPs) like silt fences; erosion control blankets; soil stabilizers; proper handling and disposal of wastes; and anti-tracking pads at site exits to prevent the offsite transport of materials. A SUSMP typically includes BMPs for source prevention and treatment control, such as catch basin filters and infiltration/detention basins, as well as minimizing impervious paving. Compliance with the required NPDES permit would ensure that potential impacts to water quality would be minimized. **Nevertheless, this impact remains potentially significant and will be evaluated further in an EIR.**

b, c) Development of both the currently proposed project and the future potential residences would increase impermeable surface area onsite, which may reduce groundwater recharge. In



addition, the drainage pattern throughout the site would be modified by project development. Therefore, adverse erosion and sedimentation effects could occur. **These impacts would be potentially significant and will be evaluated further in an EIR.**

d-f) The 71-acre project site is currently vacant and contains entirely pervious surfaces. The proposed project's private road, and future development of potentially fifteen homes would increase the amount of impervious surfaces on the project site, and so would reduce the amount of water that percolates into the ground and increase the amount of water that is discharged to the storm drain system. Two vegetated biofiltration basins are proposed on-site as part of the drainage improvements (with an option to place those basins underground or replace them with underground pipes). Nonetheless, **impacts would be potentially significant and will be evaluated further in an EIR.**

g-i) The Flood Insurance Rate Map (FIRM) issued by the Federal Emergency Management Agency (FEMA) for the project site (FEMA, FIRM Map ID # 06037C1263F, accessed 2013) indicates that the upper northwest portion of the proposed project site is adjacent to Cheseboro Creek and is contained in Zone AE and Zone X of the 100-year flood hazard zone. Zone AE is designated as the base flood zone, and Zone X designates an area with a minimal risk of flooding (not within the 100 year flood zone). Zone AE also crosses Chesebro Road, one of the access roads to the project site, which could limit access to and from the site during a flood event. **Due to a portion of the site being within Zone AE, impacts would be potentially significant and will be evaluated further in an EIR.**

k) Seismic events can induce oscillations, called seiches, of the surface of an inland body of water that varies in period from a few minutes to several hours. Tsunamis are large sea waves produced by submarine earthquakes or volcanic eruptions. The project site is not located close to the ocean or an inland body of water (Lake Lindero is approximately three miles west of to the site) and is at an elevation sufficiently above sea level to be outside the zone of a tsunami or seiche. **Therefore, no impact would occur and further analysis of this issue in an EIR is not warranted.**

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<u>X. LAND USE AND PLANNING</u> - Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) The project site is bounded by U.S. Highway 101 on the south, open space to the north and east, and residential and commercial-retail uses on the west. The project involves development



of a vacant site on the border of an urbanized area. On the west, the proposed very low density residential subdivision would be contiguous to existing low-density residential development, and, upon annexation, would become part of the City of Agoura Hills' Old Agoura community and consistent with the provisions of the OA overlay and EQ overlay that dictate land use and development standards in this part of the City. Therefore, it would not physically divide an established community. **No impact would occur and further analysis of this issue in an EIR is not warranted.**

b) The proposed project involves the subdivision of land for the construction of fifteen single-family residential dwellings on a vacant lot with a proposed zoning of Very Low Density-Residential (RV)-Old Agoura Overlay (OA)-Equestrian Overlay (EQ). This zone allows for a density of <2 dwelling units/acre, and is the lowest density residential zone in the City. Adjacent land uses in the City are zoned Low Density-Residential, one-two units per acre (RL)-OA-EQ, and Open Space-Restricted (OS-R)-OA-EQ (which allows one single-family unit per lot). The proposed project zoning of RV-OA-EQ would be compatible with the existing adjacent land use types and densities.

Currently, the project site is within the County of Los Angeles' North Area Plan (NAP). The project would establish fifteen single-family home lots, whereas the NAP allows fourteen single-family homes at a minimum density of five acres per lot. The proposed project has smaller residential lot sizes (less than five acres), as the project is designed to cluster residential lots into the flattest portion of the site in order to preserve open space and potential biological resources in the hillside areas. On average, the proposed density of the residential subdivision is 1.5 acres/unit (23 acres/15 units). When the entire 71-acre project site is taken into account, the density is 4.7 acres/unit (71 acres/15 units).

The Agoura Equestrian Estates Project would require:

- *Vesting Tentative Tract Map to:*
 - *Divide approximately 71 acres (APN 2052-009-270) into sixteen lots: (1) open space, (2) fifteen residential lots*
 - *Retain the parcel (about 0.25 acre) across Chesebro Road (APN 2055-010-270) as a separate open space lot.*
- *Development Agreement*
- *Purchase and Sale Agreement*
- *Pre-annexation Agreement*
- *Annexation and Sphere of Influence Change for the two project parcels plus a state-owned parcel (APN 2055-010-901) and a portion of the Caltrans right-of-way along U.S. Highway 101*
- *General Plan Amendment (for the annexation)*
- *Oak Tree Permit (to be determined based on final grading plans; based on the proximity of grading to the existing oak immediately off-site of the parcel, and any on- or off-site oaks)*
- *Conditional Use Permit for the overall project site, given that the approximately 70-acre parcel is hillside, and that trails are proposed in the OS-DR zone)*
- *Pre-Zoning and Zone Change (From County zoning to Residential Very Low (RV)-Old Agoura Overlay (OA)-Equestrian Overlay (EQ) for fifteen residential lots and Open Space – Deed Restricted (OS-DR)-OA-EQ for the two open space lots.*



Upon annexation and City approval of the General Plan amendment, zone change, Conditional Use Permit, and Tentative Tract Map changes, the project would be consistent with the City General Plan and City Municipal Code, including the Zoning Code. The proposed development agreement would incorporate by reference the City’s approvals and conditions on the developers’ properties. **Impacts to land use and planning would be less than significant and further discussion in an EIR is not warranted.**

c) The project site is within an urban area and is not subject to, or near, an adopted habitat conservation plan (HCP), natural community conservation plan (NCCP), or any other approved local, regional, or state habitat conservation plans (City of Agoura Hills, General Plan 2035 Final EIR, February 2010). The closest protected community is the Palo Comado Canyon portion of the Santa Monica Mountains Palo Comado Canyon Significant Ecological Area (SEA), located approximately 0.8 miles north of the project site across Chesebro Road. The closest formal wildlife corridor is the Liberty Canyon Wildlife Corridor, at U.S. Highway 101 and Liberty Canyon Road (General Plan, 2010), immediately east of the site. The Palo Comado Canyon SEA south of Agoura Road is also viewed as an area for wildlife travel. The project would not interfere with an adopted HCP or NCCP, as there are none in, or near, the City of Agoura Hills. The project would not interfere with any sensitive ecological area or any wildlife corridor or travel area (See Section IV, *Biological Resources*). Moreover, the project would preserve much of the site (48 acres) that is contiguous to other off-site open space areas as permanent open space, thereby preserving a buffer area between developed areas and the wildlife corridor. **Therefore, no impact would occur and further analysis in an EIR is not warranted.**

<u>XI. MINERAL RESOURCES</u> -- Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a, b) The project site is currently proposed for subdivision and for private street, utility, drainage and trail improvements. The site may be developed ultimately (under separate application and permit) with fifteen single family residences. The main parcel is bordered on the west by the Old Agoura residential neighborhood, and on the north and east by open spaces, and to the south by U.S. Highway 101. According to the California Division of Mines and Geology (DMG), no significant mineral deposits are present within the City of Agoura Hills (City of Agoura Hills, General Plan March 2010). The majority of the City north of Agoura Road is classified as MRZ-1. This classification is used to delineate areas where adequate information is available to determine that no mineral deposits are present, and/or there is little likelihood for significant deposits to be present. Due to the nature of the proposed project, and the surrounding land uses, conversion of the project site to mining is unlikely.



The project site is directly adjacent to the Old Agoura neighborhood of the City, and according to the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR) mapping application, there have been no new locations of drill, rework and plugging and abandonment notices received by the Division in the last 365 days in and around the proposed project area. **Impacts would be less than significant and further analysis of these issues in an EIR is not warranted.**

XII. NOISE - Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity due to construction activities above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound power levels to be consistent with that of human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz). For the most sensitive uses, such as single-family residential, 60 dBA Day-Night average level (Ldn) is the maximum normally acceptable exterior level. Ldn is the time average of all A-weighted levels for a 24-hour period, with a 10 dBA upward adjustment added to those noise levels occurring between 10:00 p.m. and 7:00 a.m. to account for the general increased sensitivity of people to nighttime noise levels. The Community Noise Equivalent Level (CNEL) is similar to the Ldn except that it adds five additional dBA to evening noise levels (7:00 p.m. to 10:00 p.m.). The City of Agoura Hills utilizes the CNEL for measuring noise levels.



a, c) The currently proposed project includes a subdivision to allow for the construction of fifteen residential single-family homes (development of the homes to potentially occur in the future as part of a separate application and permit process), specified private street, trail and infrastructure/utility improvements on the parcel adjacent to the existing residential low density (RL) single family homes that front Chesebro Road. The proposed project and development of the homes and any associated horse-keeping would be consistent with existing noise-generating uses in the vicinity, which are primarily low-density residential with some animal-keeping uses and trails, and further west, commercial retail service uses, and are expected to generate a minor amount of noise typical of single-family homes, a private road, and trails, consistent with that of the surrounding area. The future residences would not be expected to generate high levels of noise and would be similar to other residential uses in the area.

Based on the General Plan noise contours, the southern portion of the project site and neighboring RL land uses are currently subject to noise levels between 60 and 70 CNEL, depending on proximity to U.S. Highway 101 (City of Agoura Hills, General Plan Figure N-1, March 2010). Specifically, portions of the project are situated in a area of 60 and 65 CNEL, while the northern portion of the site is within a CNEL of less than 60. Note that these contours represent line-of-sight attenuation, and do not account for additional attenuation from topography and other barriers. Table N-1 of the General Plan indicates that a CNEL of 60-70 is considered "normally compatible" for locating single-family residences. A weekday afternoon 20-minute ambient noise measurement was taken on the project site at the approximate southern edge of where the potential future residences would be located (approximately 500 feet north of U.S. Highway 101) using an ANSI Type II integrating sound level meter in accordance with standard protocols on October 23, 2013. This measurement indicated an ambient noise level of approximately 42 dBA. Thus, actual noise levels in the area proposed for residential development are considerably lower than shown in the Agoura Hills General Plan, due primarily to the presence of intervening topography between Highway 101 and the project site.

Fifteen new single-family homes would generate a limited number of new vehicle trips (approximately 144, based on the Traffic Impact Assessment for the project prepared by Kimley-Horn Associates, November 2013). These trips would constitute a small fraction of the overall trips on area roadways. The majority of project-generated trips would be between the project site and U.S. 101 and would affect a limited number of sensitive receptors. Thus, project-generated traffic would not add substantially to existing traffic noise on local roadways.

Based on the above, the project would not expose residential land uses to noise exceeding the City's noise standards or otherwise contribute to a long-term increase in noise in the project vicinity. **Impacts would be less than significant and further analysis of this issue in an EIR is not warranted.**

b) The project site is not located in an area of excessive groundborne vibration and would not expose people to excessive levels of groundborne vibration. Because construction of the proposed project and potential future single-family home development are not expected to involve pile driving or other activities that generate high levels of vibration, substantial groundborne vibration is not anticipated. Based on the distance to the nearest sensitive receivers



(about 20 feet to the nearest single family residences), maximum vibration levels associated with equipment expected to be used during construction (bulldozers, trucks, jackhammers) would range from about 59 to 88 vibration decibels (VdB) (Federal Railroad Administration, 2012). The maximum vibration levels would potentially exceed the groundborne velocity threshold level of 80 VdB established by the Federal Railroad Administration for sensitive buildings, residences, and institutional land uses where people normally sleep, but would not approach the 100 VdB, level, which is the general threshold where minor damage can occur in fragile buildings. Consequently, vibration would not be expected to cause any structural damage and mandatory compliance with the City’s construction noise ordinance, which limits the days and hours of construction to between 7:00 AM and 7:00 PM, Monday through Saturday, would eliminate the potential for disturbance during nighttime hours when people normally sleep. **Impacts related to construction-related groundborne noise and vibration would therefore be less than significant and further analysis of this issue in an EIR is not warranted.**

d) Grading and construction of the project would generate a temporary increase in noise in the site vicinity. As shown in Table 4, maximum noise levels relating to construction range from 78-88 decibels (dB) at a distance of 50 feet (US EPA, 1971).

Sensitive noise receptors include residential units, child care centers, libraries, hospitals, and nursing homes. The sensitive receptors closest to the project site are the single-family residential units located as close as 20 feet from the western project site boundary, and a pre-school/kindergarten and Montessori school located approximately 600 feet west of the western project boundary. Construction noise generally attenuates by about 6 dBA per doubling of distance. Due to the proximity to the project site boundary, the nearest existing single-family residences could experience periodic maximum noise levels as high as about 90 dBA. Noise levels at the pre-school/kindergarten and Montessori school would be lower due to the greater distance from the project site and would be expected to be within 57-66 dBA range.

Table 4
Typical Noise Levels at Construction Sites

Construction Phase	Average Noise Level at 50 Feet	
	Minimum Required Equipment On-Site	All Pertinent Equipment On-Site
Clearing	84 dBA	84 dBA
Excavation	78 dBA	88 dBA
Foundation/Conditioning	88 dBA	88 dBA
Laying Subbase, Paving	78 dBA	79 dBA
Finishing and Cleanup	84 dBA	84 dBA

Source: Bolt, Beranek and Newman, "Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances," prepared for the U.S. Environmental Protection Agency, 1971.



