III. CORRECTIONS AND ADDITIONS

The following corrections and additions to the Canyon Hills Project Draft Environmental Impact Report (the "Draft EIR") have resulted from the Lead Agency's review of the comments received during the 90-day public review period. Changes to the Draft EIR are listed by the corresponding Draft EIR Section, subsection, if applicable, and then page number.

I. SUMMARY

Introduction

No corrections and/or additions are necessary.

Proposed Project

No corrections and/or additions are necessary.

Areas of Controversy

Page I-5

The first and second sentences of the "Land Use" paragraph have been revised to read:

> *Concerns were raised regarding consistency with the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan (the "Specific Plan"). Land use consistency with the Specific Plan, as well as other applicable plans and policies, are discussed in Section IV.G (Land Use).*

Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Issues To Be Resolved

No corrections and/or additions are necessary.

Alternatives

No corrections and/or additions are necessary.

Environmental Impacts and Mitigation Measures

Page I-8

The third sentence of the first paragraph has been revised to read: "Therefore, ground rupture resulting from an earthquake fault would be unlikely on the project site."

Pages I-9 and I-10

The last sentence of Mitigation Measure A-5 has been revised to read: "Design, grading and construction of the proposed cut slopes shall conform with the LABC."

Page I-11

The following mitigation measures have been added:

B-6 *Apply appropriate NOx control technologies, such as use of lean-NOx catalyst or diesel oxidation catalyst, to the extent feasible.*

B-7 *Blasting and crushing equipment shall be equipped with water spray devices in order to maintain soil moisture and prevent fugitive dust emissions.*

B-8 *Cease grading during periods when the SCAQMD calls a Stage 1 episode in SRA 8.*

B-9 *For all homes in the Development Areas located within 300 feet from the edge of Interstate 210, the project developer shall provide an information and disclosure statement to each prospective buyer and include such statement as part of the final sales literature, which statement shall include the following:*

- *The fact that the proposed home is located within 300 feet from the edge of Interstate 210.*
- *A statement that this subject has been addressed in the Final EIR for the project and that the Final EIR is on file with the City of Los Angeles, Department of City Planning.*
- *A statement that additional information regarding the potential health effects from proximity to freeways and other high traffic areas may be obtained from the SCAQMD and the Office of Environmental Health Hazard Assessment at the California Environmental Protection Agency.*

This addition is also stated in Responses 24-4, 121-11, 149-42 and 149-46 in this Final EIR.

Page I-13

Mitigation Measure C-11 has been revised to read:

> ***C-11*** *The project shall adhere to applicable provisions of the LAMC, Flood Hazard Management Specific Plan (if applicable) and the recommendations of the City Engineer/Department of Building and Safety*.

Page I-14

Mitigation Measure C-12 has been revised to read:

> ***C-12*** *The project developer and/or homeowners' association(s) shall work with the City to make residents aware of used motor oil recycling facilities and household hazardous waste drop-off centers in the area. Availability of centers can reduce the amount of toxic contaminants found in urban runoff.*

Page I-14

Mitigation Measure C-14 has been revised to read:

> ***C-14*** *Reducing pesticide and fertilizer use at the source can remove these pollutants from urban runoff. The project developer and/or homeowners' association(s) shall adopt Integrated Pest Management (IPM) programs for use on their own public grounds in addition to promoting their use to project residents*.

Page I-19

The last sentence of Mitigation Measure D.1-2 has been deleted and the following mitigation measure has been added:

> ***D.1-3*** *The mitigation and monitoring plan with respect to Mitigation Measures D.1-1 and D.1-2, above shall be subject to the approval of the Army Corps, CDFG and the Regional Water Quality Control Board*.

This addition is also stated in Response 20-3 in this Final EIR.

Page I-19

Due to the addition of Mitigation Measure D.1-3 above, the remaining mitigation measures in Section IV.D.1 (Flora & Fauna) have been renumbered to read:

> ***D.1-4*** *The project developer shall provide 2.8 acres of native riparian plantings within the proposed onsite detention basins and water quality basins and other appropriate areas.*
>
> ***D.1-5*** *The project developer shall revegetate 1.21 acres of southern mixed riparian forest and 0.15 acre of southern coast live oak riparian forest.*
>
> ***D.1-6*** *If construction occurs during the nesting season for migratory birds (March 15-August 15), then prior to construction activities, the project developer shall have a qualified biologist survey the project site for the presence of any occupied raptor nests. If such a nest is found, it shall be protected until nesting activity has ended to ensure compliance with Section 3503.5 of the California Fish and Game Code.*

Page I-19

Mitigation Measure D.1-6 has been renumbered as Mitigation Measure D.1-7 and the first paragraph has been revised to read:

> ***D.1-7*** *If grading or clearing of vegetation is scheduled to take place during the nesting season for migratory or resident birds (March 15-August 15), a qualified biologist will survey the areas to be graded no more than three days prior to the start of work. If active nests of migratory or resident birds are located, measures to ensure protection of the nesting migratory or resident bird will be determined by the monitoring biologist and will depend on factors such as the bird species and the construction schedule. These measures may include, but are not limited to:*

This revision is also stated in Response 11-10 in this Final EIR.

Page I-20

The following mitigation measures have been added:

> ***D.1-8*** *All prospective homebuyers will be advised of the implications of living adjacent to natural open space areas. The educational materials will be written to foster an appreciation of native ecosystems, and will identify appropriate measures*

that homeowners should take to minimize conflicts between wildlife, domestic animals, and humans, including:

(1) Responsibilities and benefits associated with living near a wildland area (e.g., residents will be required to avoid planting invasive plant species, and will receive benefits related to maintaining the natural beauty of nearby open space areas).

(2) Warnings of dangers and nuisances posed by wildlife that may forage at the development edge (e.g., dangers that mountain lions pose to humans and potential loss of pets to naturally occurring predators).

D.1-9 *The homeowners' association(s) shall monitor the landscaped areas over a five-year period following the completion of landscaping in a Development Area and remove, as necessary, unwanted non-native invasive species that become established, ensuring that, over time, native habitats are established.*

D.1-10 *In order to minimize the movement of displaced animals into residential areas during clearing and grubbing of areas to be graded, such clearing and grubbing activities will start at the existing urban edge and move toward open space.*

These additions are also stated in Responses 63-6, 97-5 and 166-5 in this Final EIR.

Page I-24

Mitigation Measure D.2-6 has been revised to read:

D.2-6 *The project developer shall implement the final tree planting program for the project, which shall be based on the conceptual tree planting program summarized in Table IV.D-16 in the Draft EIR and the Addendum to the Tree Inventory and Impact Analysis included in Appendix E to this Final EIR, as modified to conform to the specifications for the Development Areas in the approved vesting tentative tract map. The final tree planting program shall be approved by an independent certified arborist and shall include species, sizes, quantities, planting locations and planting specifications, as well as criteria for success and guidelines for monitoring and tree assessments. The plantings would occur within entry points, common areas, road right-of-ways, perimeters of detention basins, common slopes, flood control facilities, fuel modification slopes and private residential lots. Consistent with the conceptual tree planning program, the final tree planning program shall include (1) with respect to all*

replacement plantings, a minimum replacement ratio of 7.6:1 for impacted coast live oaks and 6.7:1 for impacted western sycamores, (2) with respect to 15-gallon and larger replacement stock, a minimum replacement ratio of 4.6:1 for impacted coast live oaks and 4.1:1 for impacted western sycamores, and (3) a 10-percent planting overage to allow for potential losses of replacement trees.

This revision is also stated in Response 20-5 and is addressed in Response 97-2 in this Final EIR.

Page I-24

Mitigation Measure D.2-7 has been revised to read:

D.2-7 *All tree plantings shall be subject to a five-year monitoring effort by an independent certified arborist. This monitoring effort shall consider growth, health, and condition of subject trees in order to evaluate the project's success. This monitoring effort might result in recommendation of remedial actions should any of the tree plantings exhibit poor or declining health. These actions may include more frequent monitoring, installation of protective devices, pruning for larger specimens, integrated pest management (IPM) for pest or disease infestation and other professionally accepted methods to improve the health and vigor of a tree. Fencing and other protective measures could be required for trees less than four (4) feet tall (including acorn plantings) planted in areas where soil compaction, foot traffic, and equine or other recreational uses may occur. These measures shall remain in place until the trees are large enough to be self-protecting. Any coast live oak that fails during the monitoring period shall be replaced with a tree of the same species and equivalent trunk diameter.*

This revision is also stated in Response 20-1 in this Final EIR.

Page I-27

Mitigation Measures D.3-2, D.3-3 and D.3-4 have been deleted. Therefore, Mitigation Measure D.3-5 has been renumbered to Mitigation Measure D.3-2. This deletion is also reflected in Topical Response 11 in this Final EIR.

Page I-27

Mitigation Measure D.3-2 (renumbered as D.3-5, see above correction) has been revised to read:

D.3-2 *The project homeowners' association(s) shall maintain openings in walls at key locations within the Development Areas to enhance local movement paths.*

Page I-28

Mitigation Measure E-2 has been revised to read:

> ***E-2*** *In accordance with Section 41.40(c) of the LAMC, construction activities, including job-site deliveries, shall not be conducted within 500 feet of any existing residential buildings before 8:00 a.m. or after 6:00 p.m. on Saturday or any national holiday or at any time on Sunday.*

Pages I-29 and I-30

Mitigation Measures E-11 and E-12 have been revised to read:

> ***E-11*** *The project developer shall appoint a construction coordinator to interface with the general contractor, neighboring communities, local neighborhood councils and local equestrian organizations. The construction coordinator shall be accessible to resolve problems related to the effects of project construction on the surrounding community, to the extent feasible. The construction coordinator shall also provide information to the surrounding community regarding scheduling of specific construction activities (e.g., grading and blasting) and construction phasing.*
>
> ***E-12*** *In order to meet the Caltrans standard regarding freeway noise, one of the following two options shall be implemented:*
>
> - *Sound walls shall be constructed at the locations and heights shown in Figure IV.E-2, as revised in Figure 3-S in Appendix F to the Final EIR.*
> - *The elevations or locations of the homes shall be altered and/or intervening berms or landform features shall be integrated into the project design.*

This revision is also stated in Responses 106-1 and 115-4 in this Final EIR.

Page I-30

Mitigation Measure E-13 has been deleted. Therefore, Mitigation Measure E-14 has been renumbered as Mitigation Measure E-13. This deletion is also reflected in Response 115-4 in this Final EIR.

Page I-32

Mitigation Measures F-1 and F-2 have been revised to read:

F-1 *The CC&Rs for the proposed project shall prohibit the use of all exterior uplighting fixtures for building facades and trees, establish design limits on the amount of landscape lighting per foot, permit only downlighting for all exterior-building mounted fixtures, and prohibit "glowing" fixtures that would be visible from existing communities or public roads.*

F-2 *The CC&Rs shall specify that night lighting on private property located on any lot located within 100 feet from the edge of Interstate 210 shall be permitted, provided it is low-height, low illumination safety lighting that is shielded and directed onto the property.*

Page I-33

The first and second sentences of the second paragraph under "Consistency with Land Use Plans, Policies and Regulations" have been revised to read:

The San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan (the "Specific Plan") was analyzed for consistency with the proposed project. As discussed in Section IV.G (Land Use), the proposed project is consistent with the Specific Plan.

Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Page I-36

The following mitigation measures have been added to read:

I-2 *With respect to the section of La Tuna Canyon Road adjacent to the project site, (1) the project developer shall dedicate along the entire project frontage on La Tuna Canyon Road to bring the right-of-way up to the standard required by the General Plan, (2) the project developer shall construct improvements on La Tuna Canyon Road so as to provide two lanes in each direction with left-turn channelization at the access points for Development Area A and Development Area B and (3) except as required to provide left-turn channelization as described above, no additional roadway widening along the proposed project's La Tuna Canyon Road frontage shall be required.*

I-3 *The project developer shall contact the Bureau of Engineering, Department of Public Works to ensure compliance with the requirements of the LAMC related to the equestrian park.*

I-4 *The driveway to Development Area A on La Tuna Canyon Road shall be aligned as the north leg of the signalized intersection at Development Area A Access/Interstate 210 Westbound Ramps and La Tuna Canyon Road.*

I-5 *To avoid the encroachment of vehicles onto the public right-of-way, a minimum of 40 feet of reservoir space shall be provided at each driveway. This distance shall be measured from the property line to the first parking stall and/or gate.*

I-6 *The driveways for Development Area B shall be located away from any blind curve along La Tuna Canyon Road. Queuing and merging areas shall be provided for ingress and egress vehicles, respectively. The driveways serving Development Area B shall be consistent with the requirement(s) of LADOT and other City departments.*

I-7 *As backing into or out of arterial highways or collector streets is not permitted, the path and location of all trucks and vehicles with horse trailers shall be indicated on the parking area and driveway plan submitted by the project developer to LADOT prior to the issuance of building permits.*

I-8 *Final LADOT approval shall be obtained prior to the issuance of any building permits. This shall be accomplished by submitting a detailed site/driveway plan, at a scale of at least 1 inch = 40 feet, to LADOT's Valley Development Review Section at 6262 Van Nuys Boulevard, Suite 320, Van Nuys. This site/driveway plan shall be submitted as soon as possible, prior to the submittal of building plans to the Department of Building and Safety.*

These additions are also stated in Responses 191-8, 191-9, 191-10, 191-11, 191-12, 191-13 and 191-15 in this Final EIR.

Page I-37

Mitigation Measure J.1-1 has been revised to read:

J.1-1 *An automatic fire sprinkler system shall be installed in each structure in accordance with Section 57.09.07 of the LAMC.*

Page I-39

Mitigation Measure J.1-19 has been revised to read:

J.1-19 *The vesting tentative tract map, indicating access roads and turning areas, shall be submitted for LAFD approval.*

Page I-40

Mitigation Measure J.2-5 has been revised to read:

> ***J.2-5*** *The project homeowners' association(s) shall retain a single alarm and security patrol company to patrol the Development Areas and correct false alarms expeditiously.*

Page I-40

The following sentence has been added after the second sentence of the "Impacts" paragraph under "Recreation and Parks" to read:

> *If to the extent the proposed equestrian park and other onsite recreational facilities do not fully satisfy the requirements of the Quimby Act with respect to the proposed project, the project developer would be required to pay Quimby fees to the City to satisfy the balance of its obligations under the Quimby Act.*

This revision is also stated in Response 155-2 in this Final EIR.

Pages I-40 and I-41

The third sentence of the "Impacts" paragraph under "Libraries" has been deleted. This revision is also stated in Response 155-2 in this Final EIR.

Page I-45

The following has been added at the end of the first paragraph under "Mitigation Measures":

> *However, the following mitigation measures are recommended to reduce further the proposed project's less-than-significant impacts associated with construction activities:*
>
> ***M.1-1*** *All hazardous or potentially hazardous materials used on the project site during construction for purposes of blasting shall be under the control of the designated contractor from the time such materials are brought onsite through the time of their use and the time they are removed from the project site. Access to these materials shall be controlled at all times. All such materials shall be fully accounted for both prior to and following all blasting work to be performed on the project site.*
>
> ***M.1-2*** *The large-scale application of herbicides for purposes of removing existing vegetation on the project site shall not be permitted. In addition, all hazardous or potentially hazardous materials used on the project site during construction*

shall be under the control of the designated contractor from the time such materials are brought onsite through the time of their use and the time they are removed from the project site. Access to these materials shall be controlled at all times. The designated storage location for these materials must be contained and separated from the ground surface by appropriate means to be designated in the construction site's SWPPP.

This addition is also stated in Responses 149-296 and 149-304 in this Final EIR.

Page I-46

The first sentence of Mitigation Measure M.2-1 has been revised to read:

M.2-1 *For all residential lots in Development Area A located within 150 feet of the edge of the SCE Transmission Line ROW, the project developer shall provide an EMF information and disclosure statement to each prospective buyer and include such a statement as part of the final sales literature, which statement shall include the following:*

Page I-47

Mitigation Measure N-1 has been revised to read: "All structures on the project site shall comply with the applicable requirements of the Specific Plan." Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Page I-48

Mitigation Measure N-4 has been revised: "All utilities installed in connection with the development of the project shall be placed underground."

Page I-48

The following mitigation measure has been added:

N-8 *Where required sound walls may interrupt views of the surrounding scenery, sound walls constructed of combination of Plexiglas and concrete blocks may be installed.*

This addition is also stated in Response 115-4 in this Final EIR.

Page I-49

Mitigation Measure O.2-3 has been revised to read:

> ***O.2-3*** *If human remains are unearthed during construction, no further disturbance shall occur until the Los Angeles County Coroner has made the necessary findings as to origin and disposition in accordance with Section 7050.5 of the California Health and Safety Code. If the remains are determined to be those of a Native American, the Native American Heritage Commission (NAHC) in Sacramento shall be contacted before the remains are removed in accordance with Section 21083.2 of the California Public Resources Code.*

II. GENERAL DESCRIPTION OF ENVIRONMENTAL SETTING

Location and Boundaries

Page II-1

The first sentence of the first paragraph has been revised to read: "The proposed Canyon Hills project site is located at 7000-8000 La Tuna Canyon Road in the City of Los Angeles (the "City")."

Overview of Environmental Setting

Page II-5

The paragraph under "San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan" has been revised to read:

> *The San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan (the "Specific Plan") includes requirements and restrictions that are generally applicable to the proposed project. The proposed project has been designed for consistency with the Specific Plan. The consistency of the proposed project with the Specific Plan is discussed in detail in Section IV.G (Land Use).*

Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Page II-6

The first sentence of the paragraph under "City of Los Angeles Municipal Code" has been revised to read:

The project site is currently zoned A1-1 (Agricultural), A1-1-K (Agricultural-Equestrian) and RE11-1 (Residential Estate), as shown in Table II-2 and Figure IV.G-4. The consistency of the proposed project with the Los Angeles Municipal Code (LAMC) is discussed in detail in Section IV.G (Land Use).

Page II-6

Table II-2 has been revised to read:

Table II-2
Existing Zoning Designations
Canyon Hills Project

Zoning Designation	Acres
A1-1 Agricultural	860
A1-1-K Agricultural – Equestrian	24
RE11-1 Residential Estate	3
Total	***887***

Related Projects

No corrections and/or additions are necessary.

III. PROJECT DESCRIPTION

Project Location

Page III-1

The first sentence of the first paragraph has been revised to read: "The Canyon Hills project site includes approximately 887 acres of land and is located at 7000-8000 La Tuna Canyon Road in the City of Los Angeles."

Project Characteristics

Page III-4

Table III-1 has been revised to read:

Table III-1
Residential Lots and Pads
Canyon Hills Project

Building Pad Size	Lots		
	Development Area A	Development Area B	Subtotal
Custom	14	8	22
90 x 115 feet	16	21	37
80 x 115 feet	72	22	94
70 x 115 feet	109	18	127
Total	**211**	**69**	**280**

Page III-4

The second sentence of the second paragraph has been revised to read:

> *The 211 homes (including 14 custom homes) proposed in Development Area A and the 69 homes (including eight custom lots) proposed in Development Area B would include a variety of lot sizes and an eclectic mix of architectural styles*.

Page III-4

The first sentence of the third paragraph has been revised to read:

> *As shown on Table III-1, the 22 custom lots would be located throughout the project site*.

Page III-5

Table III-3 has been revised to read:

Table III-3
Proposed Zoning Designations
Canyon Hills Project

Zone	Acres
A1-1 Agricultural	626
A1-1-K Equestrian	24
RE9-1-H Estate (9,000 square feet)	124
RE11-1-H Estate (11,000 square feet)	52
RE-20-1-H (20,000 square feet)	61
Total	**887**

This revision is also addressed in Topical Response 8 in this Final EIR.

Page III-6

The first and second sentences of the third paragraph have been revised to read:

> *Development Area B would be served by two access points along La Tuna Canyon Road, one approximately one mile west of the Interstate 210/La Tuna Canyon Road off-ramp and the second approximately 0.2 miles further west. Full left-turn and right-turn ingress and egress movement from La Tuna Canyon Road are proposed at these intersections*.

Page III-7

The third sentence of the first complete paragraph has been revised to read: "It is anticipated that construction of the proposed project would last approximately 60 months (beginning in 2005 and completing in 2009)."

Page III-8

The last sentence of the second paragraph under "Open Space" has been revised to read:

> *Incidental public improvements and planting enhancements may occur within natural open space areas, including passive recreational areas, hiking trails, public utilities, and native vegetation and tree plantings where the landscape is sustainable without irrigation or fuel modification*.

Page III-9

The third sentence of the paragraph under "Views/Scenic Qualities" has been revised to read:

> *The proposed residential lots have been located in a manner that would prevent future homes from obstructing views of the "Prominent Ridgelines" designated in the Specific Plan, as seen from Interstate 210 and La Tuna Canyon Road*.

Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Project Objectives

Page III-10

The second bullet has been revised to read:

- *To develop a residential project on the project site that is financially viable and thereby permits (1) the donation or dedication of most of the project site located outside the Development Areas to an appropriate public agency or nonprofit entity and (2) the development of public and private equestrian and other recreational amenities on the project site.*

Discretionary/Ministerial Actions and Approvals

Page III-10

The first, second third and fourth bullets under "Discretionary/Ministerial Actions and Approvals" have been revised to read:

- *Major Plan Review, which includes the following:*
  - ◊ *General Plan Amendments to change the land use designations in the Sunland-Tujunga Community Plan for portions of the project site from Minimum Residential, Very Low I Residential, Very Low II Residential and Open Space to Minimum Residential and Low Residential (see Figure IV.G-6).*
  - ◊ *Zone changes to change the zoning designations for the proposed Development Areas from A1-1 (Agricultural) and RE11-1 (Residential Estate), to RE9-1-H (Residential Estate), RE11-1-H (Residential Estate) and RE20-1-H (Residential Estate) (see Figure IV.G-7).*
- *Vesting Tentative Tract Map.*

Page III-10

The following bullets have been added after the fourth bullet under "Discretionary/Ministerial Actions and Approvals" to read:

- *Site Plan Review.*
- *Project Permit Compliance Review (San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan).*

Page III-10

The fifth and eighth bullets under "Discretionary/Ministerial Actions and Approvals" have been deleted.

Page III-11

The first bullet has been revised to read:

- *Section 1602 Streambed Alteration Agreement(s) from the California Department of Fish and Game*.

IV. ENVIRONMENTAL IMPACT ANALYSIS

IV.A Geology and Soils

Page IV.A-1

The first sentence of the first paragraph has been revised to read:

> *A <u>Geotechnical Evaluation</u> for the proposed project was prepared by Zeiser Kling Consultants, Inc. in March 2003 to analyze the potential geology and soils impacts associated with the proposed project*.

Page IV.A-33

The first sentence of the paragraph under "Mitigation Measures" has been revised to read:

> *As indicated in the above discussion, without mitigation, significant impacts to geology and soils would occur with implementation of the proposed project due to the potential for rock fall and landslides and the creation of cut slopes*.

Page IV.A-34

The last sentence of Mitigation Measure A-5 has been revised to read: "Design, grading and construction of the proposed cut slopes shall conform with the LABC."

Page IV.A-35

The first sentence of the paragraph under "Cumulative Impacts" has been revised to read: "Development of the proposed project in conjunction with the 13 related projects indicated in Figure II-2 in Section II.C (Related Projects) of this Draft EIR would result in further development of the Verdugo Mountains area in the City." This revision is also stated in Response 106-4 in this Final EIR.

IV.B Air Quality

Page IV.B-14

The fourth sentence of the paragraph has been revised to read: "There is a potential for horses in the equestrian park to raise minor amounts of dust." This revision is also reflected in Topical Response 8 in this Final EIR.

Page IV.B-14

The seventh sentence of the paragraph has been revised to read:

> *Furthermore, other than the one adjacent home that has its own equestrian facilities (which have been constructed on the site of the proposed equestrian park), the proposed equestrian park is isolated from other sensitive receptors in the general area that might otherwise be affected by minor amounts of dust.*

This revision is also reflected in Topical Response 8 in this Final EIR.

Page IV.B-16

The second sentence of the third complete paragraph has been revised to read:

> *The first column shows the time of day (AM or PM); the second column shows the CO concentration monitored at SRA8 in 2001; the third column shows the CO concentration predicted by the Caline model, based on 2002 traffic; and the fourth column shows the existing CO concentration if both the monitored CO concentration and the modeled concentration were added together.*

Page IV.B-17

The following text has been added after Table IV.B-7 and before the "Mitigation Measures":

> ***Potential Impact of Interstate 210 on Future Project Residents***
>
> *The following discussion addresses the potential for exposure of future project residents to vehicular emissions from Interstate 210 to cause an increased risk of contracting cancer or experiencing other adverse health effects on populations. Most of the current studies that address this issue are mapping studies that attempt to correlate experienced health effects and proximity to high traffic areas. However, none of them established a casual link between high traffic areas and health effects. Two of the studies do not address health effects at all, but simply measure particulates at decreasing downwind distances from selected freeways in Los Angeles. Some of the mapping studies discuss a*

variety of airborne emissions sources in addition to vehicle exhaust. Vehicular emissions contain criteria pollutants (i.e., NOx, SOx, CO, respirable particulate matter (PM_{10}) and VOCs) and some chemicals classified by the California Office of Environmental Health Hazard Assessment (OEHHA) as toxic air contaminants (TACs).

SCAQMD Air Toxics Plan Predict Rapid Reduction in Air Toxics from Vehicles

As discussed above, the SCAQMD is responsible for monitoring air quality in the SCAB, and for adopting controls, in conjunction with the CARB, to improve air quality. Since 1987, the SCAQMD has conducted a series of studies to assess air toxic levels in the SCAB. In 2000, the SCAQMD completed its Multiple Air Toxic Exposure Study – Phase II for the SCAB, which is commonly known as "MATES-II".[1] That study concluded that the average cancer risk in the SCAB ranges from 1,100 in a million to 1,750 in a million, with an average regional risk of approximately 1,400 in a million. Of that risk, approximately 70 percent relates to the presence of diesel particulate matter (DPM), which is listed by OEHHA as a TAC. Approximately 10 percent of the total risk is associated with benzene, which is also listed by OEHHA as a TAC and is also emitted from vehicle exhaust. The balance of the cancer risk results from a variety of chemicals and sources of air pollution.

In 2000, the SCAQMD also prepared a final draft Air Toxics Control Plan (the "Air Toxics Plan") to provide a more systematic approach for reducing the emission of TACs in the SCAB.[2] The Air Toxics Plan includes a map and the modeled estimated risk in the SCAB with respect to TACs for the year 1998 (see Figure IV.B-2). As shown on Figure IV.B-2, the highest model-estimated risk levels generally occur in the south-central portions of Los Angeles County and along freeway corridors. The cancer risk from TACs ranged from 180 in a million to 5,800 in a million. The cancer risk in the vicinity of the segment of Interstate 210 adjacent to the project site is 600-800 in a million. The Air Toxics Plan also demonstrates that cancer risks with respect to TACs decreased significantly at all six monitoring stations maintained by the CARB in Southern California between 1990 and 1998, in part as a result of increasingly stringent regulation of tailpipe emissions. That trend continues, resulting in further decreases in TAC concentrations.

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[1] *South Coast Air Quality Management District, Air Toxics Control Plan, The Multiple Air Toxics Exposure Study (MATES II), website: http://www.aqmd.gov/aqmp/atcp_ch_ii.html#MATESII, accessed April 5, 2004.*

[2] *South Coast Air Quality Management District, An Air Toxics Control Plan for the Next Ten Years, Final Draft, website: http://www.aqmd.gov/aqmp/index.html , March 2000, accessed May 5, 2004.*

After quantifying historic and current air toxics level, the Air Toxics Plan projects future air toxics levels in the SCAB and the related cancer risk, taking into consideration existing federal, State and local programs that potentially affect future emissions, including implementation of the current AQMP for the SCAB, together with additional control strategies identified in the Air Toxics Plan. For purposes of the analysis, it was assumed that all additional control strategies would be implemented by 2010. The projected map of modeled estimated risk levels in 2010 after implementation of the additional control strategies identified in the Air Toxics Plan are shown in Figure IV.B-3. A comparison of Figure IV.B-2 with Figure IV.B-3 reveals that estimated risk levels are anticipated to decrease substantially, in particular along freeway corridors. By 2010, it is anticipated that the average basin-wide risk level will be reduced by 50 percent to 700 in a million, with a minimum risk of 120 in a million and a maximum risk of 2,800 in a million. It is anticipated in the Air Toxics Plan that the cancer risk in the vicinity of the segment of Interstate 210 adjacent to the project site will decrease from 600-800 in a million to 300-400 in a million.

A draft addendum to the Air Toxics Plan (the "ATP Addendum") was published by the SCAQMD in March 2004, which predicts even lower risks in 2010 than estimated in the original Air Toxics Plan.[3] *The primary reason for the downgraded risk is the accelerated reduction in risks from mobile sources, as shown on Figure IV.B-4. Therefore, based on the information contained in the ATP Addendum, the risk associated with on-road emissions along the segment of Interstate 210 adjacent to the project site should decrease to approximately one-quarter the risk measured in 1998 (150-200 in a million). However, notwithstanding that the ATP Addendum predicts lower cancer risks than the original Air Toxics Plan, this response conservatively relies on the more complete information contained in the original Air Toxics Plan. As a result, the predicted 2010 risks cited in this response are now understood to overestimate the predicted risks in that year.*

[3] *South Coast Air Quality Management District, Addendum to the Air Toxics Control Plan (March 2000), Draft. http://www.aqmd.gov/aqmp/index.html , March 2004, accessed May 5, 2004.*

Figure IV.B-2

1998 Model Estimated Risk for the Basin (all sources)

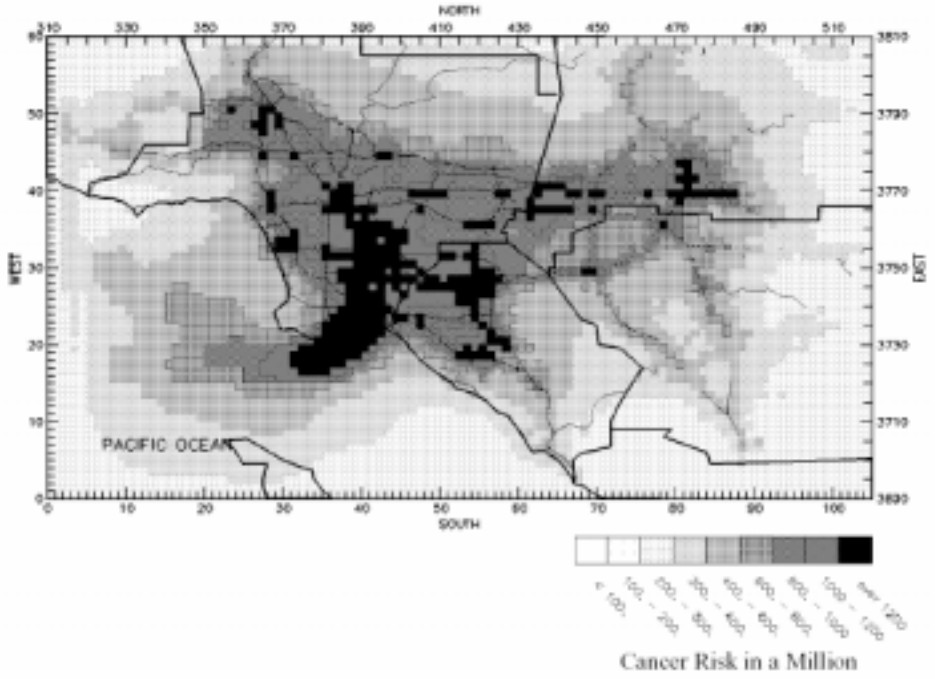


Figure IV.B-3

Model Estimated Risk in 2010 with Implementation of the Final Draft Air Toxics Control Plan (all sources)

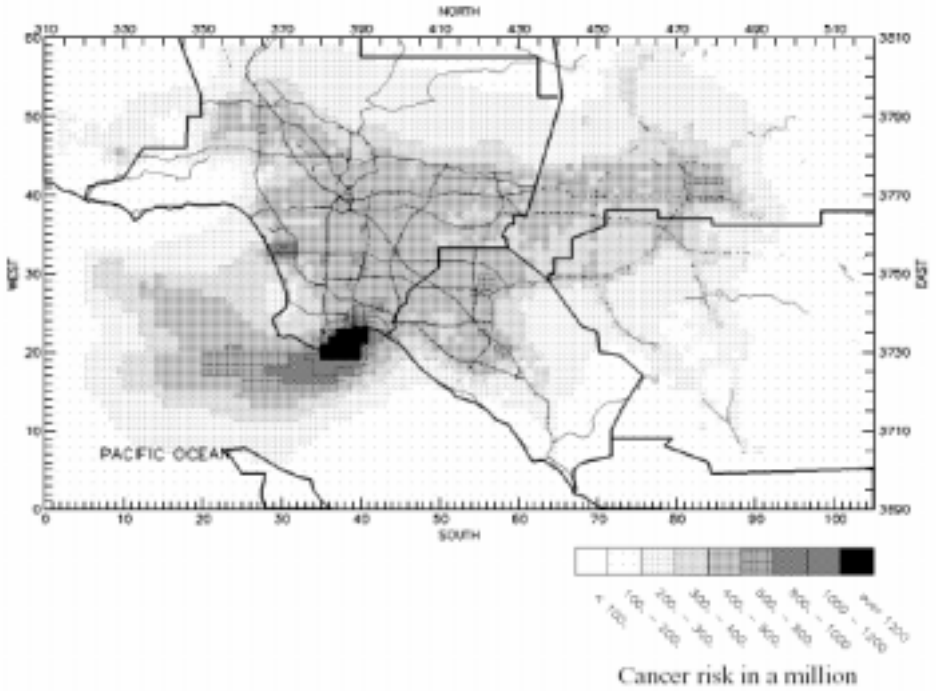
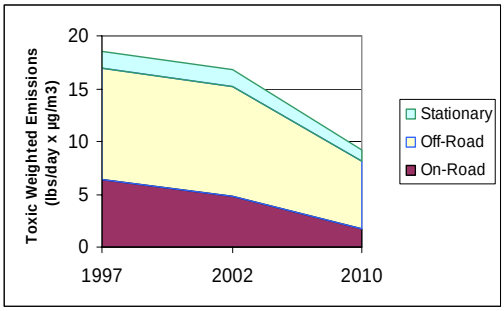


Figure IV.B-4

Projected Toxicity-Weighted Emission Reductions (1997-2010)



The Freeway Studies Do Not Demonstrate that Air Pollution From Interstate 210 Would Have a Significant Health Impact on Future Project Residents

There are two recent studies that describe measurements of various sizes of particulate matter at distances downwind from freeways. The two studies (collectively, the "Freeway Studies") were conducted in the SCAB and measured particles in very close proximity to Interstate 405[4] (the "405 Study") and Interstate 710[5] (the "710 Study"), respectively. Neither the 405 Study nor the 710 Study addressed whether, or the extent to which, exposure to higher concentrations of particles of any size range next to freeways would increase the risk of cancer or other adverse health effects. To the contrary, the stated purpose of those studies was to provide information on concentrations of particles of various size ranges in close proximity to freeways that could be used in epidemiologic studies to evaluate the health effects of those concentrations of particles.[6] In other words, there is no evidence in those studies that proximity to Los Angeles freeways results in significantly increased risk of contracting cancer or experiencing other adverse health effects not experienced by other residents in the SCAB.

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[4] *Zhu, Y, W.C.Hinds, S. Kim, S. Shen and C. Sioutas, Study of ultra.ne particles near a major highway with heavy-duty diesel traffic, Atmospheric Environment, 36: 4323–4335, 2002.*

[5] *Zhu, Y, W C. Hinds S. Kim and C. Sioutas, Concentration and Size Distribution of Ultrafine Particles Near a Major Highway, J. Air & Waste Manage. Assoc., 52:1032-1042, 2002.*

[6] *Ibid.*

A careful review of the 710 Study reflects that the measured particle concentrations in all size ranges were virtually indistinguishable from background 77 meters (m) from the edge of the freeway[7], and may have been indistinguishable from background as close as 17 m from the edge of the freeway. In the 405 Study, all particulate matter was nearly at background concentrations at 50 m - 85 m from the edge of the freeway, except for ultrafine particulate matter, which was nearly at background 135 m from the freeway.

As noted above and in the Freeway Studies, ultrafine particulates are associated with gasoline combustion, not diesel combustion. Gasoline particulate matter is not a TAC. Therefore, the discussion below focuses on potentially elevated levels of TAC particulates in proximity to Interstate 210.

As shown in Table IV.B-8 below, there would be 11 homes in the proposed Development Areas within 85 m from the edge of Interstate 210. The nearest home would be 28 m from the edge of the freeway. As discussed above, with the exception of the ultrafine particulates measured in the 405 Study, all measured particulates in the Freeway Studies are nearly at background concentrations somewhere between 17 m and 85 m from the edge of the freeways evaluated therein. Therefore, the worst-case scenario with respect to the proposed project is that 11 homes would be subject to elevated levels of TAC particulates. It should be noted that, if TAC particulates adjacent to Interstate 210 return to background concentrations at the lower end of the distance range in the Freeway Studies (i.e., 17 m to 50 m from the edge of the freeway), only one of the proposed homes would be subject to elevated levels of TAC particulates.

While the preceding analysis reflects a minimal risk of increased exposure to TAC particulates with respect to the proposed project, it significantly overstates the actual risk for at least two reasons. First, neither of the Freeway Studies reflects the existing or future condition with respect to the segment of Interstate 210 adjacent to the proposed Development Areas. Instead, they represent "worst-case" concentrations of particulates near freeways because the measurements in the Freeway Studies were taken directly downwind of the freeways under low wind speed conditions. Second, the freeways evaluated in the Freeway Studies have much higher traffic counts than does Interstate 210, the freeway near the proposed project. Each of these issues is discussed in detail below.

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[7] *The Freeway Studies report distances from the center of the freeway. As Interstate 710 is 26 m wide, and the measurement points cited are 30 m and 90 m from the center of the freeway, this translates to concentrations measured at 17 m and 77 m from the edge of the freeway.*

With respect to wind direction, both of the Freeway Studies measured concentrations of particles only when the wind was blowing directly from the freeway towards the monitors. This is not representative of conditions with respect to the segment of Interstate 210 adjacent to the proposed Development Areas. Winds near Interstate 210 do not blow from the freeway to the proposed project. Rather, the majority of winds near the proposed Development Areas blow along the freeway, rather than from the freeway to the proposed Development Areas. The three closest meteorological stations to the project site, which can be used to predict wind direction in the vicinity of the proposed Development Areas, are in Burbank, Whittier and Van Nuys. In order for a proposed Development Area to be downwind of the freeway, the wind would have to blow from either the northeast or the southwest. As shown on Figures IV.B-5 through IV.B-7, the wind measurements are strikingly consistent from the northeast and southwest. In all cases, a very small fraction (less than 5 percent) of all winds measured near the project site blow from these directions. Therefore, the proposed Development Areas are rarely downwind of Interstate 210. For that reason, TAC particulates should return to background concentrations much closer than 85 m from the edge of Interstate 210, which was the maximum distance for elevated levels of TAC particulates identified in the 405 Study.

Table IV.B-8
Proposed Homes Within 85 meters of Interstate 210

Development Area	Closest Lots To I-210	Approximate Horizontal Distance From Interstate 210	
		To Closest Wall Of Home (Feet)	To Closest Wall Of Home (Meters)
Development Area A (North of I-210)	1	182	56
	2	196	60
	3	199	61
	4	212	65
	5	215	66
	6	219	67
	7	245	75
Development Area B (South of I-210)	8	93	28
	9	194	59
	10	203	62
	11	251	77

Note: The distances shown are horizontal dimensions. The point-to-point distance with respect to a proposed home may be slightly greater depending on the difference in vertical elevation between Interstate 210 and that home.

With respect to traffic count, both Interstate 710 and Interstate 405 carry substantially more traffic than Interstate 210. Higher traffic levels result in greater emissions from the freeway. For example, the average traffic volume per hour for the segment examined in

the 405 Study was 13,900 vehicles, and was 12,180 vehicles for the segment examined in the 710 Study. In comparison, the average traffic volume per hour along the segment of Interstate 210 adjacent to the proposed project is 3,920 vehicles, a much lower traffic volume. Again, the Freeway Studies do not represent conditions at the project site. Rather, they represent "worst-case" conditions that would rarely, if ever, occur in proximity to the proposed Development Areas. In summary, the Freeway Studies represent conditions where winds flow from the freeway to the downwind locations. This rarely happens in the vicinity of the proposed Development Areas. The freeways analyzed in the Freeway Studies also have average traffic volumes per hour that are approximately 3.5 times (Interstate 405) and 3.1 times (Interstate 710) higher than Interstate 210 in the vicinity of the proposed Development Areas. As a result, the Freeway Studies reflect higher downwind concentrations than would result in the vicinity of the proposed Development Areas. Therefore, the Freeway Studies indicate that very few, and perhaps none, of the proposed homes in the Development Areas would be exposed to elevated levels of TAC particulates.

