The following sections of the Draft EIR contain detailed environmental analyses of the existing conditions of the Project Site and surrounding area; Project impacts, such as indirect, direct, short-term, long-term, and cumulative; and recommended mitigation measures, if necessary. This Draft EIR addresses those environmental issues identified in the Notice of Preparation (NOP), which is available, along with the NOP response letters, in **Appendix A**.

The Draft EIR examines the following environmental issue areas:

- 4.1 Aesthetics
- 4.2 Air Quality
- 4.3 Biological Resources
- 4.4 Cultural Resources
- 4.5 Energy
- 4.6 Geology and Soils
- 4.7 Greenhouse Gas Emissions
- 4.8 Hazards and Hazardous Materials
- 4.9 Hydrology and Water Quality
- 4.10 Land Use and Planning
- 4.11 Noise
- 4.12 Population and Housing
- 4.13 Public Services
- 4.14 Transportation
- 4.15 Tribal Cultural Resources
- 4.16 Utilities and Service Systems
- 4.17 Wildfire

Each environmental issue is addressed in a separate section of the Draft EIR and is organized into four sections, as follows:

Environmental Setting

The Environmental Setting subsection describes the existing and pre-Project conditions in terms of the physical environment at the time of the NOP issuance. This section also provides the background information that supports the analysis of the Project's impacts presented in the following subsections.

Regulatory and Planning Framework

The Regulatory and Planning Framework subsection explains the applicable federal, State, regional, and/or local regulations, statutes, and guiding policies that pertain to each respective environmental issue that may be applicable to the Proposed Project.

Thresholds of Significance

The Thresholds of Significance subsection identifies the significance thresholds, which are based on Appendix G of the CEQA Guidelines and, if relevant, the City's Initial Study Checklist and used to determine the level of significance of a particular issue. This subsection also identifies those significance thresholds for which the Project would not result in significant impacts as determined in the Initial Study (**Appendix A** of this Draft EIR).

Methodology

The Methodology subsection identifies the methods used to analyze the impacts of the Project in consideration of the significance thresholds. Each environmental issue area has its own methodology, which may include identification of models used (if applicable), surveys and research that were conducted, calculations, and plans or policies reviewed for consistency.

Project Design Features

As applicable, the Project Design Features subsection identifies components of the Project that would be implemented above and beyond compliance with specific regulations and requirements but not for the purpose of mitigating the Project's significant impacts (e.g., provision of rooftop photovoltaic systems and solar panels not required by the Santa Clarita Municipal Code).

Analysis of Project Impacts

The Analysis of Project Impacts subsection addresses each environmental topic that was determined to have a potentially significant impact in the Initial Study (**Appendix A** of this Draft EIR). The environmental impact analysis involves the identification of the environmental changes to existing physical conditions that could occur if the Project were to be implemented, as well as the magnitude, duration, extent, frequency, and range of potential impacts, as determined through review of factual, scientific data and consideration of all potential direct and reasonably foreseeable indirect effects of the Project. The impact determination is either no impact, less than significant impact, or significant impact (prior to mitigation). If potentially significant impacts are identified, feasible mitigation measures are recommended. These mitigation measures are Project-related actions taken to (1) avoid significant adverse impacts, (2) minimize a significant adverse impact, (3) rectify a significant adverse impact through restoration, (4) compensate for the impact by replacement of a substitute resource or environment, or (5) reduce or eliminate a significant adverse impact over time by preservation and maintenance operations. After consideration of the mitigation measures, the "Level of Significance after Mitigation" determination is made and identifies impacts that would remain after the application of Project-level mitigation measures and whether the impacts are considered significant. If mitigation measures would not reduce the effects of a Project impact to less than significant, then the Project effects are considered significant and unavoidable.

Cumulative Impacts

The Cumulative Impacts subsection analyzes the impacts of the Project when considered with related projects that have been identified by the City. These related projects may include past, present, and probable future projects that have the potential to produce cumulative impacts.

4.1 AESTHETICS

This section evaluates the Project's potential impacts on aesthetic resources. This section describes the existing visual setting of the Project Site and vicinity within the context of the surrounding community; identifies applicable laws, regulations, guidelines and policies relating to aesthetics; and evaluates potential aesthetic impacts related to implementation of the Project.

This section relies on the visual renderings prepared by GAA Architects and shown herein. The analysis of the Project impacts to oak trees is addressed in Section 4.3, Biological Resources, of this Draft EIR, and Project consistency with land use is addressed in Section 4.10, Land Use and Planning, of this Draft EIR.

4.1.1 ENVIRONMENTAL SETTING

SCENIC RESOURCES

The City of Santa Clarita General Plan Conservation and Open Space Element states that "while aesthetic value is subjective, it is one of the elements that contribute to people's experience of an area. Most communities identify scenic resources as an important asset, although what is considered 'scenic' may vary according to its environmental setting".[1] The Conservation and Open Space Element further states that scenic resources "can include natural open spaces, topographic formations, and landscapes that contribute to a high level of visual quality. These are significant resources that can be maintained and enhanced to promote a positive image in the community. Many people associate natural landforms and landscapes with scenic resources, such as lakes, rivers and streams, mountain meadows, and oak woodlands. These areas, generally felt by residents to possess natural beauty, provide a positive visual experience and help to define the aesthetic character of an area. Scenic resources can also include man-made open spaces and the built environment, such as greenbelts, parkways, parks, trail systems, nature preserves, sculpture gardens, and similar features."[2]

The Santa Clarita Valley is characterized by diverse topography, including river valleys, canyons, mountains, and ridgelines, as well as grasslands and forest areas. The City recognizes the importance of foothills and canyons as important scenic resources that, because of inherent slope constraints, have remained undeveloped and support a variety of natural habitats.

The Conservation and Open Space Element states that rivers and streams located within the valley's canyons "provide scenic visual relief from urbanization" with the most significant river feature in the Santa Clarita Valley being the Santa Clara River, which at its closest is approximately 1.6 miles north of the Project Site. Placerita Creek, which transects the northern portion of the Project Site, is a tributary to the south fork of the Santa Clara River. The City's General Plan generally considers that rivers and streams located in canyon bottoms provide scenic visual relief from urbanization.[3]

Scenic resources on the Project Site include a prominent ridgeline, which runs along the northeastern portion and boundary of the Project Site and Placerita Creek and the creek wash area that traverses the Project Site. The ridgeline, which is considered a "significant ridgeline" in

1 City of Santa Clarita, General Plan, Conservation and Open Space Element, page CO-52, June 2011.
2 City of Santa Clarita, General Plan, Conservation and Open Space Element, page CO-53, June 2011
3 City of Santa Clarita, General Plan, Conservation and Open Space Element, page CO-56, June 2011

the Conservation and Open Space Element, rises to a height of approximately 1,343 feet above mean sea level at its northern tip and 1,320 feet above mean sea level at the point where the ridgeline intersects the eastern boundary of the Project Site. This ridgeline is approximately 80 to 110 feet above the flat, central portion of the Project Site and surrounding areas, and slopes downward to the southwest toward Placerita Creek and the creek wash area, which ranges between 70 and 170 feet wide.

Additionally, the Project Site is adjacent to the Old Town Newhall area, which generally extends from Pine Street to Market Street, covering a few blocks on both sides of Railroad Avenue; from Market Street to 11th Street, covering a few blocks on the west side of Railroad Avenue; and from 11th Street to 14th Street, covering the parcels fronting on the west side Railroad Avenue and across from the southern portion of the Project Site. Originally settled in 1878, Old Town Newhall is characterized by its "old town" atmosphere, with a compact and walkable character and emphasis as an arts and entertainment district.[4] Old Town Newhall provides a variety of thoroughfare types, ranging from active, vibrant, and pedestrian-oriented streetscapes along Main Street to the lush turf parkways and mature canopy trees of flanking streets. Architectural styles that are consistent with the City's goals for form, character, and context include Main Street Commercial, Mediterranean, Monterey, Western Victorian, and Craftsman.[5]

SCENIC VISTAS

While there is no widely accepted definition of a scenic vista, it is often defined as a publicly accessible, expansive view of a highly valued landscape or prominent visual elements. The City's General Plan further states that scenic vistas may include views of both natural and built environments.[6]

The City's General Plan identifies several major scenic canyon areas in the region, which, in addition to providing natural habitats, also include ridgelines that provide views from the regional San Gabriel and Sierra Pelona mountain ranges to the valley floor. The closest major scenic canyon area to the Project Site is Whitney Canyon, which is approximately 1.9 miles to the southeast. Other nearby major scenic canyon areas include Elsmere Canyon, approximately 2 miles to the southeast; Wiley Canyon, approximately 2.2 miles to the southwest; Towsley Canyon, approximately 2.8 miles to the southwest; and Placerita Canyon, approximately 3.4 miles east of the Project Site.[7]

While not specified in the City's General Plan, Quigley Canyon Open Space, which is located at the end of Cleardale Avenue, in Santa Clarita, is approximately 0.7 mile east of the Project Site. The approximately 160-acre open space area features several trails, undulating slopes, and 360-degree views.[8] The highest elevations in this park reach over 1,600 feet along the trails on the east portion of the open space area, roughly 1.4 miles from the Project Site.

4 City of Santa Clarita, General Plan, Conservation and Open Space Element, page CO-39, June 2011.
5 City of Santa Clarita, Old Town Newhall Specific Plan, 2022.
6 City of Santa Clarita, General Plan, Conservation and Open Space Element, page CO-53, June 2011.
7 City of Santa Clarita, General Plan, Conservation and Open Space Element, page CO-53, June 2011.
8 HikeSantaClarita.com, "Quigley Canyon," accessed March 26, 2023, https://hikesantaclarita.com/where-to-go/quigley-canyon.

VISUAL CHARACTER OF THE SITE AND SURROUNDING AREAS

Figures 4.1-1A through **4.1-1D** show views of the Project Site and the surrounding areas. While the Project Site includes natural features, specifically the ridgeline and natural creek area in the northern portion of the site, and contains 16 oak trees, the majority of which are located in the northern portion of the site along the ridgeline and along the creek, the Project Site also shows evidence of disturbance.

The Project Site has been cleared of the majority of its natural vegetation. The central and southern portions of the Project Site have been disturbed by past uses, are relatively flat, and are characterized by low, ruderal plants and a network of gravel paths and unimproved roadways. While the Placerita Creek area contains riparian scrub vegetation and clusters of oak trees, it is also characterized by scattered piles of non-hazardous construction solid waste, such as asphalt, concrete, and wood and metal debris, and informal dirt paths.

The Project Site also includes a drainage ditch running along the northeastern boundary of the Project Site, adjacent to the western edge of the MWD property, and a drainage ditch along the southwestern boundary of the Project Site, adjacent to the railroad right-of-way (ROW) used by Metrolink and Union Pacific Railroad (UPRR), and Railroad Avenue. The southwesterly drainage ditch discharges into a culvert underneath the railroad tracks approximately 370 feet southeast of the Railroad Avenue bridge over Placerita Creek.

In general, the Project Site serves as a transition area between two communities with distinctive land use patterns. East of the Project Site, the Placerita Canyon community is a semi-rural residential area, characterized by equestrian-oriented residential uses among oak woodlands. West and southwest of the Project Site, Old Town Newhall, which is centered along Lyons Street and Main Street and located adjacent to the Project Site along Railroad Avenue, is developed with a mix of uses within a commercial district.

To the north of the Project Site beyond the ridgeline along the northern boundary of the Project Site is a neighborhood of single-family homes.

To the west, the Project Site is bordered by a railroad ROW used by Metrolink and UPRR and Railroad Avenue. Railroad Avenue is classified as a major highway and was formerly named San Fernando Road, which was identified as a “primary corridor” in the Santa Clarita Beautification Master Plan.[9]

Railroad Avenue is currently built as a four-lane road with a raised median, from 13th Street extending northward to Drayton Street, with occasional shrubs and trees. Railroad Avenue has overhead streetlights running the length of either side of the road with a sidewalk on the western frontage of the road. The eastern frontage of Railroad Avenue is lined with trees and shrubs between the road and an approximately 6-foot-high chain-link fence separating the road from the railroad ROW. The eastern side of Railroad Avenue also has five double-sided billboard signs, approximately 40 feet high, evenly spaced along the length of the Project Site, as well as several commercial businesses. On the west side of Railroad Avenue is a mixture of low-rise retail, restaurant, and automotive repair businesses, and a mobile home community, as well as Los Angeles County Fire Station No. 73. In general, the restaurant, retail, and commercial buildings west of Railroad Avenue are single-story structures.

[9] City of Santa Clarita, General Plan, Circulation Element, Table C-2, June 2011; Beautification Master Plan - Newhall, page III-15, December 2001.

IMAGE 1: View from the southwest corner of the Project Site facing northeast at the corner of Railroad Avenue and 13th Street. The existing adjacent railroad right-of-way and crossing are shown in the foreground and the ridgeline along the northern boundary of the Project Site is shown in the middleground.

IMAGE 2: View into the central portion of the Project Site facing northeast from the intersection of Railroad Avenue and 15th Street. View shows both the railroad right-of-way in the foreground and the ridgeline along the northern boundary of the Project Site in the background.

IMAGE 3: View into the northern portion of the Project Site facing northeast from Railroad Avenue and Placerita Creek. View shows the foreground views of Placerita Creek, the existing adjacent railroad right-of-way and associated culvert structure, and the ridgeline along the northern boundary of the Project Site.

Michael Baker INTERNATIONAL

Source: Google Earth, 2023.

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SHADOWBOX STUDIOS ENVIRONMENTAL IMPACT REPORT

Project Site and Surrounding Area Views

Figure 4.1-1A

IMAGE 4: View showing the Project Site from Railroad Avenue and 14th Street facing southeast. The perspective shows the northern extent of the Old Town Newhall Specific Plan Area adjacent to the Project Site, on the west side of Railroad Avenue.

IMAGE 5: View along Railroad Avenue facing north showing the central portion of the Project Site and existing commercial businesses and development along the west and east sides of Railroad Avenue.

IMAGE 6: View towards the Project Site from Arch Street and 12th Street facing north. The existing commercial uses along Arch Street are shown on the left.

IMAGE 7: View of the Project Site from the southern boundary along the intersection of Arch Street and 13th Street, facing north. The view shows the Project Site level ground in the foreground and the ridgeline along the northern boundary of the Project Site in the middleground.

IMAGE 8: View from the southeast corner of the Project Site facing northwest from the intersection of 12th Street and the MWD easement adjacent to the residences on the east side of the Project Site.

IMAGE 9: View towards the Project Site facing northwest from the Placerita Canyon neighborhood. This view shows the closest view of the northern portion of the Project Site, including the ridgeline from the adjacent residences on the east side of the Project Site.

IMAGE 10: View along 12th Street facing northeast showing the southeast corner of the Project Site and the existing chainlink fencing and the adjacent Placerita Canyon neighborhood.

IMAGE 11: View at the southern portion of the Project Site at the intersection of Arch Street and 12th Street facing south, showing adjacent commercial and industrial business uses.

IMAGE 12: View along Railroad Avenue at the intersection with Lyons Avenue showing the nearby parking garage and Old Town Library Building.

Michael Baker INTERNATIONAL

Source: Google Earth, 2023.

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SHADOWBOX STUDIOS ENVIRONMENTAL IMPACT REPORT

Project Site and Surrounding Area Views

Figure 4.1-1D

East of the Project Site is the Placerita Canyon residential community, which includes a neighborhood of single-family homes fronting on Alderbrook Drive. These homes were constructed in the 1960s and are situated on deep, narrow lots between Alderbrook Drive and the MWD ROW.

On the south side of the Project Site, 13th Street extends east from Railroad Avenue with an at-grade railroad crossing immediately east of the 13th Street and Railroad Avenue intersection. 13th Street rounds a corner to the south, becoming Arch Street, which intersects 12th Street as 12th Street extends east. This S-curve of 13th Street, Arch Street, and 12th Street makes up the southern boundary of the Project Site. This area is developed with mixed use-zoned commercial and light industrial areas, including single-story retail, restaurant, and commercial buildings with a surface parking lot along Arch Street; single-story retail and light industrial uses, including a go-kart supplier and automotive repair businesses; and self-storage, construction services, a City Public Works storage yard, and a plant nursery south of 12th Street and along Placerita Canyon Road. Farther south at the corner of Railroad Avenue and Lyons Avenue are recently constructed high-density residential buildings, as well as facilities operated by the City of Santa Clarita. These high-density residential structures are located within the Old Town Newhall district and reach a maximum height of five stories. This area also contains the two-story Old Town Newhall Library building and a four-story municipal parking garage that serves the Old Town Newhall commercial district.

AMBIENT LIGHTING CONDITIONS

The Project Site is currently undeveloped and contains no artificial lighting sources. The Project Site is surrounded by low-scale development with a variety of minor outdoor night lighting sources located at single-family homes to the east and commercial and residential uses to the south and west. There are streetlights along Railroad Avenue to the west and 13th Street, Arch Street, and 12th Street to the south. Otherwise, existing sources of artificial lighting include headlights from vehicle traffic along surrounding roads and accessing commercial and retail buildings to the south and west; railroad crossing lights at the at-grade intersection with 13th Street; traffic signals at Railroad Avenue and its intersections with both 13th Street and 15th Street; illuminated billboard signs along Railroad Avenue; and illuminated signage at commercial sites west and south of the Project Site. There are no existing sources of glare from reflective building materials or unshielded or misaligned light fixtures on or near the Project Site.

4.1.2 REGULATORY AND PLANNING FRAMEWORK

FEDERAL

There are no federal regulations or planning programs that apply to the Proposed Project regarding aesthetic resources.

STATE

California Scenic Highway Program

California adopted a Scenic Highway Program in 1963 to preserve and protect scenic highway corridors from change that would diminish the visual quality of areas that are adjacent to highways. The scenic designation is based on the amount of natural landscape visible by motorists, the scenic quality of the landscape, and the extent to which development intrudes upon

the motorist's enjoyment of the view. State Route 126 (SR-126), an eligible State Scenic Highway, is located approximately 5 miles northwest of the Project Site; however, the Project Site is not within the viewshed of this or any other eligible or designated State Scenic Highway.[10]

Nighttime Sky, California Code of Regulations Title 24, Outdoor Lighting Standards

The California legislature passed a bill in 2001 requiring the California Energy Commission to adopt energy efficiency standards for outdoor lighting, both public and private. In November 2003, the commission adopted changes to the California Code of Regulations, Title 24, Parts 1 and 6, Building Energy Efficiency Standards. These standards became effective on October 1, 2005, and included changes to the requirements for outdoor lighting for residential and nonresidential development. These standards are intended to improve the quality of outdoor lighting and to reduce the impacts of light pollution, light trespass, and glare. The standards regulate lighting characteristics, such as maximum power and brightness, shielding, and sensor controls to turn lighting on and off.

LOCAL

Santa Clarita Beautification Master Plan

The Santa Clarita Beautification Master Plan, adopted by City Council on December 11, 2001, is a tool to aid the City in accomplishing the long-term goal of citywide streetscape improvements and beautification. The Beautification Master Plan addresses concepts for streetscape design, landscape enhancement, gateways, and monumentation and signage, on both a regional and a community scale. The plan strives to maintain the identity of individual communities while unifying the entire City through design. The plan identifies a goal of providing landscaped medians within major arterial roadways in order to provide aesthetic appeal, control vehicle circulation, calm traffic, and provide area for directional and traffic signs. The Proposed Project area is included within the Newhall community portion of the Beautification Master Plan area, which describes the Newhall community as one with roots in oil and gold extraction and western movie production, industries that strongly contribute to the community's identity.[11] The Beautification Master Plan identifies Railroad Avenue (identified in the plan as San Fernando Road) as a first priority primary corridor and recommends beautification treatments, such as landscaping, construction of medians, and community-branded signage.

Santa Clarita Community Character and Design Guidelines

The Santa Clarita Community Character and Design Guidelines were adopted to provide direction for the design of new residential, commercial, mixed-use, and industrial developments within the City and for the renovation and redevelopment of built areas. The guidelines are intended to ensure that existing and future development is compatible in size, scale, and appearance with existing neighborhood character within Santa Clarita and provide pedestrian-oriented design to enrich the pedestrian experience. The guidelines define the individual character of communities within Santa Clarita, list suggested building materials, and identify specific design considerations. City staff use the guidelines in assisting applicants with all aspects of project development, including site planning, building orientation, building massing and articulation, and architectural themes. The Planning Commission and City Council use the guidelines to evaluate proposals for

[10] Caltrans, Scenic Highways, accessed on March 18, 2023, https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways.

[11] City of Santa Clarita, Beautification Master Plan - Newhall, page III-1, December 2001.

quality of design. The guidelines suggest appropriate building materials for use in the Newhall area, including appropriate wall materials (such as stone veneer, stucco, wood or fiber cement board siding), accent materials (such as stone, tile, wrought iron, wood vents), and roofing materials (such as clay tiles, asphalt shingles, tapered barrel tiles, and cement tiles). The Project Site is located within the Placerita Canyon subcommunity, which is identified by the guidelines as a rural, oak-studded, equestrian-oriented residential area northeast of downtown Newhall.[12]

Santa Clarita Municipal Code

Section 17.51.050 Outdoor Lighting Standards

The Outdoor Lighting Code of the Santa Clarita Municipal Code (SCMC) establishes the regulations for outdoor lighting, in order to minimize adverse off-site light obtrusion and reduce light pollution to preserve the night environment. In general, the regulations require outdoor lighting to be shielded (i.e., directed downward and be of a cut-off design), designed to avoid light trespass onto neighboring properties, and operated so that lighting does not disturb neighboring uses.

Section 17.51.040 Oak Tree Preservation

SCMC Section 17.51.040 states that the beauty of natural areas within the Santa Clarita Valley is enhanced by the presence of large numbers of native oak trees. The preservation ordinance outlined in SCMC Section 17.51.040 "contributes to the welfare and aesthetics of the community and retains the great historical and environmental value of these trees." Further, SCMC Section 17.51.040 states that these oak trees "lend beauty and charm to the landscape, enhance the value of property, and preserve the character of the communities in which they exist." The City's oak tree permit places restrictions on activities that cut, prune, remove, relocate, endanger, damage, or encroach into the protected zone of any oak tree.

Section 17.51.030 Landscaping and Irrigation Standards

The landscaping standards in SCMC Section 17.51.030 establish design standards for landscaping in new development to enhance the appearance of all development and to encourage protection of landmark, native, and specimen trees. The design standards accomplish this by requiring design, installation, and maintenance of landscaping and by providing standards relating to the quality, quantity, and functional aspects of landscaping and landscape screening.

Section 17.39.020 Placerita Canyon Special Standards District

The Placerita Canyon Special Standards District establishes property development standards in order to protect, maintain, preserve, and enhance the rural equestrian character and unique appeal of the community, while also mitigating the cumulative impacts of residential development. Standards within this district include requirements to provide trail easements (for residential projects greater than four dwelling units) and restrictions regarding development near river bottoms. The Project Site is located within the Placerita Canyon Special Standards District, which is primarily made up of low-density, equestrian-oriented residential neighborhoods located east of the Project Site.[13]

[12] City of Santa Clarita, Santa Clarita Community Character & Design Guidelines, page 3-15, March 2009.
[13] City of Santa Clarita, Mapping Your City, 2022, accessed March 27, 2023, https://www.santa-clarita.com/city-hall/departments/administrative-services/technology-services/geographic-information-systems-gis.

City of Santa Clarita General Plan

Applicable goals, objectives, and policies from the City of Santa Clarita General Plan Land Use Element and Conservation and Open Space Element are listed below:[14]

Land Use Element: Community Appearance

- Goal LU 6: A scenic and beautiful urban environment that builds on the community's history and natural setting
    - Objective LU 6.5. Promote high quality development that enhances the urban environment and builds long-term value.
        - Policy LU 6.5.1: Require use of high quality, durable, and natural-appearing building materials pursuant to applicable ordinances.
        - Policy LU 6.5.2: Encourage the use of designs and architectural styles that incorporate classic and timeless architectural features.
        - Policy LU 6.5.3: Require architectural enhancement and articulation on all sides of buildings (360 degree architecture), with special consideration at building entrances and corners, and along facades adjacent to major arterial streets.
        - Policy LU 6.5.4: Evaluate new development in consideration of its context, to ensure that buildings create a coherent living environment, a cohesive urban fabric, and contribute to a sense of place consistent with the surrounding neighborhoods.

Conservation and Open Space Element: Scenic Resources

- Goal CO 6: Preservation of scenic features that keep the Santa Clarita Valley beautiful and enhance quality of life, community identity, and property values.
    - Objective CO 6.3: Protect the scenic character of major water bodies.
        - Policy CO 6.3.2: Protect the banks of the Santa Clara River and its major tributaries through open space designations and property acquisitions, where feasible, to protect and enhance the scenic character of the river valley.
    - Objective CO 6.6: Limit adverse impacts by humans on the scenic environment.
        - Policy CO 6.6.1: Enhance views of the night sky by reducing light pollution through use of light screens, downward directed lights, minimized reflective paving surfaces, and reduced lighting levels, as deemed appropriate by the reviewing authority.

[14] City of Santa Clarita, General Plan, Land Use Element, June 2011; Conservation and Open Space Element, June 2011.

- Policy CO 6.6.4: Where appropriate, require new development to be sensitive to scenic viewpoints or viewsheds through building design, site layout and building heights.