Grading and construction activity could cause periodic disturbance to adjacent residences. However, grading and construction would be required to comply with Article IV, Chapter 1, of the City’s Municipal Code, which limits the use of construction equipment that generates noise in excess of 60 dBA to between the hours of 7:00 AM and 7:00 PM, Monday through Saturday. No construction activity is permitted between 7:00 PM and 7:00 AM that generates noise in excess of the 50 dBA nighttime standard, and no construction activity is permitted on Sundays or legal holidays. **With conformance to Article IV, Chapter 1, the City’s Municipal Code, temporary construction noise impacts would be less than significant and further analysis of this issue in an EIR is not warranted.**

e, f) The project site is not located within the vicinity of an airport or private airstrip. The closest airport is the Van Nuys Airport, about eighteen miles east of the site. **No impact would occur and further analysis of this issue in an EIR is not warranted.**

<u>XIII. POPULATION AND HOUSING</u> - Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Development of the currently proposed project (annexation, subdivision, private road, drainage, utilities, trails) would not result in an increase in population. However, the future potential development of fifteen new residential units on the project site would cause a direct increase in the City’s population. Using the California State Department of Finance average household size for Agoura Hills of 2.787 persons, the net increase of fifteen dwelling units would generate a resident population of approximately 42 persons (15 units x 2.787 persons/unit). The current City population is approximately 20,516, according to the most recent (January 2013) California Department of Finance estimate. Therefore, the proposed project would result in a citywide population of approximately 20,558 persons (20,516 + 42). The Southern California Association of Governments (SCAG) projects that the population of Agoura Hills will be 21,400 by 2035 (SCAG, 2012). The level of population increase associated with the fifteen homes is within the population forecast, and the physical environmental impacts associated with this increased population growth have been addressed in the individual resources sections of this Initial Study.

The proposed project would provide for the extension of utilities, including sewer system, and private road construction, to serve the fifteen residential lots. However, this infrastructure would not induce population growth beyond the fifteen single-family residential lots, as all vacant land surrounding the site would be zoned and designated for OS-DR, which is deed



restricted and no development of buildings is allowed. The project would include transferring the open space areas to the south and east of the site (as well as the small parcel across Chesebro Road) to a public entity for permanent open space preservation, and the existing open space parcel to the north of the site is owned by the State of California and is used for state park access. Consequently, adjacent vacant lands would be protected from additional urban development.

The project would not substantially increase population, and the physical environmental impacts associated with the project have been addressed in the individual resources sections of this Initial Study. **Therefore, impacts relating to population growth would be less than significant and further analysis of this issue in an EIR is not warranted.**

b, c) The project site is currently vacant. Thus, project implementation would not displace existing residents or housing. **No impact would occur and further analysis of this issue in an EIR is not warranted.**

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

The City of Agoura Hills 2035 General Plan Goal LU-1 and Land Use Policy 1.1 anticipates sustainable growth and change through well-planned development, which would in turn provide for the needs of existing and future residents and businesses, ensure the effective and equitable provision of public services, and make efficient use of land and infrastructure. The current standards and land use specifications contained within the City of Agoura Hills Municipal Code and the General Plan indicate that cumulative development (buildout of the City by the horizon year 2035) shall not exceed 8,319 housing units, 1,850,907 square feet of retail services, 3,341,448 square feet of business park/ office uses, and 1,118,126 square feet of business park-manufacturing uses. The potential future fifteen single-family homes represent about 0.2 percent of anticipated residential development.

a (i) The City of Agoura Hills is served by the Los Angeles County Fire Department (LACFD).



Fire Station #89, located at 29575 Canwood Street in Agoura Hills, approximately 1.75 miles west of the project site, serves the project site and surrounding areas. The station is staffed with a three-person engine company and a two-person paramedic squad. Fire Station #65, at 4206 Cornell Road in unincorporated Los Angeles County, also serves the City.

The currently proposed project (annexation, subdivision, private road, drainage, utilities, trails) would not increase the demand for fire protection services, but the potential future fifteen single-family homes would incrementally increase such demand. However, the proposed project would be required to pay standard development impact mitigation fees to the LACFD. In addition, the project site is currently adjacent to a residentially developed area of similar density currently served by the LACFD, and the project would be required to comply with Fire Code and LACFD standards, including specific construction specifications, access design, location of fire hydrants, and other design requirements. As a result, the project would not require substantial new or expanded fire protection facilities, and any impacts to fire protection services from implementation of this project would not be significant. **Therefore, impacts related to fire service would be less than significant and further analysis of this issue in an EIR is not warranted.**

a (ii) The Los Angeles County Sheriff's Department (LACSD) provides police protection in the City of Agoura Hills. The Malibu/Lost Hills Station, located at 27050 Agoura Road in the City of Calabasas, approximately 1.35 miles east of the project site, serves the project site and surrounding areas. The station patrols the cities of Agoura Hills, Calabasas, Hidden Hills, Westlake Village, and Malibu, as well as adjacent unincorporated areas. The Lost Hills Station participates in a reciprocal aid agreement with the nearby communities of Westlake Village and Calabasas, which enables these stations to be called upon for assistance, if necessary. The currently proposed project and the potential future fifteen homes would result in only a minor increase in demand for protection services and would not require additional police services based upon a review of the City of Agoura Hills General Plan EIR. The analysis contained within that EIR states that the current ratio of 1 deputy per 1,722 residents is an acceptable service ratio (Smith, 2009). In addition, the average emergency response time from the Malibu/Lost Hills Sheriff Station for the month of February 2009 was 4.8 minutes. The average non-emergency response time for the same period was 17.7 minutes. Both of these times are considered acceptable (Agoura Hills General Plan EIR, Section 4.11.5, Levels of Service). The City's General Plan EIR (February 2010) states that there are no current plans for future expansion of the existing police facility, staff, or general equipment inventory. **Therefore, impacts related to police protection would be less than significant and further analysis of this issue in an EIR is not warranted.**

a (iii) The Las Virgenes Unified School District (LVUSD) provides primary and secondary public education services to the project site. LVUSD manages three schools located within the attendance area of the project site: Agoura High School, A.E. Wright Middle School, and Sumac Elementary School. While the proposed project would not increase demand on schools, the potential future fifteen single-family homes could incrementally increase school enrollment and could result in exceedance of capacity at LVUSD schools.

The potential fifteen residential dwellings may be occupied by families with school aged children. According to the City's General Plan EIR (February 2010) a student generation factor of 0.66 elementary school children per household, 0.12 middle school children per household,

and 0.1367 high school children per household was used to calculate the anticipated number of new students in the City. Based on these factors, the project would result in approximately ten new elementary school students, two new middle school students, and two new high-school students.

At the time of residential unit development, the project applicant would be required to pay state-mandated school impact fees. Pursuant to Section 65995 (3)(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees "...is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." **Thus, impacts related to schools would be less than significant and further analysis of this issue in an EIR is not warranted.**

a (iv) Given the nature of the currently proposed project and that it would not increase population, it would not contribute to a demand for parks. However, development of the future fifteen homes could increase the park demand in the City. According to the amount of land to be dedicated formula provided in the Agoura Hills Municipal Code Section 10800 et seq., the project would need to provide 0.017 acres of parkland or pay an in-lieu fee. However, the proposed project would provide 48 acres of dedicated open space to the City's open space network in excess of the required 0.017 acres of parkland, as well as trails in the open space areas and on the project site. In addition, the project developer would be required to pay Quimby Act fees (Section 10800 of the Agoura Hills Municipal Code) upon recordation of the final vesting tract map to offset impacts associated with new residential units on affected park facilities. Therefore, the proposed project, and the potential future development of fifteen single-family homes, would not cause adverse impacts to parks. **Consequently, a less than significant impact to parks would occur and further analysis of this issue in an EIR is not warranted.**

a (v) Other public services include library services. Library services in the City of Agoura Hills are provided by the County of Los Angeles Public Library System. The Agoura Hills Library is located at the City Hall Civic Center, 30001 Ladyface Court, Agoura Hills, CA 91301. According to the City's General Plan Final EIR, no new library facilities are expected to be necessary to accommodate the growth proposed under the General Plan Update (Agoura Hills General Plan EIR, Section 4.11.15, Project Impacts and Mitigation). As stated in this document, Section X. Land Use and Planning, this project does not conflict with the General Plan, and would have a less than significant impact. **Therefore, no impact to other public facilities would occur and further analysis of this issue in an EIR is not warranted.**

<u>XV. RECREATION</u>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



XV. RECREATION

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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a) The currently proposed project would not add to the demand for recreation, since it involves construction of a private road, drainage facilities, utilities and trails. However, the potential future fifteen new residential units on the site would increase population and could increase the demand for recreational services. As described in Section XIV, *Public Services*, the project applicant/ developer would be required to pay Quimby Act fees (Section 10800 of the Agoura Hills Municipal Code) upon recordation of the final vesting tract map to offset impacts associated with new residential units on affected park facilities. Refer also to the discussion of Parks in Section XIV, *Public Services*, subsection a) iv). The relatively minor number of additional homes is not expected to adversely affect other recreational facilities found in the City. The City is currently constructing a new Recreation Center at Ladyface Court, which is an expanded facility from what now exists in the current building along Thousand Oaks Boulevard. Any increase in the demand for recreation from the additional fifteen homes is expected to be accommodated by this new facility. **Therefore, this impact would be less than significant, and further discussion in an EIR is not warranted.**

b) The currently proposed project includes the construction of a multi-use trail within the subdivision of the residential lots and the reconstruction of a trail on the open space property east of the site. The environmental impacts of these trails are assessed in the various environmental issue sections of this Initial Study. The trails would be sited on both RV-OA-EQ zoned land, and on OS-DR-OA-EQ zoned land.

The open space portions of the site would be zoned Open Space – Deed Restricted (OS-DR)-Old Agoura (OA)-Equestrian Overlay (EQ), for permanent open space preservation. The zoning designation has strict requirements for the preservation of natural features. Under the OS-DR zone, no uses are permitted except the following with a Conditional Use Permit: parks and trails; wildlife preserves; and public passive recreation uses that bear a reasonable relationship to open spaces.

As such, the project would have no adverse physical effect on recreation or the environment from the provision of recreational facilities, and **this impact would be less than significant.**



	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. TRANSPORTATION/TRAFFIC - 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 mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standard established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The transportation/traffic analysis is based in part on a Traffic Impact Analysis (TIA) prepared for the project by Kimley-Horn and Associates, Inc. The TIA, dated November 2013, is included in its entirety in Appendix B to this Initial Study.

Two unsignalized intersections were analyzed in the Kimley-Horn TIA:

1. Chesebro Road at Palo Comado Canyon Road/Driver Avenue/Canwood Street
2. Palo Comado Canyon Road at U.S. 101 NB Ramps

In accordance with the City's TIA guidelines, this study provides analysis of the following scenarios:

- Existing (2013) Conditions
- Existing (2013) With Project Conditions
- Near Term (2015) (Project Opening Year) Conditions
- Near Term (2015) (Project Opening Year) Conditions With Project
- Long Term (2035) (Cumulative) Conditions



Based upon the City of Agoura Hills impact criteria, a proposed project is considered to result in a significant impact if it results in any of the following:

- Degrades the LOS at an unsignalized intersection to an unacceptable level of D or worse, unless special circumstances justify otherwise; or
- Results in satisfying the most recent California Manual on Uniform Traffic Control Devices (CAMUTCD) peak-hour volume warrant or other warrants for traffic signal installation at the intersection; or
- Increases delay at an unsignalized intersection operating at an unacceptable level by five or more seconds; or
- Increases the volume-to-capacity ratio on a roadway segment operating at an unacceptable level by 0.05 or more; or
- The project is inconsistent with planned bicycle/pedestrian/transit facilities within the study area.

a) Construction would add heavy equipment to the surrounding roadways. The project would utilize Cheseboro Road, Palo Comado Canyon Road, and Driver Avenue as a haul route for trucks. In order to ensure that these pieces of equipment do not cause excessive delays, Mitigation Measure TRA-1 has been included. At full buildout, the fifteen residential units accommodated by the proposed project would generate an estimated 144 daily vehicle trips, including eleven AM peak hour trips, and fifteen PM peak hour trips. The project impact on the study area intersections was assessed by comparing two different scenarios. The first compares the existing (2013) conditions with the existing (2013) with project conditions. The second compares the near term - 2015 without project to near term - 2015 with project conditions. The near term - 2015 scenario accounts for trips anticipated to be generated by planned and pending development in the project site vicinity. As shown in Table 4 of the Kimley-Horn TIA, planned and pending development will add an estimated 3,736 daily trips, including 208 AM peak hour trips and 314 PM peak hour trips, to the local road network.

As shown in tables 5 and 6 of the Kimley-Horn TIA, significant project impacts would not occur at either study intersection under either of the above scenarios. Project traffic would increase vehicle delays at the study intersections by 0.3 to 0.5 seconds when added to the 2013 baseline and would increase vehicle delays by 0.3 to 0.7 seconds when added to the near term - 2015 condition. These changes are all less than the City's five second threshold for unsignalized intersections. As shown in Table 7 of the TIA, long-term cumulative traffic increases would incrementally degrade service levels on the local road network, but the project's contribution to this cumulative impact would not be considerable since project impacts would not be significant. **Therefore, project traffic impacts would be less than significant after mitigation and further analysis of this issue in an EIR is not warranted.**

TRA-1 During construction and ground disturbance on the project site, all large size truck trips must occur during off-peak hours (between 9:00 a.m. and 4:00 p.m.)

b) The Los Angeles County Congestion Management Program (CMP) was developed in response to California Proposition 111, approved June 1990, and is intended to address regional congestion by linking land use, transportation, and air quality decisions. The CMP document



identifies the County's CMP Highway System, and requires that Level of Service E or better be maintained on this network. Highway 101 is the nearest CMP facility in the study area.