Figure IV.B-5

KBUR Burbank Airport: 2002 Wind Direction Histogram

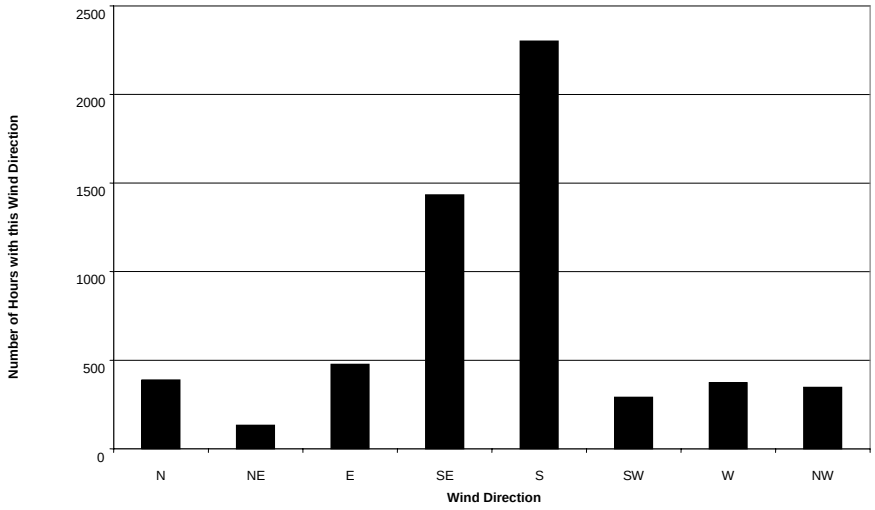


Figure IV.B-6

KWHP Whittier Airport: 2002 Wind Direction Histogram

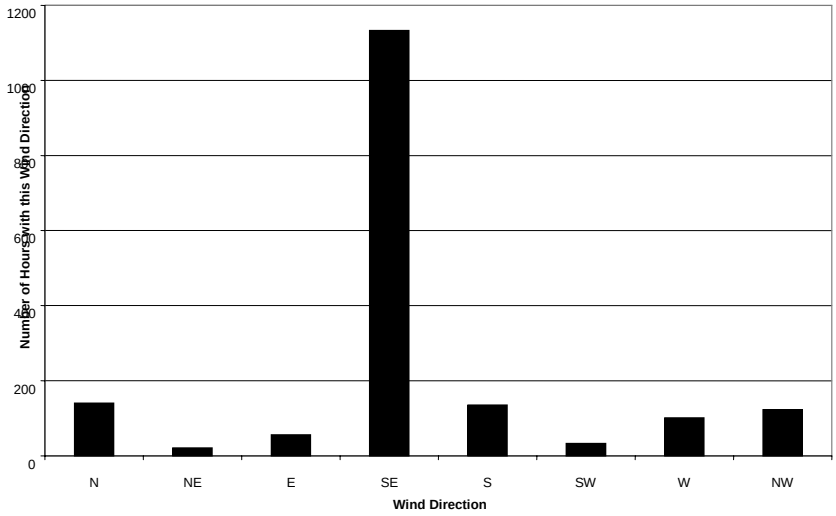
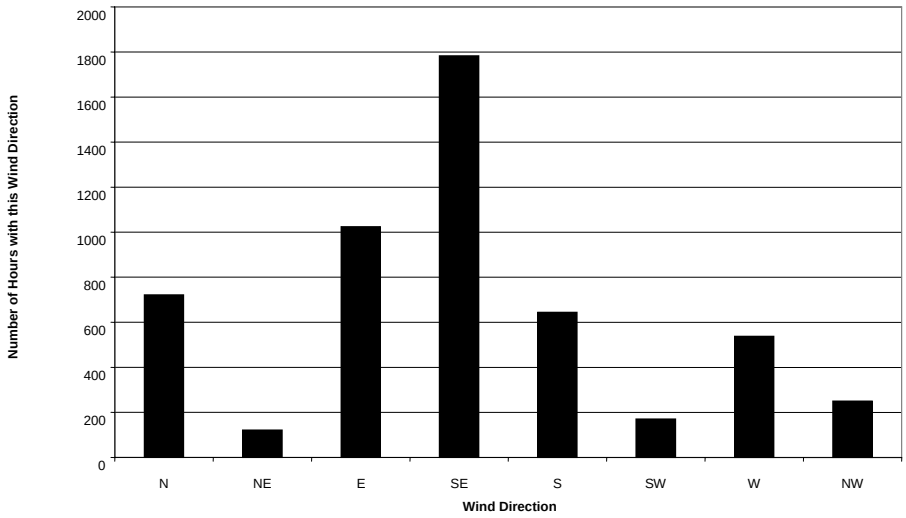


Figure IV.B-7

KVNY Van Nuys Airport: 2002 Wind Direction Histogram



Elevated Particulate Levels are Not Clearly Associated with Adverse Health Effects

Although many of the studies cite particulate matter as being the important factor associated with freeways or other high traffic areas, it is not a settled issue in the scientific community that elevated particulate matter causes adverse health effects. This is a subject of great debate and study. In particular, whether the observed weak statistical association between particulate matter and health effects identified in some studies represents biological causation is the subject of intense research and dispute in the scientific community.[8,9,10,11,12,13]

Future Project Residents Would Not be Exposed to a Substantially Increased Cancer Risk

As discussed above, there is insufficient scientific evidence to demonstrate that future project residents living in close proximity to Interstate 210 would face significant health risks associated with such proximity. However, notwithstanding this insufficient scientific evidence to demonstrate a causal link, in the interest of full disclosure, the potential increased risk is addressed below. While there is some public concern relating to potential non-cancer health risks, as discussed above, MATES-II and the Air Toxics Plan, as well as other studies and plans prepared by the SCAQMD and the CARB, focus primarily on cancer risk and how further improvements in air quality will

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[8] *Lipfert, F.W., Ahang, J., and Wyzga, R.E., Infant mortality and air pollution: A comprehensive analysis of U.S. data for 1990, J Air & Waste Manage Assoc 50:1350-1366, 2000.*

[9] *Lippman, M., Frampton M., Schwartz, J., et al., The U.S. Environmental Protection Agency particulate matter health effects research centers program: A midcourse report of status, progress, and plans, Environmental Health Perspectives 111(8), 1074-1092, 2003.*

[10] *Moolgavkar, S.H., Air pollution and hospital admissions for chronic obstructive pulmonary disease in three metropolitan areas in the United States, Inhal Toxicol 12(Suppl 4):75-90, 2000.*

[11] *Zanobetti, A., Schwartz, J., Samoli, E., Gryparis, A., Touloumi, G., Atkinson, R., Le Tertre, A., Bobros, J., Celko, M., Goren, A., Forsberg, B., Michelozzi, P., Rabczenko, D., Aranguez Ruiz, E.A., and Katsouyanni, K., The temporal pattern of mortality responses to air pollution: A multicity assessment of mortality displacement, Epidemiology, 13:87-93, 2002.*

[12] *Green, L.C., Crouch, E.A.C., Ames, M.R., and Lash, T.L., What's wrong with the National Ambient Air Quality Standard (NAAQS) for fine particulate matter (PM2.5)?, Regul Toxicol Pharmacol,35:327-337, 2002.*

[13] *Mage, D.T., A particle is not a particle is not a PARTICLE, J Exp Anal Environ Epidemiol 12:93-95, 2002.*

reduce that risk. Therefore, the balance of this discussion focuses principally on whether future project residents who would live in close proximity to Interstate 210 would face a significantly increased risk, and a significant overall risk, of contracting cancer, particularly because the relevant quantified data in the Air Toxics Plan and other SCAQMD and CARB documents generally relates to cancer risk.

The first significant impediment to carrying out a quantitative analysis is that SCAQMD has not developed a model for determining the cancer (or non-cancer) risks associated with TACs generated by a specified traffic volume on a particular freeway for use in evaluating the risks associated with development projects. As discussed above, there is no direct correlation between various particles and adverse health effects.

It is also quite difficult to determine the appropriate environmental baseline for analyzing the impact of TACs associated with Interstate 210 on future residents in the Development Areas. Pursuant to Section 15125(a) of the CEQA Guidelines, the normal environmental baseline for evaluating environmental impacts is based on the physical environmental conditions in the vicinity of the project site at the time the Notice of Preparation for the Draft EIR is published. Since Interstate 210 was part of the existing physical environment at the time the Notice of Preparation was published, impacts associated with Interstate 210 would normally not be discussed in an EIR. Section 15125(a) reflects that the purpose of CEQA analysis is to evaluate the impact of a project on the existing physical environment. In this case, however, the analysis, if required under CEQA, would evaluate the impact of the existing physical environment (i.e., Interstate 210) on the project. It is unclear whether this type of analysis is required under CEQA, and at least one court has held that it is not (see Baird v. County of Contra Costa, 32 Cal. App. 4th 1464, 1468 (1995), holding that "the purpose of CEQA is to protect the environment from proposed projects, not to protect proposed projects from the existing environment").

If it is assumed (but not conceded) that CEQA nonetheless requires analysis of the impact of Interstate 210 on future project residents, the environmental baseline must first be identified. Logically, the environmental baseline should be the current physical environment and conditions of the individuals who will eventually purchase and occupy the proposed homes. However, for obvious reasons, the identities of the future purchasers, and where they currently live, cannot be ascertained at present. Some future project residents may currently live in neighborhoods with substantially higher modeled estimated cancer risk with respect to TACs than La Tuna Canyon. Similarly, future project residents may currently live or work in proximity to facilities that generate higher concentrations of TACs at a given distance than Interstate 210. In some cases, the reverse will be true.

Therefore, reasonable assumptions must be made regarding the current environmental surroundings of those future project residents, based on existing data. It is likely that the great majority of future project residents currently reside somewhere in the SCAB, a 6,600-square-mile area that includes Orange County and the non-desert portions of Los Angeles, Riverside and San Bernardino Counties. Therefore, it is assumed in the analysis below that (1) all of the future project residents currently reside somewhere in the SCAB and (2) the average cumulative baseline cancer risk with respect to those future project residents will be 700 in a million at the time of project completion, which, as discussed above, is the anticipated average cancer risk for SCAB residents in 2010. It is recognized that a small portion of the future project residents may currently reside outside the SCAB, but it is impossible to predict whether the existing average cancer risk with respect to those future project residents is more or less than the average cancer risk in the SCAB. The use of these assumptions permit meaningful and good faith analysis of Interstate 210's impact on future residents.

The next issue is the identification of an appropriate threshold of significance in order to analyze the impact of Interstate 210 on the proposed project, based on the environmental baseline described above. This is another difficult task because neither the federal government, the State nor the City has established specific exposure criteria with respect to TACs associated with freeways or other high traffic areas. For example, the SCAQMD has adopted at least 10 rules to address air toxics emissions with respect to a variety of stationary sources.[14] *In August 2003, the SCAQMD provided interim technical guidance for estimating potential DPM associated with truck idling and movement at truck stops, warehouse/distribution centers or transit centers, ship hotelling at ports and train idling.*[15] *However, the SCAQMD has not established any threshold of significance with respect to TACs associated with high traffic areas or other mobile emission sources or promulgated any rules or regulations specifically relating to the potential impact of high traffic areas or other mobile emission sources on residential or commercial occupants.*

Appendix G to the CEQA Guidelines does not include any specific threshold of significance with respect to this issue. However, Appendix G includes the following general threshold addressing health effects under the subsection "Mandatory Findings

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[14] *South Coast Air Quality Management District, An Air Toxics Control Plan for the Next Ten Years, Final Draft, website: http://www.aqmd.gov/aqmp/index.html , March 2000, accessed May 5, 2004.*

[15] *South Coast Air Quality Management District, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, August 2003.*

of Significance", as follows: "Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?" For purposes of this analysis, that general threshold can be modified as follows:

- *A significant impact would occur if the project would expose individuals to TACs which would cause a substantially increased risk, and a substantial overall risk, of cancer or other adverse health effects on human beings, either directly or indirectly.*

As discussed above, in 2010, the year following the projected completion of the proposed project, the average cancer risk level in the Air Toxics Plan with respect to TACs will be no higher than 700 in a million, which is considered the cumulative environmental baseline for analyzing the impact of TACs associated with Interstate 210 on future project residents. This modeled estimated risk incorporates TACs (including DPM) related to motor vehicle emissions and, for that reason, some of the highest model estimated risk levels occur along freeway corridors.

In contrast, the Air Toxics Plan projects that the modeled estimated risk along the segment of the Interest 210 corridor adjacent to the project site will be no higher than 300-400 in a million in 2010. Therefore, it is anticipated that the cancer risk associated with TACs along the Interstate 210 corridor in 2010 (300-400 in a million) will be approximately 50 percent of the baseline cancer risk in the SCAB in 2010. Presumably, the modeled estimated risk levels are significantly lower along the Interstate 210 corridor because there is substantially less daily traffic on that freeway in comparison to more heavily-trafficked freeways in the SCAB, such as Interstates 405, 710 and 5. Based on this comparison, it can be expected that, on average, future project residents would experience a substantial reduction in the cancer risk associated with TACs in comparison with exposure levels at their current homes. As a result, future project residents would not be exposed to a substantially increased cancer risk and no significant impact would occur.

Furthermore, the Air Toxics Plan vastly overstates the actual cancer risk that would result from residing in a particular location. The model used to assess the risk assumed continuous exposure for 70 years. Obviously, the actual risk to future project residents as a result of living at a particular location will be much lower than 300-400 in a million in 2010 because (1) the average period of homeownership by future project residents will only be approximately nine years[16], (2) future project residents will spend

[16] *USEPA, Exposure Factors Handbook, Volume III - Activity Factors. EPA/600/P-95/002Fc, August 1997.*

significant portions of most days away from their homes at work, in school and for many other reasons and (3) when future projects residents are at home, they will spend a substantial portion of their time indoors, rather than outdoors, which reduces exposure to particulate matter over that in ambient air.

Therefore, there are no significant air quality impacts associated with developing proposed homes in proximity to Interstate 210 and no project-specific mitigation measures are required. However, in the interest of full disclosure with respect to potential health risks associated with proximity to freeways, Mitigation Measure B-9 is recommended.

This addition is also stated in Response 149-46.

Page IV.B-18

The following mitigation measures have been added:

B-6 *Apply appropriate NO_x control technologies, such as use of lean-NO_x catalyst or diesel oxidation catalyst, to the extent feasible.*

B-7 *Blasting and crushing equipment shall be equipped with water spray devices in order to maintain soil moisture and prevent fugitive dust emissions.*

B-8 *Cease grading during periods when the SCAQMD calls a Stage 1 episode in SRA 8.*

B-9 *For all homes in the Development Areas located within 300 feet from the edge of Interstate 210, the project developer shall provide an information and disclosure statement to each prospective buyer and include such statement as part of the final sales literature, which statement shall include the following:*

- *The fact that the proposed home is located within 300 feet from the edge of Interstate 210.*
- *A statement that this subject has been addressed in the Final EIR for the project and that the Final EIR is on file with the City of Los Angeles, Department of City Planning.*
- *A statement that additional information regarding the potential health effects from proximity to freeways and other high traffic areas may be obtained from the SCAQMD and the Office of Environmental Health Hazard Assessment at the California Environmental Protection Agency.*

This addition is also stated in Responses 24-4, 121-11, 149-42 and 149-46 in this Final EIR.

Page IV.B-19

The paragraph under "Construction Emission after Mitigation" has been revised to read:

> *As shown in Tables IV.B-9 and IV.B-10, the recommended control measures would substantially reduce PM_{10} emissions. The implementation of recommended Mitigation Measure B-6 would reduce NOx emissions from 10 to 25 percent. The specific reduction in NOx emissions is dependent on the quantity and types of appropriate NOx emission controls implemented with respect to the construction equipment. However, emissions of NOx and PM_{10} would remain significant after mitigation.*

Page IV.B-20

Table IV.B-8 has been revised to read:

Table IV.B-9
Maximum Daily Construction Emissions after Mitigation
(pounds per day)

Source Category	Pollutant				
	Carbon Monoxide (CO)	**Volatile Organic Compounds (VOC)**	**Oxides of Nitrogen (NOx)**	**Oxides of Sulfur (SOx)**	**Particulate Matter (PM_{10})**
Total Daily Emissions Before Mitigation	200	54	504	47	2,378
Earthmoving/Grading (Fugitive Dust) (60% reduction)	--	--	--	--	1,156
Dirt Moving (60% reduction)	--	--	--	--	248
MAXIMUM DAILY CONSTRUCTION EMISSIONS	200	34	454[a]	47	974
SCAQMD Significance Thresholds for Construction	550	75	100	150	150
Significant?	***NO***	***NO***	***YES***	***NO***	***YES***

[a] *The implementation of recommended Mitigation Measure B-6 would reduce NOx emissions from 10 to 25 percent, depending on the quantity and types of appropriate NOx emission controls implemented with respect to the construction equipment. Given that the precise quantity and types of NOx emission controls have not been determined yet, this table conservatively assumes a 10 percent reduction in NOx emissions.*

This revision is based on the discussion in Response 24-4 in this Final EIR.

Page IV.B-20

Table IV.B-9 has been revised to read:

Table IV.B-10
Peak Quarter Construction Emissions after Mitigation
(tons per quarter)

Source Category	Pollutant				
	Carbon Monoxide (CO)	**Volatile Organic Compounds (VOC)**	**Oxides of Nitrogen (NOx)**	**Oxides of Sulfur (SOx)**	**Particulate Matter (PM_{10})**
Total Peak Quarter Emissions Before Mitigation	7.22	2.07	19.54	1.86	92.71
Earthmoving/Grading (Fugitive Dust) (60% reduction)	--	--	--	--	45.10
Dirt Moving (60% reduction)	--	--	--	--	9.68
PEAK QUARTER EMISSIONS AFTER MITIGATION	7.22	2.07	17.59 [a]	1.86	37.93
SCAQMD Significance Thresholds for Construction	24.75	2.5	2.5	6.75	6.75
Significant?	***NO***	***NO***	***YES***	***NO***	***YES***

[a] *The implementation of recommended Mitigation Measure B-6 would reduce NOx emissions from 10 to 25 percent, depending on the quantity and types of appropriate NOx emission controls implemented with respect to the construction equipment. Given that the precise quantity and types of NOx emission controls have not been determined yet, this table conservatively assumes a 10 percent reduction in NOx emissions.*

This revision is based on the discussion in Response 24-4 in this Final EIR.

IV.C Hydrology and Water Quality

Page IV.C-17

Mitigation Measures C-11 and C-12 have been revised to read:

C-11 *The project shall adhere to applicable provisions of the LAMC, Flood Hazard Management Specific Plan (if applicable) and the recommendations of the City Engineer/Department of Building and Safety.*

C-12 *The project developer and/or homeowners' association(s) shall work with the City to make residents aware of used motor oil recycling facilities and household hazardous waste drop-off centers in the area. Availability of centers can reduce the amount of toxic contaminants found in urban runoff.*

Page IV.C-17

Mitigation Measure C-14 has been revised to read:

> ***C-14*** *Reducing pesticide and fertilizer use at the source can remove these pollutants from urban runoff. The project developer and/or homeowners' association(s) shall adopt Integrated Pest Management (IPM) programs for use on their own public grounds in addition to promoting their use to project residents.*

IV.D Biological Resources

Flora and Fauna

Page IV.D-1

Footnote 1 has been revised to read:

> *One of the alternatives to the proposed project consists of alternative roadway access across the Duke Property to Development Area A (the "Duke Access Alternative"), which is one of the reasons the Duke Property was included in the biological survey efforts.*

Page IV.D-2

Footnote 8 has been revised to read: "CNPS, Inventory of Rare and Endangered Plants of California (sixth edition), Rare Plant Advisory Committee, David Tibor, Convening Editor, California Native Plant Society. 2001, x + 388pp." This revision is also stated in Response 102-1 in this Final EIR.

Page IV.D-4

Footnote 22 has been revised to read:

> *CNPS Botanical Survey Guidelines, In: CNPS, Inventory of Rare and Endangered Plants of California (sixth edition), Rare Plant Advisory Committee, David Tibor, Convening Editor, California Native Plant Society, 2001, x + 388pp.*

This revision is also stated in Response 102-2 in this Final EIR.

Page IV.D-15

The reference to the Northern Red Diamond Rattlesnake in Table IV.D-4 has been eliminated in the Final EIR. In addition, "Logger-Head Shrike" in Table IV.D-4 has been revised to read:

Lanius ludovicianus	Loggerhead Shrike	Federal: SPOC State: SPOC

These revisions are also stated in Responses 9-1 and 9-3 in this Final EIR.

Page IV.D-16

The common names of *Phrynosama coronatum blainvillei* and *Rana aurora draytoni* in Table IV.D-4 have been revised to read:

Phrynosama coronatum blainvillei	San Diego Coast Horned Lizard	Federal: none State: SPOC
Rana aurora draytoni	California Red-Legged Frog	Federal: Threatened State: SPOC

Page IV.D-18

The first sentence under "Sensitive Reptile Surveys" has been revised to add Footnote 35a to read:

> *Surveys for the San Diego horned lizard (Phrynosoma coronatum blainvillei), and orange-throated whiptail (Cnemidophorus hyperythrus)[35a], were conducted during the spring and summer of 2002.*
>
> *[35a] It has been determined through subsequent research that the project site is out of the historic range of the orange-throated whiptail.*

This addition is also reflected in Response 9-1 in this Final EIR.

Page IV.D-24

"*Eriogonum californicum*" in the last sentence of the second complete paragraph has been revised to read: "*Eriogonum fasciculatum*". This revision is also stated in Response 9-7 in this Final EIR.

Page IV.D-26

The second sentence of the second paragraph has been revised to read:

> *Migratory species that utilize scrub habitats for wintering, breeding season, or during periods of migration include the white-crowned sparrow (Zonotrichia leucophrys), song sparrow (Melospiza melodia), Costa's hummingbird (Calypte costae), orange-crowned warbler (Vermivora celata), black-throated gray warbler (Dendroica nigrescens),*

> *Allen's hummingbird (Selasphorus sasin), black-chinned hummingbird (Archilochus alexandri), fox sparrow (Passerella iliaca), ash-throated flycatcher (Myiarchus cinerascens), and golden-crowned sparrow (Zonotrichia atricapilla).*

This revision is also stated in Response 9-9 in this Final EIR.