4.1.3 THRESHOLDS OF SIGNIFICANCE

The significance thresholds used to evaluate the impacts of the Proposed Project related to aesthetics are based on Appendix G of the CEQA Guidelines. Based on Appendix G, a project would have a significant impact related to aesthetics if it would:

Threshold 4.1(a): ***Have a substantial adverse effect on a scenic vista;***

Threshold 4.1(b): ***Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;***

Threshold 4.1(c): ***In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality; and/or,***

Threshold 4.1(d): ***Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.***

ISSUES NOT EVALUATED FURTHER

The Proposed Project would not result in significant impacts related to the following significance thresholds from Appendix G of the CEQA Guidelines, as determined in the Initial Study (**Appendix A**); therefore, they are not evaluated further in this Draft EIR:

Threshold 4.1(b): ***Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.***

4.1.4 METHODOLOGY

The analysis of impacts related to aesthetics considered the improvements on the Project Site, as well as the Project's improvements off-site, including a Class I multi-purpose path along the frontage of the Project on 13th, Arch, and 12th Streets; widening of 13th Street, Arch Street, and 12th Street; installation of public hydrants along the frontage of the Project on 13th, Arch, and 12th Streets; and railroad crossing improvements at 13th Street, including the installation of a bike path/trail on the north side of the crossing, widening of the crossing at 13th Street and Railroad Avenue to accommodate the wider turning radii, installation of drainage on Railroad Avenue and 13th Street, new gates, modifications on Railroad Avenue at 13th Street to accommodate the revised intersection geometry and provide increased efficiency, implementation of ADA requirements for pedestrians, and implementation of line-of-sight requirements at the grade crossing. The analysis also considered the modifications to the Dockweiler Drive Extension Project in the immediate vicinity of the Project Site, including roadway improvements to 13th Street, Arch Street, 12th Street and Placerita Canyon Road that differ from

previous approved plans, including accommodating the additional lane geometry at the Arch Street/13th Street intersection to widen the railroad crossing; construction of a pedestrian and bike bridge from the Jan Heidt Newhall Metrolink Station on Railroad Avenue to the future extension of Dockweiler Drive; and implementation of temporary storm drain improvements to accommodate surface water runoff from Dockweiler Drive prior to the completion of the Project.

The analysis of aesthetics impacts in this Draft EIR is based on field surveys, a review of aesthetic resources in the Project area, and a review of the Project's site plan (shown in **Figure 2-3** in Section 2.0, Project Description, of this Draft EIR), elevation plans (shown in **Figures 2-4** through **2-11** in Section 2.0 of this Draft EIR), landscaping plans (shown in **Figures 2-12** through **2-14** in Section 2.0 of this Draft EIR), and architectural renderings included in this section in the context of policy guidance contained within the City's General Plan, the Placerita Canyon Special Standards District, and Community Character and Design Guidelines.

4.1.5 PROJECT DESIGN FEATURES

There are no Project Design Features proposed with respect to aesthetic resources.

4.1.6 ANALYSIS OF PROJECT IMPACTS

Threshold 4.1(a): Would the project have a substantial adverse effect on a scenic vista?

Impact Analysis

The Project Site is surrounded by development along the north, south, west, and the majority of the eastern boundaries. Although there are no public scenic overlooks on or adjacent to the Project Site, the ridgeline along the northern boundary of the Project site, which is between 80 to 110 feet above the central portion of the Project Site and nearby surrounding areas, has been mapped as a significant ridgeline in the City's General Plan.[15] Given its height, the ridgeline can be seen from nearby areas, as shown in **Figures 4.1-1A** and **4.1-1C** (Images 1, 2, 3, 7, 8, and 9); however, these are foreground and middleground views that are not recognized as scenic vistas because the local public streets and neighboring developed areas do not provide a viewshed that offers a range of vision in which scenic resources may be observed.

The Project Site may be visible from scenic vistas in the Project vicinity, including the higher elevation areas at the Quigley Canyon Open Space area, which are between 0.7 mile and 1.4 miles east of the Project Site. From these distances, specific site features, such as the ridgeline and Placerita Creek, would not be distinguishable; however, based on the size of the Project Site and the existing development surrounding the site, the Project may be visually detectable from the publicly accessible trails at Quigley Canyon Open Space. The change in view would consist of the Project structures where there is currently vacant land. During construction, the change in view would consist of the presence of activity and equipment on-site and the gradual building development.

During operations, the change in view would consist of the presence of the proposed buildings and structures that would reach up to 55 feet in height and would be taller than the majority of the existing surrounding structures, which typically range between one and two stories in height.

However, the Project would not develop the entire property area and would reserve the ridgeline and Placerita Creek as open space. Further, the Project Site and the surrounding existing

[15] City of Santa Clarita, General Plan, Conservation and Open Space Element, Exhibit CO-7, June 2011.

developed areas, such as the residential and commercial uses, collectively do not contain scenic features or prominent visual elements that would constitute an expansive, highly valued landscape that would provide the viewshed for a scenic vista.

Therefore, the Project, including the off-site improvements, would not result in a substantial adverse effect on a scenic vista, and impacts would be less than significant.

Mitigation Measures

Impacts with regard to Threshold 4.1(a) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.1(a) were determined to be less than significant without mitigation.

Threshold 4.1(c): ***In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?***

Impact Analysis

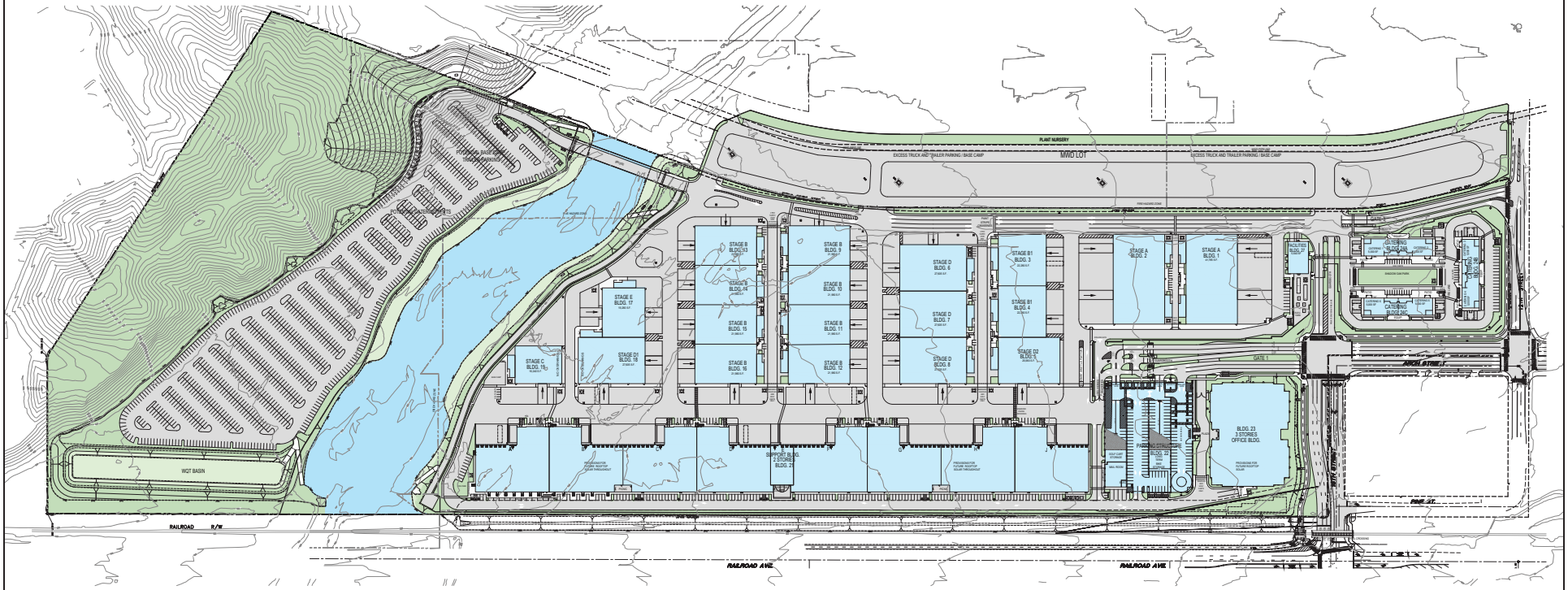
The Project Site serves as a transition area between the Placerita Canyon community and Old Town Newhall. Compared to the existing surrounding residential and commercial development, which range from one to two stories in height, the Project would introduce structures taller and greater in scale than the existing development in the Project area. The following analyzes views of the Project from the surrounding public viewing locations.

Views from the North

As shown in **Figure 2-2** in Section 2.0, Project Description, of this Draft EIR, residential uses are located north (to the south of Via Princessa) and northeast (along Circle J Ranch Road) of the Project Site. However, the ridgeline along the northern boundary of the Project Site ranges from 1,320 feet to 1,343 feet above mean sea level and from 80 to 110 feet above the ground surface at the central portion of the Project Site and the surrounding areas, as shown in **Figure 4.1-2**. Although the sound stage buildings proposed at the center of the campus would be up to 55 feet in height, the ridgeline would screen the Project from being visible from these residences. As a result, the Project, including the off-site improvements, would result in no change to existing public views from the north and northeast, and no visual impacts to existing public views from the north would occur.

Views from the East

Placerita Canyon residences fronting Alderbrook Drive are adjacent to the Project Site on the east. The residential properties are considered sensitive viewing locations and are separated from the Project Site by an existing chain-link fencing, a 35-foot-wide access road, and a row of mature trees. The Placerita Canyon Special Standards District (SCMC Section 17.39.020) establishes property development standards in order to “protect, maintain, preserve and enhance the



Michael Baker INTERNATIONAL

NOT TO SCALE

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SHADOWBOX STUDIOS ENVIRONMENTAL IMPACT REPORT

Site Plan - Topo

Figure 4.1-2

secluded, rural equestrian character of the community, to enhance the community's unique appeal and to help mitigate the cumulative impacts of residential development."

The Project Site would be developed with a 12-foot-tall security and perimeter fence primarily made of woodcrete. The eastern portion of the Project Site would also be developed with a nursery consisting of plants in containers along the eastern edge of the Project Site. Both the fencing and nursery would provide visual screening. In addition, the sound stage buildings, mechanical building, and catering buildings would be set back from the eastern boundary of the Project Site by at least 300 feet. The elevation renderings of these structures are included in Section 2.0, Project Description, of this Draft EIR. More specifically, **Figures 2-4** through **2-6** show the elevation plans for the sound stage buildings, **Figure 2-10** for the catering buildings, and **Figure 2-11** for the mechanical building. As illustrated therein, the structures would be designed with simple, symmetrical features and finished with neutral earth tones with no reflective surfaces, which would have the effect of muting their appearance. Viewed from a distance of at least 300 feet from the eastern boundary of the Project Site, the sound stage buildings (55 feet in height), the catering buildings (18 feet in height), and facilities building (21.5 feet in height), as shown in **Figure 4.1-3**, would be largely screened from the adjacent residential uses to the east by the nursery, landscaping, and fencing. The proposed buildings would not be in the immediate view frame of the residences and would not be visually dominating, which would help maintain the rural character of the community. As a result, the Project, including the off-site improvements, would result in less-than-significant impacts to existing public views from the east.

Views from the South

Across from the southern boundary of the Project Site along 12th Street, 13th Street, and Arch Street are commercial and light industrial uses, which are not considered sensitive viewing locations. As shown in **Figure 2-3,** the Project proposes catering buildings (as described above) in the southeastern corner, the campus gateway portal entrance and entrance sign north of the intersection of Arch Street and 13th Street, and a three-story office building in the southwestern corner across from the northern end of the Old Town Newhall Specific Plan area; perimeter landscaping, including oak trees, is also proposed, as shown in **Figure 2-12**.

As shown in **Figure 4.1-4**, the entrance to the proposed campus would include a thematic gateway portal approximately 33.75 feet in height and would be set back from the intersection of Arch Street and 13th Street by approximately 500 feet. The gateway portal would use natural materials and display a decorative signage supported by four pillars made of cast stone. A guard shack would be located immediately in front of the gateway portal. The base of the guard shack would be made of cast stone to match the pillars supporting the gateway portal. At a distance of 500 feet, the gateway portal would only be visible from Arch Street and would be further screened by the landscaping and proposed trees along 12th Street, 13th Street, and Arch Street from land uses to the south of the Project Site.

The elevation plans for the office building is presented in **Figure 2-8**, which shows the office building to be 50 feet in height and designed in a modern architecture style consistent with the Old Town Newhall area. The building includes a façade using concrete, wood, steel, brick, and cast stone building materials painted in neutral brown and gray earth tones, and bronze anodized aluminum windows. A mechanical screen would be located on the roof to conceal the building's mechanical equipment. The height and scale of the building and architectural style would be compatible with both the Old Town Newhall Library building and the Old Town Newhall parking

Aerial view from southeast corner showing view of Project features on the east.

View showing the southeast corner of the Project site at 12th Street and adjacent residences.

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Source: GAA Architects.

Architectural Renderings: Project Views from the East

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Figure 4.1-3

Aerial south view from Railroad Avenue.

View of the entry gateway from Arch Street.

View of the southern portion of the Project from Arch Street showing the nursery and MWD lot.

View of southern portion of the Project from 13th Street and Arch Street showing the entrance gateway.

View of office building along 13th Street.

13th Street Walking Path Perspective.

SHADOWBOX STUDIOS ENVIRONMENTAL IMPACT REPORT

Architectural Renderings: Project Views from the South

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Source: GAA Architects.

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Figure 4.1-4

garage, which are located approximately 1,000 feet south of the Project Site. The catering buildings, the gateway portal, and the office building would be visually compatible with the existing commercial and industrial uses to the south. As a result, the Project, including the off-site improvements, would result in less-than-significant impacts to existing public views from the south.

Views from the West

Along the western boundary of the Project Site, the Project proposes a three-story, 48-foot-tall office building (as described above), a 45-foot tall parking structure, and a two-story support building (up to 50 feet in height and approximately 1,790 feet in length) along Railroad Avenue. The elevation plans for these structures are shown in **Figure 2-8**, **Figure 2-9**, and **Figure 2-7**, respectively.

As shown in **Figure 4.1-5**, the façade of the support building along Railroad Avenue would utilize the Main Street Commercial architecture type to provide continuity of design aesthetic identified in the Old Town Newhall Specific Plan and ensure that the community character of Old Town Newhall is maintained while providing the necessary acoustical buffer from the railroad noise to the sound stages, as well as visual screening of the sound stages from public view. The support building's façade would consist of, but not be limited to, building materials made of concrete, brick, and clay tile roof. The building's western façade would be painted with a wide array of earth tone colors and characterized by a variety of building fenestration, including bronze anodized aluminum storefront windows, wood-framed windows, and double-hung windows, as well as decorative signage and fabric awnings. The building's western roofline would have different decorative parapets, which would help the building façade mimic a variety of storefront designs; this array would provide visual focal and interest areas that would, in turn, reduce the perceived mass and bulk of the building. The support building's loading docks and covered trash enclosure areas would be located in the interior of the campus so as not to be visible from Railroad Avenue. The façade of the support building would feature various design elements that commemorate the filmmaking heritage of the Santa Clarita Valley, including a mural featuring film stars, such as Charlie Chaplin, Gene Autry, and William S. Hart, as conceptually illustrated in one of the views in **Figure 4.1-5**.

The parking structure façade would include use of concrete, wood, steel, brick, and cast stone building materials painted in neutral brown and gray tones. Both the parking structure and three-story office building would also be designed to be compatible in scale and architectural style with both the Old Town Newhall Library building and the Old Town Newhall parking garage.

Accordingly, the Project would be designed with building setbacks, landscaping, and fencing that would screen and reduce the appearance of the proposed campus. The proposed buildings would be designed with thematic architectural elements and use materials that are visually pleasing and consistent with the Old Town Newhall Specific Plan design guidelines and the City's Community Character and Design Guidelines. The Project would not conflict with the Beautification Master Plan, Placerita Canyon Special Standards District, or the SCMC design standards for Mixed-Use Neighborhood and Non-Urban zones. Therefore, the Project, including the off-site improvements, would not substantially degrade the existing visual character or quality of public views of the site and its surroundings and would result in less than significant impacts.

View of office building and parking structures and support building from Railroad Avenue and 13th Street.

View of the Project fencing, landscaping, and support building from Railroad Avenue.

View of the southern portion Railroad Avenue Perspective showing the proposed nursery and MWD-owned property.

View of the Project fencing, landscaping, and support building from Railroad Avenue.

View of the office building from Railroad Avenue.

View of the proposed walking path from 13th Street.

SHADOWBOX STUDIOS ENVIRONMENTAL IMPACT REPORT

Architectural Renderings: Project Views from Railroad Avenue (West)

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Source: GAA Architects.

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Figure 4.1-5

Mitigation Measures

Impacts with regard to Threshold 4.1(c) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.1(c) were determined to be less than significant without mitigation.

Threshold 4.1(d): Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Impact Analysis

As discussed above, the Project Site is currently undeveloped, contains no artificial lighting sources, and is surrounded by low-scale, suburban development with low-intensity outdoor lighting to the north and east, as well as medium- and high-density commercial and residential uses with relatively higher-intensity outdoor lighting to the south and west. Further, the Project Site is bordered by Railroad Avenue on the west side, which includes sources of light, such as overhead streetlights, traffic signals, billboards, and commercial land uses.

The Project would use various types of on-site lighting, including decorative streetlights, pole-mounted drive aisle lights, sconce fixtures on building façades and on pilasters at the main entrance, door lights and under-eave mounted down lights, pedestrian down lighting sconces, an illuminated marquee on the western façade of the support building, , and illuminated signs at the main entrances.

The Placerita Canyon Special Standards District (SCMC Section 17.39.020) and the City of Santa Clarita's outdoor lighting standards (SCMC Section 17.51.050, Outdoor Lighting Standards) require all lights to be directed downward and be shielded so as to avoid off-site glare. The Project would install light fixtures with site-specific features to reduce glare, while maintaining a safe environment for pedestrians and vehicle traffic and a "dark sky" environment. Exterior fixtures would not be "drop lens" type fixtures or exposed source lighting fixtures. Pole lighting and building-mounted lighting fixtures would consist of cut-off fixtures with minimal light spillage to immediately adjacent areas within the Project Site and no light spillage beyond the boundaries of the Project Site.

The Project would use LED-type lighting fixtures to minimize glare from the light source and distribute the lighting evenly over the area that is specifically being illuminated by the light source. Higher light levels would be limited to areas requiring increased security or safety. Additionally, the Project would implement a sensor-enabled energy management system that would provide automatic reduction of lighting level output (to approximately 37 percent) if there is no movement in the area and maintain this reduced level of lighting until the sensor detects movement. When this occurs, the lighting level would be increased in 3 seconds to 100 percent until movement is no longer detected and then would maintain this 100 percent level for 5 minutes, at which point the light level would ramp down to 37 percent, which would be maintained until movement is again detected and the process is repeated. This system would minimize unnecessary lighting, while maintaining security in the area.

The Lighting Plan prepared for the Project demonstrates that no increase in foot candles would occur along the boundaries of the Project Site and complies with SCMC Section 17.51.050 (Outdoor Lighting Standards) and SCMC Section 17.39.020 (Placerita Canyon Special Standards District).[16]

As a result, the Project, including the off-site improvements, would not create significant sources of substantial light or glare; therefore, impacts would be less than significant.

Mitigation Measures

Impacts with regard to Threshold 4.1(d) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.1(d) were determined to be less than significant without mitigation.

4.1.7 CUMULATIVE IMPACTS

Impact Analysis

As indicated in Section 3.0, Environmental Setting, of this Draft EIR, there are 36 related projects that propose varying levels of development, redevelopment, or modifications to existing land uses or structures in the Project vicinity. The related projects primarily include residential, assisted living/nursing home, commercial, hotel, industrial, and office uses. As with the Project, related projects would be required to comply with relevant aesthetics and lighting-related policies, regulations, ordinances, and design standards.

The Project would transform the vacant Project Site through construction and operation of the film and television campus. These facilities would transform the existing natural and disturbed landscapes with new development, new landscape elements, and new outdoor lighting fixtures. However, the Project would not develop the northern portion of the Project Site, thereby preserving the ridgeline and Placerita Creek.

As discussed, the Project Site is surrounded by existing development, and through incorporation of the proposed site layout, including building distances from the property boundaries, architectural design elements, and landscaping, the Project would provide a visually compatible transition between the adjacent Placerita Canyon community and Old Town Newhall commercial district. In consideration of the 36 projects identified in the cumulative scenario, of which the closest projects (Oak Ridge industrial and Oak Ridge Commercial to the northwest, and Master's University Master Plan to the southeast) are located approximately 0.5 mile from the Project Site, the land alterations and changes in visual character and quality on each site would be localized, and there would not be a combined effect on the same visual setting and views. The Project would contribute to the buildout of the City and reduction of undeveloped land; however, as discussed above, the Project would not significantly reduce the quality of visual resources or affect any scenic vista on a regional scale.

[16] Lucci & Associates, Inc., Lighting Design Criteria – Shadowbox Studios, October 8, 2022; Electrical Lighting Plan, September 29, 2022.

As a result, the Project's incremental contribution to cumulative aesthetic impacts would be less than significant.

Mitigation Measures

Cumulative impacts related to aesthetics were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts related to aesthetics were determined to be less than significant without mitigation.

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4.2 AIR QUALITY

This section evaluates the Project's potential impacts on air quality. This section estimates the air pollutant emissions generated by construction and operation of the Project and evaluates whether the Project would conflict with or obstruct implementation of the air pollution reduction strategies set forth in the South Coast Air Quality Management District's (South Coast AQMD) *2016 Air Quality Management Plan*. The analysis of Project-generated air emissions focuses on whether the Project would cause an exceedance of an ambient air quality standard or South Coast AQMD significance thresholds. This section relies on information included in the *Shadowbox Studios-Santa Clarita Project Air Quality and Greenhouse Gas Emissions Study*, prepared by Rincon Consultants and dated February 2023, provided in **Appendix C** of this Draft EIR.

4.2.1 ENVIRONMENTAL SETTING

SOUTH COAST AIR BASIN

Climate

The City of Santa Clarita (City) is located in the South Coast Air Basin (SCAB), a 6,745-square-mile area bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and San Diego County to the south. The SCAB includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the Coachella Valley area in Riverside County. The South Coast AQMD monitors and regulates local air quality in the SCAB.

The general region lies in the semi-permanent high-pressure zone of the eastern Pacific. The regional climate in the SCAB is semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The usually mild climatological pattern is interrupted occasionally by periods of extremely hot weather, winter storms, or Santa Ana winds. The average annual temperature varies little throughout the SCAB, averaging 75 degrees Fahrenheit (°F). However, with a less-pronounced oceanic influence, the eastern inland portions of the SCAB show greater variability in annual minimum and maximum temperatures. All portions of the SCAB have had recorded temperatures over 100°F in recent years.

The SCAB experiences a persistent temperature inversion, meaning an increase in temperature with an increase in altitude, as a result of the North Pacific High.[1] This inversion limits the vertical dispersion of air contaminants, trapping a layer of stagnant air near the ground, where it is then further loaded with pollutants. As the sun warms the ground and the lower air layer, the temperature of the lower air layer approaches the temperature of the base of the inversion (upper) layer until the inversion layer finally breaks, allowing vertical mixing with the lower layer. These inversions cause haziness, which is caused by moisture, suspended dust, and a variety of chemical aerosols emitted by trucks, automobiles, furnaces, and other sources.

The height of the inversion is important in determining pollutant concentration. When the inversion is approximately 2,500 feet above sea level, the sea breezes carry the pollutants inland to escape over the mountain slopes or through the passes. At a height of 1,200 feet, the terrain prevents

[1] The North Pacific High is a semi-permanent, subtropical anticyclone located in the northeastern portion of the Pacific Ocean.

the pollutants from entering the upper atmosphere, resulting in a settlement in the foothill communities. Below 1,200 feet, the inversion puts a tight lid on pollutants, concentrating them in a shallow layer over the entire coastal basin. Usually, inversions are lower before sunrise than during the day. Mixing heights for inversions are lower in the summer and more persistent, being partly responsible for the high levels of ozone (O_3) observed during summer months in the SCAB. Smog in Southern California is generally the result of these temperature inversions combining with coastal day winds and local mountains to contain the pollutants for long periods of time, allowing them to form secondary pollutants by reacting with sunlight. The SCAB has a limited ability to disperse these pollutants due to typically low wind speeds.

The combination of stagnant wind conditions and low inversions in the SCAB produces the greatest pollutant concentrations. Ambient air pollutant concentrations are lowest on days of no inversion or high wind speeds, while air pollutants generated in urbanized areas are transported predominantly onshore into Riverside and San Bernardino Counties during periods of low inversions and low wind speeds. In the winter, the greatest pollution problem is the accumulation of carbon monoxide (CO) and nitrogen oxides (NO_X) due to low inversions and air stagnation during the night and early morning hours. In the summer, the longer daylight hours and the brighter sunshine combine to cause a reaction between hydrocarbons and NO_X to form photochemical smog.

The City experiences a mild Southern California high desert climate with an average temperature of 77°F. Summers are dry and warm and range in temperature from 75°F to 100°F. Winters are temperate with most of the annual rainfall occurring between the months of November and March and temperatures generally ranging from 40°F to 65°F.[2]

Ambient Air Quality

Air pollutant emissions within the SCAB are generated primarily by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at a specific location and are often identified by an exhaust vent or stack (e.g., boilers or combustion equipment that produce electricity or generate heat). Area sources are widely distributed and include sources, such as residential and commercial water heaters, painting operations, lawn mowers, and landfills. Mobile sources refer to emissions from motor vehicles and are classified as either on-road or off-road. On-road sources may come from vehicles on roadways and highways, while off-road sources may come from aircraft, ships, trains, and construction equipment. Air pollutants can also be generated by the natural environment, such as when high winds suspend fine dust particles.

Criteria Pollutants

Criteria pollutants are pollutants for which national and State criteria and standards have been promulgated and which are most relevant to current air quality planning and regulation in the SCAB. Criteria pollutants include O_3, respirable and fine particulate matter (PM_{10} and $PM_{2.5}$, respectively), CO, nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead (Pb).

[2] City of Santa Clarita, Economic Development, Climate, n.d., https://econdev.santa-clarita.com/santa-clarita-lifestyle/climate/, accessed on August 16, 2022.

Ozone (O_3)

Ozone is a gas that is formed when volatile organic compounds (VOCs) and NO_X, both byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight. As a highly reactive molecule, O_3 readily combines with many different components of the atmosphere. Consequently, high O_3 levels tend to occur only while high VOC and NO_X levels are present to sustain the formation process, and O_3 levels rapidly decline once the precursors have been depleted. O_3 is considered a regional pollutant because its reactions occur on a regional rather than local scale. In addition, because O_3 requires sunlight to form, significant concentrations occur between the months of April and October. O_3 is a pungent, colorless, toxic gas with direct health effects on humans, including changes in breathing patterns, reduction of breathing capacity, increased susceptibility to infections, inflammation of lung tissue, and some immunological changes. Groups most sensitive to ozone include children, the elderly, people with respiratory disorders, and people who exercise strenuously outdoors.