Analysis of a project's impact on a freeway segment would be required of any project that would add 150 trips or more in either direction during the AM or PM weekday peak hours. The project would not generate this level of traffic in either peak hour; therefore, further analysis of CMP facilities is not required for CMP purposes.

An analysis of CMP monitored intersections is required if a project contributes 50 or more peak hour trips to the CMP monitored intersections. The project would not contribute 50 or more peak hour trips to this intersection; therefore, additional evaluation for CMP purposes is not needed.

Based on the above, impacts related to the CMP would be less than significant and further analysis of this issue in an EIR is not warranted.

c) The project site is not within the vicinity of an airport. The nearest airport is Van Nuys Airport, located approximately eighteen miles to the east. **No impact would occur and further analysis of this issue in an EIR is not warranted.**

d, e) The proposed project does not involve any design features or changes to road alignments that would create traffic-related hazards or adversely affect emergency access, nor would the project generate an increase in traffic that would exceed City significance thresholds (See Item a), above). **Impacts would be less than significant and further analysis of this issue in an EIR is not warranted.**

f) The proposed project involves subdivision of the project site for future residential development, and creation of a private road to serve the subdivision. This action would not adversely affect the operation of any existing transit, bicycle, or pedestrian facilities or conflict with City plans or policies related to these facilities, as no such facilities are located adjacent to the project site. **No impact would occur and further analysis of this issue in an EIR is not warranted.**

<u>XVII. UTILITIES AND SERVICE SYSTEMS</u> - Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



<u>XVII. UTILITIES AND SERVICE SYSTEMS</u> - Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The City of Agoura Hills 2035 General Plan Goal LU-1 and Land Use Policy 1.1 anticipates sustainable growth and change through well-planned development, which would in turn provide for the needs of existing and future residents and businesses, ensure the effective and equitable provision of public services, and makes efficient use of land and infrastructure. Pursuant to the current standards and land use specifications contained within the City of Agoura Hills Municipal Code, the General Plan indicates that cumulative development (assuming full buildout of the City by horizon year 2035) shall not exceed 8,319 housing units, 1,850,907 square feet of retail services, 3,341,448 square feet of business park/office uses, and 1,118,126 square feet of business park manufacturing uses. The potential future fifteen dwelling units represents about 0.2 percent of anticipated residential development.

a, b, e) Wastewater generated by the City of Agoura Hills is treated at the Tapia Water Reclamation Facility, operated by the Las Virgenes Municipal Water District (LVMWD). The Tapia Water Reclamation Facility has a capacity of 16 million gallons per day (mgd), but is slated to reduce capacity to an average 12 mgd to improve nutrient removal. This facility treats an average of 9.5 mgd (LVMWD, 2014). Therefore, there is an available capacity of 2.5 mgd after the expected reduction in capacity.

The currently proposed project (annexation, subdivision, private road, drainage, utilities, trails) would not generate demand for wastewater treatment. However, the construction of potentially fifteen homes in the future would increase the need for wastewater services. According to the City of Agoura Hills General Plan Final EIR, the wastewater generation factor for a single-family residential dwelling unit is 330 gallons per day per dwelling. Based on this generation factor, the proposed project would generate approximately 4,950 gallons per day or 0.00495 mgd (City of Agoura Hills General Plan Final EIR, 2010). Wastewater generated by the residential development would be relatively minor and would account for approximately 0.06 percent of the Tapia Water Reclamation Facility's surplus treatment capacity. The reclamation facility capacity appears to be able to accommodate the project, and no expansion of the reclamation facility is expected to be needed. **Therefore, impacts to wastewater treatment**



systems would be less than significant and further analysis of this issue in an EIR is not warranted.

c) The currently proposed project involves the construction of new storm drain infrastructure to convey off-site debris laden runoff as well as on-site runoff. Refer to Section IX, *Hydrology and Water Quality*, for discussion of runoff from the project site. The proposed storm drain facilities would be constructed to adequately accommodate the site and surrounding area's runoff. **Nevertheless, impacts related to hydrological changes would be potentially significant and will be studied further in an EIR.**

d) The Las Virgenes Municipal Water District (LVMWD) supplies potable water in the City of Agoura Hills. The LVMWD has no local sources of water and obtains all of its potable water from the Metropolitan Water District of Southern California (MWD), which in turn receives water from the State Water Project. The LVMWD's potable water system currently operates with a storage deficit in the Jed Smith Zone and pumping deficits at the Twin Lakes, Mulwood, and Seminole zones (LVMWD Potable Water Updated Master Plan, 2007). The Jed Smith and Mulwood zones are in Calabasas, the Seminole Zone is southwest of Agoura Hills/Westlake Village, and the Twin Lakes Zone is isolated from the rest of the system.

The currently proposed project would generate only a nominal amount of water use during construction of the private road, drainage improvements, utilities and trails, and would not result in long-term demand for water. With regard to the potential development of fifteen homes in the future on the site, according to the City of Agoura Hills General Plan Final EIR (2010), water use for a single-family residential dwelling unit is 532 gallons per day per dwelling. Based on this factor, the residences would generate demand for 7,980 gpd or 8.9 AFY.

The LVMWD's 2010 Urban Water Management Plan (UWMP) provides scenarios for water supply in the District. These scenarios include a "multiple dry year" scenario in which drought conditions exist for consecutive years and water supply is diminished. As shown in Table 5, LVMWD's total surplus water supply is anticipated to be 147 AFY in 2017 during the multiple dry year scenario, and is anticipated to increase to 2,755 AFY in 2022 and increase to 2,823 AFY in 2027, followed by smaller surpluses in 2032 and 2037. The water demand anticipated from the potential fifteen homes would represent approximately six percent of the total 2017 regional surplus water supply. The demand from the homes as a percentage of overall 2022 supply would be 0.3 percent.

In its 2010 Regional UWMP, MWD has found that its existing water supplies, when managed according to its water resource plans, will be sufficient to meet projected demand through 2035.

The anticipated demand of 8.9 AFY from the fifteen homes is relatively minor, and would not exceed available water supplies shown in Table 5. **Therefore, impacts related to water supply would be less than significant and further analysis of this issue in an EIR is not warranted.**

Table 5
LVMWD Water Supply and Demand - Multiple Dry Year

Water Sources	2017	2022	2027	2032	2037
Imported – MWD (AFY)	27,474	29,081	30,020	29,465	29,037
Recycled (AFY)	6,366	7,907	9,488	10,496	10,808
Groundwater	0	0	0	0	0
<i>Total Water Supply (AFY)</i>	33,839	36,988	39,468	39,961	39,864
<i>Total Water Demand” (AFY)</i>	33,639	34,233	36,645	38,523	39,653
Difference	147	2,755	2,823	1,438	192

Source: 2010 Urban Water Management Plan, LVMWD, 2011.

f, g) There are two landfills at which waste from the proposed project and the potential future fifteen residences could be disposed. The Calabasas Sanitary Landfill, operated by the Los Angeles County Sanitation Districts, is located at 5300 Lost Hills Road in Calabasas. The Simi Valley Landfill, privately operated, is located at 2801 Madera Road in Simi Valley. Both landfills serve the City of Agoura Hills, as well as other communities. The total remaining capacity of the Calabasas Sanitary Landfill is 15.6 million cubic yards, or 7 million tons (Gwen Tantoco, February 2013). The facility is permitted to accept up to 3,500 tons per day. The average daily tonnage of waste received during 2012 was 643 tons per day. The expected remaining life of the landfill is to 2048. The Simi Valley Landfill is permitted to accept up to 6,000 tons per day of refuse. It currently receives about 2,500 tons per day. The landfill has a remaining capacity of 120 million cubic yards (Mike Smith, February 2013), and a remaining life of an estimated 50 years.

According to Table 4.14-5 of the City General Plan Final EIR (2010), a single-family residential dwelling unit generates approximately ten pounds of solid waste per household per day. Therefore, assuming no recycling of refuse, the potential future fifteen single-family residential units would generate an estimated 0.075 tons of solid waste per day. This is approximately 0.0021 percent of the daily capacity (3,500 tons) permitted at the Calabasas Sanitary Landfill and 0.00125 percent of the daily capacity (6,000 tons) at the Simi Valley Landfill. Based on a diversion rate of 58 percent (recycling of waste not including construction and demolition debris), which the City achieved for the year 2012 (the latest year for which data is available) through various programs and policies, the solid waste would equate to 0.0009 percent of the allowed tonnage per day at the Calabasas Landfill, and 0.000525 percent of the allowed daily tonnage at the Simi Valley Sanitary Landfill. Furthermore, the proposed project and the potential future construction of the fifteen homes would be subject to the requirements of the City’s Construction and Demolition Debris Recycling Program, which would further reduce the amount of waste entering the landfills during the construction



phase of the project. **As both landfills have sufficient capacity for the next 35-50 years, and solid waste generated by the project would have a less than significant impact on the permitted remaining capacity of either landfill and further analysis of this issue in an EIR is not warranted.**

<u>XVIII. MANDATORY FINDINGS OF SIGNIFICANCE</u>	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) As discussed in Section V, <i>Cultural Resources</i> , Mitigation Measures CR-1 through CR-3 would be required to reduce impacts to cultural resources to a less than significant level. With the implementation of these measures, impacts to examples of California history or prehistory would be reduced to a less than significant level. As discussed in Section IV, <i>Biological Resources</i> , the proposed project would potentially affect various plant and animal communities. Therefore, biological resource impacts would be potentially significant and will be studied further in an EIR.				
b) The project’s contribution to cumulative impacts would be potentially significant with respect to the issues for which project impacts were identified as potentially significant. Cumulative impacts would be potentially significant and will be studied further in an EIR.				
c) As discussed in Section VIII, <i>Hazards and Hazardous Materials</i> , development of the project site may result in potential human health issues related to both gas emissions from the nearby Calabasas Landfill and potential surface and groundwater contamination associated with landfill runoff. As discussed in sections VI, <i>Geology and Soils</i> , and IX, <i>Hydrology and Water Quality</i> , the project would also have potentially significant impacts related to exposure to geologic hazards and adverse water quality. As such, impacts to human beings would be potentially significant and will be studied further in an EIR.				



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PERSONS CONTACTED

Smith, Mike, Waste Management/GI, February 2013

Tantoco, Gwen, Sanitation Districts of Los Angeles County, February 2013

Zhao, John, Las Virgenes Municipal Water District, February 2013





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June 19, 2014

Ms. Allison Cook, Principal Planner
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Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Agoura Equestrian Estates Project, Unincorporated Los Angeles County; SCH# Not Provided

Dear Ms. Cook:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Notice of Preparation (NOP) for the Agoura Equestrian Estates Draft Environmental Impact Report (DEIR). The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.*

The Project site is located on the north side of U.S. Highway 101, east of Chesebro Road, adjacent to the eastern boundary of the City of Agoura Hills, in unincorporated Los Angeles County. The Project is set in a canyon formed by a series of ridgelines that bound the proposed development on the north, east, and southern border. The property to the north and east of the Project is protected habitat owned by the Santa Monica Mountains Conservancy. The project site is approximately 71-acres and is identified by Assessor's Parcel Number 2052-009-270 and 2055-010-270. The Project involves subdividing the site into 17 lots, including 15 single family homes on 23 acres, one lot dedicated for open space, and one lot for preservation, totaling 48 acres of open space. The Project site is located on the former proposed Herchel West Day School. This NOP does not include the construction of any homes, but does include associated infrastructure including access roads, sewers, curbs, hiking and equestrian trails, fencing, utilities, drainage swales, among other improvements. The Project site contains sensitive habitat including oak and walnut woodlands and riparian habitat. The site is also adjacent to the Liberty Canyon Wildlife Corridor.

The Department offers the following comments and recommendations to assist the City in avoiding or minimizing potential project impacts on biological resources.

Specific Comments

Baseline Biological Surveys. Page 21 of the NOP indicates that biological surveys were conducted in 1998 as part of the Herschel West School DEIR. The Department recommends conducting updated surveys for biological resources on the Project site to reflect the current condition of the property as the new baseline for the DEIR.

Liberty Canyon Wildlife Corridor. Liberty Canyon Wildlife Corridor is a major wildlife corridor adjacent to the project boundary. The Department recommends the DEIR address any potential impacts, direct and indirect, the proposed development might have on the function and value of this corridor, including, but not limited to lighting, noise, invasive species, fuel modification, increased fire risk, human disturbance, habitat removal, etc.

Deed Restricted Land. The DEIR should exclude land dedicated by deed restriction from all project related impacts/activities including fuel modification. The lead agency should consider requiring all natural open space be protected with a conservation easement recorded by a local land conservancy to be managed in perpetuity. Deed restrictions do not typically provide in perpetuity protection of resources as well as a conservation easement. The Department is willing to assist the lead agency or developer in finding a conservancy willing to be grantee on a conservation easement.

Fuel Modification. The Department recommends the DEIR include a thorough discussion of impacts associated with fuel modification requirements on biological resources in the analysis. Fuel modification, including thinning of understory vegetation, is considered a potentially significant impact by the Department, and should be analyzed and appropriately mitigated for in the DEIR.

General Comments

- 1) The Department also has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream, or use material from a streambed. For any such activities, the project applicant (or "entity") must provide written notification to the Department pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. The Department's issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. The Department as a Responsible Agency under CEQA may consider the local jurisdiction's (lead agency) Negative Declaration or EIR for the project. To minimize additional requirements by the Department pursuant to section 1600 *et seq.* and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.²
- 2) The project area supports aquatic, riparian, and wetland habitats; therefore, a jurisdictional delineation of the creeks and their associated riparian habitats should be included in the DEIR. The delineation should be conducted pursuant to the U. S. Fish and Wildlife Service

² A notification package for a LSA may be obtained by accessing the Department's website at www.wildlife.ca.gov/habcon/1600.

wetland definition adopted by the Department.¹ Please note that some wetland and riparian habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.