Page IV.D-26

The second and third sentences of the third paragraph have been revised to read:

> *Resident species noted in the Study Area include the northern flicker, black phoebe, Anna's hummingbird, western scrub-jay, mourning dove, bushtit, acorn woodpecker (Melanerpes formicivorus), barn owl (Tyto alba), great horned owl (Bubo virginianus), oak titmouse* (*Baeolophus inornatus*)*, house wren (Troglodytes aedon), Hutton's vireo (Vireo huttoni), lesser goldfinch (Carduelis psaltria), American crow (Corvus brachyrhynchos), and common raven (Corvus corax). Migratory species identified from woodland communities include the black-chinned hummingbird, Costa's hummingbird, song sparrow, ash-throated flycatcher, western bluebird (Sialia mexicana), American robin (Turdus migratorius), yellow-rumped warbler (Dendroica coronata), western tanager (Piranga ludiviciana), white-crowned sparrow, Bullock's oriole (Icterus galbula), and purple finch (Carpodacus purpureus).*

This revision is also stated in Responses 9-9, 9-10 and 9-11 in this Final EIR.

Page IV.D-27

The last sentence of the second complete paragraph has been revised to read: "Mule deer occur on portions of the project site to the north and south of Interstate 210 in low numbers, although no evidence of mule deer sign was observed within the proposed Development Areas during the wildlife movement studies and biological surveys." This revision is also stated in Response 166-10 in this Final EIR.

Page IV.D-27

The first sentence of the fourth complete paragraph has been revised to read: "The woodland communities present in the Study Area, including southern coast live oak woodland, provide habitat for numerous mammal species." This revision is also stated in Response 182-5 in this Final EIR.

Page IV.D-36

The second sentence under the heading "San Gabriel Mountains Dudleya (*Dudleya densiflora*)" has been revised to read: "This species is endemic to rocky cliffs in canyons along the south face of the San

Gabriel Mountains at 1,000 to 1,700 feet." This revision is also stated in Response 9-12 in this Final EIR.

Page IV.D-44

The second complete sentence of the first partial paragraph as been revised to read: "Ashy rufous-crowned sparrows were identified north and south of Interstate 210 with a total of four sightings." This revision is also stated in Response 9-15 in this Final EIR.

Page IV.D-46

The last sentence under the heading "Orange-Throated Whiptail (*Cnemidophorus hyperythrus*)" has been revised to read: "This species was not detected in the Study Area because the project site is out of the historic range of this species." This revision is also addressed in Response 9-1 in this Final EIR.

Page IV.D-47

The first sentence under the heading "Mountain Yellow-Legged Frog (*Rana muscosa*)" has been revised to read: "The mountain yellow-legged frog is listed by the USFWS as endangered and is a CDFG Species of Special Concern." This revision is also stated in Response 9-14 in this Final EIR.

Page IV.D-60

The entire paragraph under the heading "Orange-Throated Whiptail (*Cnemidophorus hyperythrus*)" has been revised to read: "The orange-throated whiptail was not detected during focused surveys because the project site is out of the historic range of this species." This revision is also addressed in Response 9-1 in this Final EIR.

Page IV.D-61

The subheading "Loss of wildlife habitat (cover, foraging, breeding sites) from opening up of vegetated areas to equestrian or other use" has been revised to read: "Loss of wildlife habitat (cover, foraging, breeding sites) from opening up of vegetated areas to recreational use."

Page IV.D-61

The first paragraph under the heading "Loss of wildlife habitat (cover, foraging, breeding sites) from opening up of vegetated areas to recreational use" has been deleted.

Page IV.D-64

The last sentence of Mitigation Measure D.1-2 has been deleted and the following mitigation measure has been added:

> ***D.1-3*** *The mitigation and monitoring plan with respect to Mitigation Measures D.1-1 and D.1-2, above shall be subject to the approval of the Army Corps, CDFG and the Regional Water Quality Control Board.*

This addition is also stated in Response 20-3 in this Final EIR.

Page IV.D-64

Due to the addition of Mitigation Measure D.1-3 above, the remaining mitigation measures in Section IV.D.1 (Flora & Fauna) have been renumbered to read:

> ***D.1-4*** *The project developer shall provide 2.8 acres of native riparian plantings within the proposed onsite detention basins and water quality basins and other appropriate areas.*
>
> ***D.1-5*** *The project developer shall revegetate 1.21 acres of southern mixed riparian forest and 0.15 acre of southern coast live oak riparian forest.*
>
> ***D.1-6*** *If construction occurs during the nesting season for migratory birds (March 15-August 15), then prior to construction activities, the project developer shall have a qualified biologist survey the project site for the presence of any occupied raptor nests. If such a nest is found, it shall be protected until nesting activity has ended to ensure compliance with Section 3503.5 of the California Fish and Game Code.*

Page IV.D-64

Mitigation Measure D.1-6 has been renumbered as Mitigation Measure D.1-7 and the first paragraph has been revised to read:

> ***D.1-7*** *If grading or clearing of vegetation is scheduled to take place during the nesting season for migratory or resident birds (March 15-August 15), a qualified biologist will survey the areas to be graded no more than three days prior to the start of work. If active nests of migratory or resident birds are located, measures to ensure protection of the nesting migratory or resident bird will be determined by the monitoring biologist and will depend on factors such as the*

bird species and the construction schedule. These measures may include, but are not limited to:

This revision is also stated in Response 11-10 in this Final EIR.

Page IV.D-65

The following mitigation measures have been added:

D.1-8 *All prospective homebuyers will be advised of the implications of living adjacent to natural open space areas. The educational materials will be written to foster an appreciation of native ecosystems, and will identify appropriate measures that homeowners should take to minimize conflicts between wildlife, domestic animals, and humans, including:*

(1) Responsibilities and benefits associated with living near a wildland area (e.g., residents will be required to avoid planting invasive plant species, and will receive benefits related to maintaining the natural beauty of nearby open space areas).

(2) Warnings of dangers and nuisances posed by wildlife that may forage at the development edge (e.g., dangers that mountain lions pose to humans and potential loss of pets to naturally occurring predators).

D.1-9 *The homeowners' association(s) shall monitor the landscaped areas over a five-year period following the completion of landscaping in a Development Area and remove, as necessary, unwanted non-native invasive species that become established, ensuring that, over time, native habitats are established.*

D.1-10 *In order to minimize the movement of displaced animals into residential areas during clearing and grubbing of areas to be graded, such clearing and grubbing activities will start at the existing urban edge and move toward open space.*

These additions are also stated in Responses 63-6, 97-5 and 166-5 in this Final EIR.

Native Trees

Pages IV.D-70 through IV.D-82

Figures IV.D-6 through IV.D-18 have been revised to reflect the additional trees that were identified subsequent to the completion of the original tree report. In addition, a new Figure IV.D-12a has been added. This revision is also stated in Response 149-105 in this Final EIR.

Page IV.D-87

The third sentence of the first paragraph has been revised to read: "No other trees of the *Quercus* genus subject to Section 46.00 et seq. of the LAMC or Section 8B of the Specific Plan were identified in the Study Area."

Page IV.D-90

The first sentence of the first paragraph under "Summary of Tree Inventory Data" has been revised to read: "Table IV.D-10 provides a summary of the 486 trees (comprised of 425 coast live oaks and 61 western sycamores) subject to Section 46.00 et seq. of the LAMC or Section 8B of the Specific Plan."

Page IV.D-113

The first sentence of the second paragraph under "Coast Live Oaks" has been revised to read: "The impact of the proposed project on native trees would not conflict with the City's oak tree regulations set forth in Sections 46.00 et seq. of the LAMC and Section 8B of the Specific Plan."

Page IV.D-116

The first sentence in the last paragraph has been revised to read: "The 21 trees (tree numbers 236, 238-242, 385, 403-410, 415-418, 423 and 424 in Table IV.D-10) located beneath the footprint of the two proposed bridge crossings of La Tuna Canyon have each been categorized as impacted." This revision is also stated in Response 96-11 in this Final EIR.

Figure IV.D-6 Tree Inventory

Figure IV.D-7 N1 Tree Detail

Figure IV.D-8 N2 Tree Detail

Figure IV.D-9 N3 Tree Detail

Figure IV.D-10 N4 Tree Detail

Figure IV.D-11 N5 Tree Detail

Figure IV.D-12 N6 Tree Detail

Figure IV.D-12a (new) N7 Tree Detail

Figure IV.D-13 S1 Tree Detail

Figure IV.D-14 S2 Tree Detail

Figure IV.D-15 S3 Tree Detail

Figure IV.D-16 S4 Tree Detail

Figure IV.D-17 S5 Tree Detail

Figure IV.D-18 S6 Tree Detail

Page IV.D-119

Mitigation Measure D.2-6 has been revised to read:

D.2-6 *The project developer shall implement the final tree planting program for the project, which shall be based on the conceptual tree planting program summarized in Table IV.D-16 in the Draft EIR and the Addendum to the Tree Inventory and Impact Analysis included in Appendix E to the Final EIR, as modified to conform to the specifications for the Development Areas in the approved vesting tentative tract map. The final tree planting program shall be approved by an independent certified arborist and shall include species, sizes, quantities, planting locations and planting specifications, as well as criteria for success and guidelines for monitoring and tree assessments. The plantings would occur within entry points, common areas, road right-of-ways, perimeters of detention basins, common slopes, flood control facilities, fuel modification slopes and private residential lots. Consistent with the conceptual tree planning program, the final tree planning program shall include (1) with respect to all replacement plantings, a minimum replacement ratio of 7.6:1 for impacted coast live oaks and 6.7:1 for impacted western sycamores, (2) with respect to 15-gallon and larger replacement stock, a minimum replacement ratio of 4.6:1 for impacted coast live oaks and 4.1:1 for impacted western sycamores, and (3) a 10-percent planting overage to allow for potential losses of replacement trees.*

This revision is also stated in Response 20-5 and is addressed in Response 97-2 in this Final EIR.

Page IV.D-120

Mitigation Measure D.2-7 has been revised to read:

D.2-7 *All tree plantings shall be subject to a five-year monitoring effort by an independent certified arborist. This monitoring effort shall consider growth, health, and condition of subject trees in order to evaluate the project's success. This monitoring effort might result in recommendation of remedial actions should any of the tree plantings exhibit poor or declining health. These actions may include more frequent monitoring, installation of protective devices, pruning for larger specimens, integrated pest management (IPM) for pest or disease infestation and other professionally accepted methods to improve the health and vigor of a tree. Fencing and other protective measures could be required for trees less than four (4) feet tall (including acorn plantings) planted in areas where soil compaction, foot traffic, and equine or other recreational uses may occur. These measures shall remain in place until the trees are large*

> *enough to be self-protecting. Any coast live oak that fails during the monitoring period shall be replaced with a tree of the same species and equivalent trunk diameter.*

This revision is also stated in Response 20-1 in this Final EIR.

Wildlife Movement

Page IV.D-130

Track Station No. 21 has been added to Figure IV.D-21. This addition is also stated in Response 149-130 in this Final EIR.

Page IV.D-136

The first complete sentence of the partial paragraph has been revised to read:

> *To more accurately document the usage of potential access points to the project site, biologists installed 21 track stations in areas both on the project site and off the project site that exhibited potential as wildlife movement paths between offsite areas and the project site (the track stations are summarized on Table IV.D-18 and their locations are depicted on Figure IV.D-21).*

Page IV.D-137

Table IV.D-17 has been renumbered as Table IV.D-18.

Page IV.D-161

The last sentence of the first partial paragraph has been deleted.

Page IV.D-161

Mitigation Measures D.3-2, D.3-3 and D.3-4 have been deleted. Therefore, Mitigation Measure D.3-5 has been renumbered as Mitigation Measure D.3-2. This revision is also reflected in Topical Response 11 in this Final EIR.

Page IV.D-161

Mitigation Measure D.3-1 (renumbered as D.3-5, see above correction) has been revised to read:

> ***D.3-2*** *The project homeowners' association(s) shall maintain openings in walls at key locations within the Development Areas to enhance local movement paths.*

Figure IV.D-21 Wildlife Movement

IV.E Noise

Page IV.E-2

The first sentence of the first paragraph has been revised to read:

> *On Thursday, September 12, 2002 and Friday, September 13, 2002, between the hours of 1:00 pm and 2:30 pm, short-term (15-minute) ambient noise measurements were conducted at five selected locations along the borders of the project site (Locations A, B, C, D and E, as shown in Figure IV.E-1).*

This revision is also stated in Response 149-156 in this Final EIR.

Page IV.E-2

The first sentence of the second paragraph has been revised to read: "In addition, long-term measurements (minimum of 24 hours) were recorded from Friday, September 13, 2002 through Tuesday, September 17, 2002, at one offsite location representing existing Residential Area 3 (Location E) and one onsite location near Interstate 210 (Location F)." This revision is also stated in Response 149-156 in this Final EIR.

Page IV.E-19

The last sentence of the first paragraph under "Traffic Noise at Areas Intersected by Offsite Roads" has been revised to read: "This traffic volume data at nearby offsite roads was provided by Linscott Law & Greenspan and is included in Appendix H." This revision is also stated in Response 149-151 in this Final EIR.

Page IV.E-27

Mitigation Measure E-2 has been revised to read:

> ***E-2*** *In accordance with Section 41.40(c) of the LAMC, construction activities, including job-site deliveries, shall not be conducted within 500 feet of any existing residential buildings before 8:00 a.m. or after 6:00 p.m. on Saturday or any national holiday or at any time on Sunday.*

Page IV.E-28

Mitigation Measures E-11 and E-12 have been revised to read:

> ***E-11*** *The project developer shall appoint a construction coordinator to interface with the general contractor, neighboring communities, local neighborhood councils*

and local equestrian organizations. The construction coordinator shall be accessible to resolve problems related to the effects of project construction on the surrounding community, to the extent feasible. The construction coordinator shall also provide information to the surrounding community regarding scheduling of specific construction activities (e.g., grading and blasting) and construction phasing.

E-12 *In order to meet the Caltrans standard regarding freeway noise, one of the following two options shall be implemented:*

- *Sound walls shall be constructed at the locations and heights shown in Figure IV.E-2, as revised in Figure 3-S in Appendix F to the Final EIR.*
- *The elevations or locations of the homes shall be altered and/or intervening berms or landform features shall be integrated into the project design.*

This revision is also stated in Responses 106-1 and 115-4 in this Final EIR.

Page IV.E-29

Mitigation Measure E-13 has been deleted. Therefore, Mitigation Measure E-14 has been renumbered as Mitigation Measure E-13. This revision is also reflected in Response 115-4 in this Final EIR.

Page IV.E-30

The following text has been added after the "Cumulative Impacts" subsection and before the "Level of Significance" subsection:

SUPPLEMENTAL NOISE ANALYSIS

Subsequent to the release of the Draft EIR for public review, the site plan was modified to change the elevations and/or location of three homes in proposed Development Area B (i.e., receptors R10 through R12), as recommended in Mitigation Measures E-12 and E-13 in the Draft EIR, and the project noise consultant conducted a supplemental noise analysis to examine these changes. With the redesign of the three proposed homes in Development Area B (receptors R10 through R12), the sound walls described in the Draft EIR have been modified to reduce their associated impacts, as follows (see Figure 3-S in Appendix F to the Final EIR): (1) sound wall B7, as presented in Figure IV.E-2, would be eliminated; (2) sound wall B10 would be replaced by sound wall B9, and would retain its same length and height; (3) sound wall B9 would be replaced by sound wall B8. The new sound wall B8, as compared to the original sound wall B9, would be reduced in length from 550 feet to 500 feet, and would be reduced in height from 16 to

14 feet. A new B7 sound wall (150 feet in length and 6 feet in height) would be created perpendicular to the former B7 sound wall alignment. With these modifications, the total length of the sound walls would be reduced from 1,300 feet to 900 feet, and the heights would be reduced from 8-16 feet to 6-14 feet. The supplemental noise analysis concluded that, by changing the locations and elevations of the three proposed homes and by modifying the locations of the proposed sound walls, freeway noise impacts on those three proposed homes would be reduced to less-than-significant levels.

This revision is also reflected in Response 115-4 in this Final EIR.

IV.F Artificial Light and Glare

Page IV.F-1

The first sentence of the first paragraph has been revised to read:

A Lighting Analysis for the proposed project was prepared by Patrick B. Quigley & Associates in June 2003 to analyze potential artificial light and glare impacts associated with the proposed project.

Page IV.F-2

Footnote No. 3 has been revised to read:

The project site is also visible from some local trails in the Verdugo Mountains. In particular, portions of the project site are visible from portions of Hostetter Mountainway and Verdugo Crestline Drive, which are sometimes used at night for hiking and mountain biking.

This revision is also stated in Response 42-3 in this Final EIR.

Page IV.F-2

The first complete sentence of the first partial paragraph has been revised to read: "The percentage of dark nights in the vicinity of the project site is low due to the ever-present light pollution and haze in the Los Angeles area." This revision is also stated in Response 94-15 in this Final EIR.

Page IV.F-10

The caption under Photo 5 in Figure IV.F-4 has been revised to read: "Typical southwesterly view from Reverie Road toward Interstate 210." This revision is also stated in Response 121-25 in this Final EIR.

Figure IV.F-4: Photographs 5 and 6

Page IV.F-23

Mitigation Measures F-1 and F-2 have been revised to read:

> ***F-1*** *The CC&Rs for the proposed project shall prohibit the use of all exterior uplighting fixtures for building facades and trees, establish design limits on the amount of landscape lighting per foot, permit only downlighting for all exterior-building mounted fixtures, and prohibit "glowing" fixtures that would be visible from existing communities or public roads.*
>
> ***F-2*** *The CC&Rs shall specify that night lighting on private property located on any lot located within 100 feet from the edge of Interstate 210 shall be permitted, provided it is low-height, low illumination safety lighting that is shielded and directed onto the property.*

IV.G Land Use

Page IV.G-6

The first subheading and the subsequent first and second sentences of the first paragraph have been revised to read:

> ***San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan***
>
> *The project site is also located within the area covered by the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan (the "Specific Plan"). On December 19, 2003, the Los Angeles City Council adopted the Specific Plan.*

Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Page IV.G-6

The last sentence of the second paragraph and the first sentence of the third paragraph under the heading "San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan" have been revised to read:

> *Six Scenic Highways are addressed in the Specific Plan, including two that are, in part, adjacent to the project site: Interstate 210 (Osborne Street to the City limits) and La Tuna Canyon Road (Sunland Boulevard and the City limits), as shown in Figure IV.G-2.*

> *The Specific Plan is intended to preserve, protect, and enhance the unique natural and cultural resources in the plan area*.

Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Page IV.G-6

The first paragraph under the heading "Prominent Ridgelines" has been revised to read:

> *Section 6 of the Specific Plan establishes measures to protect designated prominent ridgelines from grading and/or development. As shown on Figure IV.G-3 (Prominent Ridgelines), the project site contains and is adjacent to several designated "Prominent Ridgelines" in the Specific Plan. The ridgelines that were selected as Prominent Ridgelines have significant aesthetic quality as scenic resources, define a region or are unique and visually prominent. According to the Specific Plan, the area located within 60 vertical feet from any point along the long axis of the crest of a Prominent Ridgeline and designated as such on Map No. 2 in the Specific Plan is considered to be a "Prominent Ridgeline Protection Area". The Specific Plan provides that, with certain exceptions, no new buildings, structures or additions to existing structures are permitted within any Prominent Ridgeline Protection Area. In addition, no structure can be constructed so that the highest point of the roof, structure or parapet wall is less than 25 vertical feet from the designated Prominent Ridgeline directly above the highest point of the structure*.

Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Page IV.G-9

The first sentence of the first paragraph has been revised to read: "As shown on Map No. 2 in the Specific Plan, there are two Prominent Ridgelines designated on the project site." Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Page IV.G-9

The first sentence of the paragraph under the heading "Biological Resource Protection" has been revised to read:

> *Section 8 of the Specific Plan establishes measures to protect the unique native plant communities of the area by establishing regulations to prohibit the use of invasive plant species, and to further protect oak trees*.

Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Page IV.G-9

The two paragraphs under the heading "Scenic Highway Corridors Viewshed Protection" have been revised to read:

> *Pursuant to the Specific Plan, a Scenic Highway Corridor consists of all sites (located in whole or in part) within 500 feet from the centerline of any Scenic Highway. The Specific Plan defines a "site" as any lot or parcel of land, or contiguous combination thereof, under the same ownership located in whole or in part within the Specific Plan area. Section 9 of the Specific Plan includes certain restrictions on development within or near Scenic Highway Corridors*.
>
> *The Specific Plan also designates two potential Vista Points. As shown on Map No. 4 in the Specific Plan, one of those two potential Vista Points is located along La Tuna Canyon Road near Development Area B. According to the Specific Plan, a Vista Point is a publicly-owned area which has exceptional hillside area views and is set aside for public use*.

Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Page IV.G-9

The first sentence of the first paragraph and the entire second paragraph under the heading "Equinekeeping District Standards, Equestrian Trails, and Domestic Livestock" have been revised to read:

> *Section 7 of the Specific Plan provides measures to preserve the historic equestrian and domestic livestock nature of the area, including minimum standards for new subdivisions located within existing and future "K" Equinekeeping Districts within the Specific Plan area*.

> *In addition, and as shown on Map No. 4 in the Specific Plan, the western portion of the project site contains a non-public equestrian trail. The location of that non-public equestrian trail is shown on Figure IV.G-5 (Non-Public Equestrian Trail System). The location of that non-public equestrian trail is shown on Figure IV.G-5 (Non-Public Equestrian Trail System. A non-public equestrian trail is one that has been used informally for equestrian purposes over some period of time, but which requires a dedication of a public easement and improvement to allow permanent community access.*

Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Page IV.G-10

Table IV.G-2 has been revised to read:

Table IV.G-2
Existing Zoning Designations
Canyon Hills Project

Zoning Designation	Acres
A1-1 Agricultural	860
A1-1-K Agricultural – Equestrian	24
RE11-1 Residential Estate	3
Total	**887**

Page IV.G-12

The proposed Development Areas have been superimposed on Figure IV.G-5 in this Final EIR. This revision is also stated in Response 149-256 in this Final EIR.