Particulate Matter (PM_{10} and $PM_{2.5}$)

Particulate matter pollution consists of very small liquid and solid particles floating in the air (e.g., soot, dust, aerosols, fumes, and mists) that can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. PM_{10} and $PM_{2.5}$ consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter, respectively. Man-made sources of PM_{10} are agricultural operations, industrial processes, combustion of fossil fuels, construction, demolition operations, and entrainment of road dust into the atmosphere. Natural sources of PM_{10} include windblown dust, wildfire smoke, and sea spray salt. Elevated levels of PM_{10} can cause respiratory irritation, reduced lung function, aggravation of cardiovascular disease, and cancer in individuals. $PM_{2.5}$ is generally associated with combustion processes, as well as formation in the atmosphere as a secondary pollutant through chemical reactions. $PM_{2.5}$ is more likely to penetrate deeply into the lungs and poses a health threat to all groups but particularly to the elderly, children, and those with respiratory problems. Elevated levels of $PM_{2.5}$ can cause respiratory stress, decreased lung function, and increased risk of long-term disease, such as chronic bronchitis, asthma, and lung cancer.

Carbon Monoxide (CO)

Carbon monoxide is a colorless, odorless gas primarily emitted from combustion processes and motor vehicles due to incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO is a localized pollutant that is found in high concentrations only near its source; therefore, elevated concentrations are usually only found near areas of high traffic volumes. Other sources of CO include the incomplete combustion of petroleum fuels at power plants and fuel combustion from wood stoves and fireplaces during the winter. CO causes a number of health problems, including the aggravation of some heart diseases, reduced tolerance for exercise, impaired mental function, and impaired fetal development. At high levels of exposure, carbon monoxide reduces the amount of oxygen in the blood, which may be fatal.

Nitrogen Dioxide (NO_2)

Nitrogen dioxide is a nitrogen oxide compound produced by the combustion of fossil fuels, such as in both gasoline and diesel-powered internal combustion engines, and from point sources, such as power plants. NO_2 absorbs blue light, gives a reddish-brown cast to the atmosphere, and reduces visibility. The principal form of NO_X produced by combustion is nitric oxide, which reacts

rapidly to form NO_2, creating the mixture of nitric oxide and NO_2. NO_2 is an acute irritant that can aggravate respiratory illnesses and symptoms. NO_2 may have negative impacts on those with existing illnesses, such as chronic pulmonary fibrosis and an increase in bronchitis in young children.

Sulfur Dioxide (SO_2)

Sulfur oxides (SO_X) are compounds of sulfur and oxygen molecules. SO_2 is classified in a group of highly reactive gases known as "oxides of sulfur." The largest sources of SO_2 emissions are from fossil fuel combustion at power plants and other industrial facilities. Other sources of SO_2 emissions include industrial processes, such as extracting metal from ore, and the burning of fuels with a high sulfur content by locomotives, large ships, and off-road equipment. SO_2 is linked to a number of adverse effects on the respiratory system, including aggravation of respiratory diseases, such as asthma and emphysema, and reduced lung function.

Lead (Pb)

Lead is a metal found naturally in the environment, as well as in manufactured products. Historically, the major sources of Pb emissions have been mobile and industrial sources. Since the 1970s, the U.S. Environmental Protection Agency (USEPA) has set national regulations to gradually reduce the Pb content in gasoline. As a result of phasing out leaded gasoline, metal processing is the current primary source of Pb emissions. The highest level of Pb in the air is generally found near Pb smelters. Other stationary sources include waste incinerators, utilities, and lead-acid battery manufacturers. The health impacts of Pb include behavioral and hearing disabilities in children and nervous system impairment.

Toxic Air Contaminants (TACs)

Toxic air contaminants are air pollutants that may cause or contribute to an increase in deaths or serious illness, or that may pose a present or potential hazard to human health. TACs are different than criteria pollutants because ambient air quality standards have not been established for TACs. One of the main sources of TACs in California is diesel engine exhaust that contains solid material known as diesel particulate matter (DPM). TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. Exposure to TACs may result in long-term health effects, such as cancer, birth defects, neurological damage, asthma, or genetic damage; or short-term acute effects, such as eye watering, respiratory irritation, runny nose, throat pain, and headaches. TACs are considered either carcinogenic or non-carcinogenic based on the nature of the health effects associated with exposure. For carcinogenic TACs, potential health impacts are evaluated in terms of overall relative risk expressed as excess cancer cases per one million exposed individuals. Non-carcinogenic TACs differ in that there is generally assumed to be a safe level of exposure below which no negative health impact is believed to occur. TAC impacts are described by carcinogenic risk and by chronic (i.e., long duration) and acute (i.e., severe but of short duration) adverse effects on human health.

Local Air Quality

The South Coast AQMD operates a network of air quality monitoring stations throughout the SCAB to measure and monitor ambient pollutant concentrations and air quality. Each monitoring

station is located in a source receptor area (SRA), and the Project Site is located in the Santa Clarita Valley SRA 13. The monitoring station representative of SRA 13 is the Santa Clarita station, located at 22224 Placerita Canyon Road, adjacent to the southeastern boundary of the Project Site. This monitoring station measures ozone, CO, NO_2, PM_{10}, and $PM_{2.5}$. SO_2 and Pb are not monitored at this station, and, since the area is designated unclassified/attainment for these pollutants, air quality data for these pollutants are not included in **Table 4.2-1**, which reports ambient air quality measurements and indicates the number of days that each standard has been exceeded at the Santa Clarita station.

Table 4.2-1
AMBIENT AIR QUALITY AT THE SANTA CLARITA MONITORING STATION BY YEAR

Pollutant	2018	2019	2020
8 Hour Ozone (O_3), 8-Hour Average	0.106 ppm	0.106 ppm	0.122 ppm
Number of days above Federal standard (>0.070 ppm)	52	56	74
Number of days above State standard (>0.070 ppm)	53	57	75
Ozone (O_3), Worst Hour	0.132 ppm	0.128 ppm	0.148 ppm
Number of days above State standard (>0.09 ppm)	21	34	44
Number of days above Federal standard (>0.112 ppm)	3	1	10
Carbon Monoxide (CO), Highest 8-Hour Average[2]	0.8 ppm	1.2 ppm	0.8 ppm
Number of days above State or Federal standard (>9.0 ppm)	0	0	0
Nitrogen Dioxide (NO_2), Worst Hour (Federal Measurements)	0.059 ppm	0.046 ppm	0.046 ppm
Number of days above State standard (>0.18 ppm)	0	0	0
Number of days above Federal standard (0.10 ppm)	0	0	0
Particulate Matter (PM_{10}) Worst 24 Hours	49.4 μg/m^3	62.9 μg/m^3	67.8 μg/m^3
Number of days above Federal standard (>150 μg/m^3)	*	*	*
Particulate Matter ($PM_{2.5}$), Worst 24 Hours	31.9 μg/m^3	29.0 μg/m^3	43.3 μg/m^3
Number of days above Federal standard (>35 μg/m^3)	*	*	*

Notes:
ppm = parts per million; PM_{10} = particulate matter 10 microns or less in diameter;
$PM_{2.5}$ = particulate matter 2.5 microns or less in diameter; μg/m^3 = micrograms per cubic meter
** = insufficient data available to determine the value*

Sources: CARB, Top 4 Summary: Select Pollutant, Years & Area, 2021, https://www.arb.ca.gov/adam/topfour/topfour1.php, accessed March 2022; USEPA, 2022, Outdoor Air Quality Data – Monitor Values Report, https://www.epa.gov/outdoor-air-quality-data/monitor-values-report, accessed March 2022.

The data show the ambient air quality in the area exceeded the State and federal hourly and 8-hour O_3 standards in 2018, 2019, and 2020. Data were not available for exceedance days for PM_{10} and $PM_{2.5}$ emissions, and the area did not exceed other air quality standards in 2018, 2019, or 2020.

SENSITIVE RECEPTORS

Sensitive receptors are a land use associated with persons of a population that are more susceptible to the effects of air pollution than the general population. Sensitive receptors that are in proximity to localized sources of TACs and CO are of particular concern. The following population groups are most likely to be adversely affected by air pollution, as identified by the California Air Resources Board (CARB): children under 14, elderly over 65, athletes, and people with cardiovascular and chronic respiratory diseases. Land uses that may contain a high concentration of these sensitive population groups include residential areas, hospitals, day-care facilities, elder-care facilities, elementary schools, and parks.

Sensitive receptors that may be affected by air quality impacts associated with Project construction and operation include the following:

- Single-family residences located on Alderbrook Drive and Circle J Ranch Road, along the eastern and northeastern boundaries of the Project Site;
- Residential development south of Wiley Canyon Road and Via Princessa along the northern boundary of the Project Site;
- Residential uses 500 feet to the southeast and 500 feet to the west of the Project Site; and
- Residential uses approximately 180 feet to the west of the Project Site across Railroad Avenue.

4.2.2 REGULATORY AND PLANNING FRAMEWORK

FEDERAL

The federal Clean Air Act (FCAA) was first enacted in 1970 and amended in 1977 and 1990 for the purposes of protecting and enhancing the quality of the nation's air resources to benefit public health, welfare, and productivity. The USEPA has set primary and secondary National Ambient Air Quality Standards (NAAQS) for O_3, CO, NO_2, SO_2, PM_{10}, and $PM_{2.5}$, and Pb. Primary standards are those levels of air quality deemed necessary, with an adequate margin of safety, to protect public health. **Table 4.2-2** lists the current federal and State standards for regulated pollutants.

STATE

State Implementation Plan

The FCAA Amendments require that states submit and implement a State Implementation Plan (SIP) for areas not meeting air quality standards. In California, the SIP is a collection of documents that set forth the State's strategies for achieving the NAAQS and California Ambient Air Quality Standards (CAAQS)—a compilation of new and previously submitted plans, programs (such as monitoring, modeling, and permitting), district rules, state regulations, and federal controls. CARB is the lead agency for all purposes related to the SIP under State law. Local air districts are responsible for preparing and implementing air quality attainment plans for pollutants for which the district is in non-compliance and the plans are incorporated into the SIP.

Table 4.2-2
FEDERAL AND CALIFORNIA AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Time	California Standards[a]		Federal Standards[b]	
		Concentration[c]	SCAB Attainment Status	Concentration[c]	SCAB Attainment Status
Ozone (O_3)[d]	1 Hour	0.09 ppm (180 µg/m^3)	**Non-attainment**	N/A	N/A[f]
	8 Hours	0.070 ppm (137 µg/m^3)	**Non-attainment**	0.070 ppm (137 µg/m^3)	**Non-attainment**
Particulate Matter (PM_{10})[e]	24 Hours	50 µg/m^3	**Non-attainment**	150 µg/m^3	Attainment/ Maintenance
	Annual Arithmetic Mean	20 µg/m^3	**Non-attainment**	N/A	N/A
Fine Particulate Matter ($PM_{2.5}$)[e]	24 Hours	No Separate State Standard		35 µg/m^3	**Non-attainment**
	Annual Arithmetic Mean	12 µg/m^3	**Non-attainment**	12.0 µg/m^3	**Non-attainment**
Carbon Monoxide (CO)	8 Hours	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Attainment/ Maintenance
	1 Hour	20 ppm (23 mg/m^3)	Attainment	35 ppm (40 mg/m^3)	Attainment/ Maintenance
Nitrogen Dioxide (NO_2)[f]	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	N/A	53 ppb (100 µg/m^3)	Attainment/ Maintenance
	1 Hour	0.18 ppm (339 µg/m^3)	Attainment	100 ppb (188 µg/m^3)	Attainment/ Maintenance
Sulfur Dioxide (SO_2)[g]	24 Hours	0.04 ppm (105 µg/m^3)	Attainment	0.14 ppm (for certain areas)[g]	Unclassified/ Attainment
	3 Hours	N/A	N/A	N/A	N/A
	1 Hour	0.25 ppm (655 µg/m^3)	Attainment	75 ppb (196 µg/m^3)	N/A
	Annual Arithmetic Mean	N/A	N/A	0.30 ppm (for certain areas)[g]	Unclassified/ Attainment
Lead (Pb)[h,i]	30 days Average	1.5 µg/m^3	Attainment	N/A	N/A
	Calendar Quarter	N/A	N/A	1.5 µg/m^3 (for certain areas)[h]	**Non-attainment**
	Rolling 3-Month Average	N/A	N/A	0.15 µg/m^3	**Non-attainment**
Visibility-Reducing Particles[j]	8 Hours (10 a.m. to 6 p.m., PST)	Extinction coefficient = 0.23 km@<70 percent RH	Unclassified	**No Federal Standards**	
Sulfates	24 Hour	25 µg/m^3	Attainment		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	Unclassified		
Vinyl Chloride[h]	24 Hour	0.01 ppm (26 µg/m^3)	N/A		

Notes:

µg/m^3 = micrograms per cubic meter; ppm = parts per million; ppb = parts per billion; km = kilometer(s); RH = relative humidity; PST = Pacific Standard Time; N/A = not applicable

[a] *California standards for O_3, CO (except 8-hour Lake Tahoe), SO_2 (1- and 24-hour), NO_2, and particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles) are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.*

[b] *National standards (other than O_3, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The O_3 standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m^3 is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.*

TABLE 4.2-2
FEDERAL AND CALIFORNIA AMBIENT AIR QUALITY STANDARDS (CONTINUED)

Pollutant	Averaging Time	California Standards[a]		Federal Standards[b]	
		Concentration[c]	SCAB Attainment Status	Concentration[c]	SCAB Attainment Status

[c] *Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.*

[d] *On October 1, 2015, the national 8-hour O_3 primary and secondary standards were lowered from 0.075 to 0.070 ppm.*

[e] *On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 µg/m^3 to 12.0 µg/m^3. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 µg/m^3, as was the annual secondary standard of 15 µg/m^3. The existing 24-hour PM_{10} standards (primary and secondary) of 150 µg/m^3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.*

[f] *To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of ppb. California standards are in units of ppm. To directly compare the national 1-hour standard to the California standards, the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.*

[g] *On June 2, 2010, a new 1-hour SO_2 standard was established, and the 24-hour and annual primary standards at the time were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated non-attainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved. Note that the 1-hour national standard is in units of ppb. California standards are in units of ppm. To directly compare the 1-hour national standard to the California standard, the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.*

[h] *CARB has identified lead and vinyl chloride as toxic air contaminants with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.*

[i] *The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 Pb standard (1.5 µg/m^3 as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated non-attainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.*

[j] *In 1989, CARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer," respectively.*

Source: CARB, Ambient Air Quality Standards, May 2016.

California Clean Air Act

The California Clean Air Act (CCAA), enacted in 1988, developed the CAAQS, which are generally more stringent than the NAAQS. The CCAA requires that each local air district prepare and maintain an Air Quality Management Plan (AQMP) to achieve compliance with the CAAQS. These standards, included in the NAAQS in **Table 4.2-2**, apply to more pollutants than the NAAQS. In addition to the criteria pollutants, CAAQS have been established for visibility-reducing particles, sulfates, hydrogen sulfide, and vinyl chloride.

While the USEPA is the federal agency designated to administer air quality regulation, CARB is the State equivalent in the California Environmental Protection Agency (CalEPA). As with the FCAA, the CCAA also designates areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas designated as nonattainment are those that do not meet (or that contribute to ambient air quality in a nearby area that does not meet) the national primary or secondary ambient air quality standard for the pollutant. Areas designated as attainment are those that meet the national primary or secondary ambient air quality standard for the pollutant.

REGIONAL

South Coast Air Quality Management District

The South Coast AQMD is primarily responsible for planning, implementing, and enforcing air quality standards for the SCAB, which is a subregion within the western portion of the South Coast AQMD. The South Coast AQMD also regulates portions of the Salton Sea Air Basin and Mojave Desert Air Basin within Riverside County. The SCAB is designated non-attainment for O_3 8-hour NAAQS and nonattainment for the $PM_{2.5}$ and Pb NAAQS. The SCAB is also designated non-attainment for the O_3, PM_{10}, and $PM_{2.5}$ CAAQS. The SCAB is designated unclassifiable or in attainment for all other federal and State standards.

Air Quality Management Plan

The South Coast AQMD is required to monitor air pollutant levels to ensure that State and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards. Under State law, the South Coast AQMD is required to prepare an AQMP for pollutants for which its jurisdiction is in noncompliance.

To meet the NAAQS and CAAQS, the South Coast AQMD has adopted a series of AQMPs that serve as a regional blueprint to develop and implement an emissions reduction strategy that will bring the SCAB into attainment with the standards in a timely manner. The most significant air quality challenge in the SCAB is to reduce NO_X emissions to meet the 2037 ozone standard deadline for the non-Coachella Valley portion of the SCAB, as NO_X plays a critical role in the creation of O_3. The 2022 AQMP, adopted by the South Coast AQMD's Governing Board on December 2, 2022, includes strategies to ensure the South Coast AQMD does its part to further its ability to reduce NO_X emissions by 67 percent beyond what is required by the adopted rules and regulations in 2037 to meet the 2015 federal O_3 standards.[3] The 2022 AQMP builds on the measures already in place from the previous AQMPs and includes a variety of additional strategies, such as regulation, accelerated deployment of available cleaner technology, best management practices, co-benefits from existing programs, incentives, and other CCAA measures to meet the 8-hour O_3 standard. Since NO_X emissions also lead to the formation of $PM_{2.5}$, the NO_X reductions needed to meet the O_3 standards will likewise lead to improvement of $PM_{2.5}$ levels and attainment of annual $PM_{2.5}$ standards.[4]

The South Coast AQMD's strategy to meet the NAAQS and CAAQS distributes the responsibility for emissions reductions across federal, State, and local levels and industries. The majority of these emissions are from heavy-duty trucks, ships, and other State and federally regulated mobile source emissions, the majority of which are beyond South Coast AQMD's control. The South Coast AQMD has limited control over truck emissions with rules, such as Rule 1196. The 2022 AQMP is composed of stationary and mobile source emissions reductions, including traditional regulatory control measures, incentive-based programs, co-benefits from climate programs, mobile source strategies, and reductions from federal sources (e.g., aircraft, locomotives, and ocean-going vessels). These strategies are to be implemented in partnership with CARB and USEPA. The South Coast AQMD will not meet the standard without significant federal action. In addition to federal action, the 2022 AQMP relies on substantial future development of advanced technologies to meet the standards, including the transition to zero- and low-emission

[3] South Coast AQMD, 2022 Air Quality Management Plan, adopted December 2, 2022.
[4] South Coast AQMD, 2022 Air Quality Management Plan, adopted December 2, 2022.

technologies. Of the needed NO_X emissions reductions, 46 percent will come from federal actions, 34 percent from CARB actions, and 20 percent will come directly from South Coast AQMD actions.[5]

The 2022 AQMP also incorporates the transportation strategy and transportation control measures from SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS). Please see a more detailed discussion of the 2020-2045 RTP/SCS below.

CEQA Air Quality Handbook

The South Coast AQMD published the *CEQA Air Quality Handbook*, which was approved by the South Coast AQMD Governing Board in 1993. The *CEQA Air Quality Handbook* guides local government agencies and consultants in preparing air quality assessments for environmental documents required by CEQA. With the help of the *CEQA Air Quality Handbook*, local land use planners and other consultants can analyze and document how proposed and existing projects affect air quality and fulfill the requirements of the CEQA review process. The South Coast AQMD is in the process of developing an *Air Quality Analysis Guidance Handbook* to replace the current *CEQA Air Quality Handbook*.

Rules and Regulations

The South Coast AQMD has adopted several rules and regulations to regulate sources of air pollution in the SCAB and help achieve air quality standards for land use development projects. The following rules apply to the Project:

- Rule 402 – Nuisance: This rule states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material, which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- Rule 403 – Fugitive Dust: This rule requires projects to prevent, reduce, or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to a project property line, restricts the net PM_{10} emissions to less than 50 micrograms per cubic meter ($\mu g/m^3$), and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures (identified in the tables within the rule). Best available control measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers, and/or ceasing all activities. Finally, a contingency plan may be required if so determined by the USEPA.
- Rule 1113 – Architectural Coatings: This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

[5] South Coast AQMD, 2022 Air Quality Management Plan, adopted December 2, 2022.

- Rule 1138 – Control of Emissions from Restaurant Operations: This rule specifies PM and VOC emissions and odor control requirements for commercial cooking operations that use chain-driven charbroilers to cook meat.
- Rule 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters: This rule requires manufacturers, distributors, retailers, refurbishers, installers, and operators of new and existing units to reduce NO_X emissions from natural gas-fired water heaters, boilers, and process heaters as defined in this rule.
- Rule 1186 – PM_{10} Emissions from Paved and Unpaved Roads, and Livestock Operations: This rule applies to owners and operators of paved and unpaved roads and livestock operations. The rule is intended to reduce PM_{10} emissions by requiring the cleanup of material deposited onto paved roads, use of certified street sweeping equipment, and treatment of high-use unpaved roads (see also Rule 403).
- Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities: This rule requires owners and operators of any demolition or renovation activity and the associated disturbance of asbestos-containing materials, any asbestos storage facility, or any active waste disposal site to implement work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials.
- Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines: This rule applies to stationary compression ignition engines greater than 50 brake horsepower and sets limits on emissions and operating hours. In general, new stationary emergency standby diesel-fueled engines greater than 50 brake horsepower are not permitted to operate more than 50 hours per year for maintenance and testing.

Southern California Association of Governments 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS)

SCAG is the regional planning agency that implements the 2020-2045 RTP/SCS for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and addresses regional issues relating to transportation, the economy, community development, and the environment. SCAG coordinates with various air quality and transportation stakeholders in Southern California to ensure compliance with the federal and State air quality requirements. Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. The 2020-2045 RTP/SCS includes transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained in the 2022 AQMP. The South Coast AQMD combines its portion of the AQMP with measures prepared by SCAG.[6] The Transportation Control Measures, included as Appendix IV-C of the 2022 AQMP, are based on the 2020-2045 RTP/SCS.

The 2022 AQMP forecasts the 2037 emissions inventories ‘‘with growth’’ based on the 2020-2045 RTP/SCS. The region is projected to see a 12-percent growth in population, a 17-percent growth in

[6] South Coast AQMD, 2022 Air Quality Management Plan, adopted December 2, 2022.

housing units, an 11-percent growth in employment, and a 5-percent growth in VMT between 2018 and 2037. Despite regional growth in the past, air quality has improved substantially over the years, primarily due to the effects of air quality control programs at the local, State, and federal levels.[7]

LOCAL

City of Santa Clarita General Plan

The Conservation and Open Space Element of the Santa Clarita General Plan includes the following goals, objectives, and policies related to air quality that would be applicable to the Proposed Project:[8]

Conservation and Open Space Element: Air Quality

- Goal CO 7: Clean air to protect human health and support healthy ecosystems.
  - Objective CO 7.1: Reduce air pollution from mobile sources.
    - Policy 7.1.1: Through the mixed land use patterns and multi-modal circulation policies set forth in the Land Use and Circulation Elements, limit air pollution from transportation sources.
    - Policy 7.1.2: Support the use of alternative fuel vehicles.
    - Policy 7.1.3: Support alternative travel modes and new technologies, including infrastructure to support alternative fuel vehicles, as they become commercially available.
  - Objective CO 7.2: Apply guidelines to protect sensitive receptors from sources of air pollution as developed by CARB, where appropriate.
    - Policy CO 7.2.1: Ensure adequate spacing of sensitive land use from the following sources of air pollution: high traffic freeways and roads; distribution centers; truck stops; chrome plating facilities; dry cleaners using perchloroethylene; and large gas stations, as recommended by CARB.
  - Objective CO 7.3: Coordinate with other agencies to plan for and implement programs for improving air quality in the South Coast Air Basin.
    - Policy CO 7.3.1: Coordinate with local, regional, State, and federal agencies to develop and implement regional air quality policies and programs.

4.2.3 THRESHOLDS OF SIGNIFICANCE

The significance thresholds used to evaluate the impacts of the Project on air quality are based on Appendix G of the CEQA Guidelines. In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to air quality if it would:

Threshold 4.2(a): Conflict with or obstruct implementation of the applicable air quality plan;

[7] South Coast AQMD, 2022 Air Quality Management Plan, adopted December 2, 2022.
[8] City of Santa Clarita, General Plan, Conservation and Open Space Element, June 2011.

Threshold 4.2(b): ***Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard;***

Threshold 4.2(c): ***Expose sensitive receptors to substantial pollutant concentrations; and/or***

Threshold 4.2(d): ***Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.***

To assist in answering the Appendix G threshold questions, the City utilizes the thresholds of significance established by the South Coast AQMD.

REGIONAL THRESHOLDS

The South Coast AQMD's numeric significance thresholds for impacts to regional air quality are presented in **Table 4.2-3**. There are separate thresholds for short-term construction and long-term operational emissions. A project with daily emissions below these thresholds is considered to have a less-than-significant effect on regional air quality from both a direct and cumulative impact standpoint.

LOCALIZED SIGNIFICANCE THRESHOLDS

The South Coast AQMD has also developed localized significance thresholds (LST) as a tool to assist lead agencies in analyzing localized air quality impacts to sensitive receptors in the vicinity of the Project. The South Coast AQMD's LST Methodology outlines how to analyze localized impacts from common pollutants of concern, including NO_2, CO, PM_{10}, and $PM_{2.5}$.[9] Localized air quality impacts would occur if pollutant concentrations at sensitive receptors exceeded applicable NAAQS or CAAQS.

To minimize efforts, the South Coast AQMD developed mass rate lookup tables as a simple screening procedure. If a project's on-site emissions do not exceed the screening levels for any pollutant, it can be concluded that the project would not cause or contribute to an adverse localized air quality impact. Screening levels are provided for various distances (i.e., 82 feet [25 meters], 164 feet [50 meters], 328 feet [100 meters], 656 feet [200 meters], and 1,640 feet [500 meters]) between the Project boundary and the nearest sensitive receptor and various Project Site acreages (i.e., 1, 2, and 5 acres).

The Project Site is in SRA 13 (Santa Clarita Valley). Emissions were evaluated against the most stringent LST screening level distance. Emission screening criteria for a 5-acre site at a distance of 82 feet (25 meters) were used in the analysis for CO, PM_{10}, and $PM_{2.5}$. For NO_x, a distance of 164 feet (50 meters) was used.[10] The 5-acre screening thresholds are used since it is assumed less than 10 acres are disturbed per day during construction. Applicable LST screening levels are shown in **Table 4.2-4**.