- 3) The Department considers adverse impacts to a species protected by the CESA, for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, or candidate species that results from the project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085.) Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, the Department recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Appropriate authorization from the Department may include an incidental take permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subds. (b),(c)). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of an ITP unless the project CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.
- 4) To enable the Department to adequately review and comment on the proposed project from the standpoint of the protection of plants, fish and wildlife, we recommend the following information be included in the DEIR.
 - a) A complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes to the construction and staging areas.
 - b) A range of feasible alternatives to ensure that alternatives to the proposed project are fully considered and evaluated; the alternatives should avoid or otherwise minimize impacts to sensitive biological resources including rare plants and animal habitat and Waters of the State. Specific alternative locations should be evaluated in areas with lower resource sensitivity where appropriate.

Biological Resources within the Project's Area of Potential Effect

- 5) To provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats. The DEIR should include the following information.

¹ Cowardin, Lewis M., et al. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.

- a) Per CEQA Guidelines, section 15125(c), information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis should be placed on resources that are rare or unique to the region.
- b) A thorough, recent floristic-based assessment of special status plants and natural communities, following the Department's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see <http://www.dfg.ca.gov/habcon/plant/>). The Department recommends that floristic, alliance- and/or association-based mapping and vegetation impact assessments be conducted at the Project site and neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2008). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
- c) A current inventory of the biological resources associated with each habitat type on site and within the area of potential effect. The Department's California Natural Diversity Data Base in Sacramento should be contacted at www.wildlife.ca.gov/biogeodata/ to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code. A nine-quad search is recommended to capture the largest potential list of species that may occur on the Project site. Older records, especially associated with plants, should not be discounted, as this identifies the species range and the fact that they have been documented in the general area.
- d) An inventory of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, § 15380). This should include sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service.

Analyses of the Potential Project-Related Impacts on the Biological Resources

- 6) To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the DEIR.
 - a) A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage should also be included. The latter subject should address: project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site. The discussions should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary, and

the potential resulting impacts on the habitat, if any, supported by the groundwater. Mitigation measures proposed to alleviate such impacts should be included.

- b) Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR.
- c) The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document.
- d) A cumulative effects analysis should be developed as described under CEQA Guidelines, section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Mitigation for the Project-related Biological Impacts

- 7) The DEIR should include measures to fully avoid and otherwise protect Rare Natural Communities from project-related impacts. The Department considers these communities as threatened habitats having both regional and local significance.
- 8) The DEIR should include mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.
- 9) For proposed preservation and/or restoration, the DEIR should include measures to perpetually protect the targeted habitat values from direct and indirect negative impacts. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.
- 10) In order to avoid impacts to nesting birds, the DEIR should require that clearing of vegetation, and when biologically warranted construction, occur outside of the peak avian breeding season which generally runs from February 1 through September 1 (as early as January for some raptors). If project construction is necessary during the bird breeding season a qualified biologist with experience in conducting bird breeding surveys should conduct weekly bird surveys for nesting birds, within three days prior to the work in the area, and ensure no nesting birds in the project area would be impacted by the project. If an active nest is identified, a buffer shall be established between the construction activities and

the nest so that nesting activities are not interrupted. The buffer should be a minimum width of 300 feet (500 feet for raptors), be delineated by temporary fencing, and remain in effect as long as construction is occurring or until the nest is no longer active. No project construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

- 11) The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.
- 12) Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program including quantitative measurements; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

We appreciate the opportunity to comment on the referenced NOP. Questions regarding this letter and further coordination on these issues should be directed to Kelly Schmoker at (949-581-1015), Kelly.schmoker@wildlife.ca.gov.

Sincerely,



for
Betty J. Courtney
Environmental Program Manager I
South Coast Region

ec: Ms. Betty Courtney, CDFW, Santa Clarita
Ms. Erinn Wilson, CDFW, Los Alamitos
Ms. Mary Meyer, CDFW, Carpinteria
Mr. Scott Harris, CDFW, Pasadena
Mr. Brock Warmuth, CDFW, Camarillo
Scott Morgan, State Clearinghouse, Sacramento

Santa Monica Mountains Conservancy/
Mountains Recreation and Conservation Authority
Attention: Paul Edelman
5810 Ramirez Canyon Road
Malibu, CA 90265

California Coastal Commission
Mr. Steve Hudson
89 South California Street, Suite 200
Ventura, CA 93001-2801
FAX #: (805) 641-1732



COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

CITY OF AGOURA HILLS
2014 JUN 26 PM 1:30
CITY CLERK

DARYL L. OSBY
FIRE CHIEF
FORESTER & FIRE WARDEN

June 20, 2014

Allison Cook, Principal Planner
City of Agoura Hills
Planning Department
30001 Ladyface Court
Agoura Hills, CA 93101

Dear Mr. Cook:

PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT, "EQUESTRIAN ESTATES PROJECT," IT INVOLVES SUBDIVISION OF THE SITE INTO SEVENTEEN LOTS, INCLUDING FIFTEEN RESIDENTIAL SINGLE-FAMILY LOTS, ONE LOT FOR PERMANENT PERSERVATION OF OPEN SPACE AND ANOTHER LOT FOR PERMANENT PERSERVATION, NORTH SIDE OF U.S. HIGHWAY 101, AGOURA HILLS (FFER #201400083)

The Preparation of a Draft Environmental Impact Report has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

1. We have no comments at this time.

LAND DEVELOPMENT UNIT:

1. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants.
2. The statutory responsibilities of the County of Los Angeles Fire Department, Land Development Unit, are the review of, and comment on all projects within the unincorporated areas of the County of Los Angeles. Our emphasis is on the availability of sufficient water supplies for firefighting operations and local/regional access issues. However, we review all projects for issues that may have a significant impact on the County of Los Angeles Fire

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS
ARTESIA
AZUSA
BALDWIN PARK
BELL
BELL GARDENS
BELLFLOWER
BRADBURY

CALABASAS
CARSON
CERRITOS
CLAREMONT
COMMERCE
COVINA
CUDAHY

DIAMOND BAR
DUARTE
EL MONTE
GARDENA
GLEN DORA
HAWAIIAN GARDENS
HAWTHORNE

HIDDEN HILLS
HUNTINGTON PARK
INDUSTRY
INGLEWOOD
IRWINDALE
LA CANADA FLINTRIDGE
LA HABRA

LA MIRADA
LA PUENTE
LAKEWOOD
LANCASTER
LAWDALE
LOMITA
LYNWOOD

MALIBU
MAYWOOD
NORWALK
PALMDALE
PALOS VERDES ESTATES
PARAMOUNT
PICO RIVERA

POMONA
RANCHO PALOS VERDES
ROLLING HILLS
ROLLING HILLS ESTATES
ROSEMEAD
SAN DIMAS
SANTA CLARITA

SIGNAL HILL
SOUTH EL MONTE
SOUTH GATE
TEMPLE CITY
WALNUT
WEST HOLLYWOOD
WESTLAKE VILLAGE
WHITTIER

Department. We are responsible for the review of all projects within contract cities (cities that contract with the County of Los Angeles Fire Department for fire protection services). We are responsible for all County facilities, located within non-contract cities. The County of Los Angeles Fire Department, Land Development Unit, may also comment on conditions that may be imposed on a project by the Fire Prevention Division, which may create a potentially significant impact to the environment.

3. This property is located within the area described by the Forester and Fire Warden as a Fire Zone 4, Very High Fire Hazard Severity Zone (VHFHSZ). All applicable fire code and ordinance requirements for construction, access, water mains, fire hydrants, fire flows, brush clearance and fuel modification plans, must be met.
4. Every building constructed shall be accessible to Fire Department apparatus by way of access roadways, with an all-weather surface of not less than the prescribed width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.
5. The proposed private access road through the proposed Agoura Equestrian Estates as shown on the Site Plan and Grading Plan as a Cul-de-sac design shall meet all requirements for Cul-de sac design standards as set forth in the County of Los Angeles Title 21 Subdivision Code Section 21.24.190 Cul-de-sacs-Length restrictions.
6. Access roads shall be maintained with a minimum of 10 feet of brush clearance on each side. Fire access roads shall have an unobstructed vertical clearance clear-to-sky with the exception of protected tree species. Protected tree species overhanging fire access roads shall be maintained to provide a vertical clearance of 13 feet 6 inches.
7. The maximum allowable grade shall not exceed 15% except where topography makes it impractical to keep within such grade. In such cases, an absolute maximum of 20% will be allowed for up to 150 feet in distance. The average maximum allowed grade, including topographical difficulties, shall be no more than 17%. Grade breaks shall not exceed 10% in ten feet.
8. When involved with subdivision in a city contracting fire protection with the County of Los Angeles Fire Department, Fire Department requirements for access, fire flows and hydrants are addressed during the subdivision tentative map stage.
9. Future development of single family detached homes shall require a minimum fire flow of 1,250 gallons per minute at 20 pounds per square inch residual pressure for a two-hour duration. Two family dwelling units (duplexes) shall require a fire flow of 1,500 gallons per minute at 20 pounds per square inch residual pressure for a two-hour duration. When there are five or more units taking access on a single driveway, the minimum fire flow shall be increased to 1,500 gallons per minute at 20 pounds per square inch residual pressure for a two-hour duration.
10. Future development of single family detached homes shall require: Fire hydrant spacing shall be 600 feet and shall meet the following requirements:

- a) No portion of lot frontage shall be more than 450 feet via vehicular access from a public fire hydrant.
 - b) No portion of a structure should be placed on a lot where it exceeds 750 feet via vehicular access from a properly spaced public fire hydrant.
 - c) When cul-de-sac depth exceeds 450 feet on a residential street, hydrants shall be required at the corner and mid-block.
 - d) Additional hydrants will be required if hydrant spacing exceeds specified distances.
11. Future development of single family detached homes shall require a Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in-length and at the end of all cul-de-sacs.
12. Future development of single family detached homes: Fire Department access shall provide a minimum unobstructed width of 28 feet, clear-to-sky and be within 150 feet of all portions of the exterior walls of the first story of any single unit. If exceeding 150 feet, provide 20 feet minimum paved width "Private Driveway/Fire Lane" clear-to-sky to within 150 feet of all portions of the exterior walls of the unit. Fire Lanes serving three or more units shall be increased to 26 feet.
13. Future development of single family detached homes shall require streets or driveways within the development shall provide the following:
- a) Provide 36 feet in width on all streets where parking is allowed on both sides.
 - b) Provide 34 feet in width on cul-de-sacs up to 700 feet in length. This allows parking on both sides of the street.
 - c) Provide 36 feet in width on cul-de-sacs from 701 to 1,000 feet in length. This allows parking on both sides of the street.
 - d) For streets or driveways with parking restrictions: The entrance to the street/driveway and intermittent spacing distances of 150 feet shall be posted with Fire Department approved signs stating "NO PARKING - FIRE LANE" in three-inch high letters. Driveway labeling is necessary to ensure access for Fire Department use. - Turning radii shall not be less than 32 feet. This measurement shall be determined at the centerline of the road.
14. The County of Los Angeles Fire Department, Land Development Unit's comments are only general requirements. Specific fire and life safety requirements will be addressed at the building and fire plan check phase. There may be additional requirements during this time.
15. Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department, Land Development Unit Inspector, Nancy Rodeheffer, at (323) 890-4243 or at nrodeheffer@fire.lacounty.gov.

16. The County of Los Angeles Fire Department, Land Development Unit, appreciates the opportunity to comment on this project.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones, archeological and cultural resources, and the County Oak Tree Ordinance. Potential impacts in these areas should be addressed in the Draft Environmental Impact Report.

HEALTH HAZARDOUS MATERIALS DIVISION:

1. According to the provided information, the eastern edge of the portion of the site where the residential subdivision would occur is about half a mile from landfill. There is a potential for seepage of methane gases and intrusion of volatile organic compounds (VOCs) vapors from the landfill to the proposed residential parcels. Therefore, it is recommended that a methane and vapor intrusion study to be conducted at the proposed residential development. If methane and VOCs are detected, the impacted parcels must be mitigated under oversight of a local or a governmental agency.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,



FRANK VIDALES, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

FV:jl



CITY of CALABASAS

June 12, 2014

Allison Cook, AICP, Principal Planner
Community Development Department
City of Agoura Hills
30001 Ladyface Court
Agoura Hills, CA 91301

Dear Allison:

Thank you for sending us the Notice of Preparation for the proposed Agoura Equestrian Estates project, a 15-lot subdivision and attendant annexation, General Plan amendment, etc. for the 71-acre former Heschel West property at the eastern edge of the City of Agoura Hills. In response to the notice, the City of Calabasas Planning Division offers the following comments in regard to the scope of study and analysis in the Environmental Impact Report.

- 1) The project description indicates that the individual single-family homes (with attendant accessory structures) will be reviewed and considered individually in the future, and are not therefore described as a part of the project other than to say they will be developed in the future consistent with the City of Agoura Development Code. It is understandable to not include specific home site plans (e.g., architecture and landscape plans) at this stage because the individual lots are intended to be sold and developed individually as custom home sites. However, there are a number of basic site development activities and potential impacts which can and should be estimated now as part of this EIR. For example, it is entirely reasonable and appropriate to anticipate average and/or maximum home sizes, as well as typical accessory uses and structures (e.g., swimming pools and horse barns/stables), and to factor the inevitable construction of these structures into the grading quantities, hydrology analysis, noise impacts analysis, air quality analysis, etc. Reasonable estimates can be made for site work and construction on each of the fifteen lots. Considering also that CEQA does not allow for bifurcation of a project, and understanding that single-family homes on individual lots potentially qualify for an exemption from CEQA review (which might later prevent any review of the fifteen individual homes), it is important that the full range of impacts be considered for

this project, to include full consideration of impacts associated with the future construction of the fifteen individual homes.