Page IV.G-13

The first sentence under the heading "Oak Tree Ordinance" has been revised to read: "Section 46.00 et seq. of the LAMC and Section 8B of the Specific Plan sets forth regulations for the preservation of oaks trees in the City."

Figure IV.G-5 Non-Public Equestrian Trail System

Page IV.G-15

The last three sentences of the second paragraph have been revised to read:

> *This compares to average lot sizes ranging from approximately 4,000 to 8,000 square feet and average heights ranging from one to two stories in areas to the northeast and east of proposed Development Area A. Although the proposed residential uses would be less dense than the adjacent residential uses, the proposed project would be consistent with the existing residential land uses in the adjacent community. Therefore, the proposed homes would be compatible with the existing homes to the northeast and east.*

Page IV.G-18

The first sentence of the first paragraph has been revised to read:

> *The proposed project includes the Low Residential land use designation consistent with Map Footnote 7 in the Sunland-Tujunga Community Plan, which permits clustering of residential units in hillside areas up to the density permitted under the Low Residential land use designation.*

Page IV.G-18

The third sentence of the first paragraph has been revised to read:

> *In contrast, the density for the proposed project is approximately 1.8 dwelling units per net acre, based on the number of proposed homes (280) divided by the net acres (i.e., gross acres less road acreage) in the proposed Development Areas (158).*

Page IV.G-20

The "Consistency Discussion" of Policy 1-3.3 in Table IV.G-4 has been revised to read:

Generally Consistent. *The proposed project would not preserve all existing views of hillside and mountain areas. However, the proposed project would conform to the scenic corridor and ridgeline development requirements in the Specific Plan. Furthermore, the proposed project would preserve approximately 693 acres (78 percent of the 887-acre project site), largely consisting of undeveloped hillside and mountainous areas, as permanent open space.*

Page IV.G-20

The "Consistency Discussion" of Policy 1-6.3 in Table IV.G-4 has been revised to read:

> ***Generally Consistent.*** *While the proposed project would require approximately 4.6 million cubic yards of grading (including remedial grading), the project is a low-density residential development and clusters homes in a manner that minimizes grading and other effects on environmentally sensitive areas. Furthermore, approximately 693 acres (78 percent) of the project site would be preserved as permanent open space.*

Pages IV.G-20 and IV.G-21

The "Consistency Discussion" for Policy 1-8.1 in Table IV.G-4 has been revised to read:

> ***Consistent.*** *The proposed project would not be developed within an existing single-family equestrian-oriented neighborhood. Rather, proposed Development Area A is currently undeveloped and is located adjacent to an existing residential area, while proposed Development Area B is currently undeveloped and is not located in proximity to any existing residential area, equestrian-oriented or otherwise. Furthermore, none of the lots in the neighborhood in proximity to proposed Development Area A have a RA zoning designation or are located in the "K" Equinekeeping District. Although proposed Development Area A would not support an equestrian community due to the steep topography there, the lot sizes for Development Area A would range from 9,000 to 64,800 square feet, a far lower housing density than the existing residential area to the northeast and east. Therefore, the development of proposed Development Area A would not impact any existing single-family equestrian-oriented neighborhood with higher-density residential uses.*

This revision is also addressed in Topical Response 8 in this Final EIR.

Page IV.G-21

The "Consistency Discussion" for Policy 1-8.2 in Table IV.G-4 has been revised to read:

> ***Consistent.*** *While the proposed Development Areas would be located in the more naturally level portions of the project site, the topography there is ill-suited to equestrian use. In addition, the only non-public equestrian trail on the project site is located on the far western portion of the project site on the south side of Interstate 210 that would be preserved as open space (see Figure IV.G-5). The land use designation for that portion of the project site would remain Minimum Residential. While the proposed project includes an amendment to the Sunland-Tujunga Community Plan to change the land use designations in the Development Areas to Low Residential, the*

proposed housing density would be consistent with the range of densities permitted under the Very Low I Residential land use designation. Furthermore, the size of the lots in proposed Development Area B would be 20,000 square feet, which is the minimum lot size for horsekeeping on residential lots in the Specific Plan.

This revision is also addressed in Topical Response 8 in this Final EIR.

Page IV.G-21

The "Consistency Discussion" for Policy 5-1.1 in Table IV.G-4 has been revised to read: "**Consistent.** The proposed project includes the preservation of approximately 693 acres (78 percent of the project site) as permanent open space."

Page IV.G-21

The following Policy and Consistency Discussion has been added between Policies 5-1.1 and 5-1.3 in Table IV.G-4:

5-1.2 Protect significant environmental resources from environmental hazards.	**Generally Consistent.** The proposed project has been designed to minimize impacts on environmental resources located on the project site. For example, substantial setbacks are provided for the proposed homes near La Tuna Canyon Road in order to preserve the rural ambiance of that scenic highway. In addition, by clustering the proposed homes, approximately 693 acres (78 percent) of the project site would remain undeveloped. As a result, Drainage 2 (i.e., La Tuna Canyon Wash) and Drainage 14, which permit limited regional wildlife movement between the San Gabriel Mountains and the main body of the Verdugo Mountains (see Figure IV.D-3), would not be impacted by the proposed project. Similarly, the site design would not impact the vast majority of the significant vegetation on the project site. For example, the site design would preserve approximately 82 percent of the coast live oaks and western sycamores on the project site.

This revision is also reflected in Response 75-29 in this Final EIR.

Page IV.G-21

The first sentence of Policy 5-1.5 under the column heading "Consistency Discussion" in Table IV.G-4 has been revised to read: "The City Council has adopted the Specific Plan." This revision is also reflected in Response 75-4 in this Final EIR.

Page IV.G-21

The second sentence of Policy 5-1.5 under the column heading "Consistency Discussion" in Table IV.G-4 has been revised to read: "As discussed in more detail below, the proposed project is consistent with applicable requirements in the Specific Plan." Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Page IV.G-23

The first paragraph under the column heading "Consistency Discussion" for Policy 14-1.1 in Table IV.G-4 has been revised to read:

> ***Consistent.*** *The proposed project would incorporate bike paths into the new roadway system for access to the proposed recreation areas (e.g., trail heads and playgrounds), but not to schools. The closest school to the project site is approximately 2.4 miles away.*

Page IV.G-23

The second sentence under the column heading "Consistency Discussion" for Policy 14-2.3 in Table IV.G-4 has been revised to read:

> *However, the proposed project includes an equestrian park, which would help facilitate access to the existing equestrian trail system. In addition, the project applicant has initiated discussions with the City regarding the potential installations of a traffic signal at the entrance to the proposed equestrian park that would provide a safer connection between two segments of the non-public equestrian trail system (i.e., on the north and south sides of La Tuna Canyon Road). However, it should be noted that this traffic signal is not required to achieve consistency with Policy 14-2.3 or to mitigate a significant impact.*

This revision is also reflected in Topical Response 8 in this Final EIR.

Page IV.G-24

The second sentence of Policy 14-2.4 under the column heading "Consistency Discussion" in Table IV.G-4 has been revised to read:

One of the non-public equestrian trails shown on Map No. 4 in the Specific Plan is located in the southern subarea of the project site, but outside proposed Development Area B, and would not be affected by the proposed project.

Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Page IV.G-24

The following text has been added after the first paragraph and before the heading "San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan":

Other General Plan Elements

Table IV.G-4a provides a brief discussion of the proposed project's consistency with relevant policies contained in the Conservation Element (the objectives to which the policies relate are also shown for informational purposes, but the consistency analysis is limited to the stated policies).

Table IV.G-4a
Comparison of Project Characteristics to Conservation Element

Objective/Policy	Consistency Discussion
ARCHAEOLOGICAL AND PALEONTOLOGICAL	
Objective: Protect the City's archeological and paleontological resources for historical, cultural, research and/or educational purposes.	
Policy 1: Continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition or property modification activities.	**Consistent:** As discussed in Sections IV.O.2 (Archaeological Resources) and IV.O.3 (Paleontological Resources), no archaeological or paleontological resources are known to exist on the project site. If archaeological or paleontological resources are discovered on the project site, implementation of the mitigation measures listed in Sections IV.O.2 (Archaeological Resources) and IV.O-3 (Paleontological Resources) would ensure that no significant impacts would occur to archaeological and paleontological resources.
CULTURAL AND HISTORICAL	
Objective: Protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.	
Policy 1: Continue to identify and protect significant historic and cultural sites and/or	**Consistent:** As discussed in Section IV.O.1 (Historic Resources), no cultural or historical sites or resources

Table IV.G-4a
Comparison of Project Characteristics to Conservation Element

Objective/Policy	Consistency Discussion
resources known to exist or that are identified during land development, demolition or property modification activities.	are known to exist on the project site.
ENDANGERED SPECIES	
Objective: Protect and promote the restoration, to the greatest extent practical, of sensitive plant and animal species and their habitats.	
Policy 1: Continue to require evaluation, avoidance, and minimization of potential significant impacts, as well as mitigation of unavoidable significant impacts on sensitive animal and plant species and their habitats and habitat corridors relative to land development activities.	**Consistent:** With implementation of the mitigation measures listed in Section IV.D.1 (Flora and Fauna), implementation of the proposed project would not result in any significant impacts to biological resources, with the exception of coast live oaks. As discussed in Section IV.D.2 (Native Trees), in the long-term, replacement planting would be sufficient to mitigate project impacts with respect to coast live oaks to a less-than-significant level. In the short-term, until the trees reach a maturity sufficient to provide seed production and nesting opportunities, this impact would remain significant. However, as this impact would be mitigated in the long-term, the replanting program is considered sufficient mitigation, to the greatest extent practical, to minimize this unavoidable significant impact.
EQUINE AREAS	
Objective: Retain equine oriented uses as a part of the City's heritage and for recreational, educational and economic purposes.	
Policy 1: Continue to encourage the establishment of new equine uses and K districts and to protect existing significant areas from encroachment.	**Consistent:** None of the existing homes in proximity to the proposed Development Areas are located in a "K" Equinekeeping District, nor is any portion of the proposed Development Areas located in a "K" Equinekeeping District. Approximately 24 acres (2.7 percent) of land in the far northwest corner of the project site are in a "K" Equinekeeping District. However, no change is proposed for that portion of the project site and it would therefore remain intact. Furthermore, there are no official or non-public equestrian trails located in the proposed Development Areas or anywhere near them. The only existing non-public trail system on the project site is located west of proposed Development Area B, and it would not be impacted by the proposed project.
Policy 3: Continue to expand and maintain trail linkages which will reinforce the viability of	**Consistent:** As discussed above, there are no official or non-public equestrian trails located in the proposed

Table IV.G-4a
Comparison of Project Characteristics to Conservation Element

Objective/Policy	Consistency Discussion
equine uses.	Development Areas or anywhere near them. The proposed equestrian park would help facilitate access to the existing equestrian trail system. The proposed equestrian park is located in close proximity to the existing non-public equestrian trail system on the north and south sides of La Tuna Canyon Road.
HABITATS	
Objective: Preserve, protect, restore and enhance natural plant and wildlife diversity, habitats, corridors and linkages so as to enable the healthy propagation and survival of native species, especially those species that are endangered, sensitive, threatened or species of special concern.	
Policy 1: Continue to identify significant habitat areas, corridors and buffers and to take measures to protect, enhance and/or restore them.	**Consistent:** As discussed in Section IV.D.1 (Flora and Fauna), implementation of the proposed project would not result in any significant impacts to biological resources, with the exception of coast live oaks (see above). As discussed in Section IV.D.3 (Wildlife Movement), there would be no significant impacts to regional or local wildlife movement associated with the proposed project during operation or construction. Furthermore, the proposed project design incorporates the preservation of approximately 693 acres of open space, approximately 78 percent of the 887-acre project site.
LANDFORM AND SCENIC VISTAS	
Objective: Protect and reinforce natural and scenic vistas as irreplaceable resources and for the aesthetic enjoyment of present and future generations.	
Policy 1: Continue to encourage and/or require property owners to develop their properties in a manner that will, to the greatest extent practical, retain significant existing land forms (e.g., ridge lines, bluffs, unique geological features) and unique scenic features (historic, ocean, mountains, unique natural features) and/or make possible public view or other access to unique features or scenic views.	**Consistent:** As described in Section IV.N (Aesthetics), implementation of the proposed project would result in a significant unavoidable impact on existing scenic resources, scenic vistas and visual character. However, the proposed project has been designed to minimize visual intrusion into the project area's scenic resources. Clustering of the homes in two development areas would maximize the preservation of open space and retain large hillside areas on the project site. In addition, the proposed residential lots would be located in a manner that would prevent future homes from obstructing views of the "Prominent Ridgelines" designated in the Specific Plan. The proposed project design, in addition to the mitigation measures listed in Section IV.N (Aesthetics), would, to the greatest extent practical, retain existing landforms and unique scenic

Table IV.G-4a
Comparison of Project Characteristics to Conservation Element

Objective/Policy	Consistency Discussion
	features for present and future generations.

Table IV.G-4b presents an analysis of the proposed project's consistency with relevant policies in the Transportation Element. Objectives are shown for informational purposes, but the consistency evaluation is limited to the relevant policies.

Table IV.G-4b
Comparison of Project Characteristics to Transportation Element

Objective/Policy	Consistency Discussion
ACCESSIBILITY AND MOBILITY	
Objective 4: Preserve the existing character of lower density residential areas and maintain pedestrian-oriented environments where appropriate.	
Policy 4-1: Seek to eliminate or minimize the intrusion of traffic generated by new regional or local development into residential neighborhoods while preserving an adequate collector street system.	**Consistent:** As discussed in Sections IV.G (Land Use) and IV.I (Transportation and Traffic), the proposed project would develop unique circulation systems to serve the two proposed Development Areas and would not utilize existing residential streets for this purpose.
INTEGRATED SYSTEM	
Objective 11: Preserve and enhance access to scenic resources and regional open space.	
Policy 11-2: Provide for protection and enhancement of views of scenic resources along or visible from designated scenic highways through implementation of guidelines set forth in this Transportation Element.	**Consistent:** As discussed in Sections IV.G (Land Use) and IV.I (Transportation and Traffic), none of the proposed homes in proposed Development Area A would be constructed in a manner that silhouettes any homes against the skyline above the Verdugo Crestline Prominent Ridgeline, when viewed from any designated Scenic Highway to the north of the project site. As discussed in Section IV.G (Land Use), the proposed project is consistent with all of the requirements and restrictions in the Specific Plan and Sunland-Tujunga Community Plan with respect to the protection of prominent ridgelines and scenic corridors.

Table IV.G-4c presents an analysis of the proposed project's consistency with relevant policies in the Housing Element. Objectives are shown for informational purposes, but the consistency evaluation is limited to the relevant policies.

Table FEIR-4c
Comparison of Project Characteristics to Housing Element

Objective/Policy	Consistency Discussion
LIVABLE COMMUNITIES	
Objective 2.1: Promote housing strategies which enhance neighborhood safety and sustainability, and provide for adequate population, development, and infrastructure and service capacities within the City and each community plan area, or other pertinent service area.	
Policy 2.1.2: Facilitate neighborhood safety through improved development standards which provide for common areas, adequate lighting, clear definition of outdoor spaces, attractive fencing, use of landscaping as a natural barrier and to enhance aesthetic appearance, secure storage areas, and good visual connections.	**Consistent:** The proposed project would include common areas, adequate public area lighting, and a clear definition of outdoor spaces as part of the overall development plan. The project would conform with applicable development standards imposed by the City through the site map approval and permit process.
Objective 2.3: Encourage the location of housing, jobs, and services in mutual proximity. Accommodate a diversity of uses that support the needs of the City's existing and future residents.	
Policy 2.3.3: Encourage the development of new projects that are accessible to public transportation and services consistent with the community plans. Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	**Generally Consistent:** The nearest public transportation access point to the proposed project would be approximately two miles away. However, the proposed project would incorporate bike paths into the new roadway system for access to the proposed recreational facilities (e.g., trail heads and playgrounds). As previously discussed, the planned bikeway on La Tuna Canyon Road (between Tuxford and Honolulu) does not currently exist.

Table IV.G-4d presents an analysis of the proposed project's consistency with relevant policies in the Air Quality Element. Objectives are shown for informational purposes, but the consistency evaluation is limited to the relevant policies.

Table IV.G-4d
Comparison of Project Characteristics to Air Quality Element

Objective/Policy	Consistency Discussion
GOOD AIR QUALITY	
Objective 1.3: Reduce particulate air pollutants emanating from unpaved areas, parking lots, and construction sites.	
Policy 1.3.1: Minimize particulate emissions from construction sites.	**Consistent:** As discussed in Section IV.B (Air Quality), mitigation measures are recommended to minimize particulate emissions from the project site during project construction activities.
LAND USE IMPACTS	
Objective 4.2: Reduce vehicle trips and vehicle miles traveled associated with land use patterns.	
Policy 4.2.3: Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**Generally Consistent:** The site design for the project is compatible with pedestrians, bicycles, and alternative fuel vehicles, but would not accommodate public transit.

These additions are also stated in Responses 143-5 and 152-37 in this Final EIR.

Page IV.G-24

The first subheading has been revised to read: "San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan." Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Pages IV.G-24 and IV.G-25

The ten paragraphs under the heading "San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan" have been revised to read:

The Specific Plan includes several requirements and restrictions that are generally applicable to the proposed project. The analysis of the proposed project's visual impacts is presented in Section IV.N (Aesthetics).

Section 6A.1: *No buildings or structures shall be placed or constructed within any Prominent Ridgeline Protection Areas, except as otherwise provided in Section 6B of the Specific Plan.*

Consistency Discussion: *As reflected in the site plan for the proposed project, none of the proposed homes would be located in whole or in part in a Prominent Ridgeline Protection Area.*

Section 6A.2: *No buildings or structures shall be constructed so that the highest point of the roof, structure or parapet wall is less than 25 vertical feet from the designated Prominent Ridgeline directly above the highest point of the building or structure.*

Consistency Discussion: *As reflected in the site plan for the proposed project, the highest point of the roof, structure or parapet wall of each proposed home will be at least 25 vertical feet from any designated Prominent Ridgelines.*

Section 6A.3: *Where a Prominent Ridgeline Protection Area is shown on only one side of a Prominent Ridgeline, buildings or structures built on the portion of the Site without a Prominent Ridgeline Protection Area shall not be allowed to break the silhouette of the corresponding Prominent Ridgeline.*

Consistency Discussion: *As discussed above, the easterly portion of the "Verdugo Crestline" Prominent Ridgeline Protection Area located along or near the northern boundary of the project site is not visible from designated Scenic Highways located to the south. As a result, and as shown on Map No. 2 of the Specific Plan, the south side of that Prominent Ridgeline does not include a Prominent Ridgeline Protection Area. None of the proposed homes in Development Area A will be constructed in a manner that silhouettes any homes against the skyline above the Verdugo Crestline Prominent Ridgeline, when viewed from any listed Scenic Highway to the north of the project site.*

Section 6A.4: *No grading or berming shall occur that alters the elevation of the crest of any Prominent Ridgeline.*

Consistency Discussion: *As reflected in the site plan for the proposed project, no grading or berming shall occur with respect to the proposed project that would alter the elevation of the crest of any Prominent Ridgeline.*

Section 6A.5: *Graded slopes should be landform graded where practical in accordance with the provisions of the Department of City Planning's Landform Grading Manual. In order to create slopes that reflect as closely as possible the surrounding natural hills, graded hillsides should have a variety of slope ratios, should not exceed a ratio of 2:1*

and should transition to the natural slope in a manner that produces a natural appearance.

Consistency Discussion: *The use of the word "should" with respect to these provisions reflect that they are not mandatory, but instead are permissive and intended as guidelines only, consistent with the City's policy. Nonetheless, it is the applicant's intent, where practical and feasible, to grade slopes in accordance with the Landform Grading Manual and otherwise comply with the requirements in Section 6A.5. However, it is anticipated that, while the graded hillsides would have a variety of slope ratios, the ratio of some graded hillsides would exceed a ratio of 2:1.*

Section 6A.6: *No native vegetation shall be removed within any Prominent Ridgeline Protection Area, except for driveways, building footprints and any required equine pad or stable areas, or as necessary to meet fire safety and brush clearance requirements, to develop recreational trails, or for landscaping associated with residential lots.*

Consistency Discussion: *No removal of native vegetation would occur within any Prominent Ridgeline Protection Area in connection with the proposed project, except as permitted in Section 6A.6.*

Section 9: *The maximum height of any structure within a Scenic Highway Corridor shall be 30 feet.*

Consistency Discussion: *None of the proposed homes located within 500 feet from Interstate 210 or La Tuna Canyon Road would exceed 30 feet in height.*

Based on the foregoing, the proposed project is consistent with the requirements and restrictions in the Specific Plan. Therefore, the land use impacts related to consistency with the Specific Plan would be less than significant.

Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Page IV.G-26

The first complete sentence of the first partial paragraph has been revised to read:

Specifically, the zoning designation for approximately 234 acres currently designated as A1-1 (Agricultural) would be changed to RE20-1-H, RE11-1-H and RE9-1-H (Residential Estate). In addition, approximately three acres of land currently zoned RE11-1 would be modified to RE11-1-H.

This revision is also reflected in Response 117-1 and Topical Response 8 in this Final EIR.

Page IV.G-26

The first sentence of the first complete paragraph has been revised to read:

> *As shown in Figure IV.G-7, and Table IV.G-5, approximately 124 acres (14 percent) of the proposed Development Areas would be located in the RE9-1-H zone (Residential Estate, Height District No. 1, Hillside Area), approximately 52 acres (5.8 percent) of the proposed Development Areas would be located in the RE11-1-H zone (Residential Estate, Height District No. 1, Hillside Area) and approximately 61 acres (6.9 percent) of the proposed Development Areas would be located in the RE20-1-H zone (Residential Estate, Height District No.1, Hillside Area).*

This revision is also reflected in Response 117-1 and Topical Response 8 in this Final EIR.

Page IV.G-26

The following sentence has been added after the fourth sentence of the first complete paragraph: "The maximum allowable density for the RE-20 zone is normally based on a lot with a minimum average width of 80 feet and a minimum lot area of 20,000 square feet." This revision is also reflected in Response 117-1 and Topical Response 8 in this Final EIR.

Page IV.G-26

The fifth sentence of the first complete paragraph has been revised to read:

> *Pursuant to Section 17.05H.1 of the LAMC, the addition of the proposed "H" Hillside Area zoning designation would permit the City's Advisory Agency to reduce the width and area of not more than 20 percent of the lots in the proposed RE9, RE11 and RE20 zones under certain conditions.*

This revision is also reflected in Response 117-1 and Topical Response 8 in this Final EIR.

Page IV.G-26

Table IV.G-5 has been revised to read:

Table IV.G-5
Proposed Zoning Designations
Canyon Hills Project

Zone	Acres (Gross) Existing	Acres (Gross) Proposed
A1-1 Agricultural	860	626
A1-1-K Equestrian	24	24
RE9-1-H Estate (9,000 SF)	0	124
RE11-1-H Estate (11,000 SF)	3	52
RE20-1-H Estate (20,000 SF)	0	61
Totals	**887**	**887**

This revision is also reflected in Response 117-1 and Topical Response 8 in this Final EIR.

Page IV.G-27

Figure IV.G-7 has been revised to reflect the proposed zoning for Development Area B has been changed to RE20-H. This revision is also reflected in Response 117-1 and Topical Response 8 in this Final EIR.

IV. H Population and Housing

No corrections and/or additions are necessary.

IV.I Transportation/Traffic

Page IV.I-2

The first sentence in the second paragraph has been revised to read:

> *The Foothill (Interstate 210) Freeway is a major freeway route that runs from the Ontario (I-15) Freeway in San Bernardino County to the east and joins the Golden State (I-5) Freeway near the City of San Fernando to the northwest.*

This revision is also stated in Response 191-2 in this Final EIR.

Figure IV.G-7: Proposed Zoning Designation

Pages IV.I-3, IV.I-8, IV.I-9, IV.I-19 through IV.I-21, IV.I-25, IV.I-26, IV.I-30, IV.I-31 and IV.I-33 through IV.I-36

Figures IV.I-1 through IV.I-3, IV.I-5 through IV.I-7 and IV.I-9 through IV.I-16 have been revised to reflect the correct spelling of Mt. Gleason Avenue. In addition, Figures IV.I-9 through IV.I-16 have been revised to reflect the traffic volumes shown in Figures 10 through 17 in Appendix J (Traffic Impact Study) to the Draft EIR. Figure IV.I-1 has been revised to show the lane configurations listed in Comment 191-3. Figures IV.I-2 and IV.I-3 have been revised to reflect the 2002 existing AM and PM hour traffic volumes. These revisions are also stated in Responses 152-80, 191-3, 191-4, 191-6 and 191-7 in this Final EIR.

Page IV.I-11

At the end of the first paragraph under the heading "Construction Assumptions", the following text has been added to read:

> *To the extent feasible, the equipment staging area and construction worker parking will not interfere with traffic on La Tuna Canyon Road or the Interstate 210 ramps when offsite staging or parking is necessary.*

This addition is also stated in Response 191-5 in this Final EIR.

Page IV.I-11

At the end of the first paragraph under the heading "Construction Traffic Trip Generation", the following text has been added to read: "All truck activities should be minimized during the commuter peak hours to the extent feasible." This addition is also stated in Response 191-5 in this Final EIR.

Page IV.I-16

The second sentence of the first paragraph has been revised to read: "Hillhaven Avenue intersects with Alene Drive, which is a 40-foot wide dedicated street with variable pavement width ranging from 18 to 22 feet." This revision is also stated in Responses 96-7 and 111-19 in this Final EIR.

Figure IV.I-1 Existing Lane Configurations

Figure IV.I-2 Existing Traffic Volumes AM Peak Hour

Figure IV.I-3 Existing Traffic Volumes PM Peak Hour

Figure IV.I-5 Project Trip Distribution

Figure IV.I-6 Project Traffic Volumes AM Peak Hour

Figure IV.I-7 Project Traffic Volumes PM Peak Hour

Figure IV.I-9 Related Projects Traffic Volume AM Peak Hour

Figure IV.I-10 Related Projects Traffic Volume PM Peak Hour

Figure IV.I-11 Existing Plus Ambient Growth Traffic Volumes AM Peak Hour

Figure IV.I-12 Existing Plus Ambient Growth Traffic Volumes PM Peak Hour

Figure IV.I-13 Future 2009 Pre-Project Traffic Volumes AM Peak Hour

Figure IV.I-14 Future 2009 Pre-Project Traffic Volumes PM Peak Hour

Figure IV.I-15 Future 2009 With Project Traffic Volumes AM Peak Hour

Figure IV.I-16 Future 2009 With Project Traffic Volumes PM Peak Hour

Page IV.I-45

The following traffic mitigation measures have been added:

I-2 *With respect to the section of La Tuna Canyon Road adjacent to the project site, (1) the project developer shall dedicate along the entire project frontage on La Tuna Canyon Road to bring the right-of-way up to the standard required by the General Plan, (2) the project developer shall construct improvements on La Tuna Canyon Road so as to provide two lanes in each direction with left-turn channelization at the access points for Development Area A and Development Area B and (3) except as required to provide left-turn channelization as described above, no additional roadway widening along the proposed project's La Tuna Canyon Road frontage shall be required.*

I-3 *The project developer shall contact the Bureau of Engineering, Department of Public Works to ensure compliance with the requirements of the LAMC related to the equestrian park.*

I-4 *The driveway to Development Area A on La Tuna Canyon Road shall be aligned as the north leg of the signalized intersection at Development Area A Access/Interstate 210 Westbound Ramps and La Tuna Canyon Road.*

I-5 *To avoid the encroachment of vehicles onto the public right-of-way, a minimum of 40 feet of reservoir space shall be provided at each driveway. This distance shall be measured from the property line to the first parking stall and/or gate.*

I-6 *The driveways for Development Area B shall be located away from any blind curve along La Tuna Canyon Road. Queuing and merging areas shall be provided for ingress and egress vehicles, respectively. The driveways serving Development Area B shall be consistent with the requirement(s) of LADOT and other City departments.*

I-7 *As backing into or out of arterial highways or collector streets is not permitted, the path and location of all trucks and vehicles with horse trailers shall be indicated on the parking area and driveway plan submitted by the project developer to LADOT prior to the issuance of building permits.*

I-8 *Final LADOT approval shall be obtained prior to the issuance of any building permits. This shall be accomplished by submitting a detailed site/driveway plan, at a scale of at least 1 inch = 40 feet, to LADOT's Valley Development Review Section at 6262 Van Nuys Boulevard, Suite 320, Van Nuys. This*

site/driveway plan shall be submitted as soon as possible, prior to the submittal of building plans to the Department of Building and Safety.

These additions are also stated in Responses 191-8, 191-9, 191-10, 191-11, 191-12, 191-13 and 191-15 in this Final EIR.

IV.J Public Services

Fire Protection

Page IV.J-1

The first sentence of the second paragraph under the heading "Fire Stations" has been revised to read: "Fire Station No. 74 is located 7777 Foothill Boulevard, which is approximately 2.8 miles from proposed Development Area A and 4.21 miles from proposed Development Area B, would have primary response duties." This revision is based on the discussion in Topical Response 13 in this Final EIR.

Page IV.J-1

The second sentence of the second paragraph under the heading "Fire Stations" has been revised to read: "This Task Force Station is comprised of a truck and engine company, with a paramedic rescue ambulance." This revision is also stated in Response 2-2 in this Final EIR.

Page IV.J-3

The first sentence of the first paragraph has been revised to read: "Other stations that would serve the project site include Fire Station No. 24, which is located at 9411 Wentworth Street in Sunland, which is 5.23 miles from proposed Development Area A and 4.21 miles from proposed Development Area B." This revision is based on the discussion in Topical Response 13 in this Final EIR.

Page IV.J-3

The third sentence of the first paragraph has been revised to read: "Fire Station No. 77 is located at 8943 Glenoaks Boulevard in Sun Valley, which is 5.8 miles from proposed Development Area A and 4.32 miles from proposed Development Area B, would also serve the project site with a paramedic engine company." This revision is based on the discussion in Topical Response 13 in this Final EIR.

Page IV.J-4

The first complete sentence of the first partial paragraph has been revised to read: "The maximum response distance for residential land uses is 1.5 miles for both an engine and truck company." This revision is based on the discussion in Topical Response 13 in this Final EIR.

Page IV.J-5

The following text has been added after the first complete paragraph and before the heading "Environmental Impacts":

Brush Clearance Program

The LAFD's Brush Clearance Program[17] (the "Program") requires all subdivisions within areas designated as a VHFHSZ to comply with the City's brush clearance and fuel modification requirements. The Program requires clearance of brush on any portion of a property that lies with 200 feet of any structure (either onsite or offsite) in accordance with the following criteria. Brush Clearance Zone - within the first 100 feet surrounding any structure, all native brush, grass and weeds must be cleared to a height of three inches. Exceptions to this requirement include: (1) selected native brush, which may be trimmed up from the ground 1/3 of its total height, with a minimum separation distance of 18 feet between other such brush and any structure; and (2) trees, which need not be spaced 18 feet apart, but must be trimmed up to six feet from the ground, with all dead material removed. Fuel Modification Zone – within the second 100 feet, the amount of native vegetation must be reduced and/or the arrangement of native vegetation must modified as follows: heavy brush must be trimmed up so that all foliage in the lower third of the plant is removed, and dead plants must be removed to a height of three inches above the ground. Additionally, all dead material must be removed from live plants; and all cut material must be removed or mulched.

Where an existing offsite structure is located within 200 feet of the property line, onsite brush clearance/fuel modification must be provided in accordance with the above criteria. However, no brush clearance/fuel modification is required where the subject property is adjacent to undeveloped land or where the nearest structure is more than 200 feet from the subject property line.

This revision is also addressed in Responses 38-1 and 38-6 in this Final EIR.

---

[17] *Los Angeles Fire Department Brush Clearance Program, Brush clearance Requirements: website: http://www.lafd.org/brush/.*

Page IV.J-6

The last two sentences of the paragraph under the heading "Long-Term Operational Impacts" have been revised to read:

> *This new resident population would increase the potential risk of a wildfire in the area and, concomitantly, the need for fire protection and emergency services in the area. The following discussion analyzes the major criteria for determining the proposed project's impacts to fire protection services, including response distance, emergency access/evacuation, and fire flows, as well as project features that would reduce the potential risk of wildfire.*

Page IV.J-7

The first sentence of the paragraph under the heading "Response Distance and Access" has been revised to read:

> *Since the response distance between the project site and the primary response fire station is not within Fire Code specifications pertaining to engine and truck companies (1.5 miles for residential development), impacts with respect to distance criteria are considered to be potentially significant.*

This revision is also reflected in Topical Response 13 in this Final EIR.

Page IV.J-7

The last sentence of the paragraph under the heading "Response Distance and Access" has been revised to read: "That requirement has been included as Mitigation Measure J.1-1 below." This revision is also stated in Response 23-4 in this Final EIR.

Page IV.J-8

The following text has been added after the last paragraph:

> ***Brush Clearance Program***
>
> *The proposed project has been designed to comply with the City's Brush Clearance Program. As set forth in Table IV.D-6, the proposed project would include brush clearance on approximately 46.43 ungraded acres of the project site and brush thinning (fuel modification) on approximately 47.34 ungraded acres of the project site. Brush clearance/fuel modification impacts to biological resources are discussed in Section IV.D (Flora and Fauna). Implementation of the brush clearance/fuel modification*

requirements would result in decreased fire hazards for the proposed project and adjoining areas.

This revision is also reflected in Response 149-15 in this Final EIR.

Page IV.J-9

Mitigation Measure J.1-1 has been revised to read:

J.1-1 *An automatic fire sprinkler system shall be installed in each structure in accordance with Section 57.09.07 of the LAMC.*

Page IV.J-11

Mitigation Measure J.1-19 has been revised to read:

J.1-19 *The vesting tentative tract map, indicating access roads and turning areas, shall be submitted for LAFD approval.*

Page IV.J-12

The second bullet has been revised to read:

- *Mitigation measures are recommended above to ensure that adequate response times and access to the project site are provided; and*

Police Protection

Page IV.J-13

The fifth sentence of the first paragraph under the heading "Environmental Setting" has been revised to read: "More specifically, the project site is within Report Districts (RD) 1694 and 1699." This revision is also reflected in Response 175-50 in this Final EIR.

Page IV.J-13

The following has been added at the end of the first paragraph under the heading "Environmental Setting": "The service boundaries for RD 1699 are the Foothill Freeway (I-210) to the north, the Los Angeles City boundary to the south and east and the Wildwood fire road and La Tuna Canyon Road to the west." This addition is also reflected in Response 175-50 of this Final EIR.

Page IV.J-15

The following table has been added after Table IV.J-1:

Table IV.J-1a
RD 1699 Crime Statistics

Type of Crime	Number of Crimes
Burglary from Business	0
Burglary from Home	0
Burglary Other	0
Street Robbery	0
Other Robbery	0
Murder, Rape	0
Aggravated Assault	1
Burglary from Vehicle	6
Theft from Vehicle	0
Grand Theft	1
Theft from Person	0
Purse Snatch	0
Other Theft	0
Vehicle & Bicycle Theft	0
Bunco	0
Total	***8***

Source: 2002 LAPD Selected Crimes and Attempts by RD from the Police Arrest and Crime Management Information System 2 Report.

This addition is also stated in Response 175-50 in this Final EIR.

Page IV.J-19

Mitigation Measure J.2-5 has been revised to read:

> ***J.2-5*** *The project homeowners' association(s) shall retain a single alarm and security patrol company to patrol the Development Areas and correct false alarms expeditiously*.

Recreation and Parks

Page IV.J-26

The third to last sentence of the first partial paragraph has been revised to read: "The proposed three-acre public equestrian park would also be available to all project residents." This revision is based on the discussion in Topical Response 8 of this Final EIR.

Libraries

Page IV.J-32

The second, third and fourth sentences of the paragraph under the heading "Cumulative Impacts" have been revised to read:

> *The related projects would generate approximately 311 employees and approximately 401 residents. If all of the employees generated by the related projects were to become new residents in the Sunland-Tujunga Community Plan area, those employees and the new residents would generate a need for 356 square feet of additional library space. Overall, the proposed project and related projects would therefore generate a need for 771.5 square feet of additional library space.*

Page IV.J-32

The second to last sentence of the paragraph under the heading "Cumulative Impacts" has been revised to read:

> *Considering the relatively small amount of library space that would be required (i.e., 771.5 square feet) and that other libraries (i.e., the Sun Valley Branch Library and La Crescenta Library) would be available to serve the population associated with the related projects, the proposed project in combination with the related projects would not warrant the construction of new or physically altered existing libraries or, to the extent that any new facilities were required, the construction of those facilities would not be expected to result in any significant environmental impacts.*

Schools

Page IV.J-35

The first sentence of the third paragraph under the heading "School Facilities Fee Plan" has been revised to read:

> *Pursuant to Section 65995.5-7 of the California Government Code, the LAUSD has established a residential developer fee at a rate of $3.73 per square foot on new residential construction within the boundaries of the LAUSD.*

This revision is also stated in Response 53-1 in this Final EIR.

IV.K Energy Conservation

No corrections and/or additions are necessary.

IV.L Utilities and Service Systems

Water

Page IV.L-3

The sixth and seventh sentences of the first complete paragraph have been revised to read:

> *Water from this new 1.5 million gallon water tank would be delivered to Development Area A via a new water main constructed within existing public rights-of-way (i.e., no new easements would be necessary). The second water tank would be located in proposed Development Area B at an elevation of approximately 1,800 feet.*

Solid Waste and Disposal

Page IV.L-18

The second sentence of the second paragraph under the heading "Long-Term Operational Impacts" has been revised to read:

> *As discussed above, the AB 939 requirement to reduce the solid waste stream in landfills by 50 percent means that approximately 1,712 pounds (0.856 tons) of the proposed project's total daily solid waste generation (or 312 tons per year) must be recycled rather than disposed at a landfill.*

IV.M Hazards and Hazardous Materials

Environmental Site Assessment

Page IV.M-10

The following text has been added after the heading "Project Impacts" and before the heading "Project Site":

> *Construction Impacts of the Proposed Project*
>
> *Impacts associated with the use and temporary storage of hazardous materials on the project site during construction activities are evaluated in Sections IV.A (Geology and Soils) and IV.C (Hydrology and Water Quality).*
>
> *As noted in Section IV.C (Hydrology and Water Quality), the project construction site would contain a variety of construction materials that are potential sources of storm water pollution, including the following: adhesives; cleaning agents; landscaping materials; plumbing, painting, heating/cooling and masonry materials; floor and wall coverings; and demolition debris. Construction material spills can be a source of storm water pollution and/or soil contamination. According to the Los Angeles City Bureau of Engineering, routine safety precautions for handling and storing toxic and hazardous materials, and maintaining construction equipment in proper working condition, may effectively control the potential pollution of storm water by these materials. These same types of common sense, "good housekeeping" procedures can also be extended to non-hazardous storm water pollutants such as sawdust and other solid wastes.*
>
> *Consistent with the requirements of the General Construction Activity Storm Water Permit, a stormwater pollution prevention plan (SWPPP) would be prepared for the project in advance of the start of construction. The SWPPP would include all relevant best management practices presented as mitigation measures in the Draft EIR as well as additional measures necessary to reduce non-stormwater discharges from the project site to the maximum extent practicable throughout the construction period.*
>
> *Materials necessary during construction to perform any blasting needed to complete the grading of the project site would likely be hazardous in nature. These materials would need to be managed and controlled by the contractor in order to ensure that no adverse impacts occur.*

This addition is also stated in Response 149-296 in this Final EIR.

Page IV.M-12

The following has been added at the end of the first paragraph under the heading "Mitigation Measures":

> *However, the following mitigation measures are recommended to reduce further the proposed project's less-than-significant impacts associated with construction activities:*
>
> ***M.1-1*** *All hazardous or potentially hazardous materials used on the project site during construction for purposes of blasting shall be under the control of the designated contractor from the time such materials are brought onsite through the time of their use and the time they are removed from the project site. Access to these materials shall be controlled at all times. All such materials shall be fully accounted for both prior to and following all blasting work to be performed on the project site.*
>
> ***M.1-2*** *The large-scale application of herbicides for purposes of removing existing vegetation on the project site shall not be permitted. In addition, all hazardous or potentially hazardous materials used on the project site during construction shall be under the control of the designated contractor from the time such materials are brought onsite through the time of their use and the time they are removed from the project site. Access to these materials shall be controlled at all times. The designated storage location for these materials must be contained and separated from the ground surface by appropriate means to be designated in the construction site's SWPPP.*

This addition is also stated in Responses 149-296 and 149-304 in this Final EIR.

Electromagnetic Field Emissions

Page IV.M-14

The first sentence of the second paragraph has been revised to read:

> *Many of the statements and much of the data and analysis relied on in this Section are based on the most recent and comprehensive review of the scientific literature concerning the health effects of EMF exposure, as presented in "An Evaluation of the Possible Risks From Electric and Magnetic Fields (EMFs) From Power Lines, Internal Wiring, Electrical Occupations, and Appliances, Final Report dated June 2002 (the "EMF Report").*

Page IV.M-31

The first sentence of the third complete paragraph has been revised to read:

> *Once again, however, while the number of houses that will be affected by EMFs can be identified and classified based on approximate estimated exposure levels, there is no evidence to conclude that the proximity of a home to the SCE Transmission Line ROW has any direct correlation to adverse health effects*.