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9 South Coast AQMD, Finalized Localized Significance Threshold Methodology, July 2008.

10 For most pollutants, 25 meters is the most stringent screening distance. For NO_X emissions, the most stringent screening distance is 50 meters. This is because at the emission source, the principal component of NO_X is a mixture of nitric oxide (roughly 95 percent). Once emitted, nitric oxide reacts with the atmosphere to form NO_2 in the atmosphere. Due to the gradual decomposition of nitric oxide to form NO_2, health risks initially increase with distance (in the area where the decomposition rate exceeds dispersion rate) and then begin to decrease with distance.

Table 4.2-3
SOUTH COAST AQMD AIR QUALITY SIGNIFICANCE THRESHOLDS

Mass Daily Thresholds[a]		
Pollutant	**Construction[b]**	**Operation**
NO_X	100 lbs/day	55 lbs/day
VOC[d]	75 lbs/day	55 lbs/day
PM_{10}	150 lbs/day	150 lbs/day
$PM_{2.5}$	55 lbs/day	55 lbs/day
SO_X	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead[e]	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TACs) and Odor Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic & Acute Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to South Coast AQMD Rule 402	
Ambient Air Quality Standards for Criteria Pollutants[c]		
NO_2 1-hour average Annual Arithmetic Mean	South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (State) 0.03 ppm (State) and 0.0534 ppm (federal)	
PM_{10} 24-hour average Annual Average	10.4 μg/m^3 (construction)[d] & 2.5 μg/m^3 (operation) 1.0 μg/m^3	
$PM_{2.5}$ 24-hour average	10.4 μg/m^3 (construction) & 2.5 μg/m^3 (operation)	
SO_2 1-hour average 24-hour average	0.25 ppm (State) & 0.075 ppm (federal—99th percentile) 0.04 ppm (State)	
Sulfate 24-hour average	25 μg/m^3 (State)	
CO 1-hour average 8-hour average	South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (State) and 35 ppm (federal) 9.0 ppm (State/federal)	
Lead 30-day average Rolling 3-month average	1.5 μg/m^3 (State) 0.15 μg/m^3 (federal)	

Notes:
lbs/day = pounds per day ppm = parts per million μg/m^3 = micrograms per cubic meter
[a] *South Coast AQMD CEQA Handbook, 1993, pages 6-2 and 6-3.*
[b] *Construction thresholds apply to both the South Coast Air Basin and Coachella Valley (Salton Sea and Mojave Desert Air Basins).*
[c] *Ambient air quality thresholds for criteria pollutants are based on South Coast AQMD Rule 1303, Table A-2 unless otherwise stated.*
[d] *Ambient air quality threshold is based on South Coast AQMD Rule 403.*

Source: South Coast AQMD, South Coast AQMD Air Quality Significance Thresholds, revised April 2019.

Table 4.2-4
SOUTH COAST AQMD LST SCREENING LEVELS

Pollutant	Mass Daily Emissions Screening Criteria (pounds/day)	
	Construction	Operation
NO_x/NO_2	236	236
CO	1,644	1,644
PM_{10}	12	3
$PM_{2.5}$	6	2

Notes:
NO_x/NO_2 = nitrogen oxides; CO = carbon monoxide; PM_{10} = particulate matter 10 micrometers or less in diameter; $PM_{2.5}$ = fine particulate matter 2.5 micrometers or less in diameter
Source Receptor Area 13 for a 5-acre parcel at a distance of 82 feet (25 meters) except for NO_x, which is based on a distance of 164 feet (50 meters).
Source: South Coast AQMD, Final Localized Significance Threshold Methodology, Table C-1, 2006-2008 Thresholds for Construction and Operation with Gradual Conversion of NO_x to NO_2, revised October 21, 2009.

CUMULATIVE IMPACTS

Based on South Coast AQMD guidance, individual construction projects that exceed the South Coast AQMD's recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which SCAB is in non-attainment. As discussed in the South Coast AQMD's White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution:

> *As Lead Agency, the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR… Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.*[11]

The cumulative analysis of air quality impacts in this Draft EIR follows the South Coast AQMD's guidance such that construction or operational Project emissions will be considered cumulatively considerable if Project-specific emissions exceed an applicable recommended significance threshold established by the South Coast AQMD.

ISSUES NOT EVALUATED FURTHER

The Proposed Project would not result in a significant impact related to the following Appendix G significance threshold, as determined in the Initial Study (**Appendix A**), and, therefore, is not evaluated further in this Draft EIR:

Threshold 4.2(d): Would the project create objectionable odors affecting a substantial number of people?

[11] South Coast AQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, Appendix D, August 2003.

4.2.4 METHODOLOGY

The analysis of impacts related to air quality considered the improvements on the Project Site, as well as the Project's improvements off-site, including a Class I multi-purpose path along the frontage of the Project on 13th, Arch, and 12th Streets; widening of 13th Street, Arch Street, and 12th Street; installation of public hydrants along the frontage of the Project on 13th, Arch, and 12th Streets; and railroad crossing improvements at 13th Street, including the installation of a bike path/trail on the north side of the crossing, widening of the crossing at 13th Street and Railroad Avenue to accommodate the wider turning radii, installation of drainage on Railroad Avenue and 13th Street, new gates, modifications on Railroad Avenue at 13th Street to accommodate the revised intersection geometry and provide increased efficiency, implementation of ADA requirements for pedestrians, and implementation of line-of-sight requirements at the grade crossing. The analysis also considered the modifications to the Dockweiler Drive Extension Project in the immediate vicinity of the Project Site, including roadway improvements to 13th Street, Arch Street, 12th Street and Placerita Canyon Road that differ from previous approved plans, including accommodating the additional lane geometry at the Arch Street/13th Street intersection to widen the railroad crossing; construction of a pedestrian and bike bridge from the Jan Heidt Newhall Metrolink Station on Railroad Avenue to the future extension of Dockweiler Drive; and implementation of temporary storm drain improvements to accommodate surface water runoff from Dockweiler Drive prior to the completion of the Project.

Criteria pollutants for Project construction and operation were calculated using the California Emissions Estimator Model (CalEEMod) version 2020.4.0. The methodology for construction and operation emission estimates for the Project are discussed below.

CONSTRUCTION

Project construction would primarily generate temporary criteria pollutants from construction equipment operation on-site and construction worker vehicle trips to and from the Project Site, and from construction material deliveries to and from the Project Site. Construction input data for CalEEMod include, but are not limited to, (1) the anticipated start and finish dates of construction activity; (2) inventories of construction equipment to be used; and (3) areas to be excavated and graded. The analysis assessed maximum daily emissions from individual construction activities, including site preparation, grading, building construction, paving, and architectural coating. There would be no demolition phase since the existing site is vacant.

Construction emissions were modeled in CalEEMod to start in April 2023 with completion anticipated in September 2025. The quantity, duration, and the intensity of construction activity influences the amount of construction emissions and their related pollutant concentrations that occur at any one time. The emission forecasts reflect conservative assumptions where a relatively large amount of construction is occurring in a relatively intensive manner. If construction is delayed or occurs over a longer period, criteria pollutant emissions would be reduced because of (1) a more modern and cleaner-burning construction equipment fleet mix in future years than assumed in the CalEEMod, and/or (2) a less intensive buildout schedule (total annual emissions occurring over a greater number of days).

Construction emissions were quantified by estimating the types and quantity of equipment that would be used on-site during each construction phase, as provided by the model defaults. As a Project design feature, off-road diesel-powered construction equipment would meet or exceed the

CARB and USEPA Tier 3 off-road emissions standards and be equipped with Level 3 diesel particulate filters at a minimum. Equipment may also use alternative (non-diesel) fuel to reduce diesel exhaust emissions. Therefore, the CalEEMod default for operation of equipment greater than 50 horsepower was changed to be equipped with CARB and USEPA rated Tier 3 engines with Level 3 diesel particulate filters. CalEEMod also estimates off-site emissions from worker, vendor, and delivery truck trips. The number of worker and vendor trips were based on CalEEMod defaults. The default trip lengths were used for all construction trips. To include on-site emissions, the default worker trip lengths were increased by approximately 0.8 mile, which is the length of the Project Site. This accounts for on-site travel during construction. In addition, it is assumed that less than 10 acres would be disturbed by on-site construction per day.

The Project proposes a bridge across Placerita Creek to access a graded employee parking area on the north side of Placerita Creek. This analysis evaluates the adjacent 11.4-acre Metropolitan Water District (MWD) right-of-way parcel, which may potentially be utilized for excess parking, subject to agreement with MWD. These features were included as part of the overall parking construction and are not analyzed separately. The analysis assessed maximum daily emissions from individual construction activities, including site preparation, grading, building construction, paving, and architectural coating. The Project would implement two design features to reduce construction equipment emissions, which are further discussed below.

OPERATION

Operational sources of criteria pollutant emissions include area, energy, and mobile sources, which are further discussed below.

Area Sources

Emissions associated with area sources include consumer products, landscape maintenance, and architectural coating. Area source emissions were calculated using standard emission rates from CARB, USEPA, and South Coast AQMD.

Energy Sources

The Project would be served by Southern California Edison (SCE). Emissions from energy sources are primarily generated by natural gas use. The emissions factors for natural gas combustion are based on USEPA's AP-42 (Compilation of Air Pollutant Emissions Factors). Emissions from electricity use are not included in the air quality analysis as they only apply to GHG emissions since electricity generation is an indirect emission generated off-site and, therefore, not relevant for local and regional air quality conditions. The annual natural gas consumption was adjusted using data for the Shadowbox Studios based in Atlanta, Georgia.

The Project would also include the operation of up to seven food trucks on a daily basis. The food trucks would be located in the southern portion of the Project Site adjacent to each of the three catering buildings. Each station would be equipped with a 30-amp or greater electrical service; generators would not be used for the food trucks.

Mobile Sources

Mobile source emissions are estimated by multiplying the Project trip rate, average trip length, and the vehicle emission factors. The Project-specific trip generations for trips to the sound stage, production support, and production office are discussed in detail in Section 4.14, Transportation,

of this Draft EIR. Additionally, during operation, employees and guests of the Project would travel on-site using electric golf carts, and production staff may use vans.

Stationary Sources

The Project would incorporate the use of six emergency back-up generators, which would be 1,400-amp diesel studio generators. These generators would be tested for 20 minutes per month. South Coast AQMD permits assume that generators would operate up to 50 hours per year for testing purposes. An additional four hours of emergency use per year was assumed for a total of 54 hours of operation per year as a conservative estimate of emissions.

4.2.5 PROJECT DESIGN FEATURES

The following Project design features are proposed with respect to air quality:

PDF-AQ-1: The Project will operate off-road diesel-powered construction equipment to meet or exceed CARB and USEPA Tier 3 off-road emissions standards with Level 3 diesel particulate filters or be alternatively (non-diesel) fueled to reduce diesel exhaust emissions.

PDF-AQ-2: Off-road diesel-powered construction equipment will meet or exceed the CARB and USEPA Tier 3 off-road emissions standards and be equipped with Level 3 diesel particulate filters at a minimum.

4.2.6 ANALYSIS OF PROJECT IMPACTS

Threshold 4.2(a): Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Impact Analysis

A project may be inconsistent with the AQMP if it would generate population, housing, or employment growth exceeding forecasts used in the development of the AQMP. The 2022 AQMP incorporates local city general plans and the 2020-2045 RTP/SCS socioeconomic forecast projections of regional population, housing, and employment growth. In the 2020-2045 RTP/SCS, the employment growth forecasted for the City of Santa Clarita in the year 2045 was estimated to be 105,200 employees, an increase of 14,000 employees compared to the 2016 employment baseline of 91,200 employees. The Project would generate direct employment for 2,333 persons and 3,500 additional indirect employment due to studio activities. This would be a total of approximately 5,800 employees, which would be within the SCAG's projected 2045 employment increase of 14,000 employees for Santa Clarita. In addition, the Project would not generate new housing. Therefore, the Project would be consistent with the population, housing, and employment projections utilized in the AQMP.

The 2022 AQMP also provides strategies and measures to reach attainment of the O_3, PM_{10}, and $PM_{2.5}$ CAAQS. As shown in **Table 4.2-5** and **Table 4.2-6** below under Threshold 4.2(b), construction and operation of the Project would not generate criteria pollutant emissions that would exceed the South Coast AQMD thresholds for ozone precursors (VOCs and NO_X) or $PM_{2.5}$, or any criteria pollutant threshold. Therefore, the Project would not result in an increase in frequency or severity of existing air quality violations, cause or contribute to a new violation, or delay timely attainment of the air quality standards in the 2022 AQMP. Given the Project's

compliance with regulatory thresholds and SCAG 2045 employment forecasts, the Project would not conflict with or obstruct implementation of the 2022 AQMP, and, as such, impacts would be less than significant.

Mitigation Measures

Impacts with regard to Threshold 4.2(a) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.2(a) were determined to be less than significant without mitigation.

Threshold 4.2(b): Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or State ambient air quality standard?

Impact Analysis

Construction

Project construction activities would generate air pollutant emissions. **Table 4.2-5** summarizes the estimated maximum daily emissions of VOC, NO_x, CO, SO_2, PM_{10}, and $PM_{2.5}$. As shown, emissions from Project construction activities, including those associated with the off-site improvements, would not exceed the South Coast AQMD regional thresholds. Furthermore, the Project would be required to comply with South Coast AQMD rules and regulations to control fugitive dust emissions. Because the Project's emissions are below applicable South Coast AQMD significance thresholds, the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment, and regional construction impacts would be less than significant.

Operation

Operational emissions generated by both stationary and mobile sources would result from normal daily activities on-site after construction is complete. **Table 4.2-6** summarizes the Project's operational emissions generated by area sources, energy sources, and mobile sources. These emissions assume the four hours of emergency generator use occurs in one day as a conservative emissions scenario. As shown in **Table 4.2-6**, the operational emissions from the Project would not exceed the regional thresholds of significance established by the South Coast AQMD for criteria pollutants. Therefore, consistent with the findings presented in the South Coast AQMD's White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, because Project emissions would not exceed the regional thresholds for any of the criteria pollutants, the Project would not result in a cumulatively considerable net increase in any criteria pollutant for which the SCAB is non-attainment under the NAAQS or the CAAQS, and, as such, regional operational impacts would be less than significant.

In addition, although the Project would increase emissions from mobile sources, the Project is expected to have a lower home-based-work VMT[12] per employee compared to the Citywide threshold.

[12] A home-based-work trip is a trip that has home at one end of the trip and work at the other.

Table 4.2-5
CONSTRUCTION CRITERIA POLLUTANT EMISSIONS

Emissions Source	Maximum Emissions (pounds/day)[a]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer Emissions						
2023	6	39	82	<1	22	6
2024	42	41	90	<1	26	7
2025	42	52	104	<1	26	7
Maximum Summer Emissions	42	52	104	<1	26	7
Winter Emissions						
2023	7	40	77	<1	22	6
2024	42	42	85	<1	26	7
2025	43	53	99	<1	26	7
Maximum Winter Emissions	43	53	99	<1	26	7
Maximum Daily Construction Emissions	**43**	**53**	**104**	<1	**26**	**7**
South Coast AQMD Regional Thresholds	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***

Notes:
VOC = volatile organic compounds; NO_x = nitrogen oxide; CO = carbon monoxide; SO_2 = sulfur dioxide;
PM_{10} = particulate matter 10 micrometers in diameter or less; $PM_{2.5}$ = fine particulate matter 2.5 micrometers or less in diameter
*[a] Emissions were calculated using CalEEMod version 2020.4.0, as recommended by the South Coast AQMD. Refer to **Appendix C** for assumptions used in this analysis.*
Source: Rincon Consultants, Inc., Shadowbox Studios-Santa Clarita Project Air Quality and Greenhouse Gas Emissions Study, February 2023.

Table 4.2-6
OPERATIONAL CRITERIA POLLUTANT EMISSIONS

Emission Source	Maximum Emissions (pounds per day)[a,b]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer Emissions						
Area	28	<1	1	<1	<1	<1
Energy	<1	1	1	<1	<1	<1
Mobile	21	23	220	<1	56	15
Emergency Generators	1	25	27	<1	1	1
Maximum Summer Emissions	**51**	**49**	**248**	<1	**57**	**16**
Winter Emissions						
Area	28	<1	1	<1	<1	<1
Energy	<1	1	1	<1	<1	<1
Mobile	20	24	212	<1	56	15
Emergency Generators	1	25	27	<1	1	1
Maximum Winter Emissions	**50**	**50**	**240**	<1	**57**	**16**
Maximum Daily Emissions	**51**	**50**	**248**	<1	**57**	**16**
South Coast AQMD Regional Thresholds	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Notes:
VOC = volatile organic compounds; NO_x = nitrogen oxide; CO = carbon monoxide; SO_x = sulfur dioxide;
PM_{10} = particulate matter 10 micrometers in diameter or less; $PM_{2.5}$ = fine particulate matter 2.5 micrometers or less in diameter
*[a] Emissions were calculated using CalEEMod version 2020.4.0, as recommended by South Coast AQMD. Refer to **Appendix C** for assumptions used in this analysis.*
[b] The numbers may not add up precisely due to rounding.
Source: Rincon Consultants, Inc., Shadowbox Studios-Santa Clarita Project Air Quality and Greenhouse Gas Emissions Study, February 2023.

According to the Transportation Assessment prepared for the Project (see **Appendix L** and Section 4.14, Transportation, of this Draft EIR), the average home-based-work VMT per employee for the City of Santa Clarita is 17.9. The Project would have a home-based-work VMT per employee of 14.0, which is less than the Citywide average. Because the Project would generate new jobs, it would also provide additional employment opportunities for local existing and future residents, thus decreasing the VMT per for home-based-work trips compared to similar employment opportunities, and would have a commensurate reduction in per trip air pollutant emissions.

Mitigation Measures

Impacts with regard to Threshold 4.2(b) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.2(b) were determined to be less than significant without mitigation.

Threshold 4.2(c): Would the Project expose sensitive receptors to substantial pollutant concentrations?

Impact Analysis

As identified above, sensitive receptors that may be affected by air quality impacts associated with Project construction and operation include the following:

- Single-family residences located on Alderbrook Drive and Circle J Ranch Road, along the eastern and northeastern boundaries of the Project Site;
- Residential development south of Wiley Canyon Road and Via Princessa along the northern boundary of the Project Site;
- Residential uses 500 feet to the southeast and 500 feet to the west of the Project Site; and
- Residential uses approximately 150 feet of the Project Site across Railroad Avenue.

Construction

Table 4.2-7 summarizes maximum daily on-site emissions associated with construction of the Project, including the proposed off-site improvements. As noted in the table, the applicable emission levels found in the LST lookup tables for SRA 13 are the screening levels for a 5-acre site at a distance of 82 feet (25 meters) for all pollutants except for NO_x, which uses a distance of 164 feet (50 meters). The on-site construction emissions of NO_X, CO, PM_{10}, and $PM_{2.5}$ would not exceed South Coast AQMD LST screening levels during any phase of construction, as shown in **Table 4.2-7**. Therefore, the Project would not expose sensitive receptors to substantial criteria pollutant concentrations during construction activities.

With regard to TACs, construction-related activities would result in short-term, Project-generated emissions of DPM exhaust emissions from off-road, heavy-duty diesel equipment for site preparation, grading, building construction, and other construction activities. Generation of DPM from construction projects typically occurs in a single area for a short period (i.e., approximately 29 months).

Table 4.2-7
ON-SITE CONSTRUCTION EMISSIONS

	Maximum On-site Emissions (pounds per day)[a]			
	NO_X/NO_2	CO	PM_{10}	$PM_{2.5}$[c]
Construction Emissions	30.3	37.2	9.0	4.7
SRA 13 Applicable LST Screening Levels[b]	236	1,644	12	6
Screening Levels Exceeded?	**No**	**No**	**No**	**No**

Notes:
SRA = source receptor area; NO_x = nitrogen oxides; NO_2 = nitrogen dioxide; CO = carbon monoxide;
PM_{10} = particulate matter 10 micrometers in diameter or less; $PM_{2.5}$ = fine particulate matter 2.5 micrometers or less in diameter

[a] *Some numbers may not add up precisely due to rounding considerations. Maximum on-site emissions are the highest emissions that would occur on the Project Site from on-site sources, such as heavy construction equipment and architectural coatings. The emissions also account for construction worker vehicle trips and haul truck trips traveling the Project length, which is approximately 0.8 miles. Refer to **Appendix C** for assumptions used in this analysis.*

[b] *The applicable LST screening levels for SRA 13 are those identified for a 5-acre site at a distance of 82 feet (25 meters) for all pollutants except for NO_x, which uses a distance of 164 feet (50 meters).*

[c] *One of the main sources of TACs in California is diesel engine exhaust that contains solid material known as diesel particulate matter (DPM). More than 90 percent of DPM is less than one micron in diameter and, therefore, is a subset of $PM_{2.5}$. For the purpose of this analysis, DPM emissions are conservatively assumed to be similar to $PM_{2.5}$ emissions.*

Source: Rincon Consultants, Inc., Shadowbox Studios-Santa Clarita Project Air Quality and Greenhouse Gas Emissions Study, February 2023.

The dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that receptor has to the substance. Dose is positively correlated with time (i.e., a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual (MEI)). The risks estimated for an MEI are higher if a fixed exposure occurs over a longer period of time. According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the given project. Thus, the duration of proposed construction activities (i.e., 29 months) is 8 percent of the total exposure period used for health risk calculation.

As presented in **Table 4.2-7,** localized DPM emissions, a subset of $PM_{2.5}$ emissions, are below the LST screening levels. Although the localized analysis does not directly measure health risk impacts, it does provide data that can be used to evaluate the potential to cause health risk impacts. The low level of PM emissions coupled with the short-term duration of construction activity would result in a low level of DPM concentrations in the Project area. Thus, construction activities would not expose sensitive receptors to substantial TAC concentrations.

Additionally, the Project would be consistent with the 2016 AQMP requirements and control strategies and the CARB In-Use Off-Road Diesel Vehicle Regulations, which are intended to reduce emissions from construction equipment and activities. In addition, the Project includes Project Design Features PDF-AQ-1 and PDF-AQ-2, identified in Subsection 4.2.5, Project Design Features, above, to ensure that only off-road diesel-powered equipment with proper particulate filers are used on-site, which would further reduce DPM emissions.

Operation

Table 4.2-8 summarizes maximum daily on-site localized emissions associated with operation of the Project. Similar to the regional emissions, the localized emissions assume that all four hours of emergency generator use occur in one day. As shown in this table, the on-site emissions of NO_X, CO, PM_{10}, and $PM_{2.5}$ would not exceed South Coast AQMD LST screening levels during operation. If the Project were to include the installation of stationary sources (e.g., diesel-powered emergency-use generators) on-site, then the sources would be subject to South Coast AQMD permitting requirements to ensure they do not pose a potential health risk impact. Therefore, the Project would not expose sensitive receptors to substantial criteria pollutant concentrations during operation, and, as such, impacts would be less than significant.

Table 4.2-8
ON-SITE OPERATION EMISSIONS

	Maximum On-site Emissions (pounds per day)[a]			
	NO_X/NO_2	**CO**	**PM_{10}**	**$PM_{2.5}$**
Operation Emissions	26	29	1	1
SRA 13 Applicable LST Screening Levels[b]	236	1,644	3	2
Screening Levels Exceeded?	**No**	**No**	**No**	**No**

Notes:
SRA = source receptor area; NO_x = nitrogen oxides; NO_2 = nitrogen dioxide; CO = carbon monoxide;
PM_{10} = particulate matter 10 micrometers in diameter or less; $PM_{2.5}$ = fine particulate matter 2.5 micrometers in diameter or less
[a] *Emissions only account for on-site operation emissions. Refer to **Appendix C** for assumptions used in this analysis.*
[b] *The applicable LST screening levels for SRA 13 are those identified for a five-acre site at a distance of 82 feet (25 meters) for all pollutants except for NO_x. The LST screening level for a five-acre site at a distance of 164 feet (50 meters) was used for NO_x.*
Source: Rincon Consultants, Inc., Shadowbox Studios-Santa Clarita Project Air Quality and Greenhouse Gas Emissions Study, February 2023.

With regard to TACs, implementation of the Project would involve construction of a film studio campus with sound stages, production offices, and amenities (e.g., catering, a gym, an on-site car wash, and detailing service). While such developments are not typically associated with emissions of TACs, long-term stationary sources of TACs, such as diesel-powered emergency-use generators, would be installed on-site to support the Project. Pursuant to South Coast AQMD rules and regulations, including South Coast AQMD Rule 1401 (New Source Review of Toxic Air Contaminants), major stationary sources having the potential to emit TACs would be required to obtain permits from the South Coast AQMD. Permits may be issued provided the source is constructed and operated in accordance with applicable South Coast AQMD rules and regulations. Given that compliance with applicable standards and regulations would be required, TAC emissions from new permitted stationary sources would not be anticipated to result in an increased risk to nearby sensitive receptors that would exceed applicable screening levels.

In addition to long-term exposure to stationary emission sources, the operation of the Project would increase emissions from mobile sources. However, as discussed above under Threshold 4.2(b), the increase in traffic generated by the Project would not result in substantial mobile emissions.

Other long-term operational emissions include toxic substances, such as cleaning agents used on-site. Compliance with State and federal handling regulations would ensure that emissions remain below significant levels. The use of such substances, such as cleaning agents, is

regulated by the FCAA, as well as State-adopted regulations for the chemical composition of consumer products. Therefore, Project-related TAC emission impacts during operation would not expose sensitive receptors substantial pollutant concentrations, and, as such, impacts would be less than significant.

Mitigation Measures

Impacts with regard to Threshold 4.2(c) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.2(c) were determined to be less than significant without mitigation.

4.2.7 CUMULATIVE IMPACTS

Impact Analysis

The cumulative context for air quality is regional. The SCAB is designated non-attainment for O_3 8-hour NAAQS and nonattainment for the $PM_{2.5}$ and Pb NAAQS. The SCAB is also designated non-attainment for the O_3, PM_{10}, and $PM_{2.5}$ CAAQS. The SCAB is designated unclassifiable or in attainment for all other federal and State standards. Despite the current non-attainment status and local air quality standard exceedances, air quality in the SCAB has generally improved since the inception of air pollutant monitoring in 1976. This improvement is mainly due to lower-polluting on-road motor vehicles, more stringent regulation of industrial sources, and the implementation of emission reduction strategies by the South Coast AQMD. This trend toward cleaner air has occurred regardless of continued population growth.