- 2) The site plan (Figure 3) shows the proposed subdivision layout, along with 2-foot contour intervals. Although the area proposed for subdivision is relatively flat when compared to the remainder of the project site, it is not entirely flat. In fact, the elevation within the specific area being subdivided ranges from a low spot of approximately 923 feet AMSL to a high spot of approximately 986 feet AMSL (63 feet of elevation change). Furthermore, and as presented in Figure 3, several of the proposed lots would have as much as 26 to 34 feet of elevation change on the lots themselves. This means significant grading is likely for the individual home sites, and associated grading impacts would be reasonable to anticipate and analyze as part of this EIR.
- 3) The biological habitat value of the meadow on this property (Chesbro Meadow) seems to have been understated, and should be more thoroughly investigated in the EIR. Furthermore, the EIR should include as part of the alternatives analysis a review of a compact clustered home alternative whereby all or a significant portion of the meadow may be preserved as part of the open space area.
- 4) Because of the close proximity of both National Park Service parklands (Chesbro Canyon) and Old Agoura Park, Section III (AIR QUALITY) should indicate that the project may expose sensitive receptors to substantial pollutant concentrations (sub-section d). Also, the statement within the IS at the bottom of page 16 that construction activity would be dispersed over the entire 23-acre site is questionable, and contradictory to earlier statements about individual home site construction not being considered part of the project. If the 15 individual home sites are indeed separate projects (even though I assert they are not), then this part of the environmental analysis would have to consider the air quality impacts for the specific area(s) of construction, which would be the new private road, the utility lines, and the raised pad on Lot #1 only. This area of construction would be much smaller and more concentrated than 23 acres. (I estimate it to be only 5 acres of total area, excluding the individual home sites.)
- 5) A well-documented wildlife corridor exists in this area, and it is good to see that the wildlife corridor is mentioned in the Initial Study (ref. page 22 of the IS). In fact, a statement is made indicating that potential impacts to the wildlife corridor will be studied in the EIR. However, the statements in the Initial Study suggest that the wildlife corridor is geographically limited to the Liberty Canyon area (east and southeast of the subject property), rather than existing partially on or involving the subject property, as is generally well understood to be the case. Therefore, I strongly recommend that the EIR

offer a more thorough discussion of this topic, and that appropriate concern and study be given to the role played by the subject property as a meaningful and contributing component of the wildlife corridor.

- 6) The Cumulative Impacts Analysis should include and consider cumulative impacts (both short-term and long-term) from all future development planned or zoned along Agoura Road, Canwood Street, Chesebro Road, and Palo Camado Canyon Road. For example, significant undeveloped commercially zoned properties exist in this particular area of the City of Agoura Hills: 1) ten undeveloped commercial properties along Agoura Road just east of Palo Camado Road; 2) several undeveloped commercial parcels at the northwest corner of the Palo Comado Canyon Road / Agoura Road intersection; and 3 acres of undeveloped commercial land at the NW corner of the Liberty Canyon/Agoura Road intersection
- 7) Recognizing that the City of Agoura has initiated the process for upgrading the Palo Camado Road Interchange (Chesebro Road) at Highway 101 (for which an MND was prepared in late 2012), it will be important for the project EIR to dovetail closely with the interchange project MND (including mitigation measures and cumulative impacts). Furthermore, with both projects apparently having similar timing (construction in 2015), the cumulative impacts analysis should also study cumulative construction impacts.
- 8) The analysis on noise impacts, as discussed in the Initial Study on pages 36 – 39, fails to cover the nearby Chesbro Canyon open space and trails system as a sensitive receptor which could potentially be impacted by construction noise from this project. Under Section XII a) of the IS, it would seem more likely that National Park Service standards should be applied, and the determination at the IS level would be that noise impacts (not only from the 15 future homes, but also from project and home construction, would be potentially significant.
- 9) Section XV (RECREATION), and specifically within subsection (a), suggests that future recreational needs for the future occupants of the 15 new homes will be easily accommodated through the City of Agoura Hills. However, it is clear from the project name as well as the design that equestrian users will be the predominant inhabitants within this project. And the analysis fails to account for likely increases in use of adjacent National Park Service equestrian trails and related facilities.
- 10) The map exhibits within the Initial Study fail to identify significant public park lands which exist very close to the proposed project site. Both the National Park Service lands of Chesebro Canyon and Old Agoura Park are situated within only a few hundred yards of this project. So that the public may fully understand all potential impacts associated

with this project, to include potential impacts to nearby park lands, the EIR should make clear in map exhibits the close geographic proximity of this project to the National Park Service lands and to Old Agoura Park.

Again, thank you for the opportunity to comment on the scope of analysis planned for the Environmental Impact Report being prepared for this development project. Looking forward, we ask that the City of Agoura Hills continue to keep the City of Calabasas informed of future developments, actions, and public notices regarding the project.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Bartlett", written in a cursive style.

Thomas Bartlett, AICP
City Planner

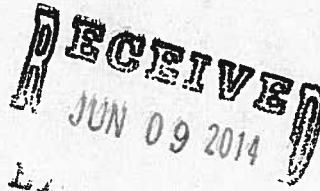
Cc: Maureen Tamuri, IA, AICP, Community Development Director



**South Coast
Air Quality Management District**
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

June 3, 2014

Allison Cook - Principal/Environmental Analyst
City of Agoura Hills
30001 LadyFace Court
Agoura Hills, CA 93101



**Notice of Preparation of a CEQA Document for the
Agoura Equestrian Estates Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft CEQA document. Please send the SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website here: www.aqmd.gov/ceqa/hdbk.html. SCAQMD staff also recommends that the lead agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the lead agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: <http://www.aqmd.gov/ceqa/handbook/signthres.pdf>. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore,

when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Perspective*, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the project, including:

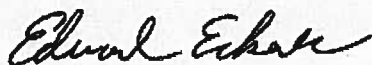
- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages at: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions
- Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/prdas/aqguide/aqguide.html>.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's webpage (<http://www.aqmd.gov>).

The SCAQMD staff is available to work with the Lead Agency to ensure that project emissions are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at imacmillan@aqmd.gov or call me at (909) 396-3244.

Sincerely,



Ed Eckerle
Program Supervisor
Planning, Rule Development & Area Sources



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT

CITY OF AGOURA HILLS
2014 JUN 23 AM 9:21
CITY CLERK



KEN ALEX
DIRECTOR

Notice of Preparation

June 17, 2014

To: Reviewing Agencies
Re: Agoura Equestrian Estates Project
SCH# 2014061063

Attached for your review and comment is the Notice of Preparation (NOP) for the Agoura Equestrian Estates Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Allison Cook
City of Agoura Hills
30001 Ladyface Court
Agoura Hills, CA 91301

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2014061063
Project Title Agoura Equestrian Estates Project
Lead Agency Agoura Hills, City of

Type NOP Notice of Preparation

Description The proposed Agoura Equestrian Estates project involves subdivision of the site into seventeen lots, including fifteen residential single-family lots; one lot (APN 2055-010-270) for permanent preservation of open space (to be zoned OS-DR-OA-EQ); and another lot for permanent preservation (APN 2052-009-270) (to be zoned OS-DR-OA-EQ). The project site is located on the former proposed Heschel West Day School site in unincorporated Los Angeles County. The proposed development also includes the construction of a private access road through the site, including rolled curbed, trails, fencing and drainage improvements within the private road right-of-way, the relocation/construction of an existing multi-use informal trail located partially within and partially outside of the site boundaries to the east; earthen and rock drainage swale improvements and two vegetated biofiltration basins for runoff (with an option to place these basins underground or replace them with underground pipes); an equestrian trail and fence along the western side of the site, adjacent to the existing homes; and extension of utilities under the proposed private road from existing water and sewer lines in Chesebro Road, to the south of the site. No landscaping is proposed as part of the subdivision and drainage / utilities / road improvements.

Lead Agency Contact

Name Allison Cook
Agency City of Agoura Hills
Phone 818 597 7310 **Fax**
email
Address 30001 Ladyface Court
City Agoura Hills **State** CA **Zip** 91301

Project Location

County Los Angeles
City Agoura Hills
Region
Cross Streets
Lat / Long
Parcel No.

Township	Range	Section	Base
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Proximity to:

Highways
Airports
Railways
Waterways
Schools
Land Use

Project Issues

Reviewing Agencies Resources Agency; Department of Conservation; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 5; Native American Heritage Commission; California Highway Patrol; Caltrans, District 7; Air Resources Board; Regional Water Quality Control Board, Region 4

Date Received 06/17/2014 **Start of Review** 06/17/2014 **End of Review** 07/16/2014

Resources Agency

Resources Agency
Nadell Gayou

Dept. of Boating & Waterways
Nicole Wong

California Coastal Commission
Elizabeth A. Fuchs

Colorado River Board
Tamyra Trujillo

Dept. of Conservation
Elizabeth Carpenter

California Energy Commission
Eric Knight

Cal Fire
Dan Foster

Central Valley Flood Protection Board
James Herota

Office of Historic Preservation
Ron Parsons

Dept of Parks & Recreation Environmental Stewardship Section

California Department of Resources, Recycling & Recovery
Sue O'Leary

S.F. Bay Conservation & Dev't. Comm.
Steve McAdam

Dept. of Water Resources Agency
Nadell Gayou

Fish and Game

Dept. of Fish & Wildlife
Scott Flint
Environmental Services Division

Fish & Wildlife Region 1
Donald Koch

Fish & Wildlife Region 1E
Laurie Harnsberger

Fish & Wildlife Region 2
Jeff Drongenesen

Fish & Wildlife Region 3
Charles Armor

Fish & Wildlife Region 4
Julie Vance

Fish & Wildlife Region 5
Leslie Newton-Reed
Habitat Conservation Program

Fish & Wildlife Region 6
Gabrina Gatchel
Habitat Conservation Program

Fish & Wildlife, Region 6 /IM
Heidi Sickler
Inyo/Mono, Habitat Conservation Program

Dept. of Fish & Wildlife M
George Isaac
Marine Region

Other Departments

Food & Agriculture
Sandra Schubert
Dept. of Food and Agriculture

Dept. of General Services
Public School Construction

Dept. of General Services
Anna Garbeff
Environmental Services Section

Dept. of Public Health
Jeffery Worth
Dept. of Health/Drinking Water

Delta Stewardship Council
Kevan Samsam

Independent Commissions, Boards

Delta Protection Commission
Michael Machado

Cal EMA (Emergency Management Agency)
Dennis Castrillo

Native American Heritage Comm.
Debbie Treadway

Public Utilities Commission
Leo Wong

Santa Monica Bay Restoration
Guangyu Wang

State Lands Commission
Jennifer Deleong

Tahoe Regional Planning Agency (TRPA)
Cherry Jacques

Business, Trans & Housing

Caltrans - Division of Aeronautics
Philip Crimmins

Caltrans - Planning
Terri Pencovic

California Highway Patrol
Suzann Ikeuchi
Office of Special Projects

Housing & Community Development
CEQA Coordinator
Housing Policy Division

Dept. of Transportation

Caltrans, District 1
Rex Jackman

Caltrans, District 2
Marcelino Gonzalez

Caltrans, District 3
Eric Federicks - South
Susan Zanchi - North

Caltrans, District 4
Erik Alm

Caltrans, District 5
David Murray

Caltrans, District 6
Michael Navarro

Caltrans, District 7
Dianna Watson

Caltrans, District 8
Dan Kopulsky

Caltrans, District 9
Gayle Rosander

Caltrans, District 10
Tom Dumas

Caltrans, District 11
Jacob Armstrong

Caltrans, District 12
Maureen El Harake

Cal EPA

Air Resources Board

All Projects
CEQA Coordinator

Transportation Projects
Nesamani Kalandiyur

Industrial Projects
Mike Tollstrup

State Water Resources Control Board
Regional Programs Unit
Division of Financial Assistance

State Water Resources Control Board
Student Intern, 401 Water Quality Certification Unit
Division of Water Quality

State Water Resources Control Board
Phil Crader
Division of Water Rights

Dept. of Toxic Substances Control
CEQA Tracking Center

Department of Pesticide Regulation
CEQA Coordinator

RWQCB 1
Cathleen Hudson
North Coast Region (1)

RWQCB 2
Environmental Document Coordinator
San Francisco Bay Region (2)

RWQCB 3
Central Coast Region (3)

RWQCB 4
Teresa Rodgers
Los Angeles Region (4)

RWQCB 5S
Central Valley Region (5)

RWQCB 5F
Central Valley Region (5)
Fresno Branch Office

RWQCB 5R
Central Valley Region (5)
Redding Branch Office

RWQCB 6
Lahontan Region (6)

RWQCB 6V
Lahontan Region (6)
Victorville Branch Office

RWQCB 7
Colorado River Basin Region (7)

RWQCB 8
Santa Ana Region (8)

RWQCB 9
San Diego Region (9)

Other

Conservancy



Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

June 24, 2014

Allison Cook
Principal Planner/Environmental Analyst
City of Agoura Hills
30001 Ladyface Court
Agoura Hills, CA 93101

RE: Agoura Equestrian Estates Project

Dear Ms. Cook:

Thank you for the opportunity to comment on the proposed Agoura Equestrian Estates Project located on the north side of U.S. Highway 101, adjacent to the eastern boundary of the City of Agoura Hills. This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (LACMTA) concerning issues that are germane to our agency's statutory responsibility in relation to our facilities and services that may be affected by the proposed project.