Page IV.M-33

The first sentence of Mitigation Measure M.2-1 has been revised to read:

> ***M.2-1*** *For all residential lots in Development Area A located within 150 feet of the edge of the SCE Transmission Line ROW, the project developer shall provide an EMF information and disclosure statement to each prospective buyer and include such a statement as part of the final sales literature, which statement shall include the following:*

IV.N Aesthetics

Page IV.N-2

The third sentence of the second paragraph has been revised to read: "The San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan (the "Specific Plan") provides guidelines for the protection of the scenic values of these two highways and others (see Section IV.G (Land Use) for detailed discussion of the Specific Plan)." Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Pages IV.N-2 and IV.N-3

The third sentence of the second paragraph under the heading "Northern Portion" has been revised to read: "The onsite portion of neither of these two ridges is designated as a Prominent Ridgeline in the Specific Plan." Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Page IV.N-3

The first sentence of the second paragraph under the heading "Southern Portion" has been revised to read: "Development Area B is located primarily on the south and east sides of a Prominent Ridgeline (designated in the Specific Plan) that rises above the freeway grade in the south-central portion of the project site." Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Page IV.N-8

The third sentence of the paragraph under the heading "Southern Portion" has been revised to read: "Eastbound vehicles travel approximately 0.8 miles of project site freeway frontage before the "Prominent Ridgeline" (as designated in the Specific Plan) in Development Area B comes into view (see Figure IV.N-4, Section D)." Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Page IV.N-16

The second sentence of the paragraph under the heading "Observation Point #5 – Figure IV.N-10" has been revised to read: "To the south, the intervening northwest-facing "Prominent Ridgeline" (as designated in the Specific Plan) would effectively block all views of Development Area B." Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Page IV.N-25

The third and fourth sentences of the first paragraph under the heading "Photo Simulation 3 – Figure IV.N-15" have been revised to read:

> *The higher elevation, offsite portion of this ridgeline is designated as "Prominent Ridgeline" in the Specific Plan. However, the Prominent Ridgeline designation and the "Prominent Ridgeline Protection Area" associated with it do not extend onto the project site (see Section IV.G (Land Use) for detailed discussion of the Specific Plan).*

Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Page IV.N-25

The fourth sentence of the first paragraph under the heading "Photo Simulation 4 – Figure IV.N-16" has been revised to read: "The Verdugo Crestline, designated as a "Prominent Ridgeline" in the Specific Plan (although only the land on the north side of the easterly portion of that Prominent Ridgeline has been designated as a "Prominent Ridgeline Protection Area"), appears to be indicated by the SCE transmission line tower in the left-hand portion of the photograph." Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Page IV.N-26

The second complete sentence of the first partial paragraph has been revised to read: "While, the main portion of Development Area A would not be seen from this location, the edge of the development would appear as a line of homes arranged along the skyline and descending along a minor ridge (which is not a designated Prominent Ridgeline in the Specific Plan)." Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Page IV.N-39

Mitigation Measure N-1 has been revised to read: "All structures on the project site shall comply with the applicable requirements of the San Gabriel/Verdugo Mountains Scenic Preservation Specific Plan." Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Page IV.N-40

Mitigation Measure N-4 has been revised to read:

> ***N-4*** *All utilities installed in connection with the development of the project shall be placed underground.*

Page IV.N-40

The following mitigation measure has been added:

> ***N-8*** *Where required sound walls may interrupt views of the surrounding scenery, sound walls constructed of a combination of Plexiglas and concrete blocks may be installed.*

This addition is also stated in Response 115-4 in this Final EIR.

IV.O Cultural Resources

Page IV.O-8

Mitigation Measure O.2-3 has been revised to read:

> ***O.2-3*** *If human remains are unearthed during construction, no further disturbance shall occur until the Los Angeles County Coroner has made the necessary findings as to origin and disposition in accordance with Section 7050.5 of the California Health and Safety Code. If the remains are determined to be those of a Native American, the Native American Heritage Commission (NAHC) in Sacramento shall be contacted before the remains are removed in accordance with Section 21083.2 of the California Public Resources Code.*

V. GENERAL IMPACT CATEGORIES

Summary of Significant Unavoidable Impacts

No corrections and/or additions are necessary.

Significant Irreversible Environmental Impacts

No corrections and/or additions are necessary.

Growth Inducing Impacts of the Proposed Project

Page V-2

The third sentence of the first paragraph has been revised to read: "Section 15126.2(d) of the CEQA Guidelines states:".

Page V-2

The first sentence of the last paragraph has been revised to read:

> *As also discussed in Section IV.H (Population and Housing), the new roadways and other infrastructure (e.g., water facilities, electricity transmission lines, natural gas lines, etc.) associated with the proposed project would not induce growth because they would only serve project residents*.

Impacts Found to Be Less than Significant

Page V-3

The third sentence of the second paragraph has been revised to read: "The proposed zone changes in the proposed Development Areas from A1 to RE9, RE11 and RE20 is discussed in Section IV.G (Land Use) in this Draft EIR." This revision is also stated in Response 117-1 and is addressed in Topical Response 8 in this Final EIR.

VI. ALTERNATIVES TO THE PROPOSED PROJECT

Alternative A: No Project Alternative

No corrections and/or additions are necessary.

Alternative B: Development Area A Only, 280 Lots

Pages VI-20 and VI-21

The first sentence of the second paragraph under "Land Use" has been revised to read:

> *Since Alternative B proposes similar land uses within the project site as the proposed project, the land use consistency analysis presented in Section IV.G (Land Use) – which addresses the RCPG, Community Plans, Specific Plan, LAMC and Oak Tree Ordinance – would be similar under this alternative*.

Page VI-28

The discussion under the heading "Reduction of Significant Project Impacts" has been revised to read:

> *The proposed project would result in the following significant environmental impacts after mitigation: construction emissions, construction noise, artificial light, scenic vistas, scenic resources, visual character and short-term effects on coast live oak trees. However, Alternative B would substantially lessen the following significant*

environmental impacts associated with the proposed project by eliminating all significant impacts associated with the development of proposed Development Area B, including (1) construction air quality impacts, (2) construction noise impacts, (3) artificial light impact on La Tuna Canyon Road, (4) impacts on non-jurisdictional riparian habitat and coast live oaks in Development Area B and (5) scenic vistas, scenic resources and the visual character of Development Area B as viewed from Interstate 210 and La Tuna Canyon Road.

Alternative C: Duke Property Alternative Access, 280 Lots

Page VI-29

The fourth sentence of the fifth paragraph has been revised to read: "However, the revised access through the Duke Property would descend into Development Area A along a topographic ridge identified by the Specific Plan as a "Prominent Ridgeline"."

Page VI-34

The fourth, fifth and sixth sentences of the first paragraph under the heading "Land Use" have been revised to read:

The land use impact associated with Alternative C is potentially different with respect to the Specific Plan because the alternative access road would cross a potential designated Prominent Ridgeline. However, Section 6B.3 of the Specific Plan provides that a public or private street is permitted to cross a Prominent Ridgeline Protection Area under circumstances that are applicable here.[1] : "Therefore, Alternative C is consistent with the Specific Plan.

[1] *Section 6B.3 of the Specific Plan states that where compliance with Sections 6A.4 and 6A.5 would "(a) substantially restrict access to a substantial portion of a Site; (b) create a land-locked Site; or (c) result in a greater impact on the existing natural terrain and landscape than would alternative access ways, then a street or private street and related improvements may be allowed to cross a Prominent Ridgeline Protection Area in accordance with the applicable regulations of the LAMC . . . ."*

Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Page VI-36

The second sentence of the second paragraph under the heading "Recreation and Parks" has been revised to read: "The proposed three-acre public equestrian park would also be available to all project residents." This revision is also reflected in Topical Response 8 in this Final EIR.

Page VI-39

The second sentence of the first paragraph under the heading "Aesthetics" has been revised to read:

> *The only material difference between the two is that the proposed project includes access to Development Area A along an elevated frontage road parallel to the freeway that extends for a distance of approximately 2,600 feet (measured west from the Interstate 210/La Tuna Canyon Road interchange), while under Alternative C, access to Development Area A travels across the Duke Property and a potential Prominent Ridgeline (as designated in the Specific Plan).*

Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Page VI-40

The second complete sentence of the first partial paragraph has been revised to read: "However, the alternate access through the Duke Property would descend into Development Area A across a topographic ridge identified in the Specific Plan as a Prominent Ridgeline." Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Page VI-40

The last sentence of the first partial paragraph has been revised to read: "On balance, while a significant aesthetic impact would remain, Alternative C would substantially reduce the aesthetic impact of the proposed project as viewed from Interstate 210."

Page VI-41

The last sentence of the first paragraph under the heading "Reduction of Significant Project Impacts" has been revised to read:

> *However, Alternative C would substantially lessen the following significant environmental impacts associated with the proposed project:*
>
> - *The number of impacted coast live oaks would be reduced by 30.*
> - *The aesthetic impact of proposed project as viewed from Interstate 210.*

Alternative D: Reduced Density, 87 Lots

Page VI-51

The first sentence of the first complete paragraph has been revised to read:

> *As indicated in Figure IV.G-4 in Section IV.G (Land Use), approximately 860 acres (97 percent) of the project site is zoned A1-1 (Agricultural, Height District No. 1). The remaining 27 acres (three percent) of the project site is zoned A1-1-K (Agricultural, Height District No. 1, Equinekeeping District) and RE11-1 (Residential Estate, Height District No. 1).*

Page VI-51

The fourth sentence of the second complete paragraph has been revised to read: "Similar to the proposed project, Alternative D has been designed for consistency with the Specific Plan." Responses 17-2, 35-2, 75-4, 108-1, 117-2, 129-3, 129-4, 146-6, 149-178, 149-180, 149-181, 149-314, 149-315, 157-2, 158-9 and 175-27 and Topical Responses 6 and 8 in this Final EIR address changes to the Draft EIR relating to the adoption of the Specific Plan following the completion of the Draft EIR.

Page VI-53

The following has been added at the end of the first partial paragraph:

> *However, the reduction in the number of proposed homes from 280 to 87 would substantially reduce the traffic impact at Study Intersection No. 4 at Development Area A Access/Interstate 210 Westbound Ramps and La Tuna Canyon Road.*

Page VI-61

The last sentence and the first bullet under the heading "Reduction of Significant Project Impacts" have been revised to read:

> *However, Alternative D would substantially lessen the following significant environmental impacts associated with the proposed project:*
>
> - *Construction air quality impacts.*
> - *Construction noise impact on the existing residential community to the north and northeast.*
> - *Traffic impacts to local roadway intersections and segments.*

Alternative E: Reduced Density, 210 Lots

Page VI-65

The last sentence of the first paragraph under the heading "Land Use" has been revised to read: "Furthermore, development under this alternative would also be consistent with the proposed rezoning of the Development Areas to RE9, RE11 and RE20, just as the proposed project would be consistent with those zoning designations." This revision is also stated in Response 117-1 and is addressed in the discussion in Topical Response 8 in this Final EIR.

Page VI-65

The first sentence of the second paragraph under the heading "Land Use" has been revised to read: "As Alternative E proposes similar land uses within the same Development Areas as the proposed project, the land use consistency analysis presented in Section IV.G (Land Use), which addresses the RCPG, Community Plans, Specific Plan, LAMC and Oak Tree Ordinance, would be similar under this alternative."

Page VI-72

The last sentence of the paragraph under the heading "Reduction of Significant Project Impacts" has been revised to read:

> *Alternative E would substantially lessen the following significant environmental impacts associated with the proposed project:*
>
> - *Traffic impacts to local roadway intersections and segments*.

Pages VI-74 and VI-75

Table VI-8 has been revised to change the impacts to fire and police protection under Alternative D as greater than the proposed project. This revision is also stated in Response 92-2 in this Final EIR. In addition, Table VI-8 has been revised to more precisely reflect the impacts to air quality and noise under Alternatives D and E.

Environmentally Superior Alternative

No corrections and/or additions are necessary.

Table VI-8
Alternatives Comparison

Impact Area	Proposed Project Impact with Mitigation	Alternative A: No Project Alternative	Alternative B: Development Area A Only	Alternative C: Duke Property Alternative Access, 280 Lots	Alternative D: Reduced Density, 87 Lots	Alternative E: Reduced Density, 210 Lots
Geology and Soils	Less Than Significant	Less	North – Greater South - Less	Similar	Less	Less
Air Quality	Significant (Construction Emissions Only)	Less	Less	Greater	Construction – Greater Operation – Less	Construction - Similar Operation - Less
Hydrology and Water Quality	Less Than Significant	Greater	Similar	Similar	Similar	Similar
Biological Resources						
Flora and Fauna	Less Than Significant	Less	Less	Less	Greater	Similar
Native Trees	Significant	Less	Less	Less	Greater	Similar
Wildlife Movement	Less Than Significant	Less	Similar	Similar	Greater	Similar
Noise	Significant (Construction Noise Only)	Less	North – Greater South - Less	Greater	Less	Construction - Similar Operation - Less
Artificial Light and Glare	Significant	Less	Less	Less	Greater	Similar
Land Use	Less Than Significant	Less	Similar	Similar	Less	Similar
Population and Housing	Less Than Significant	Less	Similar	Similar	Less	Less
Transportation/Traffic	Less Than Significant	Less	Greater	Similar	Less	Less
Public Services						
Fire Protection	Less Than Significant	Less	Similar	Similar	Greater	Less
Police Protection	Less Than Significant	Less	Similar	Similar	Greater	Less
Recreation and Parks	Less Than Significant	Less	Similar	Similar	Less	Less
Libraries	Less Than Significant	Less	Similar	Similar	Less	Less
Schools	Less Than Significant	Less	Similar	Similar	Less	Less

Table VI-8 (continued)
Alternatives Comparison

Impact Area	Proposed Project Impact with Mitigation	Alternative A: No Project Alternative	Alternative B: Development Area A Only	Alternative C: Duke Property Alternative Access, 280 Lots	Alternative D: Reduced Density, 87 Lots	Alternative E: Reduced Density, 210 Lots
Energy Conservation						
Electricity	Less Than Significant	Less	Similar	Similar	Less	Less
Natural Gas	Less Than Significant	Less	Similar	Similar	Less	Less
Utilities and Service Systems						
Water	Less Than Significant	Less	Similar	Similar	Less	Less
Sewer	Less Than Significant	Less	Similar	Similar	Similar	Less
Solid Waste and Disposal	Less Than Significant	Less	Similar	Similar	Less	Less
Hazards and Hazardous Materials						
Environmental Site Assessment	Less Than Significant	Less	Similar	Similar	Similar	Similar
Electromagnetic Field Emissions	Less Than Significant	Less	Greater	Similar	Less	Less
Aesthetics	Significant	Less	North – Greater South - Less	Less	Greater	Similar
Cultural Resources						
Historic Resources	No Impact	Similar	Similar	Similar	Similar	Similar
Archaeological Resources	No Impact	Similar	Similar	Similar	Similar	Similar
Paleontologic Resources	No Impact	Similar	Similar	Similar	Similar	Similar

Less: Impact of the alternative is less than the proposed project.
Similar: Impact of the alternative is similar to the proposed project.
Greater: Impact of the alternative is greater than the proposed project.

VESTING TENTATIVE TRACT MAP SITE PLAN

Vesting Tentative Tract Map No. 61672 (the "VTTM") for the proposed project was filed with the City on July 9, 2004. The site plan in the VTTM (the "VTTM Site Plan") sets forth the final site and lot configurations in the proposed Development Areas and is a refinement of the site plan in the Draft EIR (the "Draft EIR Site Plan") on Figures III-1 (Site Plan) and III-2 (Site Plan Detail). The proposed limits of grading in the VTTM Site Plan differ to a minor extent from the limits of grading shown on the Draft EIR Site Plan. As shown on Figure FEIR-1, the areas in which the grading under the VTTM Site Plan and the Draft EIR Site Plan differ are spread throughout the proposed Development Areas and generally consist of very small amounts of land that fall into one of two categories:

(1) Areas that were identified as being subject to grading and/or disturbance under the Draft EIR Site Plan are now located beyond the limits of disturbance on the VTTM Site Plan and would no longer be impacted; and

(2) Areas that were identified as being outside the limits of disturbance on the Draft EIR Site Plan are now located within the limits of disturbance on the VTTM Site Plan and would now be impacted.

Overall, there would be a net reduction in the number of acres that would be graded or subject to fuel modification under the VTTM Site Plan. Table FEIR-1 presents the acreages that would be subject to grading or other permanent ground disturbance (brush clearance or thinning) in the proposed Development Areas under both the Draft EIR and VTTM Site Plans.

Table FEIR-1
Comparison of Grading and Ground Disturbance Impacts

Type of Ground Disturbing Activity	Draft EIR (DEIR) Site Plan (from Section II of DEIR)	VTTM Site Plan	Change in Acreage
Permanent Grading	216.91	198.26	- 18.65
Brush Clearance (Ungraded Areas)	46.43	31.46	- 14.97
Brush Thinning (Ungraded Areas)	47.34	54.70	+ 7.36
Temporary Grading	23.32	29.74	+ 6.42
Total Acreage of Permanent Impact	**310.68**	**284.42**	**- 26.26**
Note: Temporary grading is not included in permanent impact acreage totals.			

As shown on Table FEIR-1, and as discussed in the Draft EIR (see Section III (Project Description) of the Draft EIR), the development of the Project under the Draft EIR Site Plan would have required the grading of approximately 240.23 acres of land, including approximately 216.91 acres of permanent

grading and approximately 23.32 acres of temporary grading, as shown on Table FEIR-1. The permanent grading included approximately 3.87 acres of land in the SCE Transmission Line ROW.

Under the VTTM Site Plan, the land subject to permanent grading would be reduced from approximately 216.91 acres to approximately 198.26 acres, a net decrease of approximately 18.65 acres. The overall area impacted by temporary grading would change from approximately 23.32 acres of land to approximately 29.74 acres of land, a net increase of approximately 6.42 acres. However, as discussed in the Draft EIR, the land subject to temporary grading would be restored with native vegetation. Overall, the land subject to permanent and temporary grading would decrease from approximately 240 acres to 228 acres, a net reduction of approximately 12 acres.

As also shown on Table FEIR-1, the ungraded areas that would be subject to fuel modification (i.e., brush clearance and brush thinning) would change under the VTTM Site Plan. The ungraded areas subject to brush clearance would decrease from approximately 46.43 acres to approximately 31.46 acres, a net reduction of approximately 14.97 acres. The ungraded areas subject to brush thinning would change from approximately 47.34 acres to approximately 54.70 acres, a net increase of approximately 7.36 acres. Overall, the ungraded areas subject to fuel modification would decrease by approximately 7.61 acres.

Taking all of these changes into account, the implementation of the VTTM Site Plan would decrease the area subject to permanent grading and land disturbance from approximately 310.68 acres to approximately 284.42 acres, a net reduction of approximately 26.26 acres, as shown on Table FEIR-1.

Changes to Environmental Impacts

The overall reduction in the areas subject to grading and disturbance reflected in the VTTM Site Plan would serve to reduce the overall degree of the environmental impacts described and analyzed in the Draft EIR, although the spatial distribution of some impacts would change to a small degree. For example, as a result of the reduced grading and disturbance, the visual impacts associated with the VTTM Site Plan would be less significant than the visual impacts associated with the Draft EIR Site Plan, notwithstanding that the VTTM Site Plan includes several small areas that would now be subject to disturbance.

However, while this overall reduction in grading and disturbance would be beneficial from an environmental standpoint, it is appropriate to provide detailed information regarding the impact of the revised grading and disturbance areas on flora and fauna and native trees. That analysis is set forth below.

Figure FEIR-1 Change in Grading Areas

Biological Resources - Flora and Fauna

The changes in the limits of grading and disturbance on the VTTM Site Plan as compared to the Draft EIR Site Plan would result in minor modifications to the acreages of several vegetation associations that would be impacted by the proposed project. Section IV.D.1 (Biological Resources – Flora and Fauna) of the Draft EIR presents a summary of the impacts to vegetation associations on the project site under the Draft EIR Site Plan. It should be noted, however, that the 3.87 acres of land in the SCE Transmission Line ROW that would have been graded under the DEIR Site Plan were inadvertently omitted from the flora and fauna impact analysis in the Draft EIR (see Table IV.D-6 in the Draft EIR). In any event, the grading and disturbance impacts with respect to the SCE Transmission Line ROW under the Draft EIR and VTTM Site Plans are identical.

Tables FEIR-2 and FEIR-3 below present the total acreages (onsite and offsite) of each vegetation association that would be impacted under the VTTM Site Plan in comparison to the Draft EIR Site Plan.

Table FEIR-2
Comparison of All Vegetation Impacts

Vegetation Association	Total Acres Onsite	Permanent Grading Impacts (Including Offsite Impacts for VTTM)		Temporary Grading Impacts (Restored with Native Vegetation)		Brush Clearance (Ungraded Areas)		Brush Thinning Functional Impact (Ungraded Areas)		Total Acres of Permanent Vegetation Impact	
Site Plan		***DEIR***	***VTTM***	***DEIR***	***VTTM***	***DEIR***	***VTTM***	***DEIR***	***VTTM***	***DEIR***	***VTTM***
Mixed Chaparral	699.31	196.94	183.55	18.47	22.94	41.84	28.47	20.40	24.57	259.18	236.59
Coastal Sage Scrub	75.41	0.79	0.70	0.37	1.16	0.50	0.53	0.56	0.49	1.85	1.72
Deerweed Scrub	8.13	1.03	2.00	1.33	0.47	0.44	0.14	0.55	0.50	2.02	2.64
Mulefat Scrub	0.66	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Chamise Chaparral	51.86	7.12	8.64	0.00	0.00	3.62	2.23	1.36	1.31	12.10	12.18
Southern Mixed Riparian Forest	24.59	2.23	1.59	1.21	2.12	0.00	0.00	0.41	0.23	2.64	1.82
South Coast Live Oak Woodland	2.60	0.25	0.25	0.00	0.00	0.00	0.00	0.00	0.00	0.25	0.25
Chamise Chaparral – CSS Ecotone	8.89	1.50	1.00	1.79	2.54	0.00	0.00	0.00	0.00	1.50	1.00
South Coast Live Oak Riparian Forest	11.74	0.52	0.11	0.15	0.51	0.02	0.00	0.07	0.09	0.61	0.20
Southern Willow Scrub	2.09	0.31	0.31	0.00	0.00	0.00	0.00	0.00	0.00	0.31	0.31
Disturbed-Ruderal	1.63	0.31	0.11	0.00	0.00	0.00	0.09	0.00	0.17	0.31	0.37
Total	**886.93**	**211.00**	**198.26**	**23.32**	**29.74**	**46.43**	**31.46**	**23.67**	**27.35**	**280.77**	**257.08**

Notes: Permanent impacts do not include areas that would be subject to remedial grading, but revegetated with native species upon completion of grading. The functional impact associated with brush thinning represents 50% of the total acreage subject to brush thinning. Offsite impacts consist of 0.49 acres of chamise chaparral and 3.38 acres of mixed chaparral in the SCE Transmission Line ROW.