The Project would contribute PM and the O_3 precursors (VOC and NO_X) to the area during construction and operation. As described in Subsection 4.2.6, Analysis of Project Impacts, above, regional emissions during Project construction and operation would not exceed the South Coast AQMD thresholds, contribute substantially to an existing or projected air quality violation, or be potentially significant. Therefore, the regional, localized, and TAC emissions during Project construction and operational would not be cumulatively considerable, and, as such, cumulative impacts would be less than significant.

Mitigation Measures

The Project's contribution to cumulative air quality impacts were determined to be not considerable/less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

The Project's contribution to cumulative air quality impacts were determined to be not cumulatively considerable/less than significant without mitigation.

4.3 BIOLOGICAL RESOURCES

This section describes the biological resources that occur or have the potential to occur on the Project Site and evaluates the potential impacts that could occur from the Project on those resources. This section identifies common vegetation and habitat types on the Project Site, any sensitive plant communities and special-status plant and animal species that may occur, and the regulatory requirements pertaining to those resources. This section assesses the potential significant impacts to these biological resources from the Project and recommends mitigation measures to avoid, minimize, or reduce the significance of any potential impacts.

Information in this section is based on the *Shadowbox Studios Project Biological Resources Assessment* (BRA), completed in February 2023 by Rincon Consultants, Inc. (Rincon), and provided in **Appendix D** of this Draft EIR. The BRA incorporates the following survey reports that were also prepared by Rincon:

- Results of the 2015 Rare Plant Surveys, Devco Santa Clarita, Los Angeles County, California dated August 4, 2015
- Placerita Meadows 2020 Rare Plant Survey, Santa Clarita, California dated June 18, 2020
- Blackhall Studios Property 2021 Rare Plant Survey, Santa Clarita, California dated June 24, 2021
- Blackhall Studios Property 2022 Rare Plant Survey, Santa Clarita, California dated June 21, 2022
- Burrowing Owl Habitat Assessment and Focused Survey Results for the Blackhall Studios Project, City of Santa Clarita, Los Angeles County, California dated July 8, 2022
- Blackhall Property Project Coastal California Gnatcatcher Focused Survey Report dated May 26, 2022
- Blackhall Property 2021 Jurisdictional Waters and Wetlands Delineation, Santa Clarita, California dated July 12, 2021

In addition, the BRA incorporates a Protected Oak Tree Report prepared by Arbor Essence and dated July 1, 2021.

4.3.1 ENVIRONMENTAL SETTING

The Project Site is located within a region that is characterized by a Mediterranean climate with warm, dry summers and cool, wet winters. The average annual precipitation in the region is 15.56 inches with the majority falling in February. The topography of the Project Site is generally level, with the exception of a hill in the northern portion. Elevation ranges between approximately 1,210 and 1,320 feet above mean sea level. The Project Site is located within the Upper Santa Clara River Watershed within Santa Clara River Reach 5.

In the northern portion of the Project Site, Placerita Creek flows from east to west. Two ephemeral drainages running south to northwest occur within the southern portion of the Project Site. Generally, the aquatic resources have been mapped as riverine and stream/river.

VEGETATION COMMUNITIES AND LAND COVER TYPES

A total of six vegetation communities and one land cover type were identified on the Project Site during the rare plant survey and field reconnaissance survey. The six vegetation communities found on the Project Site are wild oat and annual brome grasslands, California buckwheat scrub, chamise–California buckwheat scrub, big sagebrush scrub, giant reed break, and scale broom scrub. Two of these vegetation communities, the big sagebrush scrub and scale broom scrub, are considered sensitive by the California Department of Fish and Wildlife (CDFW).

The land cover type on the Project Site is classified as disturbed habitat, which comprises habitat that has been physically disturbed and is no longer recognizable as a native or naturalized vegetation association but continues to retain a soil substrate. Disturbed habitat is found along the southeastern boundary of the Project Site and consists of an ornamental tree line along the adjacent residential development. Disturbed habitat is also present in the northeastern portion of the Project Site with vegetation mainly composed of non-native species.

GENERAL WILDLIFE

A total of 23 wildlife species were identified on the Project Site during the field reconnaissance survey, the majority of which are native avian species. Common avian species in the region include the northern mockingbird (*Mimus polyglottos*), house finch (*Haemorhous mexicanus*), common raven (*Corvus corax*), white-crowned sparrow (*Zonotrichia leucophrys*), and dozens of other resident and migratory species. The mammalian and avian species would be expected to use the Project Site for foraging, nesting, and/or shelter. Common mammalian species occurring in the region include, but are not limited to, the mule deer (*Odocoileus hemionus*) and coyote (*Canis latrans*).

SPECIAL-STATUS AND SENSITIVE BIOLOGICAL RESOURCES

For the purpose of the analysis in this section, special-status species are defined as:

- Species listed as threatened or endangered under the Federal Endangered Species Act (FESA) (species that are under review may be included if there is a reasonable expectation of listing within the life of the Project);
- Species listed as candidate, threatened, or endangered under the California Endangered Species Act (CESA);
- Species designated as Fully Protected, Species of Special Concern, or Watch List by the CDFW;
- Species occurring on lists 1 or 2 of the California Native Plant Society (CNPS) California Rare Plant Ranks (CRPR) system, per the following definitions:
  - CRPR 1A = Plants presumed extinct in California
  - CRPR 1B.1 = Rare or endangered in California and elsewhere; seriously endangered in California (over 80 percent of occurrences threatened/high degree and immediacy of threat)
  - CRPR 1B.2 = Rare or endangered in California and elsewhere; fairly endangered in California (20 to 80 percent occurrences threatened)
  - CRPR 1B.3 = Rare or endangered in California and elsewhere, not very endangered in California (less than 20 percent of occurrences threatened or no current threats known)

  - CRPR 2 = Rare, threatened, or endangered in California but more common elsewhere
  - CRPR 3 = Review List: Plants about which more information is needed
  - CRPR 4 = Watch List (WL): Plants of limited distribution;
- Species ranked globally (G) or sub-nationally (S) 1 through 3 based on NatureServe's methodologies:
  - G1 or S1 – Critically imperiled globally or statewide
  - G2 or S2 – Imperiled globally or statewide
  - G3 or S3 – Vulnerable to extirpation or extinction globally or statewide; and
- Plant communities that have limited distributions, high value for sensitive wildlife, contain special-status species, or are particularly susceptible to disturbance.

Special-Status Plant Species

A total of 42 special-status plant species have been recorded within a nine-quadrangle search of the Project Site based on a review of relevant databases and literature. Eighteen of the 42 species have a low potential to occur on the Project Site based on the presence of marginally suitable habitat, none of which were observed during focused botanical surveys. The remaining 24 special-status plant species are not expected to occur based on incompatible habitat conditions, as identified in the Special-Status Species Evaluation Table included in Appendix D of the BRA.

No plant species listed as rare, threatened, or endangered under CESA or FESA, or special-status plants, were observed on the Project Site during the rare plant surveys, jurisdictional delineation, or the field reconnaissance survey. The Peirson's morning-glory (*Calystegia peisonii*), which has a CRPR of 4.2, was observed to be growing along the ridge on the northern side of the property within wild oat grassland during the rare plant survey in 2021. The CNPS considers this species to be moderately threatened; however, it is not state- or federally-protected. In addition, plants with a CRPR of 4.2 are not considered special-status and do not warrant consideration in accordance with CEQA Guidelines Section 15380 unless the specific circumstances relevant to local distributions make them of potential scientific interest; the City of Santa Clarita does not have such a list of rare, threatened, or endangered plant species.

Special-Status Wildlife Species

A total of 47 special-status wildlife species have been recorded or have the potential to occur within a 5-mile radius of the Project Site based on a review of relevant databases and literature. Based on the presence of habitat suitability or direct observations via the field reconnaissance survey and Project Site visit, 22 of the 47 species are present or have potential to occur on the Project Site: 5 species with a high potential; and 2 species with a moderate potential; 12 species with a low potential; and 3 species that were observed on-site. The remaining 25 special-status wildlife species are not expected to occur because the Project Site does not support their required habitat components and/or is not within the known range of the species. The species with moderate to high potential to occur on the Project Site include the following:

California horned lark (*Eremophila alpestris actia*) is a WL species that is found in coastal regions from Sonoma County to San Diego County, as well as the main part of the San Joaquin Valley. This species inhabits chaparral, short-grass prairies, bald hills, mountain meadows, open

coastal plains, fallow grain fields, and alkali flats. The nearest recent CNDDB occurrence is approximately 5 miles northwest of the Project Site. The Project Site contains suitable habitat within the non-native grasslands primarily in the southern portion; therefore, California horned lark has a moderate potential to occur on the Project Site.

San Diego black tailed jackrabbit (*Lepus californicus bennettii*) inhabits a wide range of habitats, including desert shrublands, sagebrush, chaparral, oak woodland with an herb mosaic component. This species occurs from coastal Southern California to Baja California. The species requires a mix of grasses, forbs and shrubs for foraging and prefers predominantly open areas without dense understory. The closest CNDDB occurrence was recorded in 2005 approximately 6.2 miles northwest of the Project Site. In addition, the Project Site contains suitable open shrub habitats and friable soils for burrow excavations; therefore, this species has a moderate potential to occur on the Project Site.

California legless lizard (*Anniella* spp.)[1] is found in the Coast Ranges from Contra Costa County to the Mexican border. The species occurs in a variety of habitats, including sparsely vegetated areas of coastal dunes, valley foothill grasslands, chaparral, and coastal scrub that contain sandy or loose organic soils with leaf litter and moist soils for burrowing. Areas disturbed by agriculture or other human uses are typically not suitable habitat for the species. Numerous CNDDB occurrences of the species have been documented within a 5-mile radius of the Project Site, which contains chaparral and scrub habitats with loose loamy soils suitable for the species. The reach of Placerita Creek within the Project Site contains moist soils suitable for the species; therefore, California legless lizard has a high potential to occur on the Project Site.

Coastal whiptail (*Aspidoscelis tigris stejnegeri*) is found in deserts and semi-arid areas with sparse vegetation within Ventura, Los Angeles, Riverside and San Diego counties. The species is commonly found in a variety of habitats, including valley-foothill hardwood, valley-foothill hardwood-conifer, valley-foothill riparian, mixed conifer, pine-juniper, chamise-redshank chaparral, mixed chaparral, desert scrub, desert wash, alkali scrub, and annual grasslands. Several CNDDB occurrences have been documented within 5 miles of the Project Site, including one relatively recent occurrence from 2005 approximately 1.6 miles northeast of the Project Site. Big sagebrush scrub, wild oat and annual brome grasslands, California buckwheat scrub, chamise-California buckwheat scrub, and scale broom scrub on the Project Site provide potentially suitable for this species; therefore, coastal whiptail has a high potential to occur on the Project Site.

Coast horned lizard (*Phrynosoma blainvillii*) can be found in grasslands, coniferous forests, woodlands, and chaparral habitats, containing open areas and patches of loose soil. There are numerous CNDDB records within the regional vicinity of the Project Site. The Project Site contains suitable open areas for sunning, shrubs for cover, and loose soil for burial; therefore, coast horned lizard has a high potential to occur on the Project Site.

Bell's sage sparrow (*Artemisiospiza belli belli*) is a WL species that nests in chaparral habitats dominated by fairly dense stands of chamise. It also occurs in coastal sage scrub habitats in the southern portion of its range. Nests are located on the ground beneath a shrub or in a shrub 6 to 8 inches above the ground. There are numerous CNDDB records within the regional vicinity of the Project Site. In addition, the Project Site contains suitable habitat within the chamise-California buckwheat scrub; therefore, Bell's sage sparrow has a high potential to occur on the Project Site.

[1] "Spp." means species in the plural form and is used to describe the presence of more than one species of the same genus, whose identification was not achieved.

Loggerhead shrike (*Lanius ludovicianus*) inhabits broken woodlands, savannah, pinyon-juniper, Joshua tree and riparian woodlands, desert oases, scrub, and washes. This species prefers open country for hunting, with perches for scanning, and fairly dense shrubs and brush for nesting.

In addition to the seven species with moderate to high potential to occur, descriptions of burrowing owl and coastal California gnatcatcher are also discussed below.

Burrowing owl (*Athene cunicularia*) requires underground burrows or occasionally, other cavities, for nesting, roosting, and cover. Burrows used by the owls are usually dug by other species, known as host burrowers. California ground squirrel burrows are frequently used by burrowing owls, but they may also use dens or holes dug by other fossorial species, including American badger and canid species. In some instances, owls have been known to excavate their own burrows. Natural rock cavities, debris piles, culverts, and pipes also are used for nesting and roosting. Two recent CNDDB occurrences have been documented within 5 miles of the Project Site. Numerous California ground squirrel burrows were observed throughout the Project Site that are potentially suitable for burrowing owls. However, no burrowing owl or sign thereof were detected during focused burrowing owl surveys conducted in 2022.

Coastal California gnatcatcher (*Polioptila californica californica*) is a federally threatened species that is an obligate, permanent resident of coastal sage scrub habitats in Southern California. Its range extends from Ventura County south to northwest Baja California, Mexico. It is strongly associated with coastal sage scrub habitat below 820 feet in coastal areas and between 820 and 1,640 feet in inland areas; however, not all types of coastal sage scrub communities are used or preferred. This species appears to be most abundant in areas dominated by California sagebrush and California buckwheat. The breeding season extends from late February through August with peaks nesting in mid-March to mid-May. The nearest designated critical habitat for the species is located approximately 2 miles south of the Project Site. The Project Site contains marginal quality habitat for the species in the big sagebrush scrub and California buckwheat scrub vegetation communities. In addition, the nearest CNDDB occurrence was recorded in 2019 approximately 1.6 miles northeast of the Project Site. However, no coastal California gnatcatchers were detected during focused breeding season surveys conducted in 2022.

The species that were observed on-site include the following:

Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*) is a WL species that occurs in Southern California coastal sage scrub and sparse mixed chaparral. The Project Site contains suitable buckwheat scrub, chamise-buckwheat scrub, and big sagebrush scrub habitat that provides appropriate nesting substrate for this species. Two observations of Southern California rufous-crowned sparrows were recorded within wild oat and annual brome grassland and buckwheat scrub during the January 2022 reconnaissance survey.

Cooper's hawk (*Accipiter cooperii*) is a WL species typically found in open, interrupted, or marginal type woodlands in the western United States. This species nests in riparian growths of deciduous trees in canyon bottoms or river flood plains, or in live oak trees. An individual Cooper's hawk was observed perched on top of a coast live oak tree on the Project Site during the January 2022 reconnaissance survey; however, a nest was not observed.

Yellow warbler (*Setophaga petechia*) is found in coastal regions from Del Norte County to San Diego County. This species breeds in riparian woodlands from coastal and desert lowlands, as well as montane chaparral and in open mixed conifer habitats. It is often found in riparian plant

associations in close proximity to water. This species frequently nests and forages in willow shrubs and thickets. An individual yellow warbler was incidentally observed foraging near Placerita Creek during a site walk in April 2022. The individual observed in April 2022 is likely a migrating individual as there is no nesting habitat on the Project Site suitable for yellow warbler.

Nesting Birds

The Project Site contains suitable habitat to support nesting birds and raptors protected under the California Fish and Game Code (CFGC) and the Migratory Bird Treaty Act (MBTA). Potential nesting habitat for birds and raptors was observed throughout the Project Site, with the most suitable locations being mature coast live oak (*Quercus agrifolia*) and valley oak trees (*Quercus lobata*) and scrub vegetation. A single, inactive passerine nest was observed within a coast live oak tree on the Project Site during the field reconnaissance survey.

Sensitive Plant Communities

The Project Site contains the two sensitive plant communities of big sagebrush scrub and scale broom scrub. These communities are subject to ongoing disturbance due to off-highway vehicle usage and fragmentation due to surrounding commercial and residential land uses. Accordingly, the plant community of big sagebrush scrub is ranked G2/S2, which indicates that the community is imperiled globally or statewide, while the plant community of scale broom scrub is ranked G3/S3, which indicates that the community is vulnerable to extirpation or extinction globally or statewide.

Critical Habitats

No designated critical habitat occurs on the Project Site. The nearest designated critical habitat is for coastal California gnatcatcher, located approximately 2 miles south of the Project Site.

JURISDICTIONAL WATERS AND WETLANDS

The Jurisdictional Waters and Wetlands Delineation Survey identified jurisdictional waters and wetlands that are potentially subject to U.S. Army Corps of Engineers (USACE) jurisdiction pursuant to Section 404 of the Clean Water Act (CWA), the Los Angeles Regional Water Quality Control Board (RWQCB) jurisdiction pursuant to Section 401 of the CWA and the California Water Code, and CDFW jurisdiction pursuant to Sections 1600 et seq. of the CFGC. The literature review and jurisdictional delineation survey determined the Placerita Creek streambed is potentially subject to USACE, RWQCB, and CDFW jurisdictions, while the ephemeral drainages on the Project Site are potentially subject to RWQCB and CDFW jurisdictions. The areas of these jurisdictional resources are shown in **Table 4.3-1**. **Figure 4.3-1** shows the jurisdictional limits on the Project Site.

Table 4.3-1
JURISDICTIONAL RESOURCES ON THE PROJECT SITE

Feature	USACE Non-Wetland Waters of the U.S.		RWQCB Non-Wetland Waters of the State		CDFW Streambed and Associated Riparian Habitat	
	Acres	Lineal Ft.	Acres	Lineal Ft.	Acres	Lineal Ft.
Placerita Creek	0.97	1,435	0.97	1,435	9.82	1,435
Western Ephemeral Drainage	0	0	1.08	2,615	1.08	2,615
Eastern Ephemeral Drainage	0	0	1.18	2,937	1.18	2,937
Totals	**0.97**	**1,435**	**3.23**	**6,987**	**12.08**	**6,987**

Source: Rincon Consultants, Inc., Shadowbox Studios Project Biological Resources Assessment, February 2023.

	Placerita Creek		West Drainage	East Drainage
	Permanent Impacts	Temporary Impacts	Permanent Impacts	Permanent Impacts
Non-Wetland Waters of the U.S./State	0.048 Ac./130 Lin. Ft.	0.24 Ac./1,268 Lin. Ft.		
CDFW Streambed	0.511 Ac./841 Lin. Ft.	3.89 Ac./5,807 Lin. Ft.	1.08 Ac./2615 Lin. Ft.	1.18 Ac./2937 Lin. Ft.
Non-Wetland Waters of the State			1.08 Ac./2615 Lin. Ft.	1.18 Ac./2937 Lin. Ft.

Source: Rincon Consultants, Inc., Shadowbox Studios Project Biological Resources Assessment, February 2023.

Michael Baker INTERNATIONAL

NOT TO SCALE

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SHADOWBOX STUDIOS ENVIRONMENTAL IMPACT REPORT

Map of Jurisdictional Limits on Project Site

Figure 4.3-1

BIOLOGICAL RESOURCES PROTECTED BY THE CITY OF SANTA CLARITA

Natural resources within Santa Clarita limits are regulated according to the City of Santa Clarita General Plan, Santa Clarita Municipal Code (SCMC), and ordinances. The natural resources occurring on the Project Site are further described below.

Protected Oak Trees and Other Trees

The City of Santa Clarita Oak Tree Preservation Ordinance (SCMC Section 17.51.040) protects and preserves oak trees in the City. An inventory and evaluation of protected oak trees for the Project Site concluded there are six heritage coast live oak trees, six non-heritage coast live oak trees, one heritage valley oak tree, and three non-heritage valley oak trees. Native trees on public property are protected under the City's Parkway Trees Ordinance (SCMC Section 13.76). Numerous non-native trees are located on the Project Site; however, these trees are not protected by the City's Parkway Tree Ordinance.

Significant Ecological Areas

Significant Ecological Areas (SEAs) are defined by the City as "ecologically important land and water systems that are valuable as plant or animal communities, often important to the preservation of threatened and endangered species, and conversation of biological diversity in the County."[2] The City's General Plan and SCMC Section 17.38.080 include treatment of the SEA Overlay Zone as among the habitat types within the City. The Project Site is not located within an SEA.

Habitat Conservation Plans

The Project Site is not located within any habitat conservation plans, natural community conservation plan, or other approved local, regional, or State habitat conservation plan area.

4.3.2 REGULATORY AND PLANNING FRAMEWORK

FEDERAL

Clean Water Act

Congress enacted the CWA "to restore and maintain the chemical, physical, and biological integrity" of the waters of the U.S. Waters of the U.S. are broadly defined to include navigable waters, perennial and intermittent streams, lakes, rivers, and ponds, as well as wetlands, marshes, and wet meadows.

Section 404

Section 404 of the CWA authorizes the USACE to issue permits regulating the discharge of dredged or fill materials into the waters of the U.S. The objective is to ensure that no discharge of dredged or fill material may be permitted if a practical and less damaging alternative exists or if the Waters of the U.S. would be significantly degraded. Projects may be permitted on an individual basis or may be covered under one of several approved nationwide permits. Individual permits are required for potentially significant impacts and are assessed based on the type of action (e.g., amount of fill). Individual permits also typically require substantial time for review and approval by the USACE. Nationwide permits are preapproved for a project if it meets appropriate conditions set forth in a nationwide permit. A CWA Section 401 Water Quality Certification, which is

[2] City of Santa Clarita, General Plan, Conservation and Open Space Element, June 2011.

administered by the State Water Resources Control Board (SWRCB), must be issued prior to issuance of any Section 404 permit.

Section 401

Section 401 of the CWA requires an applicant requesting a federal license or permit for an activity that may result in any discharge into navigable waters (such as a Section 404 Permit) to provide state certification that the proposed activity will not violate state and federal water quality standards. In California, a Section 401 Certification is issued by the RWQCBs and by the SWRCB for multi-region projects. If a Section 401 Certification is issued, it may include binding conditions, imposed either through the certification itself or through the requested federal license or permit.

Endangered Species Act

The U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) share responsibility for implementing FESA. Generally, the USFWS implements FESA for terrestrial and freshwater species, while the NMFS implements FESA for marine and anadromous species. Projects that would result in "take" of any threatened or endangered animal species, or a threatened or endangered plant species if occurring on federal land, are required to obtain permits from the USFWS or NMFS through either Section 7 (interagency consultation with a federal nexus) or Section 10 (Habitat Conservation Plan) of FESA, depending on the involvement by the federal government in funding, authorizing, or carrying out a project. The permitting process is used to determine if a project would jeopardize the continued existence of a listed species and what measures would be required to avoid jeopardizing the species. "Take" under federal definition means to harass, harm (which includes habitat modification), pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct. Proposed or candidate species do not have the full protection of FESA; however, the USFWS and NMFS advise project applicants that they could be elevated to listed status at any time.

Migratory Bird Treaty Act

The MBTA of 1918 is intended to ensure the sustainability of populations of all protected migratory bird species. The MBTA prohibits the take of protected migratory bird species without prior authorization by the USFWS. A migratory bird species is included on the list of protected species if it meets one or more of the following criteria:

- Occurs in the United States or U.S. territories as the result of natural biological or ecological processes and is currently, or was previously listed as, a species or part of a family protected by one of the four international treaties or their amendments;
- Revised taxonomy results in the species being newly split from a species that was previously on the list, and the new species occurs in the United States or U.S. territories as the result of natural biological or ecological processes; or
- New evidence exists for its natural occurrence in the United States or U.S. territories resulting from natural distributional changes and the species occurs in a protected family.

In 2004, the Migratory Bird Treaty Reform Act (MBTRA) limited the scope of the MBTA by stating the MBTA applies only to migratory bird species that are native to the U.S. or U.S. territories and that a native migratory bird species is one that is present as a result of natural biological or ecological processes. The MBTRA requires the USFWS to publish a list of all non-native, human-introduced bird species to which the MBTA does not apply. The most recent updated list was

published in 2020, which identifies species belonging to biological families referred to in treaties the MBTA implements but are not protected because their presence in the U.S. or U.S. territories is solely the result of intentional or unintentional human-assisted introductions.

STATE

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act is the principal law governing water quality regulation in California. It establishes a comprehensive program to protect water quality and the beneficial uses of water. The Porter-Cologne Act applies to surface waters, wetlands, and groundwater and to both point and nonpoint sources of pollution. Pursuant to the Porter-Cologne Act (California Water Code Section 13000 et seq.), the policy of the State is as follows:

- The quality of all the waters of the State shall be protected,
- All activities and factors affecting the quality of water shall be regulated to attain the highest water quality within reason, and
- The State must be prepared to exercise its full power and jurisdiction to protect the quality of water in the State from degradation.

The Porter-Cologne Act established nine RWQCBs (based on watershed boundaries) and the SWRCB, which are all charged with implementing its provisions and which have primary responsibility for protecting water quality in California. The SWRCB provides program guidance and oversight, allocates funds, and reviews RWQCB decisions. In addition, the SWRCB allocates rights to the use of surface water. The RWQCBs have primary responsibility for individual permitting, inspection, and enforcement actions within each of nine hydrologic regions. The SWRCB and RWQCBs have numerous nonpoint source related responsibilities, including monitoring and assessment, planning, financial assistance, and management.

California Endangered Species Act

CESA (CFGC Section 2050 et seq.) prohibits take of State-listed threatened or endangered species. Take under CESA is defined as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.”

This definition does not prohibit indirect harm by way of habitat modification, except where such harm is the proximate cause of death of a listed species. Where incidental take would occur during construction or other lawful activities, CESA allows the CDFW to issue an Incidental Take Permit upon finding, among other requirements, that impacts to the species have been minimized and fully mitigated. Unlike FESA, CESA’s protections extend to candidate species during the period (typically one year) while the California Fish and Game Commission decides whether the species warrants CESA listing.

California Fish and Game Code

Sections 3511, 4700, 5050, and 5515

The CDFW enforces CFGC Sections 3511, 4700, 5050, and 5515, which prohibit take of species designated as fully protected. The CDFW is not allowed to issue an Incidental Take Permit for fully protected species; therefore, impacts to these species must be avoided. The exception is a

situation where a natural community conservation plan is in place that authorizes take of the fully protected species.