We understand that the applicant has performed a Transportation Impact Analysis (TIA) as part of the Initial Study. To reiterate the TIA requirements that are part of the State of California Congestion Management Program (CMP), we are submitting our formal guidelines as formality. A TIA, with roadway and transit components, is required under the State of California CMP statute. The CMP TIA Guidelines are published in the "2010 Congestion Management Program for Los Angeles County", Appendix D (attached). The geographic area examined in the TIA must include the following, at a minimum:

1. All CMP arterial monitoring intersections, including monitored freeway on/off-ramp intersections, where the proposed project will add 50 or more trips during either the a.m. or p.m. weekday peak hour (of adjacent street traffic).
2. If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
3. Mainline freeway-monitoring locations where the project will add 150 or more trips, in either direction, during either the a.m. or p.m. weekday peak hour.
4. Caltrans must also be consulted through the NOP process to identify other specific locations to be analyzed on the state highway system.

The CMP TIA requirement also contains two separate impact studies covering roadways and transit, as outlined in Sections D.8.1 – D.9.4. If the TIA identifies no facilities for study based on the criteria above, no further traffic analysis is required. However, projects must still consider transit impacts. For all CMP TIA requirements please see the attached guidelines.

If you have any questions regarding this response, please contact Marie Sullivan at 213-922-5667 or by email at SullivanMa@metro.net. Please send the Draft EIR to the following address:

LACMTA Development Review
One Gateway Plaza MS 99-23-4
Los Angeles, CA 90012-2952

Sincerely,

A handwritten signature in black ink, appearing to read "Marie Sullivan". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Marie Sullivan
Development Review Coordinator, Countywide Planning

Attachment: CMP Appendix D: Guidelines for CMP Transportation Impact Analysis

GUIDELINES FOR CMP TRANSPORTATION IMPACT ANALYSIS

Important Notice to User: This section provides detailed travel statistics for the Los Angeles area which will be updated on an ongoing basis. Updates will be distributed to all local jurisdictions when available. In order to ensure that impact analyses reflect the best available information, lead agencies may also contact MTA at the time of study initiation. Please contact MTA staff to request the most recent release of "Baseline Travel Data for CMP TIAs."

D.1 OBJECTIVE OF GUIDELINES

The following guidelines are intended to assist local agencies in evaluating impacts of land use decisions on the Congestion Management Program (CMP) system, through preparation of a regional transportation impact analysis (TIA). The following are the basic objectives of these guidelines:

- Promote consistency in the studies conducted by different jurisdictions, while maintaining flexibility for the variety of project types which could be affected by these guidelines.
- Establish procedures which can be implemented within existing project review processes and without ongoing review by MTA.
- Provide guidelines which can be implemented immediately, with the full intention of subsequent review and possible revision.

These guidelines are based on specific requirements of the Congestion Management Program, and travel data sources available specifically for Los Angeles County. References are listed in Section D.10 which provide additional information on possible methodologies and available resources for conducting TIAs.

D.2 GENERAL PROVISIONS

Exhibit D-7 provides the model resolution that local jurisdictions adopted containing CMP TIA procedures in 1993. TIA requirements should be fulfilled within the existing environmental review process, extending local traffic impact studies to include impacts to the regional system. In order to monitor activities affected by these requirements, Notices of Preparation (NOPs) must be submitted to MTA as a responsible agency. Formal MTA approval of individual TIAs is not required.

The following sections describe CMP TIA requirements in detail. In general, the competing objectives of consistency & flexibility have been addressed by specifying standard, or minimum, requirements and requiring documentation when a TIA varies from these standards.

D.3 PROJECTS SUBJECT TO ANALYSIS

In general a CMP TIA is required for all projects required to prepare an Environmental Impact Report (EIR) based on local determination. A TIA is not required if the lead agency for the EIR finds that traffic is not a significant issue, and does not require local or regional traffic impact analysis in the EIR. Please refer to Chapter 5 for more detailed information.

CMP TIA guidelines, particularly intersection analyses, are largely geared toward analysis of projects where land use types and design details are known. Where likely land uses are not defined (such as where project descriptions are limited to zoning designation and parcel size with no information on access location), the level of detail in the TIA may be adjusted accordingly. This may apply, for example, to some redevelopment areas and citywide general plans, or community level specific plans. In such cases, where project definition is insufficient for meaningful intersection level of service analysis, CMP arterial segment analysis may substitute for intersection analysis.

D.4 STUDY AREA

The geographic area examined in the TIA must include the following, at a minimum:

- All CMP arterial monitoring intersections, including monitored freeway on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic).
- If CMP arterial segments are being analyzed rather than intersections (see Section D.3), the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions). Within the study area, the TIA must analyze at least one segment between monitored CMP intersections.
- Mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during either the AM or PM weekday peak hours.
- Caltrans must also be consulted through the Notice of Preparation (NOP) process to identify other specific locations to be analyzed on the state highway system.

If the TIA identifies no facilities for study based on these criteria, no further traffic analysis is required. However, projects must still consider transit impacts (Section D.8.4).

D.5 BACKGROUND TRAFFIC CONDITIONS

The following sections describe the procedures for documenting and estimating background, or non-project related traffic conditions. Note that for the purpose of a TIA, these background estimates must include traffic from all sources without regard to the exemptions specified in CMP statute (e.g., traffic generated by the provision of low and very low income housing, or trips originating outside Los Angeles County. Refer to Chapter 5, Section 5.2.3 for a complete list of exempted projects).

D.5.1 Existing Traffic Conditions. Existing traffic volumes and levels of service (LOS) on the CMP highway system within the study area must be documented. Traffic counts must

be less than one year old at the time the study is initiated, and collected in accordance with CMP highway monitoring requirements (see Appendix A). Section D.8.1 describes TIA LOS calculation requirements in greater detail. Freeway traffic volume and LOS data provided by Caltrans is also provided in Appendix A.

D.5.2 Selection of Horizon Year and Background Traffic Growth. Horizon year(s) selection is left to the lead agency, based on individual characteristics of the project being analyzed. In general, the horizon year should reflect a realistic estimate of the project completion date. For large developments phased over several years, review of intermediate milestones prior to buildout should also be considered.

At a minimum, horizon year background traffic growth estimates must use the generalized growth factors shown in Exhibit D-1. These growth factors are based on regional modeling efforts, and estimate the general effect of cumulative development and other socioeconomic changes on traffic throughout the region. Beyond this minimum, selection among the various methodologies available to estimate horizon year background traffic in greater detail is left to the lead agency. Suggested approaches include consultation with the jurisdiction in which the intersection under study is located, in order to obtain more detailed traffic estimates based on ongoing development in the vicinity.

D.6 PROPOSED PROJECT TRAFFIC GENERATION

Traffic generation estimates must conform to the procedures of the current edition of Trip Generation, by the Institute of Transportation Engineers (ITE). If an alternative methodology is used, the basis for this methodology must be fully documented.

Increases in site traffic generation may be reduced for existing land uses to be removed, if the existing use was operating during the year the traffic counts were collected. Current traffic generation should be substantiated by actual driveway counts; however, if infeasible, traffic may be estimated based on a methodology consistent with that used for the proposed use.

Regional transportation impact analysis also requires consideration of trip lengths. Total site traffic generation must therefore be divided into work and non-work-related trip purposes in order to reflect observed trip length differences. Exhibit D-2 provides factors which indicate trip purpose breakdowns for various land use types.

For lead agencies who also participate in CMP highway monitoring, it is recommended that any traffic counts on CMP facilities needed to prepare the TIA should be done in the manner outlined in Chapter 2 and Appendix A. If the TIA traffic counts are taken within one year of the deadline for submittal of CMP highway monitoring data, the local jurisdiction would save the cost of having to conduct the traffic counts twice.

D.7 TRIP DISTRIBUTION

For trip distribution by direct/manual assignment, generalized trip distribution factors are provided in Exhibit D-3, based on regional modeling efforts. These factors indicate Regional Statistical Area (RSA)-level tripmaking for work and non-work trip purposes.

(These RSAs are illustrated in Exhibit D-4.) For locations where it is difficult to determine the project site RSA, census tract/RSA correspondence tables are available from MTA.

Exhibit D-5 describes a general approach to applying the preceding factors. Project trip distribution must be consistent with these trip distribution and purpose factors; the basis for variation must be documented.

Local agency travel demand models disaggregated from the SCAG regional model are presumed to conform to this requirement, as long as the trip distribution functions are consistent with the regional distribution patterns. For retail commercial developments, alternative trip distribution factors may be appropriate based on the market area for the specific planned use. Such market area analysis must clearly identify the basis for the trip distribution pattern expected.

D.8 IMPACT ANALYSIS

CMP Transportation Impact Analyses contain two separate impact studies covering roadways and transit. Section Nos. D.8.1-D.8.3 cover required roadway analysis while Section No. D.8.4 covers the required transit impact analysis. Section Nos. D.9.1-D.9.4 define the requirement for discussion and evaluation of alternative mitigation measures.

D.8.1 Intersection Level of Service Analysis. The LA County CMP recognizes that individual jurisdictions have wide ranging experience with LOS analysis, reflecting the variety of community characteristics, traffic controls and street standards throughout the county. As a result, the CMP acknowledges the possibility that no single set of assumptions should be mandated for all TIAs within the county.

However, in order to promote consistency in the TIAs prepared by different jurisdictions, CMP TIAs must conduct intersection LOS calculations using either of the following methods:

- The Intersection Capacity Utilization (ICU) method as specified for CMP highway monitoring (see Appendix A); or
- The Critical Movement Analysis (CMA) / Circular 212 method.

Variation from the standard assumptions under either of these methods for circumstances at particular intersections must be fully documented.

TIAs using the 1985 or 1994 Highway Capacity Manual (HCM) operational analysis must provide converted volume-to-capacity based LOS values, as specified for CMP highway monitoring in Appendix A.

D.8.2 Arterial Segment Analysis. For TIAs involving arterial segment analysis, volume-to-capacity ratios must be calculated for each segment and LOS values assigned using the V/C-LOS equivalency specified for arterial intersections. A capacity of 800 vehicles per hour per through traffic lane must be used, unless localized conditions necessitate alternative values to approximate current intersection congestion levels.

D.8.3 Freeway Segment (Mainline) Analysis. For the purpose of CMP TIAs, a simplified analysis of freeway impacts is required. This analysis consists of a demand-to-capacity calculation for the affected segments, and is indicated in Exhibit D-6.

D.8.4 Transit Impact Review. CMP transit analysis requirements are met by completing and incorporating into an EIR the following transit impact analysis:

- Evidence that affected transit operators received the Notice of Preparation.
- A summary of existing transit services in the project area. Include local fixed-route services within a ¼ mile radius of the project; express bus routes within a 2 mile radius of the project, and; rail service within a 2 mile radius of the project.
- Information on trip generation and mode assignment for both AM and PM peak hour periods as well as for daily periods. Trips assigned to transit will also need to be calculated for the same peak hour and daily periods. Peak hours are defined as 7:30-8:30 AM and 4:30-5:30 PM. Both “peak hour” and “daily” refer to average weekdays, unless special seasonal variations are expected. If expected, seasonal variations should be described.
- Documentation of the assumption and analyses that were used to determine the number and percent of trips assigned to transit. Trips assigned to transit may be calculated along the following guidelines:
 - Multiply the total trips generated by 1.4 to convert vehicle trips to person trips;
 - For each time period, multiply the result by one of the following factors:
 - 3.5% of Total Person Trips Generated for most cases, except:
 - 10% primarily Residential within 1/4 mile of a CMP transit center
 - 15% primarily Commercial within 1/4 mile of a CMP transit center
 - 7% primarily Residential within 1/4 mile of a CMP multi-modal transportation center
 - 9% primarily Commercial within 1/4 mile of a CMP multi-modal transportation center
 - 5% primarily Residential within 1/4 mile of a CMP transit corridor
 - 7% primarily Commercial within 1/4 mile of a CMP transit corridor
 - 0% if no fixed route transit services operate within one mile of the project

To determine whether a project is primarily residential or commercial in nature, please refer to the CMP land use categories listed and defined in Appendix E, *Guidelines for New Development Activity Tracking and Self Certification*. For projects that are only partially within the above one-quarter mile radius, the base rate (3.5% of total trips generated) should be applied to all of the project buildings that touch the radius perimeter.

- Information on facilities and/or programs that will be incorporated in the development plan that will encourage public transit use. Include not only the jurisdiction’s TDM Ordinance measures, but other project specific measures.

- Analysis of expected project impacts on current and future transit services and proposed project mitigation measures, and;
- Selection of final mitigation measures remains at the discretion of the local jurisdiction/lead agency. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the existing mitigation monitoring requirements of CEQA.

D.9 IDENTIFICATION AND EVALUATION OF MITIGATION

D.9.1 Criteria for Determining a Significant Impact. For purposes of the CMP, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$), causing LOS F ($V/C > 1.00$); if the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity ($V/C \geq 0.02$). The lead agency may apply a more stringent criteria if desired.

D.9.2 Identification of Mitigation. Once the project has been determined to cause a significant impact, the lead agency must investigate measures which will mitigate the impact of the project. Mitigation measures proposed must clearly indicate the following:

- Cost estimates, indicating the fair share costs to mitigate the impact of the proposed project. If the improvement from a proposed mitigation measure will exceed the impact of the project, the TIA must indicate the proportion of total mitigation costs which is attributable to the project. This fulfills the statutory requirement to exclude the costs of mitigating inter-regional trips.
- Implementation responsibilities. Where the agency responsible for implementing mitigation is not the lead agency, the TIA must document consultation with the implementing agency regarding project impacts, mitigation feasibility and responsibility.