Table FEIR-3
Comparison of Permanent Vegetation Impacts

Vegetation Association	Draft EIR Site Plan Permanent Impacts	VTTM Site Plan Permanent Impacts (Including Offsite Impacts)	Change in Impact Acreage
Mixed Chaparral	259.18	236.59	- 22.59
Coastal Sage Scrub	1.85	1.72	- 0.13
Deerweed Scrub	2.02	2.64	+ 0.62
Mulefat Scrub	0.00	0.00	No change
Chamise Chaparral	12.10	12.18	+ 0.08
Southern Mixed Riparian Forest	2.64	1.82	- 0.82
South Coast Live Oak Woodland	0.25	0.25	No change
Chamise Chaparral–CSS Ecotone	1.50	1.00	- 0.50
South Coast Live Oak Riparian Forest	0.61	0.20	- 0.41
Southern Willow Scrub	0.31	0.31	No change
Disturbed-Ruderal	0.31	0.37	+ 0.06
Total	**280.77**	**257.08**	**- 23.69**

As shown on Tables FEIR-2 and FEIR-3, the VTTM Site Plan would decrease the overall amount of permanent vegetation impact by 23.69 acres. The data in Table FEIR-2 illustrates that the VTTM Site Plan would increase the temporary impacted acreage by 6.42 acres. In addition, the amount of permanently impacted acreage with respect to most of the individual vegetation associations would decrease. In particular, the southern mixed riparian forest impacted by the proposed project would be reduced from 2.64 acres to 1.82 acres, a net decrease of 0.82 acre, while the south coast live oak riparian forest impacted by the proposed project would be reduced from 0.61 acre to 0.20 acre, a net decrease of 0.41 acre.

However, the amount of permanently impacted acreage within the following vegetation associations would be increased by very small amounts: deerweed scrub, chamise chaparral, and disturbed-ruderal. The loss of an additional 0.62 acre of deerweed scrub from an artificial slope would not alter the conclusion in the Draft EIR that the impact of the proposed project on deerweed scrub would not be significant because deerweed scrub does not provide significant habitat. The loss of an additional 0.08 acre of chamise chaparral would not change the conclusion in the Draft EIR that the impact of the proposed project on chamise chaparral would not be significant due to the abundance of that vegetation in the area. Finally, the loss of an additional 0.06 acre of disturbed-ruderal vegetation would not change the conclusion in the Draft EIR that the proposed project would not have a significant impact on disturbed-ruderal vegetation because this type of vegetation possesses very low habitat function.

The changes to the grading and vegetation disturbance associated with the VTTM Site Plan would also result in minor modifications in the amount and type of impacted acreage within the jurisdiction of the U.S. Army Corps of Engineers (Army Corps) and the California Department of Fish and Game (CDFG), as well as non-jurisdictional riparian habitats on the project site. Table FEIR-4 provides a comparison of the Draft EIR and VTTM Site Plan impacts to riparian areas by jurisdiction and type.

Table FEIR-4
Comparison of Changes to Drainage and Riparian Habitat Impacts

Type of Impact	Grading/Ground Disturbance Impact Acreage		Change in Acreage
Site Plan	***DEIR***	***VTTM***	
Drainages Under ACOE Jurisdiction - Impacted	2.06	2.07	+ 0.01
Drainages Under CDFG Jurisdiction - Impacted	2.45	2.47	+ 0.02
Drainages Under ACOE Jurisdiction - Preserved	4.40	4.39	- 0.01
Drainages Under CDFG Jurisdiction - Preserved	6.67	6.65	- 0.02
Jurisdictional Riparian Habitats			
Southern Mixed Riparian Forest	0.68	0.70	+ 0.02
South Coast Live Oak Riparian Forest	0.04	0.04	No change
Southern Willow Scrub	0.02	0.02	No change
Non-Jurisdictional Riparian Habitats			
Southern Mixed Riparian Forest	1.96	1.35	- 0.61
South Coast Live Oak Riparian Forest	0.55	0.25	- 0.30
Southern Willow Scrub	0.29	0.29	No change
Temporary Impacts			
Southern Mixed Riparian Forest	1.21	2.12	+ 0.91
South Coast Live Oak Riparian Forest	0.15	0.51	+ 0.36
Southern Willow Scrub	0.00	0.00	No change

As shown on Table FEIR-4, the revised grading contemplated under the VTTM Site Plan would slightly increase the amount of acreage within both Army Corps and CDFG jurisdictional drainages that would be impacted by the proposed project. However, these increases are extremely small (0.01 and 0.02 acre, respectively) and would not alter the conclusions in the Draft EIR that the recommended mitigation would reduce these impacts to a less-than-significant level. No changes to the recommended mitigation measures are necessary in light of such a small change in the amount of area to be impacted. Similarly, the VTTM Site Plan would slightly increase the amount of jurisdictional riparian habitat that would be impacted by 0.02 acre of southern mixed riparian forest. The additional affected area is located within Drainage 4 on the eastern side of proposed Development Area A. However, since this increase is extremely small, it would not alter the conclusion in the Draft EIR that the recommended mitigation would reduce this impact to a less-than-significant level. No changes to the recommended

mitigation measures are necessary in light of such a small change in the amount of area to be impacted. It should also be noted that while the implementation of the VTTM Site Plan would result in a 0.02-acre increase in the amount of impacted jurisdictional riparian habitat, it would reduce the amount of impacted non-jurisdictional riparian habitat by 0.91 acre, resulting in a net decrease of 0.89 acre.

Temporary impacts to riparian habitat on the project site would increase under the VTTM Site Plan by 1.27 acres. Most of this increase would occur in areas adjacent to the entrances to proposed Development Area B across La Tuna Canyon Wash. These areas would be affected by remedial grading but would be restored with native vegetation following completion of construction activities.

Biological Resources - Trees

Subsequent to the completion of the original tree inventory (see Appendix G to the Draft EIR), three additional coast live oaks were identified within the proposed limits of disturbance with respect to proposed Development Area A that were not included in the original tree inventory.[18] These additional coast live oaks have been added to the tree inventory and are shown on revised Figures IV.D-6 through IV.D-18 in this section of this Final EIR. The three additional trees are numbered 523, 524 and 525. Tree number 525 has been included in both revised Figure IV.D-6 and Detail Map N4 in revised Figure IV.D-11. The other two coast live oaks are shown on revised Figure IV.D-6 and are generally located to the northwest and west of tree number 525. These two trees are isolated and therefore did not require inclusion in a detail map. The three additional trees have DBH measurements of 18, 14 and 27 inches, respectively, with average overall health ratings ranging from 2.9 to 3.0. These three additional coast live oaks would be impacted by the proposed project, thereby increasing the maximum number of coast live oaks that could be impacted by the proposed project under the Draft EIR Site Plan from 232 to 235.

As discussed in the Tree Report Addendum (Appendix E to the Final EIR), the three additional coast live oaks enlarge the total "Area of Occupation" by three acres. The fair market value of the impacted trees is $7,926. In order to mitigate the impact associated with the loss of the additional three trees, the Tree Report Addendum includes a modification to the original conceptual tree planting program to plant an additional 36 new coast live oaks in 24-inch boxes, which have an approximate value installed of $8,100 and exceeds the value of the three additional impacted coast live oaks.

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[18] *A supplemental tree inventory was conducted March 12, 2004 by Scott Eckardt, certified arborist (certification number WC-5914) of Dudek & Associates, Inc., and Tony Bomkamp, a Regulatory Specialist with Glenn Lukos Associates, Inc. Tom Larson, a Registered Consulting Arborist (Registration No. 389) of Dudek & Associates, Inc., served as lead arborist.*

In connection with the refinement of the proposed project during the preparation of the VTTM Site Plan, the permanent grading area was reduced from 216.91 acres to 198.26 acres. As a result, 14 fewer coast live oaks and one more western sycamore would be impacted with the development of the proposed project under the VTTM Site Plan as compared to the DEIR Site Plan. Table FEIR-5 provides a comparison of all of the coast live oaks and western sycamores that have a different status under the VTTM Site Plan as compared to the Draft EIR Site Plan. These trees are listed in Table FEIR-5 by tree identification number and tree type. The previous status of the tree was described in the Draft EIR and was associated with the Draft EIR Site Plan. The revised status of each tree reflects its status under the VTTM Site Plan. The three trees that were initially identified after circulation of the Draft EIR (the "Addendum" trees described above) would be impacted under either the Draft EIR or VTTM Site Plans and are also described in Table FEIR-5, together with a summary of the overall number of coast live oaks and western sycamores identified in the Draft EIR and the Tree Report Addendum.

Table FEIR-5
Comparison of Tree Impacts

Tree Number	Species Name	Previous Status Under Draft EIR Site Plan	Revised Status Under VTTM Site Plan	Effective DBH	No. of Trunks	Overall Rating
DEIR Listed Trees						
2	*Quercus agrifolia*	Preserved	Preserved w/MM	17	3	3.4
3	*Quercus agrifolia*	Impacted	Preserved w/MM	20	1	2.4
9	*Quercus agrifolia*	Preserved w/MM	Preserved	14	1	2
17	*Platanus racemosa*	Preserved	Preserved w/MM	18	2	2.4
21	*Quercus agrifolia*	Preserved	Preserved w/MM	8	1	2.2
22	*Quercus agrifolia*	Preserved	Preserved w/MM	16	2	3.8
24	*Quercus agrifolia*	Preserved	Preserved w/MM	20	1	3.2
26	*Quercus agrifolia*	Preserved	Preserved w/MM	14	1	3.2
29	*Quercus agrifolia*	Impacted-Buffer	Preserved	20	1	2.4
30	*Quercus agrifolia*	Impacted	Preserved	18	1	2.4
105	*Quercus agrifolia*	Preserved	Preserved w/MM	20	4	3.2
107	*Quercus agrifolia*	Impacted-Buffer	Preserved w/MM	8	2	2.6
110	*Platanus racemosa*	Impacted	Impacted Buffer	13	1	3.8
115	*Quercus agrifolia*	Impacted-Buffer	Impacted	29	1	3.4
123	*Quercus agrifolia*	Impacted	Impacted Buffer	32	3	3.4
135	*Quercus agrifolia*	Impacted-Buffer	Preserved w/MM	17	3	3
149	*Quercus agrifolia*	Impacted-Buffer	Impacted	14	1	2.4
150	*Quercus agrifolia*	Preserved	Impacted Buffer	19	1	2.6
184	*Quercus agrifolia*	Impacted	Impacted Buffer	19	1	3.8
214	*Quercus agrifolia*	Impacted	Preserved w/MM	34	1	3.6
215	*Quercus agrifolia*	Impacted	Preserved w/MM	25	1	3.4
216	*Quercus agrifolia*	Impacted	Impacted Buffer	15	1	3.2

Table FEIR-5 (continued)
Comparison of Tree Impacts

Tree Number	Species Name	Previous Status Under Draft EIR Site Plan	Revised Status Under VTTM Site Plan	Effective DBH	No. of Trunks	Overall Rating
219	*Quercus agrifolia*	Impacted	Preserved w/MM	13	1	3.4
220	*Platanus racemosa*	Preserved w/MM	Impacted Buffer	14	1	3.6
230	*Quercus agrifolia*	Preserved	Preserved w/MM	9	1	2.6
231	*Quercus agrifolia*	Preserved	Preserved w/MM	18	1	2.8
232	*Quercus agrifolia*	Preserved	Preserved w/MM	22	1	3.4
233	*Platanus racemosa*	Preserved	Preserved w/MM	15	1	2.6
235	*Quercus agrifolia*	Preserved w/MM	Impacted Buffer	25	2	2.4
244	*Quercus agrifolia*	Preserved	Preserved w/MM	17	1	3.6
245	*Quercus agrifolia*	Preserved	Preserved w/MM	28	3	3.4
254	*Quercus agrifolia*	Preserved w/MM	Impacted	15	2	2
255	*Quercus agrifolia*	Impacted-Buffer	Impacted	25	5	2.4
277	*Quercus agrifolia*	Impacted	Impacted Buffer	20	1	2.2
291	*Quercus agrifolia*	Impacted-Buffer	Preserved	8	4	1.6
292	*Quercus agrifolia*	Preserved	Impacted	19	6	2
296	*Platanus racemosa*	Impacted	Impacted Buffer	12	3	2.8
299	*Quercus agrifolia*	Impacted	Preserved w/MM	14	1	2
300	*Quercus agrifolia*	Impacted	Preserved w/MM	44	1	2.4
305	*Platanus racemosa*	Impacted-Buffer	Impacted	14	1	3.8
306	*Quercus agrifolia*	Preserved	Preserved w/MM	37	2	3.8
307	*Quercus agrifolia*	Preserved	Preserved w/MM	8	1	3.8
311	*Quercus agrifolia*	Preserved	Impacted	23	2	3.2
325	*Quercus agrifolia*	Impacted-Buffer	Impacted	19	1	3.4
352	*Quercus agrifolia*	Preserved	Impacted Buffer	18	1	3.2
372	*Quercus agrifolia*	Impacted	Preserved w/MM	38	4	3.4
373	*Quercus agrifolia*	Impacted	Impacted Buffer	31	1	3.6
375	*Quercus agrifolia*	Preserved	Preserved w/MM	11	1	3.2
378	*Platanus racemosa*	Preserved	Preserved w/MM	16	2	3.2
379	*Platanus racemosa*	Preserved	Preserved w/MM	22	1	3.6
385	*Quercus agrifolia*	Impacted-Buffer	Preserved w/MM	12	3	3.4
386	*Quercus agrifolia*	Preserved w/MM	Preserved	17	3	3.4
387	*Quercus agrifolia*	Preserved w/MM	Preserved	17	1	3.6
388	*Quercus agrifolia*	Preserved w/MM	Preserved	8	1	3
389	*Quercus agrifolia*	Preserved w/MM	Preserved	8	2	3.6
391	*Quercus agrifolia*	Preserved w/MM	Preserved	8	2	2.8
393	*Quercus agrifolia*	Preserved w/MM	Preserved	11	1	2.6
403	*Quercus agrifolia*	Impacted-Buffer	Preserved w/MM	12	5	3
404	*Quercus agrifolia*	Impacted-Buffer	Preserved w/MM	10	2	3.6
405	*Quercus agrifolia*	Impacted	Preserved w/MM	10	1	3.2
406	*Quercus agrifolia*	Impacted	Preserved w/MM	9	2	3.8
407	*Quercus agrifolia*	Impacted-Buffer	Preserved w/MM	13	2	3.4
408	*Quercus agrifolia*	Impacted	Preserved w/MM	11	1	3

Table FEIR-5 (continued)
Comparison of Tree Impacts

Tree Number	Species Name	Previous Status Under Draft EIR Site Plan	Revised Status Under VTTM Site Plan	Effective DBH	No. of Trunks	Overall Rating
409	*Quercus agrifolia*	Impacted	Preserved w/MM	12	1	3.4
410	*Quercus agrifolia*	Impacted	Preserved w/MM	18	1	2.6
411	*Quercus agrifolia*	Preserved w/MM	Preserved	17	1	2.6
414	*Quercus agrifolia*	Preserved w/MM	Impacted Buffer	29	2	3.4
415	*Platanus racemosa*	Impacted-Buffer	Preserved w/MM	28	1	3.8
416	*Platanus racemosa*	Impacted	Impacted Buffer	30	2	3.8
417	*Quercus agrifolia*	Impacted	Impacted Buffer	26	2	3.8
418	*Quercus agrifolia*	Impacted	Impacted Buffer	18	2	3.4
419	*Quercus agrifolia*	Preserved	Impacted	33	2	3.8
427	*Quercus agrifolia*	Preserved w/MM	Impacted	34	3	2
428	*Quercus agrifolia*	Impacted-Buffer	Preserved w/MM	24	4	3
429	*Platanus racemosa*	Preserved w/MM	Impacted	16	1	2.6
430	*Quercus agrifolia*	Impacted-Buffer	Impacted	16	1	2.4
431	*Quercus agrifolia*	Preserved w/MM	Impacted	29	2	2.6
432	*Platanus racemosa*	Preserved w/MM	Impacted	17	2	2.4
433	*Quercus agrifolia*	Preserved	Preserved w/MM	22	1	2
436	*Quercus agrifolia*	Preserved	Preserved w/MM	28	2	2.4
437	*Quercus agrifolia*	Preserved	Preserved w/MM	29	1	2.6
438	*Quercus agrifolia*	Preserved	Preserved w/MM	16	1	2.6
439	*Quercus agrifolia*	Preserved	Preserved w/MM	20	1	2
441	*Platanus racemosa*	Preserved	Preserved w/MM	12	2	2
442	*Quercus agrifolia*	Preserved	Preserved w/MM	24	2	2.4
444	*Quercus agrifolia*	Preserved	Preserved w/MM	14	1	2.4
445	*Platanus racemosa*	Impacted-Buffer	Impacted	13	2	2.2
446	*Quercus agrifolia*	Preserved w/MM	Impacted Buffer	18	1	2.4
447	*Platanus racemosa*	Impacted-Buffer	Impacted	17	5	2.6
449	*Platanus racemosa*	Impacted-Buffer	Preserved w/MM	14	3	2.8
451	*Platanus racemosa*	Preserved	Preserved w/MM	12	2	2.8
466	*Quercus agrifolia*	Preserved	Preserved w/MM	21	2	2.8
476	*Quercus agrifolia*	Impacted-Buffer	Preserved w/MM	13	1	1.6
477	*Quercus agrifolia*	Preserved	Preserved w/MM	15	1	2.8
478	*Quercus agrifolia*	Impacted	Preserved w/MM	19	1	2
479	*Quercus agrifolia*	Impacted	Preserved w/MM	19	1	2.8
480	*Quercus agrifolia*	Impacted	Impacted Buffer	17	1	2.6

Table FEIR-5 (continued)
Comparison of Tree Impacts

Subtotals for Draft EIR-Listed Trees						
	Draft EIR Site Plan Impacts:			**VTTM Site Plan Impacts:**		
Species	*Impacted*	**20' Wide Disturbance Area**	**Total**	**Impacted**	**20' Wide Disturbance Area**	**Total**
Coast Live Oak	212	20	232	200	18	218
Western Sycamore	22	5	27	24	4	28
Total	*234*	*25*	*259*	*224*	*22*	*246*

Addendum Tree Report Revisions						
Tree Number	**Species Name**	**Previous Status Under Draft EIR Site Plan**	**Revised Status Under VTTM Site Plan**	**Effective DBH**	**No. of Trunks**	**Overall Rating**
523	*Quercus agrifolia*	Impacted	Impacted	18	1	3.0
524	*Quercus agrifolia*	Impacted	Impacted	14	1	3.0
525	*Quercus agrifolia*	Impacted	Impacted	27	1	2.8

Subtotals for Addendum Trees						
	Draft EIR Site Plan Impacts:			**VTTM Site Plan Impacts:**		
Species	**Impacted**	**20' Wide Disturbance Area**	**Total**	**Impacted**	**20' Wide Disturbance Area**	**Total**
Coast Live Oak	3	0	3	3	0	3
Overall Total (Draft EIR and Addendum)						
Coast Live Oak	215	20	235	203	18	221
Western Sycamore	22	5	27	24	4	28
Total	***235***	***25***	***262***	***227***	***22***	***249***

As shown on Table FEIR-5, implementation of the VTTM Site Plan would result in a net reduction in the number of trees that would be impacted by the proposed project when compared with the DEIR Site Plan (including the "Addendum" trees). A total of 14 fewer coast live oaks and one more western sycamore would be impacted under the VTTM Site Plan. As a result of this overall decrease in the number of impacted trees, the conceptual tree planning program and other recommended mitigations in the Draft EIR provide an acceptable level of mitigation. However, Mitigation Measures D.2-6 and D.2-7 have been revised in response to comments on the Draft EIR and otherwise to clarify their application. These revised mitigation measures are included in this section of this Final EIR.

Summary

The changes to grading and ground disturbance patterns in the proposed Development Areas under the VTTM Site Plan would result in an overall decrease in the extent of disturbance and associated environmental impacts. Differences in biological impacts with respect to flora and fauna and native trees are very small and generally represent a reduction in impact scale. For the few specific impacts

that would marginally increase under the VTTM Site Plan, the increases are small in scale and would not change the conclusions of the Draft EIR regarding impact significance or recommended mitigation.