Sections 3503, 3503.5, and 3513

CFGC Sections 3503, 3503.5, and 3513 describe unlawful take, possession, or destruction of native birds, nests, and eggs. CFGC Section 3503.5 protects all birds of prey and their eggs and nests against take, possession, or destruction of nests or eggs.

Section 1602

CFGC Section 1602 states that it is unlawful for any person to "substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake" without first notifying the CDFW of that activity. Thereafter, if the CDFW determines and informs the entity that the activity will not substantially adversely affect any existing fish or wildlife resources, the entity may commence the activity. If, however, the CDFW determines that the activity may substantially adversely affect an existing fish or wildlife resource, the entity may be required to obtain from the CDFW a Streambed Alteration Agreement (SAA), which will include reasonable measures necessary to protect the affected resource(s), before the entity may conduct the activity described in the notification. Upon receiving a complete Notification of Lake/Streambed Alteration, the CDFW has 60 days to present the entity with a draft SAA. Upon review of the draft SAA by the applicant, any problematic terms are negotiated with the CDFW and a final SAA is executed.

LOCAL

City of Santa Clarita Oak Tree Ordinance

The City of Santa Clarita Oak Tree Preservation Ordinance (SCMC Section 17.51.040) protects and preserves oak trees in the City and provides regulatory measures to accomplish this purpose. This policy applies to the removal, pruning, cutting, and/or encroachment into the protected zone of oak trees. The following definitions are provided in the ordinance:

- "Oak tree" means any oak tree of the genus *Quercus*, including but not limited to valley oak, California live oak, canyon oak (*Quercus chrysolepis*), interior live oak (*Quercus wislizenii*), and scrub oak (*Quercus dumosa*), regardless of size.
- "Heritage oak tree" means any oak tree measuring 108 inches or more in circumference or, in the case of a multiple trunk oak tree, 2 or more trunks measuring 72 inches each or greater in circumference, measured 4.5 feet above the natural grade surrounding each tree. In addition, the City's Planning Commission and/or City Council may classify any oak tree, regardless of size, as a heritage tree if it is determined by a majority vote thereof that such tree has exceptional historic, aesthetic, and/or environmental qualities of major significance or prominence to the community.
- "Oak tree protected zone" means a specifically defined area totally encompassing an oak tree within which work activities are strictly controlled. Using the dripline as a point of reference, the protected zone shall commence at a point 5 feet outside of the dripline and extend inward to the trunk of the tree. In no case shall the protected zone be less than 15 feet from the trunk of an oak tree.

An oak tree permit is required to cut, prune, remove, relocate, endanger, damage, or encroach into the protected zone of any oak tree on any public or private property within the City. Oak trees that do not exceed 6 inches in circumference when measured at a point 4.5 feet above the tree's natural grade are exempt from the permit.

City of Santa Clarita Parkway Trees Ordinance

Native trees are protected under the City's Parkway Trees Ordinance (SCMC Section 13.76). Pursuant to this ordinance, a tree permit must be obtained prior to damaging or removing any protected trees that are classified as the following:

- "Exceptional specimen tree" means a tree considered an outstanding specimen of its species by reason of age, rarity, location, size, aesthetic quality, endemic status, or unique character, and so designated by resolution of the City Council.
- "Habitat tree" means a tree (or any group of trees) which has special importance as a wildlife habitat, and so designated by resolution of the City Council.
- "Historic tree" shall mean a living tree in association with some event or person of historical significance to the community or because of special due to size, condition or aesthetic qualities, and so designated by resolution of the City Council.
- "Indigenous tree" means a tree which occurs naturally in the City, and so designated by resolution of the City Council.

Additionally, the ordinance defines a tree as a woody plant that has the potential of attaining a minimum height of 15 feet and has a canopy of foliage borne normally by a single trunk.

City of Santa Clarita General Plan

Applicable goals, objectives, and policies from the City's General Plan Conservation and Open Space Element are listed below:[3]

- Goal CO 3: Conservation of biological resource and ecosystems, including sensitive habitats and species.
    - Objective CO 3.1: In review of development plans and Projects, encourage conservation of existing natural areas and restoration of damaged natural vegetation to provide for habitat and biodiversity.
        - Policy CO 3.1.1: On the Land Use Map and through the development review process, concentrate development into previously developed or urban areas to promote infill development and prevent sprawl and habitat loss, to the extent feasible.
        - Policy CO 3.1.2: Avoid designating or approving new development that will adversely impact wetlands, floodplains, threatened or endangered species and habitat, and water bodies supporting fish or recreational uses, and establish an adequate buffer area as deemed appropriate through site specific review.
        - Policy CO 3.1.3: On previously undeveloped sites ("greenfields"), identify biological resources and incorporate habitat preservation measures into the site

[3] City of Santa Clarita, General Plan, Conservation and Open Space Element, June 2011.

plan, where appropriate. (This policy will generally not apply to urban infill sites, except as otherwise determined by the reviewing agency).

- Policy CO 3.1.4: For new development on sites with degraded habitat, include habitat restoration measures as part of the Project development plan, where appropriate.
- Policy CO 3.1.5: Promote the use of site-appropriate native or adapted plant materials and prohibit use of invasive or noxious plant species in landscape designs.
- Policy CO 3.1.6: On development sites, preserve and enhance natural site elements including existing water bodies, soil conditions, ecosystems, trees, vegetation and habitat, to the extent feasible.
- Policy CO 3.1.7: Limit the use of turf-grass on development sites and promote the use of native or adapted plantings to promote biodiversity and natural habitat.
- Policy CO 3.1.8: On development sites, require tree planting to provide habitat and shade to reduce the heat island effect caused by pavement and buildings.
- Policy CO 3.1.9: During construction, ensure preservation of habitat and trees designated to be protected through use of fencing and other means as appropriate, so as to prevent damage by grading, soil compaction, pollution, erosion or other adverse construction impacts.
- Policy CO 3.1.10: To the extent feasible, encourage the use of open space to promote biodiversity.
- Policy CO 3.1.11: Promote use of pervious materials or porous concrete on sidewalks to allow for planted area infiltration, allow oxygen to reach tree roots (preventing sidewalk lift-up from roots seeking oxygen), and mitigate tree-sidewalk conflicts, in order to maintain a healthy mature urban forest.

- Objective CO 3.2: Identify and protect areas which have exceptional biological resource value due to a specific type of vegetation, habitat, ecosystem, or location.
  - Policy CO 3.2.3: Ensure protection of any endangered or threatened species or habitat, in conformance with State and federal laws.
- Objective CO 3.3: Protect significant wildlife corridors from encroachment by development that would hinder or obstruct wildlife movement.
- Objective CO 3.5: Maintain, enhance, and manage the urban forest throughout developed portions of the Santa Clarita Valley to provide habitat, reduce energy consumption, and create a more livable environment.
  - Policy CO 3.5.1: Continue to plant and maintain trees on public lands and within the public right-of-way to provide shade and walkable streets, incorporating measures to ensure that roots have access to oxygen at tree maturity, such as use of porous concrete.
  - Policy CO 3.5.2: Where appropriate, promote planting of trees that are native or climactically appropriate to the surrounding environment, emphasizing oaks, sycamores, maple, walnut, and other native species in order to enhance habitat, and discouraging the use of introduced species such as eucalyptus, pepper trees, and palms except as ornamental landscape features.

- Objective CO 3.6: Minimize impacts of human activity and the built environment on natural plant and wildlife communities.
  - Policy CO 3.6.1: Minimize light trespass, sky-glow, glare, and other adverse impacts on the nocturnal ecosystem by limiting exterior lighting to the level needed for safety and comfort; reduce unnecessary lighting for landscaping and architectural purposes and encourage reduction of lighting levels during nonbusiness nighttime hours.
  - Policy CO 3.6.2: Reduce impervious surfaces and provide more natural vegetation to enhance microclimates and provide habitat.

4.3.3 THRESHOLDS OF SIGNIFICANCE

The significance thresholds used to evaluate the impacts of the Project related to biological resources are based on Appendix G of the CEQA Guidelines and the City's Initial Study Checklist.

CEQA GUIDELINES APPENDIX G

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to biological resources if it would:

Threshold 4.3(a): ***Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service;***

Threshold 4.3(b): ***Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service;***

Threshold 4.3(c): ***Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;***

Threshold 4.3(d): ***Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;***

Threshold 4.3(e): ***Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or***

Threshold 4.3(f): ***Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.***

CITY'S INITIAL STUDY CHECKLIST

In addition, in accordance with the City's Initial Study Checklist, a project would have a significant impact related to biological resources if it would:

Threshold 4.3(g): ***Affect a Significant Ecological Area (SEA) or Significant Natural Area (SNA) as identified on the City of Santa Clarita SEA Delineation Map.***

ISSUES NOT EVALUATED FURTHER

The Proposed Project would not result in significant impacts related to the following significance thresholds from Appendix G of the CEQA Guidelines or the City's Initial Study Checklist, as determined in the Initial Study (**Appendix A**); therefore, they are not evaluated further in this Draft EIR:

Threshold 4.3(f): ***Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?***

Threshold 4.3(g): ***Would the Project affect a Significant Ecological Area (SEA) or Significant Natural Area (SNA) as identified on the City of Santa Clarita SEA Delineation Map?***

4.3.4 METHODOLOGY

The analysis of impacts related to biological resources considered the improvements on the Project Site, as well as the Project's improvements off-site, including a Class I multi-purpose path along the frontage of the Project on 13th, Arch, and 12th Streets; widening of 13th Street, Arch Street, and 12th Street; installation of public hydrants along the frontage of the Project on 13th, Arch, and 12th Streets; and railroad crossing improvements at 13th Street, including the installation of a bike path/trail on the north side of the crossing, widening of the crossing at 13th Street and Railroad Avenue to accommodate the wider turning radii, installation of drainage on Railroad Avenue and 13th Street, new gates, modifications on Railroad Avenue at 13th Street to accommodate the revised intersection geometry and provide increased efficiency, implementation of ADA requirements for pedestrians, and implementation of line-of-sight requirements at the grade crossing. The analysis also considered the modifications to the Dockweiler Drive Extension Project in the immediate vicinity of the Project Site, including roadway improvements to 13th Street, Arch Street, 12th Street and Placerita Canyon Road that differ from previous approved plans, including accommodating the additional lane geometry at the Arch Street/13th Street intersection to widen the railroad crossing; construction of a pedestrian and bike bridge from the Jan Heidt Newhall Metrolink Station on Railroad Avenue to the future extension of Dockweiler Drive; and implementation of temporary storm drain improvements to accommodate surface water runoff from Dockweiler Drive prior to the completion of the Project.

The analysis of impacts related to biological resources is based on the *Shadowbox Studios Project Biological Resources Assessment*, dated February 2023, and prepared by Rincon Consultants, Inc. (provided in **Appendix D**). Information, conclusions, and recommendations included in this assessment are based on a regulatory review (refer to Subsection 4.3.2, Regulatory and Planning Framework, above); literature review; field reconnaissance survey; and additional focused surveys for jurisdictional delineation, rare plants, burrowing owls, and California gnatcatchers.

LITERATURE REVIEW

Literature reviews of the USFWS Information for Planning and Conservation System (IPAC); CDFW California Natural Diversity Database (CNDDB); and the CNPS Online Inventory of Rare, Threatened, and Endangered Plants of California were conducted to obtain comprehensive information regarding state- and federally-listed species, as well as other special-status species, considered to have potential to occur within the U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle for Newhall, California and the surrounding eight quadrangles (i.e., Whitaker Peak, Warm Springs Mountain, Green Valley, Val Verde, Mint Canyon, Santa Susana, Oat Mountain, San Fernando). In addition, other resources, such as aerial photographs, the United States Department of Agriculture's (USDA) Web Soil Survey, the USFWS Critical Habitat Portal, the USFWS National Wetland Inventory, and the USGS National Hydrography Dataset were reviewed for information about the Project Site.

FIELD RECONNAISSANCE SURVEY

A field reconnaissance survey was conducted by biologists on January 20, 2022, to document the existing conditions and to evaluate the potential for presence of sensitive biological resources on the Project Site, including special-status plant and wildlife species, sensitive plant communities, potential jurisdictional waters of the U.S./State and wetlands, and habitat for federally- and state-protected nesting birds. The Project Site was surveyed on foot, where accessible, and surveyed via binoculars for areas that were inaccessible. Representative photographs of the Project Site were taken and an inventory of all plant and wildlife species observed was compiled (provided in Appendix **D**).

FOCUSED SURVEYS

Jurisdictional Delineation

A formal jurisdictional delineation, which was conducted by Rincon in June 2021, mapped and recorded the extent of potential waters of the U.S., CDFW-jurisdictional streambeds, and/or waters of the State. Current federal and state policies, methods, and guidelines were used to identify and delineate potential jurisdictional areas.

Rare Plant Surveys

Information on rare plants is based on previous botanical survey reports prepared by Rincon from 2015, 2020, 2021, and 2022. The surveys were floristic in nature, and all plant species observed within the 93.5-acre Project Site were recorded. Field surveys were scheduled to optimize detection of any rare plant species with potential to occur on the Project Site based on the known blooming periods of rare plant species that had been previously documented in the region. The surveys were conducted using systematic field techniques by walking meandering transects through the entire Project Site, with special attention given to areas with a high potential to support rare plant species (e.g., vegetation community interfaces or areas with unique soils).

Burrowing Owl Surveys

Information related to the western burrowing owl is based on the findings of several focused surveys conducted in April, May, and June of 2022, which were performed by systematically searching for potential foraging and nesting habitat on the Project Site plus a 150-meter buffer in accordance with CDFW's Staff Report on Burrowing Owl Mitigation; this staff report takes into

account the California Burrowing Owl Consortium's Survey Protocol and Mitigation Guidelines.[4] The Project Site was assessed on foot by walking transects spaced approximately 10 meters apart in suitable habitat and were appropriately adjusted to allow for 100 percent visual coverage of the ground surface.

California Gnatcatcher Surveys

Information related to the coastal California gnatcatcher is based on the results of several focused breeding season surveys conducted in April and May of 2022. Breeding season surveys were conducted pursuant to Section IV of the USFWS Coastal California Gnatcatcher Presence/Absence Survey Protocol.[5] The focused coastal California gnatcatcher surveys were conducted within a 100-foot buffer of the Project Site during the breeding season (March 15–June 30).

4.3.5 PROJECT DESIGN FEATURES

There are no Project Design Features proposed with respect to biological resources.

4.3.6 ANALYSIS OF PROJECT IMPACTS

Threshold 4.3(a): Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Impact Analysis

Special-Status Plant Species

As described in Subsection 4.3.1 above, the CNDDB and CNPS query results identified 42 special-status plant species within a 9-quadrangle search of the Project Site. Twenty-four of these species occur outside the elevation range of the Project Site or require habitat conditions that are not present on the Project Site. The remaining 18 species have a low potential to occur on the Project Site based on marginally suitable habitat and lack of detection during the rare plant surveys.

No plant species listed as rare, threatened, or endangered under CESA or FESA, or special-status plants, were observed on the Project Site or the areas immediately surrounding the Project Site during the rare plant surveys, jurisdictional delineation, or the field reconnaissance survey. Peirson's morning-glory, which has a CRPR of 4.2, was observed on the Project Site during the rare plant survey in 2021. However, plants with a CRPR of 4.2 do not warrant consideration in accordance with CEQA Guidelines Section 15380 unless the specific circumstances relevant to local distributions make them of potential scientific interest. The City of Santa Clarita does not have such a list of rare, threatened, or endangered plant species. Therefore, since no special-status plant species exist on the Project Site or the areas immediately surrounding the Project Site, no impact would occur as a result of Project implementation.

[4] CDFW, Staff Report on Burrowing Owl Mitigation, March 7, 2012; The California Burrowing Owl Consortium, Burrowing Owl Survey Protocol and Mitigation Guidelines, April 1993.

[5] USFWS, Coastal California Gnatcatcher (*Polioptila californica californica*) Presence/Absence Survey Protocol, issued February 28, 1997, revised July 28, 1997, and rewritten for clarity with minor edits June 26, 2019.

Special-Status Wildlife Species

A total of 47 special-status wildlife species were identified within a 5-mile radius of the Project Site based on the literature review. Seven of these special-status wildlife species have a moderate to high potential to occur on the Project Site based on known ranges, habitat preferences for the species, and species occurrence records in the vicinity. Three special-status wildlife species were observed on the Project Site during field surveys: southern California rufous-crowned sparrow, Cooper's hawk, and yellow warbler. In addition, native birds protected under the MBTA and CFGC may nest on-site.

As potentially suitable habitat for these special-status wildlife species exists on the Project Site, implementation of the Project would potentially impact existing habitat. Construction of the Project would potentially result in direct impacts during initial ground-disturbing activities or indirect adverse impacts to special-status wildlife species if present. Construction activities have the potential to directly impact nesting birds through the destruction of nests or disturbances leading to nest failure. As such, impacts to special-status wildlife species (i.e., nesting birds) that exist on the Project Site or the areas immediately surrounding the Project Site would be potentially significant.

However, since burrowing owls and coastal California gnatcatchers were not detected at the Project Site or the areas immediately surrounding the Project Site during the focused species surveys, no impacts to these species would occur as a result of Project implementation.

Mitigation Measures

To reduce potential significant impacts to candidate, sensitive, or special-status species, the following mitigation measures are proposed for the Project:

MM-BIO-1: The Project shall implement the following best management practices (BMPs) during construction:

- The contractor shall clearly delineate the construction limits and prohibit any construction-related traffic outside those boundaries;
- Project-related vehicles shall observe a 10-mile-per-hour speed limit within the unpaved limits of construction;
- All open trenches or excavations shall be fenced and/or sloped to prevent entrapment of wildlife species;
- All food-related trash items such as wrappers, cans, bottles, and food scraps generated during Project construction shall be disposed of in closed containers only and removed daily from the Project Site;
- No deliberate feeding of wildlife shall be allowed;
- No pets shall be allowed on the Project Site;
- No firearms shall be allowed on the Project Site;
- If vehicle or equipment maintenance is necessary, it shall be performed in the designated staging areas;

- If construction must occur at night (between dusk and dawn), all lighting shall be shielded and directed downward to minimize the potential for glare or spillover onto adjacent properties and to reduce impacts on local wildlife; and
- During construction, heavy equipment shall be operated in accordance with standard BMPs. All equipment used on-site shall be properly maintained to avoid leaks of oil, fuel, or residues. Provisions shall be in place to remediate any accidental spills.

MM-BIO-2: A qualified biological monitor familiar with special-status species with potential to occur on the Project Site shall be present during initial ground disturbance or vegetation removal activities. The biological monitor shall have the authority to temporarily stop work if one or more individuals of these special-status species are observed; the monitor shall then relocate these individuals to suitable undisturbed habitat, outside the areas directly and indirectly affected by ground disturbance activities.

MM-BIO-3: Construction activities should occur outside of the bird breeding season (generally February 1 to August 31) to the extent practicable. If construction must occur within the bird breeding season, then no more than three days prior to initiation of ground disturbance and/or vegetation removal, a nesting bird preconstruction survey shall be conducted by a qualified biologist within the disturbance footprint plus a 100-foot buffer (500 feet for raptors), where feasible. If the Proposed Project is phased or construction activities stop for more than one week, a subsequent preconstruction nesting bird survey shall be required prior to each phase of construction.

Preconstruction nesting bird surveys shall be conducted during the time of day when birds are active (typically early morning or late afternoon) and shall factor in sufficient time to perform this survey adequately and completely. A report of the nesting bird survey results, if applicable, shall be submitted to the property owner/developer for review and approval prior to ground and/or vegetation disturbance activities.

If nests are found, their locations shall be flagged. An appropriate avoidance buffer for passerines is generally 100 feet and up to 500 feet for raptors; however, the buffer distance may be modified by a qualified biologist depending upon the species and the proposed work activity. The avoidance buffer shall be determined and demarcated by a qualified biologist with bright orange construction fencing or other suitable material that is clearly visible to construction personnel and heavy equipment operators. Active nests shall be monitored periodically by a qualified biologist until it has been determined that the nest is no longer being used by either the young or adults. No ground disturbance shall occur within this buffer until the qualified biologist confirms that the breeding/nesting is completed, and all the young have fledged. If no nesting birds are observed during preconstruction surveys, no further actions would be necessary.

Level of Significance After Mitigation

Implementation of **Mitigation Measures MM-BIO-1** through **MM-BIO-3** would reduce the potential to impact candidate, sensitive, or special-status species, including southern California rufous-crowned sparrow, Cooper's hawk, and yellow warbler, as well as other native birds protected under the MBTA and CFGC, to a less-than-significant level.

Threshold 4.3(b): Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Impact Analysis

Two sensitive plant communities, big sagebrush scrub and scale broom scrub, were identified on the northern half of the Project Site. The acreage of existing habitat, the area that would be temporarily impacted by Project construction, and the area that would be permanently impacted by the Project footprint are shown in **Table 4.3-2**, below. Temporary impacts refer to impacts on areas that would be affected during construction but would be restored following the completion of construction activities. Permanent impacts refer to impacts on areas that would be permanently development where restoration is not possible.

Table 4.3-2
ACREAGE IMPACTS TO VEGETATION COMMUNITIES

Vegetation Community/Land Cover	Existing Habitat within Project Site (acres)	Temporary Impacts (acres)	Permanent Impacts (acres)
Big Sagebrush Scrub	1.39	0	1.39
Scale Broom Scrub	4.00	0.57	0.002
Total	**5.39**	**0.57**	**1.392**
Source: Rincon Consultants, Inc., Shadowbox Studios Project Biological Resources Assessment, February 2023.			

The big sagebrush scrub community is found in several distinct patches on the Project Site, south of Placerita Creek. Big sagebrush scrub is dominant in the open shrub layer along with California buckwheat and California sagebrush. The herbaceous layer is sparse and dominated by perennial mustard. The scale broom scrub community is located within a portion of Placerita Creek that is scoured from intermittent stream flows. The substrate is composed of gravel, cobble, sand, and scattered woody debris in the main channel of Placerita Creek, with finer silty soils and sparse annual grass and shrub cover on lower terraces. Commonly encountered plant species include native shrubs and herbaceous species. Both communities of big sagebrush scrub and scale broom scrub have been fragmented by previous off-highway vehicle use on the Project Site. While the habitat value of these sensitive communities has been reduced by fragmentation and anthropogenic disturbances and no impact on the southern half, including the areas for off-site improvements, would occur, the Project would continue to result in 0.57 acre of temporary impacts and 1.392 acres of permanent impacts to existing habitat on the northern half of the Project Site. Therefore, impacts to the big sagebrush scrub and scale broom scrub communities would be significant.

Mitigation Measures

To reduce potential significant impacts to riparian habitat or other sensitive natural communities (big sagebrush scrub and scale broom scrub), the following mitigation measures are proposed for the Project:

MM-BIO-4: Impacts to sensitive vegetation communities shall be avoided to the greatest extent feasible. Compensatory mitigation for impacts to big sagebrush scrub and scale broom scrub communities, such as on-site restoration, off-site restoration, or purchase of credits through an approved Mitigation Bank or through applicant sponsored mitigation (e.g., on-site restoration), to reduce impacts to sensitive vegetation communities shall be accomplished at a minimum ratio of 1:1; however, the final ratio shall be determined and approved by the California Department of Fish and Wildlife (CDFW) prior to issuance of a grading permit. If on-site or off-site restoration is feasible, a Restoration Plan shall be prepared and submitted for approval by the CDFW prior to initiating construction or any site disturbance. At a minimum, the Restoration Plan shall include the following:

- A description of the purpose and goals of the restoration
- Identification of success criteria and performance standards
- Methods of site preparation
- Irrigation plan and schedule
- Best management practices
- Maintenance and monitoring program
- Adaptive management strategies
- Key stakeholders and responsible parties
- Funding
- Contingencies

Level of Significance After Mitigation

Implementation of **Mitigation Measure MM-BIO-4**, which would require compensatory mitigation measures, would reduce impacts to riparian habitat or other sensitive natural communities, specifically big sagebrush scrub and scale broom scrub communities, to a less-than-significant level.

Threshold 4.3(c): ***Would the Project have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

Impact Analysis

Placerita Creek and the two unnamed ephemeral drainages on the Project Site are potentially subject to the jurisdictions of USACE, RWQCB, and CFDW. The acreage of temporary construction impacts and permanent operational impacts to jurisdictional areas associated with the Project are shown in **Table 4.3-3** and **Table 4.3-4**. Temporary impacts refer to impacts on areas that would be affected during construction but would be restored following the completion

of construction activities. Permanent impacts refer to impacts on areas that would be permanently development where restoration is not possible.

Table 4.3-3
TEMPORARY IMPACTS TO JURISDICTIONAL AREAS

Jurisdictional Area	USACE Non-Wetland Waters of the U.S. (acres/linear feet)	RWQCB Non-Wetland Waters of the State (acres/linear feet)	CDFW Streambed and Associated Riparian Habitat (acres/linear feet)
Placerita Creek	0.24/1,268	0.24/1,268	3.89/5,807
Western Ephemeral Drainage	0	0	0
Eastern Ephemeral Drainage	0	0	0
Total	**0.24/1,268**	**0.24/1,268**	**3.89/5,807**
Source: Rincon Consultants, Inc., Shadowbox Studios Project Biological Resources Assessment, February 2023.			

Table 4.3-4
PERMANENT IMPACTS TO JURISDICTIONAL AREAS

Jurisdictional Area	USACE Non-Wetland Waters of the U.S. (acres/linear feet)	RWQCB Non-Wetland Waters of the State (acres/linear feet)	CDFW Streambed and Associated Riparian Habitat (acres/linear feet)
Placerita Creek	0.05/130	0.05/130	0.51/841
Western Ephemeral Drainage	0	1.08/2,615	1.08/2,615
Eastern Ephemeral Drainage	0	1.18/2,937	1.18/2,937
Total	**0.05/130**	**2.31/5,682**	**2.77/6,393**
Source: Rincon Consultants, Inc., Biological Resources Assessment prepared for the Shadowbox Studios Project, February 2023.			