Final selection of mitigation measures remains at the discretion of the lead agency. The TIA must, however, provide a summary of impacts and mitigation measures. Once a mitigation program is selected, the jurisdiction self-monitors implementation through the mitigation monitoring requirements contained in CEQA.

D.9.3 Project Contribution to Planned Regional Improvements. If the TIA concludes that project impacts will be mitigated by anticipated regional transportation improvements, such as rail transit or high occupancy vehicle facilities, the TIA must document:

- Any project contribution to the improvement, and
- The means by which trips generated at the site will access the regional facility.

D.9.4 Transportation Demand Management (TDM). If the TIA concludes or assumes that project impacts will be reduced through the implementation of TDM measures, the TIA must document specific actions to be implemented by the project which substantiate these conclusions.

D.10 REFERENCES

1. *Traffic Access and Impact Studies for Site Development: A Recommended Practice*, Institute of Transportation Engineers, 1991.
2. *Trip Generation*, 5th Edition, Institute of Transportation Engineers, 1991.
3. *Travel Forecast Summary: 1987 Base Model - Los Angeles Regional Transportation Study (LARTS)*, California State Department of Transportation (Caltrans), February 1990.
4. *Traffic Study Guidelines*, City of Los Angeles Department of Transportation (LADOT), July 1991.
5. *Traffic/Access Guidelines*, County of Los Angeles Department of Public Works.
6. *Building Better Communities*, Sourcebook, Coordinating Land Use and Transit Planning, American Public Transit Association.
7. *Design Guidelines for Bus Facilities*, Orange County Transit District, 2nd Edition, November 1987.
8. *Coordination of Transit and Project Development*, Orange County Transit District, 1988.
9. *Encouraging Public Transportation Through Effective Land Use Actions*, Municipality of Metropolitan Seattle, May 1987.



United States Department of the Interior

NATIONAL PARK SERVICE
Santa Monica Mountains National Recreation Area
401 West Hillcrest Drive
Thousand Oaks, California 91360-4207

In reply refer to:
L76 (SAMO) / Liberty Canyon

June 20, 2014

Allison Cook, Principal Planner/Environmental Analyst
City of Agoura Hills
30001 Ladyface Court
Agoura Hills, CA 91301

Dear Ms. Cook:

The National Park Service (NPS) has reviewed the Initial Study (IS) for the proposed Agoura Equestrian Estates, a proposed subdivision of approximately 71 acres into 15 single family residential lots and two open space lots. The project site is east of Chesebro Road north of Highway 101.

The National Park Service appreciates the opportunity to comment on the proposed development. We provide comments on the effects of private and public land development in the Santa Monica Mountains at the invitation of state and local units of government with authority to prevent or minimize adverse uses. We offer the following comments. Overall, we concur with the IS conclusion to draft an Environmental Impact Report (EIR) to fully analyze the project's potential impacts under a range of alternatives.

Surrounding Land Uses: The IS states the northern and eastern boundaries of the project site are surrounded by "Santa Monica Mountains open space owned by the State of California" (pg. 2). Please note these boundaries also coincide with the congressionally established boundary of the Santa Monica Mountains National Recreation Area (SMMNRA). The land, while not owned by NPS, is managed by NPS under a Cooperative Management Agreement among NPS, State Parks, Santa Monica Mountains Conservancy and Mountains Recreation and Conservation Authority. Recognition of the parkland-adjacent setting is critical to analysis of impacts on natural, cultural, scenic, and recreational resources.

Aesthetics

NPS finds the IS correctly identifies the level of potential impacts on aesthetics as potentially significant. In addition to the impacts on visual compatibility with the neighboring community and the effects of glare and on night skies, the draft EIR should evaluate lighting/glare impacts on wildlife in the adjacent open space. The draft EIR should also evaluate the impacts on the open space viewed for park visitors traveling along Chesebro Road to and from the Cheeseboro Canyon Trailhead.

Biological Resources

Item IV(d) of the IS anticipates a less than significant impact on the project's potential to interfere substantially with the movement of wildlife. The IS, nevertheless, states that impacts to wildlife movement will be analyzed in an EIR. NPS finds the IS insufficiently describes the extent of the wildlife corridor by stating on pg. 21 that the "closest formal wildlife corridor is the Liberty Canyon Wildlife Corridor, at U.S. Highway 101 and Liberty Canyon Road (City of Agoura Hills General Plan, 2010)." NPS wishes to distinguish between wildlife corridors in the narrowest sense of culverts, tunnels, and underpasses that are pinch or choke points to movement, and the ecological concept of wildlife corridors as habitat linkages between greater open space areas. NPS has consistently described the Liberty Canyon Wildlife Corridor, beginning in 1982 with the Resource Management Plan for Santa Monica Mountains National Recreation Area, as a broader area encompassing a wide swath of land on either side of Highway 101. The Liberty Canyon Road underpass is only the narrowest point of the overall wildlife corridor. When evaluating the role of the subject property within the context of wildlife movement and wildlife corridors, NPS recommends the draft EIR preparers consider recent reports, including the *South Coast Missing Linkages Report* (Penrod, et al. 2006), and the California Essential Habitat Connectivity Project (<https://www.dfg.ca.gov/habcon/connectivity>).

The draft EIR should also consider the potential "edge" effects on wildlife, including domestic pet predation, noise, light, sound, non-native invasive plant spread, and pest control. Conditions to avoid or mitigate impacts from adjacent human occupation should be prescribed. At minimum, the draft EIR should consider the negative impacts on wildlife from residential use of anti-coagulant rodenticides and condition against the use of these deadly poisons.

Items IV(b) and IV(c) of the IS anticipate potentially significant impacts to sensitive plant communities and wetland habitat. NPS has observed two plant species on the property that are not listed species, but are nevertheless unusual occurrences within SMMNRA: for *California macrophylla* and dwarf barley (*Hordeum depressum*). The plants are located in the vicinity of two seeps within the proposed development footprint. The plant diversity increases in wetter years, with observations around the seeps of *Brodiaea terrestris* subsp. *kernensis*, *Navarretia mitracarpa*, *Lepidium latipes* (NPS knows of only one other occurrence in the Santa Monica Mountains), *Microseris douglasii* subsp. *tenella*, and along the nearby trail, *Amsinckia menziesii*, all among the other more common forbs. The draft EIR should consider these observations when evaluating impacts to wetland habitat.

Land Use and Planning

The draft EIR should consider the adjacency to State parkland and the greater Santa Monica Mountains National Recreation Area. Preparers may reference park management goals and objectives stated in the SMMNRA General Management Plan (2003).

The project should be designed to place homes and other structures subject to the 200-foot fuel modification zone required by Los Angeles County at least 200 feet from the public land boundary. Avoiding fuel modification on public land protects natural resources and reduces public/private conflicts about fuel modification.

Government policy dictates that park visitors should only enter the public trail network from public entrance points. At least five lots on the proposed subdivision abut the open space lot and would be within feet of the proposed realigned trail. The inclination to create individual private access points onto the public trail should be expected. The draft EIR should contemplate potential vegetation and soil impacts from each residence that would desire immediate access to the trail and offer conditions to avoid natural resource impacts. If the open space is conveyed to a public agency, conditioning to avoid private entrances would also reduce conflicts with neighboring park management.

Recreation

The project site is situated adjacent to national, state, and local parkland covering approximately 16,000 acres in the Simi Hills and offering over 50 miles of public trails. An existing unofficial trail crosses the project site. The trail connects the project site to the greater trail network to the north, and a potential trail to the south toward parkland in the Santa Monica Mountains south of Highway 101. The applicant is aware of the importance of public recreation trails and has met with NPS to consult on the design of the proposed trail across open space Lot 17. NPS appreciates the incorporation of our design recommendations to improve sustainability and to satisfy NPS trail construction guidelines. It would be helpful to extend the trail alignment to the eastern boundary of the property. As currently illustrated on Figure 3, the trail appears to end abruptly, when in reality, the proposed trail would meet the existing trail that heads east toward the boundary.

Lot 16, the proposed open space lot on the northwest side of Chesebro Road, is crossed by the Agoura Equestrian Center Trail. The trail allows equestrians to stage at the equestrian center, often when equestrian parking at Cheeseboro Canyon is not available. The equestrians ride along the connector trail to trails in Cheeseboro Canyon. NPS requests the applicant consider offering a public trail easement across open space Lot 16 to secure permanent public access along this important trail.

Thank you for the opportunity to comment. If you have questions, please call Melanie Beck at (805)370-2346.

Sincerely,



for David Szymanski
Superintendent

cc: Joe Edmiston, Executive Director, Santa Monica Mountains Conservancy
Craig Sap, Superintendent, Angeles District, State Department of Parks and Recreation
Clark Stevens, District Manager, Resource Conservation District of the Santa Monica Mountains

June 26, 2014

Ms. Allison Cook
Principle Planner/Environmental Analyst
City of Agoura Hills
30001 Ladyface Court
Agoura Hills, CA 93101

**INITIAL STUDY (IS)/NOTICE OF PREPRATION (NOP)
/DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
AGOURA EQUESTRIAN ESTATES PROJECT
ASSESSOR'S PARCEL NO. 2055, PAGE 10, PARCEL 270, AND
ASSESSOR'S PARCEL NO. 2055, PAGE 9, PARCEL 270
CITY OF AGOURA HILLS**

We completed our review of the INOP/DEIR associated with the proposed Agoura Equestrian Estates Project. The project involves a subdivision for 15 residential single-family lots on the former Heschel School site in the unincorporated Los Angeles County area with the remaining area to be dedicated for open space. The proposed subdivision is currently within Unincorporated Los Angeles County area and the City of Agoura Hills is processing an annexation through Local Agency Formation Commission (LAFCO) and the City of Agoura Hills entitlement process would follow the LAFCO annexation. The project site is located on the former proposed Heschel West Day School site and the project will not tier off the previous EIR, but the technical data from the Heschel West Day School EIR has been independently analyzed by the City and utilized as appropriate in the preparation of the Initial Study.

The comments are based that the annexation will be approved by the Los Angeles County Board of Supervisors and LAFCO. The City of Agoura Hills would be responsible for the environmental documents and the subdivision requirements.

The following comments are from Los Angeles County, Department of Public Works and are for your consideration and relate to the environmental document only:

Geology and Soils

1. The total grading (cut, fill, import, export, and overexcavation) that will occur as part of this project must be disclosed in the DEIR. Please note that all project materials (site plan, application, and environmental documents) must contain the same grading quantities and disclosures.

2. Any necessary haul routes must be fully disclosed in the DEIR. If the proposed haul routes are on roadways within the unincorporated County's jurisdiction, the DEIR must include discussions regarding the impacts that the hauling will have. Specifically, the impacts on the structural integrity of the surrounding roadways and the proposed measures that will be used to mitigate the impact will need to be analyzed and discussed in the environmental document. In addition, the haul route may impact additional Cities or jurisdictions that would need to comment on the haul route.
3. The grading exhibit must clearly define the limits of grading to determine if any drainage impacts to any adjacent lots in the County's jurisdiction and must be disclosed in the DEIR.

If you have any questions regarding the geology and soils comment nos. 1, 2 and 3, please contact Omar Ahmed of Land Development Division at (626) 458-4921 or oahmed@dpw.lacounty.gov.

4. item (i), Rupture of a known earthquake fault, etc... on page 24: the determination for this item should be "no impact". Revised accordingly.
5. A geology and soils engineering report should be included in the DEIR.
6. The geologist and soils engineer should review and reference geotechnical report addressing a previous project on the property located at 27600 Canwood Street.
7. All or portions of the site is located within a potentially liquefiable area per the State of California Seismic Hazard Zones Map – Calabasas Quadrangle. All geotechnical issues discussed in the IS/NOP should be addressed in the DEIR. All proposed mitigation measures for the geological and geotechnical hazards should be included in the DEIR.

If you have any questions regarding the geology and soils comments nos. 4 through 7, please contact Jeremy Wan of Geotechnical and Materials Engineering Division at (626) 458-7980 or jwan@dpw.lacounty.gov.

Hydrology/Water Quality

1. We would like the opportunity to review the project's EIR and hydrology study approved by Public Works should be included in the DEIR.

Ms. Allison Cook
June 26, 2014
Page 2

If you have any questions regarding the hydrology/water quality comment, please contact Toan Duong of Land Development Division at (626) 458-4921 or tduong@dpw.lacounty.gov.

Transportation/Traffic

1. Any dedication and road improvements within the County's/city's jurisdiction must be discussed in the DEIR. The proposed subdivision will require dedication and road improvements on Chesebro Road and must be disclosed in the DEIR.

If you have any questions regarding the transportation/traffic comment, please contact Omar Ahmed of Land Development Division at (626) 458-4921 or oahmed@dpw.lacounty.gov.

If you have any other questions or require additional information, please contact Ruben Cruz of Land Development Division at (626) 458-4910 or rcruz@dpw.lacounty.gov.

RC:

P:\dpub\SUBPCHECK\Plan Checking Files\Zoning Permits\Projects submitted by Other Agencies\APN 2055-010-270 and 2052-009-270 - Agoura Equestrian Estates\CEQA\IS-NOP\Division Comments\City of Agoura Hills, Agoura Equestrian Estates NOP-DEIR.docx

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, OFFICE OF TRANSPORTATION PLANNING
IGR/CEQA BRANCH
100 MAIN STREET, MS # 16
LOS ANGELES, CA 90012-3606
PHONE: (213) 897-9140
FAX: (213) 897-1337



*Flex your power!
Be energy efficient!*

June 19, 2014

Ms. Allison Cook
City of Agoura Hills
30001 Ladyface Court
Agoura Hills, CA 93101

Re: Agoura Equestrian Estates
Notice of Preparation (NOP) of a Draft EIR
IGR No. 140543FL
Vic. LA/101/ PM 33.9

Dear Ms. Cook:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the proposed Agoura Equestrian Estates project. Based on the NOP of an Environmental Impact Report (EIR), the proposed project involves subdivision of an approximately 71-acre site into seventeen lots: fifteen residential single-family lots, one lot for permanent preservation of open space, and another lot for permanent preservation.