As identified in **Table 4.3-1** above, a total of 0.97 acres (1,435 linear feet) of non-wetland waters of the U.S. occurs on the Project Site. No wetland waters of the U.S. were identified on the Project Site. A total of 3.23 acres (6,987 linear feet) of wetland waters of the State occur on the Project Site. No isolated wetland waters of the State were identified on the Project Site. A total of 12.08 acres (6,987 linear feet) of CDFW streambed and associated riparian habitat occur on the Project Site. The Project would result in a total of 3.89 acres of temporary impacts and 2.77 acres of permanent impacts to existing jurisdictional areas on the Project Site. As shown in **Figure 4.3-1**, no jurisdictional areas were identified in the areas for off-site improvements. The Project would be required to secure permits for impacts to jurisdictional waters prior to initiating any construction activities. The discharge of fill into USACE jurisdictional areas would require a permit pursuant to CWA Section 404 and a Section 401 Certification from the RWQCB, and any modification to a streambed, including removal of riparian vegetation, would require a Streambed Alteration Agreement from the CDFW pursuant to CFGC Section 1600. The Project would be required to comply with the conditions established by each jurisdiction for these permits. However, given the uncertainty of the outcome of the permitting process, impacts to state- or federally-protected wetlands would be potentially significant.

Mitigation Measures

To reduce potential significant impacts to state- or federally protected wetlands, the following mitigation measure, along with **Mitigation Measure MM-BIO-1** identified above, is proposed for the Project:

MM-BIO-5 Compensatory mitigation for temporary and permanent impacts to land subject to the jurisdiction of USACE, RWQCB, and/or CFDW, such as purchase of credits through an approved Mitigation Bank or through applicant sponsored mitigation (e.g., on-site restoration), shall be accomplished at a minimum ratio of 1:1; however, the final ratio shall be determined and approved by the California Department of Fish and Wildlife (CDFW), U.S. Army Corps of Engineers (USACE), and Regional Water Quality Control Board (RWQCB) prior to impacting state- or federally regulated waters. If on-site restoration would occur, a Restoration Plan, as identified in **Mitigation Measure MM-BIO-4**, shall be prepared and submitted for approval by CDFW, USACE, and RWQCB prior to initiating construction or any site disturbance.

Level of Significance After Mitigation

Mitigation Measure MM-BIO-1 requires heavy equipment to be operated in accordance with standard BMPs to prevent leaks of oil, fuel, or residues into wetlands. Permanent impacts to Placerita Creek and the two unnamed ephemeral drainages would be reduced to less-than-significant levels through compensatory mitigation as required in **Mitigation Measure MM-BIO-5**. Therefore, implementation of **Mitigation Measures MM-BIO-1** and **MM-BIO-5** would reduce potential impacts to state- or federally-protected wetlands to less-than-significant levels.

Threshold 4.3(d): Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Impact Analysis

No regional wildlife linkages or corridors are mapped on the Project Site or in the areas for off-site improvements, but local wildlife could use Placerita Creek on the Project Site for movement. The introduction of human disturbance associated with Project construction may temporarily dissuade wildlife from utilizing the corridor; however, development of the Project would not create a significant barrier for wildlife movement. The Project Site is located in an overall fragmented landscape, which includes a railroad right-of-way to the west, major roads in the immediate vicinity, and residential development to the north and east. In addition, the Project Site is not located within any areas mapped as Essential Connectivity Areas by the California Essential Habitat Connectivity Project. Thus, the Project's impacts related to interference with a migratory wildlife corridor, movement by native or migratory wildlife species, or a native wildlife nursery site would be less than significant.

Mitigation Measures

Impacts with regard to Threshold 4.3(d) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.3(d) were determined to be less than significant without mitigation.

Threshold 4.3(e): Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Impact Analysis

The City's General Plan contains objectives and policies for biological resources that are relevant to the Project, such as the protection of biological resources in SEAs and significant wildlife corridors. No SEAs are present on the Project Site, and, as addressed in Threshold 4.3(d), no regional wildlife corridors are mapped on the Project Site or in the areas for off-site improvements. Therefore, in compliance with the objectives and policies of the City's General Plan, the Project would not impact SEAs or wildlife movement corridors.

The City of Santa Clarita's Oak Tree Preservation Ordinance protects all oak trees of the genus *Quercus* regardless of size from removal, pruning, cutting, or encroachment. Sixteen oak trees protected by the City's Oak Tree Preservation Ordinance are present on the Project Site; there are two additional oak trees off-site that are located on Arch Street and Railroad Avenue. The Project would remove 13 of these on-site trees, which include 7 heritage trees; the two off-site trees would remain. Accordingly, the Project would require an oak tree permit for the encroachment into the protected zone and the removal of the 13 oak trees. The Project would be required to comply with permit requirements, including, but not limited to, the relocation of the impacted oak trees on-site or off-site to offset the loss of the trees; the payment of a fee; or donation of boxed trees to the City or another approved public agency. The fee or boxed trees would be required to be equivalent to the type of oak trees removed from the Project Site. In addition, the Project would replace the removed trees with 450 trees of different non-oak varieties, including Bubba desert willow, Tuscarora crape myrtle, Brisbane box, little gem magnolia, fruitless olive, Canary Island pine, icee blue podocarpus, and Columbia plane tree, as well as 211 oak trees, including coast live oak, Engelmann oak, Saratoga Laurel, and southern live oak. Therefore, the Project would not conflict with the City's Oak Tree Preservation Ordinance with compliance with the oak tree permit requirements and the proposed planting of 661 trees, including 211 oak trees, on-site. As such, impacts related to any local policies or ordinances protecting biological resources would be less than significant.

Mitigation Measures

Impacts with regard to Threshold 4.3(e) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.3(e) were determined to be less than significant without mitigation.

4.3.7 CUMULATIVE IMPACTS

Impact Analysis

Due to the site-specific nature of biological conditions (e.g., existence of sensitive or special-status species, vegetation, wildlife, jurisdictional areas), impacts to biological resources are typically assessed on a project-by-project basis rather than on a cumulative basis. Nonetheless, as detailed in Section III, Environmental Setting, of this Draft EIR, there are 36 related projects that propose varying levels of development, redevelopment, or modifications to existing land uses or structures in the Project vicinity. These related projects would result in the cumulative increase of urbanization and development in the region that would cause the loss of native vegetation, tree removal, and reduction of open space. As a result, there would be less habitat available for protected species. However, as with the Project, related projects and other future development projects would be subject to established regulations pertaining to the protection of biological resources, including those set forth in the CWA, FESA, and CESA, as well as site-specific biological resource assessments that would identify potential effects related to the existing biological conditions for that site. With adherence to applicable regulations and any site-specific recommendations set forth in a site-specific biological resource assessment, the Project and related projects would not result in significant cumulative impacts related to biological resources. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

Mitigation Measures

Cumulative impacts with regard to biological resources were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts with regard to biological resources were determined to be less than significant without mitigation.

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4.4 CULTURAL RESOURCES

This section evaluates potential impacts to cultural resources, including historical and archaeological resources, that may result from the Project. Historical resources include all properties (i.e., historic, archaeological, landscapes, traditional) eligible or potentially eligible for the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR), as well as those that may be significant under local laws and programs. Archaeological resources include artifacts, structural remains, and human remains belonging to an era of history or prehistory. This section relies primarily on information included in the *Phase 1 Paleontological and Archaeological Resources Assessment for the Shadowbox Studios Project* (Phase 1 Assessment), dated August 2022, prepared by ArchaeoPaleo Resource Management, Inc. (APRMI), and provided in **Appendix E** of this Draft EIR.

4.4.1 ENVIRONMENTAL SETTING

The cultural record for Southern California is generally divided into the prehistoric and historic periods. The prehistoric period is the time prior to written documentation and colonization. The historic period represents the time from which written documentation was kept for Southern California—from the first Spanish explorers in the 1500s to the present day. The historic period begins when the first Spanish explorers recorded in writing their observations of the area and its inhabitants.

HISTORICAL BACKGROUND

Prehistoric

Evidence of this early habitation comes from the City of Los Angeles, which has two of the earliest sites that contains human remains in all of the Americas: “La Brea Woman” and “Los Angeles Man.” Found in 1914, the “La Brea Woman” site contained the osteological remains of a young Native American woman, dated to approximately 40,000 years ago and discovered at the La Brea Tar Pits in Hancock Park. The “Los Angeles Man” site contained several human skull fragments found in 1936, with two teeth and several bones of an Imperial Mammoth (*Mammuthus imperator*), all dated to be approximately 20,000 years old.[1]

Other prehistoric human archaeological records date to as early as 11,000 before present (BP) near the beginning of the Archaic period in coastal Southern California with the San Dieguito Tradition. The San Dieguito Tradition is described as a generalized hunting tradition dating from 9,000 to 10,000 years ago; it has since been subsumed into the longer Western Pluvial Lakes Tradition. The people from this period were possibly descended from Paleo-Indians who inhabited the desert regions of southeastern California.[2]

Between 8,000 and 6,000 BP, regional exploitation of food resources in California became more systematic and efficient. Flourishing between 7,500 and 5,000 BP, the individuals of the Encinitas Tradition continued to exploit game and vegetation in the same traditions as their San Dieguito predecessors but added seasonal foraging strategies that yielded protein rich plant material.

1 Michael Moratto, *California Archaeology with New Introduction*, 2004.
2 Michael Moratto, *California Archaeology with New Introduction*, 2004; Claude Warren, *Archaic Prehistory in the Western United States: Cultural Tradition and Ecological Adaptation on the Southern California Coast*, 1968, pp. 1-14.

Evidence of formalized burials suggest that the Encinitas way of life was more socioculturally complex than that of the San Dieguito Tradition.[3]

During the Campbell Tradition, circa 5,000–4,500 BP, new forms of subsistence procurement and technology, increasing societal changes, and growing core settlements began to emerge throughout Southern California. Many Native American settlements were located in transitional ecological zones, which provided these groups with a broad spectrum of subsistence (e.g., land and sea mammals, fish, and acorns) without extensive migration, resulting in village-style communities surrounded by peripheral settlements.[4]

Historic

European explorers made sporadic visits into the general Los Angeles area during the 16th Century. Extensive Spanish interaction with the Gabrieleño began in 1769, when Gaspar de Portolá led an overland expedition from San Diego across Southern California. The expedition party traveled through present-day Elysian Park to find a river that is known today as the Los Angeles River.[5] Twelve years after Portola's voyages, settlers of various ethnicities, including of Spanish, African, and Native American descent, established a pueblo on the coastal plain of the Los Angeles River. Over time, the area known as the Ciudad de Los Angeles became the "City of Angels," and on April 4, 1850, it became known as the City of Los Angeles.[6]

The goal of the Spanish colonization effort was not only to create local populations of settling peasants and merchants but also to include native peoples who already occupied the region into those populations. In order to incorporate the indigenous tribes, efforts were made to educate them and convert them to Christianity, which led to religious missions in becoming the cornerstone of colonization.[7] To support the Spanish settlements, missions did not just attempt to convert California Indians but also used them to work on the farms and ranches present on mission grounds. Many of the Gabrieleño were gradually forced to move to the San Gabriel or San Fernando Missions to provide labor, and many of the Native Americans living on the coastal plains and inland valleys at the time were also transported here, though small groups did escape this confinement.[8]

The forced interaction with the Spanish marked the beginning of the decline of the indigenous population, especially as the local population suffered from the European epidemics. By 1800, the original Gabrieleño villages were empty and the Gabrieleños and other Native Americans provided much of the labor for the European ranches, farms, and communities.[9] During this time, only fragmentary ethnographic information was recorded. Because of the lack of collected data,

3 Joseph Chartkoff & Kerry Kona Chartkoff, *The Archaeology of California*, 1984; Michael Moratto, *California Archaeology with New Introduction*, 2004; Mark Sutton and Jill Gardner, *Pacific Coast Archaeological Society Quarterly: Reconceptualizing the Encinitas Transition of Southern California*, 2006.

4 Claude Warren, *Archaic Prehistory in the Western United States: Cultural Tradition and Ecological Adaptation on the Southern California Coast*, 1968, pp. 1-14; William Wallace, "Suggested Chronology for Southern California Coastal Archaeology," *Southwestern Journal of Anthropology*, 1955; Joseph Chartkoff & Kerry Kona Chartkoff, *The Archaeology of California*, 1984; Michael Moratto, *California Archaeology with New Introduction*, 2004.

5 Blake Gumprecht, *The Los Angeles River: Its Life, Death, and Possible Rebirth*, 1999.

6 William Mason, *Los Angeles under the Spanish Flag: Spain's New World*, 2004; Dale Pitt & Leonard Pitt, *Los Angeles A to Z: An Encyclopedia of the City and County*, 1997.

7 Joseph Chartkoff and Kerry Kona Chartkoff, *The Archaeology of California*, 1984.

8 Lowell J. Bean & Charles R. Smith, *Handbook of North American Indians* Vol. 8: *California*, 1978, pp. 538-549.

9 Lowell J. Bean & Charles R. Smith, *Handbook of North American Indians* Vol. 8: *California*, 1978, pp. 538-549.

the Tongva, a group that once flourished in the rich Los Angeles environment, is one of the Native American groups that is least known ethnographically.[10]

The Mexican period began when Mexico gained its independence from Spain in 1821, and, at the same time, the mission system began to break down. Eventually, around 1834, the secularization of the mission system in Alta California began. After Mexico gained independence from Spain, California experienced a period of thriving ranchos between the years of 1821 through 1848.[11] American military forces were present within California during the summer of 1846 as a result of the Mexican American War. Mexican resistance deteriorated, and the United States occupied Mexico City in 1848, marking the beginning of the American period (1848 to present).[12]

Local History

In 1850, Henry Mayo Newhall, who emigrated from Saugus (Massachusetts) after selling his auction firm, became an early pioneer of Santa Clarita upon news of the Gold Rush of 1849. However, he shifted his focus to railroad manufacturing when he realized that most of the gold mining sites had already been claimed. In 1857, Newhall invested in rail companies for the rail systems that would connect San Francisco to other cities. After much success in his railroad investments, Newhall returned to auctioneering and began to focus on real estate. Newhall's largest purchase in the area was the acquisition of Rancho San Francisco, which was later renamed after his death as Newhall Ranch. At the time of the Rancho San Francisco acquisition, construction had begun for the San Fernando railroad tunnel through the Newhall Pass. Upon completion of the railroad, many of the local preliminary workers moved three miles south to the area, which officially became known as the town of Newhall in 1878.

The Kentucky native Henry Clay Needham began to establish the Kansas prohibition laws that he wrote, enacted by then Kansas Governor John St. John, when he arrived in downtown Newhall in 1888. To expand on and achieve their ideas of prohibition, St. John, along with George B. Katzenstein of Sacramento and James Yarnell of Los Angeles, combined their finances in 1887 to purchase 10,000 acres of land from the town of Newhall to establish a subdivision of the Newhall property as a "dry" colony, which Needham supervised. The area included Lyons Station and Lyons Station Cemetery and ran all the way north through the present Circle J tract to Soledad Canyon Road. Needham plotted the subdivision, within which he settled on an approximately 700-acre lot, known as Needham Ranch, located southwest of today's intersection of Newhall Avenue and Sierra Highway. Mark Gates Sr. purchased the 700-acre Needham Ranch in 1957, to develop the Eternal Valley Memorial and Mortuary Park in the northeastern corner of the property.

The Newhall community merged with the communities of Valencia, Saugus, and Canyon Country forming the City of Santa Clarita and becoming an incorporated city in 1987. Old Town Newhall is the oldest neighborhood and is known as the historic core of Santa Clarita. Historic properties, as part of the Old Town section of Newhall, are situated adjacent to/and within the North Newhall Specific Plan boundaries. While some of the older buildings have been torn down, others are still being used and maintained today.

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10 Blake Gumprecht, *The Los Angeles River: Its Life, Death, and Possible Rebirth*, 1999.

11 Kevin Starr, *California: A History*, 2005; R.J. Wlodarski, "A Phase 1 Archaeological Study for the New Studio Project Subsequent EIR," Culver City, County of Los Angeles, California, 1998.

12 U.S. Congress, The Statutes at Large, Treaties, and Proclamations, of the United States of America from December 5, 1859 to March 3, 1863, Acts of the Thirty-seventh Congress of the United States, Statute II—1861-62, 1863.

As western movie producers used the Newhall area for their films in the 1930s and 1940s, some of the actors and producers bought Newhall land. To this day, due to the local preservation laws, some of the historic Tom Mix cottages, which were used for lodging during filming, still exist. The William S. Hart residence, now part of the Natural History Museum of Los Angeles County's family of museums, is south of the Project Site at Railroad Avenue and Newhall Avenue. Another point of interest near the Project Site is the Circle J Ranch neighborhood, which is located 0.38 mile north and was known as a popular setting for films and rodeos. This neighborhood was developed in the 1980s and remains a residential subdivision today.

EXISTING CONDITIONS

Historic Resources

Cultural Resources Records Search

A records search from the California Historical Resources Information System – South Central Coastal Information Center (SCCIC) housed at California State University, Fullerton, was completed in September 2021. The records search reviewed current inventories of the NRHP, California Historical Landmarks, California Points of Historical Interest, Built Environment Resource Directory for Los Angeles County, and California Register of Historical Resources (CRHR) to determine any local resources that have been previously evaluated for historic significance within a one-mile radius around the Project Site. For the purpose of this assessment, the OHP definition of historic resources was used, which considers any building or object that is 45 years of age or older to be historic.

The records search identified previously recorded cultural resources within a one-mile radius of the Project Site. These cultural resources include four historic buildings, as identified in **Table 4.4-1**, and five historic structures.

TABLE 4.4-1
EXISTING HISTORIC BUILDINGS IN THE PROJECT VICINITY

Resource	Location	NRHP/CRHR Status
William S Hart Park	South of the intersection of Newhall Avenue and Main Street, approximately 0.5 mile south of the Project Site	Not registered
Saugus Train Station	Part of the Heritage Junction Historic Park, south of the intersection of Newhall Avenue and Pine Street, approximately 0.7 mile south-southeast of the Project Site	Not registered
Good Templars Hall, Pardee Home	Part of the Heritage Junction Historic Park, southwest of the intersection of Newhall Avenue and Pine Street, approximately 0.7 mile south-southeast of the Project Site	Not registered
Newhall Jail	24522 Spruce Street, approximately 950 feet southwest of the Project Site	Eligible

Source: ArchaeoPaleo Resource Management, Inc., Shadowbox Studios – Santa Clarita Phase 1 Assessment, August 2022; Santa Clarita Valley Historical Society, Heritage Junction Site Map, https://scvhistory.com/scvhistory/hs0099.htm, accessed February 9, 2023.

The William S. Hart Park comprises numerous buildings, which were constructed on the Horseshoe Ranch in 1910 by movie star William S. Hart; this historic resource is currently not registered. Another historic building is the Saugus Station, which was built circa 1887 and originally located on San Fernando Road and Drayton Street and later moved to San Fernando Road and Pine Street; this historic resource is currently not registered. The station was a focal point in transportation and is an example of original western rural architecture. The third historic building is the Good Templars Hall, which is more commonly known as the Pardee House and was built by Henry Clay Needham; this historic resource is currently not registered. It served many purposes throughout the years and was often the scene of many social and community events.[13] The fourth historic building is the Newhall Jail, which was constructed in 1909, and is the earliest remaining public building in Newhall; this historic resource is currently eligible for listing in the NRHP and CRHR. It is significant because it is one of two examples remaining of the Mission Revival style in the Project Area.

The five historic structures within a one-mile radius of the Project Site are the Southern California Edison (SCE) transmission towers. One of the five towers is the SCE Big Creek East & West Transmission Line, which consists of two parallel electrical transmission lines constructed sometime between 1912 and 1913. The structure is considered a contributing element to the NRHP-listed Big Creek Hydroelectric System Historic District, which was listed in the NRHP on July 26, 2016. The other four towers are the SCE Mile 3 Tower 1, SCE Tower Pardee-Sylmar M2-T5, SCE Tower Orchard Village, and Wiley Canyon SCE Transmission Tower, which are part of a long line of towers extending across the urban area of Newhall. These towers were constructed between 1950 and 1965 by the SCE Company as part of the electrical expansion service in Newhall and have been determined not eligible for listing in the NRHP or CRHR.

Historical Topographic Maps

A review of the U.S. Geological Survey Historical Topographic Map Collection did not identify any buildings or structures on the Project Site between 1903 to 1933. Development of the surrounding community included the San Francisco and New Orleans rail line that extended on a north-to-south trend, west of the Project Site. By the year 1933, this rail line was observed in topographic maps as the Southern Pacific Railroad. The historical topographic maps still showed no buildings or structures on the Project Site from 1952 to 1995, but urban development of the surrounding vicinity rapidly increased. The 1969 map reveals a concrete aqueduct diversion structure that transects the eastern portion of the Project Site within the Metropolitan Water District (MWD) property.

Historical Aerial Photographs

Historical aerial photographs were reviewed spanning the timeline between 1985 and 2022. No buildings or structures were observed on the Project Site during that timeline.

Archaeological Resources

Field Reconnaissance Survey

A field reconnaissance survey was conducted on July 27 and July 28, 2021, to evaluate the presence of any cultural resources. During the field survey, four archaeological resources, which

[13] Maggi Perkins, *Newhall Images of America*, 2010, pp. 68-69.

included a prehistoric-aged grinding stone (quern stone), a prehistoric-aged hammerstone, a prehistoric-aged arrow point sharpening tool, and a historic-aged clear glass apothecary bottle, were discovered and recovered at ground surface; however, the potential for discoveries below ground still exist. Typically, artifacts observed during a field survey are left in situ; however, due to concerns about the artifacts being damaged or not found again due to heavy rain runoff in Placerita Creek, the artifacts were collected. Additional field reconnaissance of the Project Site was conducted on March 2, 2022, due to the addition of the MWD-owned property. No new archaeological sites, features, or isolates were observed during this reconnaissance.

However, due to the initial discoveries of the four artifacts identified above, there is a potential for additional cultural resources to be present on the Project Site.

Historical Aerial Photographs

Historical aerial photographs were reviewed spanning the timeline between 1985 and 2022. Over this span of years, no disturbance of the Project Site was observed except for northern margins of the Placerita Creek, where informal roads can be observed. There is no evidence in the photographs to determine whether the Project Site has been vastly disturbed. Therefore, cultural resources that were present on the surface where these roads were built may have been lost or covered by the road and still may be intact.

Previously Recorded Cultural Resources and Previous Cultural Resources Investigations

The SCCIC records search results identified one prehistoric artifact outside of the Project Site boundaries but within a one-mile radius and indicated that 52 cultural resources studies and assessments have been conducted within a one-mile radius of the Project Site. Northridge Archaeological Research Center conducted a Cultural Resource and Impact Assessment for the Art Grayson Oil and Gas Lease Project in Newhall (1984). In their assessment, one prehistoric andesite core was found in a heavily disturbed area and recorded. No other significant cultural resources were documented in any of the 52 cultural resources studies and assessments. However, despite the absence of previously recorded archaeological resources on the Project Site as reported by the SCCIC, the Project Site was determined to be highly sensitive for archaeological resources due to the discovery of the four artifacts identified above and based on the local historic background of the Project vicinity and the Project Site's past proximity to the historic-aged remnants of the Circle J Ranch. Previous land uses in the Project vicinity may have influenced the import and export of such items from the current Project Site.

4.4.2 REGULATORY AND PLANNING FRAMEWORK

FEDERAL

In 1966, the National Historic Preservation Act (NHPA) established the NRHP as a guide for local, state, and federal governments, private groups, and citizens to identify historic resources and properties that should be protected from destruction or impairment. The NRHP identifies significant cultural resources that may include districts, buildings, structures, objects, prehistoric archaeological sites, historic-period archaeological sites, traditional cultural properties, and cultural landscapes from the local to the national level. Within the NRHP, approximately 2,500 of the more than 90,000 districts, buildings, structures, objects, and sites are recognized as National Historic Landmarks or National Historic Landmark Districts, meaning they possess exceptional national significance in American history and culture.

Historic districts derive their significance from being a unified entity, although they may often be composed of a variety of resources. A district is defined as a geographic area of land containing a significant concentration of buildings, sites, structures, or objects united by historical events, architecture, aesthetic, character, and/or physical development. Within historic districts, properties are identified as contributing and non-contributing. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archaeological values for which a district is significant because it was present during the period of significance, relates to the significance of the district, and retains its physical integrity, or it independently meets the criterion for listing in the NRHP. A resource that is listed in or eligible for listing in the NRHP is considered a "historic property" under Section 106 of the National Historic Preservation Act.

To be eligible for listing in the NRHP, a resource must be at least 50 years of age, unless it is of exceptional importance as defined in Title 36 of the Code of Federal Regulations (CFR), Part 60, Section 60.4(g). In addition, a resource must be significant in American history, architecture, archaeology, engineering, or culture. The following four criteria for evaluation have been established to determine the significance of a resource:

A. Association with events that have made a significant contribution to the broad patterns of our history;

B. Association with the lives of persons significant in our past;

C. Embodiment of the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. Have yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one or more of these significance criteria, a property must have integrity, which is defined as "the ability of a property to convey its significance."[14] The NRHP recognizes seven qualities that, in various combinations, define integrity: location, design, setting, materials, workmanship, feeling, and association. To retain historic integrity, a property must possess several of these seven aspects. In general, the NRHP has a higher integrity threshold than state or local registers. In the case of districts, integrity means the physical integrity of the buildings, structures, or features that make up the district, as well as the historic, spatial, and visual relationships of the components. In order to possess integrity, a district must, on balance, still communicate its historic identity in the form of its character-defining features.

STATE

California Register of Historical Resources

The CRHR, similar in nature to the NRHP, is "an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and

[14] United States Department of the Interior, "National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation," 1997, page 44.

feasible, from substantial adverse change."[15] The CRHR was enacted in 1992 and its regulations are administered by the California Office of Historic Preservation (OHP). The criteria for eligibility for the CRHR are based upon NRHP criteria but are specific to California's history and cultural heritage. Certain resources are determined to be automatically included in the CRHR, including California properties formally determined eligible for listing, or already listed in, the NRHP.

A resource eligible for the CRHR must meet one of the four criteria and retain enough of its historic character or appearance (integrity) to be recognized as a historical resource and convey the reason for its significance. These four criteria, which are similar to those of the NRHP for considering a resource to be significant, are as follows:

1) If the resource is associated with events which have made a significant contribution to the broad patterns of California's history and historical heritage;

2) If the resource is associated with the lives of persons significant in California's past;

3) If the resource embodies the distinctive characteristics of a type, period, or method of construction, or represent the work of a master, or possess high artistic value; or

4) If the resource yields, or is likely to yield, information important in prehistory or history.