We understand this Initial Study analyzes the impacts of future residential development, but the actual approval for physical construction of the residences is not currently proposed. Individual residential construction would be subject to separate application review and permitting when such development is proposed in the future.

We want to remind you storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful of the project's need to discharge clean run-off water and it is not permitted to discharge onto State highway facilities.

Any transportation of heavy construction equipment and/or materials which requires the use of oversized-transport vehicles on State highways will require a Caltrans transportation permit. We recommend that large size truck trips be limited to off-peak commute periods.

If you have any questions, please feel free to contact me at (213) 897 - 9140 or project coordinator Frances Lee at (213) 897- 0673 or electronically at frances.lee@dot.ca.gov.

Sincerely,

DIANNA WATSON
IGR/CEQA Branch Chief
Caltrans District 7

From: Patricia Hachiya [<mailto:phachiya@planning.lacounty.gov>]
Sent: Thursday, June 19, 2014 1:18 PM
To: Allison Cook
Cc: Marjorie Santos
Subject: Comments in Agoura Equestrian Estates Project Initial Study

Dear Ms. Cook –

Thank you for the opportunity to comment on the Agoura Equestrian Estates Project. Please note the following comments we have with regards to scope and content of the upcoming EIR:

1. Please note the name of the County's Plan for the area as "Santa Monica Mountains North Area Plan". In addition, there is a zoning overlay adopted by the Board of Supervisors in 2011 called the "Santa Monica Mountains North Area Community Standards District".
2. APN 2055-010-270 is zoned OS-P (Open Space – Parks) under County zoning.
3. Under Aesthetics and Biological Resources, please address whether there are any Oak Woodlands on or near the property (as defined by the State, oak woodlands are oak stands – two or more oaks – with greater than 10% canopy cover with oaks at least 5 inches in diameter measured at 4.5 feet above mean natural grade) and note any mitigations if needed.

If you have any additional questions on the comments, feel free to contact me. Thank you.

PATRICIA L. HACHIYA, AICP | Supervising Regional Planner
Impact Analysis Section
Los Angeles County Department of Regional Planning
213.974.6461 | <http://planning.lacounty.gov> | phachiya@planning.lacounty.gov

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County of Los Angeles Public Library ■ www.colapublib.org
7400 East Imperial Hwy., Downey, CA 90242 ■ (562) 940-8400



Margaret Donnellan Todd
County Librarian

October 15, 2014

Allison Cook, Principal Planner
City of Agoura Hills
Planning and Community Development Department
30001 Ladyface Court
Agoura Hills, CA 91301

Dear Ms. Cook:

REQUEST FOR INFORMATION FOR THE AGOURA EQUESTRIAN ESTATES INITIAL STUDY

This is to provide you with written comments for the Agoura Equestrian Estates Project Initial Study (Project). The entire Project site is approximately 71 acres and is located in the unincorporated area of the County of Los Angeles (County). The proposed Project involves subdivision of the site into seventeen lots, which includes fifteen residential single-family lots and the annexation of the entire 71 acres to the City of Agoura Hills. The County of Los Angeles Public Library (Public Library) currently provides library service to the residents of the proposed annexation area.

No Annexation

The Project site is located in the Agoura Hills Library (Library) service area of the Public Library. The size of the Library is 17,722 gross sq. ft. The Library has a collection of 98,222 books and other library materials as of March 31, 2014.

The Public Library's current service level guidelines for planning purposes are a minimum of 0.50 gross square foot of library facility space per capita, 2.75 items (books and other library materials) per capita, and 1.0 public access computer per 1,000 people served. The Library currently meets these guidelines in providing library services to the residents it serves.

The proposed 15 new single-family residential projects will be located in the unincorporated area served by the Public Library and is subject to the County's library facilities mitigation fee.

Allison Cook
October 15, 2014
Page 2

In order to mitigate the impact of this Project on library services, the applicant or its successor in interest will be required to pay the library facilities mitigation fee (*Los Angeles County Code*, Chapter 22.72) at the time the building permits for the project are issued. The proposed Project is located in the Public Library's Planning Area 7 (Santa Monica Mountains). The current mitigation fee for this area, which may be adjusted annually based on changes in the Consumer Price Index, is \$869 per residential unit. Therefore, the total mitigation fee that would be required is \$13,035 (\$869 x 15 residential units). The actual fee obligation for this project may be higher because the fee per residential unit will be that in effect at the time the building permits are issued.

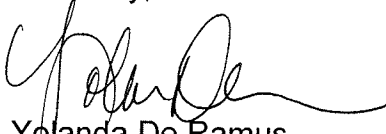
Annexation

If the proposed annexation is approved, the Public Library will continue to provide library service for the residents of the Project site. The Public Library will continue to receive its dedicated share of property tax revenue but will no longer receive its voter-approved special tax revenue and the County would lose the 4.5% Utility User Tax (Measure U) revenues generated from the subject area.

Following the annexation, developers of the new 15 residential projects within the subject area will not be required to pay the library facilities mitigation fees to the Public Library.

If you have any questions or need additional information, please feel free to contact Elsa Muñoz at (562) 940-8450 or emunoz@library.lacounty.gov.

Sincerely,



Yolanda De Ramus
Chief Deputy

YDR:AC:EM:MB:vl

U:\STAFFSERVICES\DEVELOPER FEE\EIR\Agoura Esquestrian Estates - Draft Initial Study.docx

c: Elsa Muñoz, Head, Support Services, Public Library
Beth Wilson, Library Administrator, Public Library



COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION
"Parks Make Life Better!"

Russ Guiney, Director

John Wicker, Chief Deputy Director

CITY OF AGOURA HILLS

2014 JUL -1 PM 3: 52

CITY CLERK

July 1, 2014

Sent via email: acook@ci.agoura-hills.ca.us

Ms. Allison Cook
Principal Planner/Environmental Analyst
City of Agoura Hills
30001 Ladyface Court
Agoura Hills, CA 93101

Dear Ms. Cook:

**NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE AGOURA EQUESTRIAN ESTATES PROJECT**

The Notice of Preparation of a Draft Environmental Impact Report for the Agoura Equestrian Estates Project has been reviewed for potential impact on the facilities of this Department (DPR) for which we offer the following comments:

Quimby Act Fees

Page 42 (Recreation Section) indicates that the "project developer would be required to pay Quimby Act fees (Section 10800 of the Agoura Hills Municipal Code) upon recordation of the final vesting tract map to offset impacts associated with new residential units on affected park facilities." If the proposed project is not annexed by the City of Agoura Hills, it would be subject to the County's Quimby requirements because the parcel is currently located within an unincorporated area of Los Angeles County.

Trails

According to the National Park Service (Santa Monica Mountains) trails data inventory, the Agoura Equestrian Center Connector Trail, an existing National Park Service trail traverses and/or is adjacent to the proposed project site. The County Department of Parks and Recreation requires a trail easement dedication for the Agoura Equestrian Center Connector Trail.

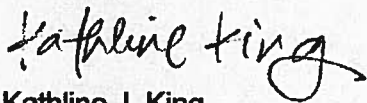
The Department requests that the Applicant delineate a trail easement dedication over the existing trail path on the site plan for the Agoura Equestrian Center Connector Trail (see attached aerial map for trail alignment). The center line of the trail easement should be the center line of the existing trail path, denote as "Agoura Equestrian Center Connector Trail" on the site plan. Because of the necessity to show this trail alignment as it pertains to proposed development as well as topographical features, specific

Ms. Allison Cook
July 1, 2014
Page 2

information regarding the trail easement dedication, must be accurately shown on the tentative map prior to final map recordation.

Thank you for including this Department in the review of this notice. Should you have any questions regarding trails, please contact Ms. Lorrie Bradley at (213) 738-2812 or lbradley@parks.lacounty.gov. For any other inquiries, please contact Ms. Jul Ing Chien at (213) 351-5129 or jchien@parks.lacounty.gov.

Sincerely,

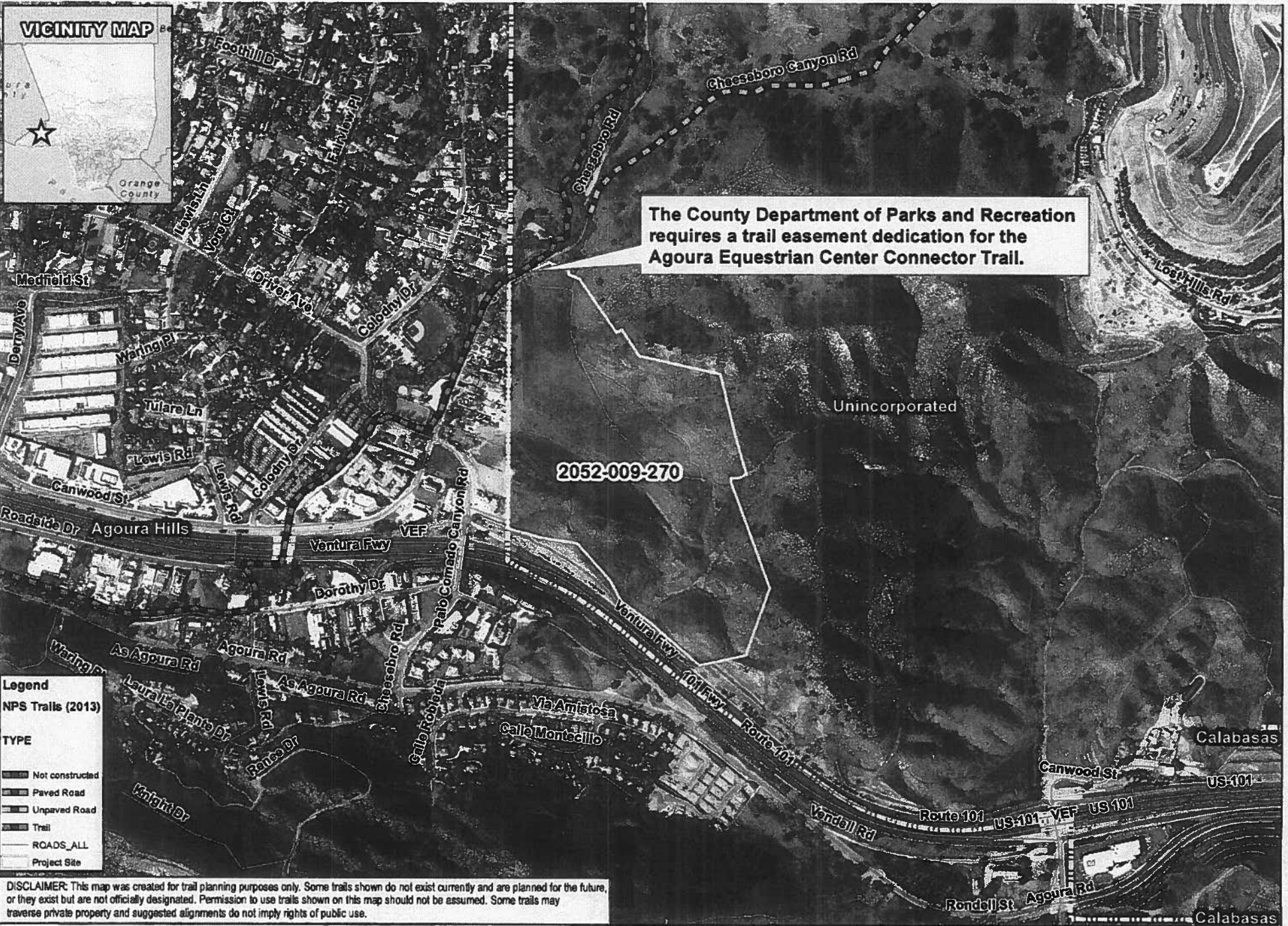


Kathline J. King
Chief of Planning

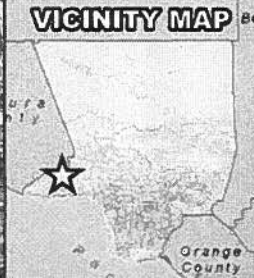
KK:JR: JIC: OR / Response to Agoura Hills Equestrian Estates NOP

Enclosure : NOP/IS Agoura Equestrian Estates - Trails Map

c: Parks and Recreation (N. E. Garcia, J. Rupert, F. Moreno, L. Bradley, O. Ruano)



The County Department of Parks and Recreation requires a trail easement dedication for the Agoura Equestrian Center Connector Trail.



- Legend**
 NPS Trails (2013)
- TYPE**
- Not constructed
 - Paved Road
 - Unpaved Road
 - Trail
 - ROADS_ALL
 - Project Site

DISCLAIMER: This map was created for trail planning purposes only. Some trails shown do not exist currently and are planned for the future, or they exist but are not officially designated. Permission to use trails shown on this map should not be assumed. Some trails may traverse private property and suggested alignments do not imply rights of public use.

TRAIL REVIEW: NOP/INITIAL STUDY AGOURA EQUESTRIAN ESTATES
 County of Los Angeles | Department of Parks & Recreation

1,000 Feet

Date: 08/25/14
 Prepared By: Planning_OR
 Trails: DPR_NPS
 Parcels: EGIS_ASSR_PARCELS
 Roads: Thomas Brothers (All rights reserved)
 Aerial: LAR-IAC4