A historic resource that may not retain sufficient integrity to meet the criteria for listing in the NRHP may still be eligible for listing in the CRHR. Additionally, the CRHR consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The CRHR automatically includes the following:

- California properties listed on the NRHP and those formally determined eligible for the NRHP;
- California Registered Historical Landmarks from No. 770 onward; and
- California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Resources Commission for inclusion on the CRHR.

California Environmental Quality Act

The California Environmental Quality Act (CEQA) is the principal statute governing environmental review of projects occurring in the state and is codified in Public Resources Code (PRC) Section 21000 et seq. CEQA requires lead agencies to determine if a proposed project would have a significant effect on the environment, including significant effects on historical or unique archaeological resources. Under PRC Section 21084.1, a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.

The term "historical resource" is defined in PRC Section 21084.1. CEQA Guidelines Section 15064.5 describes how significant impacts on historical and archaeological resources are determined. Under CEQA Guidelines Section 15064.5(a), historical resources include:

[15] California Public Resources Code, Section 5024.1(a).

1. A resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the CRHR, as defined in PRC Section 5024.1.

2. A resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g), will be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource will be considered by the lead agency to be "historically significant" if the resource meets the four criteria for listing in the CRHR as outlined in PRC Section 5024.1.

The fact that a resource is not listed in or determined to be eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to PRC Section 5020.1[k]), or not identified in a historical resources survey (meeting the criteria in PRC Section 5024.1[g]) does not preclude a lead agency from determining that the resource may be a historical resource as defined in PRC Section 5020.1(j) or PRC Section 5024.1.

As noted above, CEQA also requires lead agencies to consider whether projects will impact unique archaeological resources. PRC Section 21083.2(g) states:

> "'Unique archaeological resource' means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:
>
> 1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
>
> 2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
>
> 3. Is directly associated with a scientifically recognized important prehistoric or historic event or person."

According to CEQA Sections 15064.5(b)(1) and 15064.5(b)(2), a substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired; the significance is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion, or eligibility for inclusion, in the CRHR.

California Administrative Code

Title 14, Section 4307 of the California Administrative Code Section 4307 states that "no person shall remove, injure, deface, or destroy any object of paleontological, archaeological, or historical interest or value."

Public Resources Code

Section 30244

PRC Section 30244 protects cultural resources and states that feasible mitigation measures shall be required for development that would adversely impact archaeological resources as identified by the State Historic Preservation Officer.

Section 5097.98

PRC Section 5097.98, as amended by Assembly Bill 2641, provides procedures in the event that human remains of Native American origin are discovered during implementation of a project. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. PRC Section 5097.98 further requires that, upon notification by a County coroner, the Native American Heritage Commission (NAHC) designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods. In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the landowner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

California Health and Safety Code

California Health and Safety Code (HSC) Sections 7050.5, 7051, and 7054 address the illegality of interference with human burial remains and the disposition of Native American burials in archaeological sites. These regulations protect such remains from disturbance, vandalism, or inadvertent destruction and establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, including treatment of the remains prior to, during, and after evaluation, and reburial procedures.

LOCAL

City of Santa Clarita General Plan

The Conservation and Open Space Element of the General Plan for the City of Santa Clarita includes the following goals, objectives, and policies related to cultural resources that would be applicable to the Proposed Project:[16]

- Goal CO 5: Protection of historical and culturally significant resources that contribute to community identity and a sense of history.
    - Objective CO 5.1: Protect sites identified as having local, state, or national significance as a cultural or historical resource.
        - Policy CO 5.1.1: For sites identified on the Cultural and Historical Resources Map (Exhibit CO-6), review appropriate documentation prior to

[16] City of Santa Clarita, *City of Santa Clarita General Plan, Conservation and Open Space Element*, June 2011.

issuance of any permits for grading, demolition, alteration, and/or new development, to avoid significant adverse impacts. Such documentation may include cultural resource reports, environmental impact reports, or other information as determined to be adequate by the reviewing authority.

- Policy CO 5.1.2: Review any proposed alterations to cultural and historic sites identified in Table CO-1 or other sites which are so designated, based on the guidelines contained in the Secretary of the Interior's Standards for the Treatment of Properties (Title 36, Code of Federal Regulations, Chapter 1, Part 68, also known as 36 CFR 68), or other adopted City guidelines.
- Policy CO 5.1.3: As new information about other potentially significant historic and cultural sites becomes available, update the Cultural and Historical Resources Inventory and apply appropriate measures to all identified sites to protect their historical and cultural integrity.

- Objective CO 5.2: Protect and enhance the historic character of Downtown Newhall.
  - Policy CO 5.2.1: In keeping with the Downtown Newhall Specific Plan policies, ensure that the scale and character of new development is compatible with and does not detract from the context of historic buildings and block patterns.
  - Policy CO 5.2.3: Ensure that all aspects of community design in Newhall, including street furniture, lighting, trash collection and storage areas, seating, and other accessory structures, are of a design and scale appropriate for the historic character of the district, while maintaining a sense of authenticity.

City of Santa Clarita Municipal Code

Chapter 17.64 of the City of Santa Clarita Municipal Code (SCMC), Historic Preservation, seeks to preserve, protect, or relocate (where necessary) historic, cultural, and natural resources that have special historic or aesthetic character or interest. Specifically, SCMC Section 17.64.030 states that a "building, structure, or object may be designated by the [City's Planning] Commission as a historic resource if it possesses sufficient character-defining features and integrity, and meets at least one (1) of the following criteria:

A. Is associated with events that have made a significant contribution to the historical, archaeological, cultural, social, economic, aesthetic, engineering, or architectural development of the City, State or nation; or

B. Is associated with persons significant in the history of the City, State or nation; or

C. Embodies distinctive characteristics of a style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship; or

D. Has a unique location, singular physical characteristic(s), or is a landscape, view or vista representing an established and familiar visual feature of a neighborhood, community, or the City; or

E. Has yielded, or has the potential to yield, information important to the history or prehistory of the City, State, or nation."

4.4.3 THRESHOLDS OF SIGNIFICANCE

The significance thresholds used to evaluate the impacts of the Project related to cultural resources are based on Appendix G of the CEQA Guidelines. In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to cultural resources if it would:

Threshold 4.4(a): ***Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5;***

Threshold 4.4(b): ***Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; or***

Threshold 4.4(c): ***Disturb any human remains, including those interred outside of dedicated cemeteries.***

4.4.4 METHODOLOGY

The analysis of impacts related to cultural resources considered the improvements on the Project Site, as well as the Project's improvements off-site, including a Class I multi-purpose path along the frontage of the Project on 13th, Arch, and 12th Streets; widening of 13th Street, Arch Street, and 12th Street; installation of public hydrants along the frontage of the Project on 13th, Arch, and 12th Streets; and railroad crossing improvements at 13th Street, including the installation of a bike path/trail on the north side of the crossing, widening of the crossing at 13th Street and Railroad Avenue to accommodate the wider turning radii, installation of drainage on Railroad Avenue and 13th Street, new gates, modifications on Railroad Avenue at 13th Street to accommodate the revised intersection geometry and provide increased efficiency, implementation of ADA requirements for pedestrians, and implementation of line-of-sight requirements at the grade crossing. The analysis also considered the modifications to the Dockweiler Drive Extension Project in the immediate vicinity of the Project Site, including roadway improvements to 13th Street, Arch Street, 12th Street and Placerita Canyon Road that differ from previous approved plans, including accommodating the additional lane geometry at the Arch Street/13th Street intersection to widen the railroad crossing; construction of a pedestrian and bike bridge from the Jan Heidt Newhall Metrolink Station on Railroad Avenue to the future extension of Dockweiler Drive; and implementation of temporary storm drain improvements to accommodate surface water runoff from Dockweiler Drive prior to the completion of the Project.

Evaluation of the Project's potential to result in a significant impact on cultural resources is based on the resource identification efforts presented in the Phase 1 Assessment provided in **Appendix E** of this Draft EIR.

This analysis evaluates anticipated changes in the physical environment resulting from the Project against the thresholds of significance identified above to determine if direct and indirect changes to existing conditions would constitute potentially significant effects to known or potential cultural resources. Project changes are described and potential impacts, if any, are identified under each impact discussion. Where impacts would be considered potentially significant, mitigation measures are identified to reduce impacts to a less-than-significant level.

HISTORIC RESOURCES

Pursuant to CEQA Guidelines Section 15064.5(b)(1), "a project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired." The analysis presented below evaluates whether historical resources exist either within or adjacent to the Project Site and whether project impacts would result in an adverse change in the significance of such resources.

ARCHAEOLOGICAL RESOURCES

Impacts to archaeological resources are also based on the analysis in the Phase 1 Assessment, which included a cultural resource records search conducted at the SCCIC to review recorded archaeological resources within a one-mile radius of the Project Site, cultural resource reports and historic topographic maps on file, historic aerial photographs; previous cultural reports and studies conducted within a one-mile radius of the Project Site; and a field survey of the Project Site.

The potential for the Project Site to contain buried archaeological resources is assessed based on the field survey. The analysis of impacts to archaeological resources considers the extent of ground-disturbing activities during Project construction and identifies the potential to uncover such resources.

4.4.5 PROJECT DESIGN FEATURES

No Project Design Features are proposed with respect to cultural resources.

4.4.6 ANALYSIS OF PROJECT IMPACTS

Threshold 4.4(a): Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Impact Analysis

The Phase 1 Assessment did not identify any historic buildings, structures, or features on the Project Site. Accordingly, the Project would not have direct impacts to any historical resource.

However, the review of previously recorded cultural resources within a one-mile radius of the Project Site identified four historic buildings and five historic structures. As identified in **Table 4.4-1** above, none of the historic buildings are located in the immediate vicinity of the Project Site or have a direct line-of-sight of the Project Site. Similarly, there are no SCE transmission towers on the Project Site, and development of the Project Site would not be unlike any other development that has occurred in the Newhall community since the towers were constructed. Accordingly, the Project would not physically alter these historic buildings and structures or their immediate surroundings that would impact the reason for which they were listed in the NRHP and CRHR. All of these resources would continue to convey their historic significance after implementation of the Project. Therefore, the Project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5. As such, the Project would not have direct or indirect impacts to these historic resources, and impacts would be less than significant.

Mitigation Measures

Impacts with regard to Threshold 4.4(a) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.4(a) were determined to be less than significant without mitigation.

Threshold 4.4(b): Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Impact Analysis

As identified in the Phase 1 Assessment, due to initial discoveries of artifacts during the field reconnaissance, the Project Site was determined to be highly sensitive for archaeological resources. Consequently, there is a potential for additional cultural resources to be uncovered from ground-disturbing activities during Project construction and implementation of off-site improvements. Therefore, these ground-disturbing activities may result in significant impacts to archaeological resources.

Mitigation Measures

To reduce potential significant impacts to archaeological resources, the following mitigation measures are proposed for the Project:

MM-CR-1 Prior to the start of construction, the Project applicant shall retain a cultural resources principal investigator, who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology. This principal investigator shall create a Worker's Environmental Awareness Program (WEAP) pamphlet that shall be provided as training to construction personnel to understand the requirements for the protection of cultural resources. This training shall include examples of archaeological cultural resources to look for and protocols to follow if discoveries are made. The principal investigator shall develop the training and supply any Project-specific supplemental materials necessary to execute the training.

MM-CR-2 Archaeological resources monitoring shall be conducted by a cultural resources principal investigator, who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology, during Project-related earth-disturbing activities pursuant to the California Office of Historic Preservation standards. Monitoring shall entail visual inspection of Project-related earth-disturbing activities (i.e., grubbing and grading, trenching, shoring, mass excavation, footings, utility installation, etc.) on a full-time basis unless the cultural resources principal investigator deems that construction monitoring can be conducted on a part-time basis or is no longer required.

MM-CR-3 If previously unidentified cultural resources are discovered, the cultural resources principal investigator, who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology, shall have the authority

to divert or temporarily halt ground-disturbing activities in the area of discovery to allow for evaluation. The principal investigator shall evaluate the find and contact the City of Santa Clarita as soon as possible with recommendations as to the significance and proper treatment of the find. Depending on the nature of the find, the determination of significance may require additional excavation, potentially including the preparation and execution of a Phase II Archaeological Testing Plan. The City of Santa Clarita, acting with the advice of the consulting principal investigator, shall determine the significance and treatment of the discovered resources. If the resources are Native American in origin, then the City of Santa Clarita shall notify consulting tribes and seek their input as to the significance and treatment of the find.

MM-CR-4 Avoidance and preservation-in-place are the preferred treatment for both archaeological sites and tribal cultural resources, but avoidance is not always feasible. For significant cultural resources meeting the definition of a historical resource per CEQA Guidelines Section 15064.5(a) or a unique archaeological resource per PRC Section 21083.2(g) as determined by the City of Santa Clarita, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the consulting archaeologist and approved by the City of Santa Clarita before being carried out using professional archaeological methods. Before construction activities are allowed to resume in the affected area, the Data Recovery Program shall be completed to the satisfaction of the City of Santa Clarita. Work may continue on other parts of the project while consultation and treatment are concluded.

If human remains are encountered, work within 50 feet of the discovery shall be suspended, and the City of Santa Clarita shall be contacted immediately. The City of Santa Clarita shall, in turn, contact the Los Angeles County coroner. If the remains are deemed Native American in origin, the coroner shall contact the Native American Heritage Commission, which shall identify a most likely descendant in compliance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5. The most likely descendant shall have up to 48 hours to visit the site and make recommendations as to the treatment and final deposition of the remains. Work may be resumed at the landowner's discretion but shall only commence after consultation and treatment have been concluded to the satisfaction of the City of Santa Clarita. Work may continue on other parts of the Project Site while consultation and treatment are conducted.

MM-CR-5 All archaeological resources collected during the course of Project construction (including those collected during the Phase I Investigation and other pre-Project identification efforts) shall be taken to a properly-equipped archaeological laboratory, where they shall be cleaned, analyzed, and prepared for curation. At a minimum, and unless otherwise specified in any treatment plans prepared for the Project, all resources shall be identified, analyzed, catalogued, photographed, and labeled. At the close of the Project, the collection shall be donated to a public institution with a research interest in the materials and the capacity to care for the materials in perpetuity. Accompanying notes, maps, and photographs shall also be filed at the

repository, as appropriate. The cost of curation is assessed by the repository and is the responsibility of the Project applicant.

At the conclusion of monitoring and laboratory work, a final report shall be prepared describing the results of the cultural mitigation monitoring efforts. The report shall include a summary of the field and laboratory methods, an overview of the cultural background of the Project vicinity, a catalog of cultural resources recovered, an analysis of cultural resources recovered and their scientific significance, and recommendations. A copy of the report shall also be submitted to the designated museum repository (if applicable).

Level of Significance After Mitigation

Implementation of **Mitigation Measures MM-CR-1** through **MM-CR-5** would reduce potential impacts to archaeological resources to less than significant.

Threshold 4.4(c): Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?

Impact Analysis

The Project Site is not known to be on an active, previously active, or informal cemetery. Accordingly, the Project's potential to disturb human remains interred outside of formal cemeteries is considered low. However, it is possible that unknown human remains may be located within the Project Site, and ground-disturbing activities may encounter these remains. In the event human remains are encountered during implementation of the Project, as well as the off-site improvements, the Project would be required to comply with PRC Section 5097.98 and HSC Sections 7050.5, 7051, and 7054 (see Subsection 4.4.2, Regulatory and Planning Framework, above, for details). Compliance with these regulatory requirements would ensure that impacts to any human remains discovered during the Project's ground-disturbing activities would be less than significant.

Mitigation Measures

Impacts with regard to Threshold 4.4(c) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.4(c) were determined to be less than significant without mitigation.

4.4.7 CUMULATIVE IMPACTS

Impact Analysis

Historical Resources

and would implement a mitigation measure to provide an archaeological monitor during grading to identify and recover any important archaeological materials that may be encountered during that soil disturbing phase of construction. This will avoid any significant project-level impacts. Other pending projects listed in Table 4-1 would likely require grading and excavation during construction, which could disturb subsurface archaeological resources or human remains that are

culturally or temporally related to any such materials that might be found within the project site. Due to the significant distances between the project and any of the other pending project sites, however, there is limited potential to disturb the same resources that might extend beyond the project site. Further, these other would be required to undergo environmental review pursuant to CEQA and would be subject to Section 7050.5(b) of the California Health and Safety Code for treatment of human remains; Section 21083.2 of the CEQA Statute for treatment of archaeological resources; and Chapter 17.64 of the City of Santa Clarita municipal code which establishes protections for historic, cultural, and natural resources of special historic interest. Therefore, because subsurface cultural resources are protected upon discovery by law, the combined effects from the proposed project and related projects would not be cumulatively significant.

Cumulative impacts may occur if the Project and related projects cumulatively affect historical resources in the immediate vicinity, contribute to changes within the same historic district, or involve resources that are examples of the same property type or significant within the same context as the one adversely affected by the Project. A significant cumulative impact associated with the Project and related projects would occur if the combined impact of the Project and related projects would materially and adversely alter those physical characteristics that convey the historic significance of a historical resource and that justify its listing, or eligibility for listing, as a historical resource. As discussed above, the implementation of the Project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 and would not result in direct impacts to historical resources. result in less-than-significant impacts to historical resources. In addition, there are no related projects within the same viewshed as the Project to result in a combined effect on the significance of historical resources in the Project vicinity. Therefore, the Project's impacts to historic resources would not be cumulatively considerable, and cumulative impacts to historic resources would be less than significant.

Archaeological Resources and Human Remains

The Project's impacts on archaeological resources were determined to be less than significant with implementation of **Mitigation Measures MM-CR-1** through **MM-CR-5**, and the Project's impacts on human remains were determined to be less than significant with compliance with State law. Depending on the depth of excavation and sensitivity of development sites in the City, mitigation measures would be required for related projects that have the potential to cause significant impacts on undiscovered cultural resources. In addition, related projects would be required to comply with State law regarding archaeological resources and human remains to ensure proper identification, treatment, and/or preservation of any sensitive cultural resources. Therefore, the Project's impacts to archaeological resources and human remains would not be cumulatively considerable, and cumulative impacts to archaeological resources and human remains would be less than significant with mitigation.

Mitigation Measures

Cumulative impacts related to historical resources would be less than significant. As such, no mitigation measures related to historical resources are required. As set forth above, the Project would implement **Mitigation Measures MM-CR-1** through **MM-CR-5** related to archaeological resources to reduce the Project's impacts to less-than-significant levels.

Level of Significance After Mitigation

Cumulative impacts related to historical resources were determined to be less than significant without mitigation. With the implementation of **Mitigation Measures MM-CR-1** through **MM-CR-5**, the Project would not considerably contribute to cumulative impacts associated with archaeological resources or human remains, and such cumulative impacts would be less than significant.

4.5 ENERGY

This section analyzes impacts on energy resources resulting from construction and operation of the Project, with potential short- and long-term energy consumption impacts. This section evaluates the Project's impacts regarding the avoidance of wasteful and inefficient energy usage, consistency with various state and local regulations applicable to energy efficiency, reduction of fossil fuel-generated energy sources, and the expansion of renewable energy sources. This section relies primarily on information included in the *Energy Utilization Study* (Energy Report), dated August 2022, prepared by Rincon Consultants, and provided in **Appendix F** of this Draft EIR.

4.5.1 ENVIRONMENTAL SETTING

Energy use is typically quantified using British thermal units (Btu). A Btu is the amount of heat required to raise the temperature of one pound of water by one degree Fahrenheit (°F). The generating capacity of a unit of electricity is expressed in megawatts (MW). Electricity generation may be quantified in megawatt-hours (MWh), kilowatt-hours (kWh), or gigawatt-hours (GWh). Natural gas generation is expressed in therms, where one therm is equivalent to 100,000 Btu.

STATEWIDE AND REGIONAL ENERGY USAGE

California is one of the lowest per capita energy users in the United States due to its energy efficiency programs and mild climate. In 2019, California consumed 7,802 trillion Btu of energy with a total consumption per capita of 198 million Btu.

Electricity and Natural Gas

Electricity and natural gas are primarily consumed by the built environment for lighting, appliances, heating and cooling systems, and fireplaces, as well as industrial processes and alternative fuel vehicles.

Most of California's electricity is generated in-State, but California relies on out-of-state imports for nearly 90 percent of its natural gas supply. In 2020, approximately 30 percent of California's electricity was imported from the Northwest and Southwest. Of the 272,576 GWh of total electricity consumed in California in 2020, 190,913 GWh was generated in-State. Approximately 33 percent of the in-State generation was from renewable energy sources, such as wind, solar photovoltaic, geothermal, and biomass. A detailed list of the type and amount of electricity generated by in-State nonrenewable and renewable energy sources is provided in Table 1 of the Energy Report (see **Appendix F**).

Petroleum

Petroleum fuels are primarily consumed by on-road and off-road equipment, and some industrial processes. Though California's population and economy are expected to grow, gasoline demand is forecasted to decline due to improvements in fuel efficiency and increased light-duty vehicle electrification.

California is one of the top producers of petroleum in the nation, with Statewide drilling operations concentrated primarily in the Kern and Los Angeles Counties. A network of crude oil pipelines connects production areas to oil refineries in the Los Angeles area, the San Francisco Bay Area, and the Central Valley. In 2019, the State supplied about 4 percent of the United States' overall

production of crude oil. California oil refineries also process Alaskan and foreign crude oil received at ports in Los Angeles, Long Beach, and the San Francisco Bay Area. Crude oil production in California and Alaska is in decline, and California refineries depend increasingly on foreign imports. Of the total amount of California's oil supply in 2021, 56 percent was supplied by foreign imports, 29 percent by California, and 15 percent by Alaska.

In California, gasoline consumed primarily by light-duty cars, pickup trucks, and sport utility vehicles is the most used transportation fuel. Diesel, the second most-used transportation fuel, is primarily consumed by heavy-duty trucks, delivery vehicles, buses, trains, ships, boats and barges, farm equipment, and heavy-duty construction and military vehicles. Both gasoline and diesel are primarily petroleum-based, and their consumption releases greenhouse gas (GHG) emissions. The transportation sector is the single largest source of GHG emissions in the State and accounts for the largest share of the State's energy consumption. Approximately 40 percent of all inventoried GHG emissions in the State in 2019 was generated by the transportation sector. As the State's largest energy consumer, the transportation sector accounts for 39 percent of all end-use energy consumption in 2019. To reduce Statewide vehicle emissions, California requires that all motorists use California Reformulated Gasoline, which is sourced almost exclusively from in-State refineries. In 2020, Los Angeles County consumed approximately 2,770 million gallons of gasoline and 299 million gallons of diesel—representing approximately 22 percent and 17 percent of the Statewide gasoline/diesel consumption, respectively—for a total of 3,069 million gallons total petroleum fuel consumption.

Alternative Fuels

A variety of alternative fuels are used to reduce petroleum-based fuel demand. Conventional gasoline and diesel may be replaced by alternative fuels such as hydrogen, biodiesel, and electricity, depending on the capability of the vehicle. Currently, there are 17 biodiesel refueling stations, 47 hydrogen refueling stations, and 35,709 electric vehicle (EV) supply equipment ports across California.

LOCAL SERVICE PROVIDERS

Southern California Edison (SCE) would provide electrical service to the Project Site. SCE is an independently owned utility that provides electrical service to approximately 15 million customers across a 50,000-square-mile service, including 180 incorporated cities across 15 counties. In 2020, the total electricity consumption in the SCE service area was 83,533 GWh, with the greatest consumption occurring in the residential and commercial building sectors, which consumed 32,475 GWh and 28,800 GWh, respectively.

Southern California Gas (SoCalGas) would provide natural gas service to the Project Site. SoCalGas provides natural gas to approximately 21.8 million customers across a 24,000-square-mile territory, including parts of the following counties: Riverside, Orange, San Bernardino, Los Angeles, Ventura, Santa Barbara, Kern, Inyo, Tulare, and Mono. In 2020, the total natural gas consumption in the SoCalGas service area was 5,231 million therms, with the greatest consumption occurring in the residential and industrial sectors, which consumed 2,426 million therms and 1,616 million therms, respectively.

4.5.2 REGULATORY AND PLANNING FRAMEWORK

FEDERAL

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 was enacted to improve vehicle fuel economy and help reduce dependence on foreign oil. Specifically, the act increases the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard, which requires fuel producers to use at least 36 billion gallons of biofuel in 2022, and reduces the nation's demand for oil by setting a national fuel economy standard of 35 miles per gallon by 2020, an increase in fuel economy standards of 40 percent. The Energy Independence and Security Act also sets energy efficiency standards for lighting and appliances.

Energy Policy and Conservation Act

The Energy Policy and Conservation Act was enacted in 1975 and established fuel economy standards for new light-duty vehicles sold in the United States. As a result of the act, the National Highway Traffic and Safety Administration (NHTSA) is responsible for establishing and regularly updating vehicle standards.

Corporate Average Fuel Economy Standards

Established by the US Congress in 1975, the Corporate Average Fuel Economy (CAFE) Standards (49 Code of Federal Regulations [CFR] Parts 531 and 533) set fuel economy standards for all new passenger cars and light trucks sold in the United States. The NHTSA and the US Environmental Protection Agency (USEPA) jointly administer the CAFE standards, which become more stringent each year.

In August 2016, the USEPA and NHTSA announced the adoption of the phase two programs related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program applies to vehicles with model year 2018 through 2027 for certain trailers, and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to lower carbon dioxide (CO_2) emissions by approximately 1.1 billion metric tons of CO_2 ($MTCO_2$) and reduce oil consumption by up to two billion barrels over the lifetime of the vehicles sold under the program. The NHTSA and the USEPA jointly published the "Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One: One National Program" (SAFE I Rule) in September 2019 and issued the Final SAFE Rule (i.e., SAFE Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks) in April 2020. The SAFE I Rule relaxes federal CAFE vehicle standards and revokes California's authority to set its own vehicle standards. On December 29, 2021, the NHTSA issued the final rule to repeal the SAFE I Rule, effective January 28, 2022, which removes the improper restrictions placed on states and local governments from developing innovative policies to address their specific environmental and public health challenges.[1] The USEPA also issued a decision on March 14, 2022, that rescinded its 2019 withdrawal of California's authority to set its own vehicle standards.[2]

[1] Federal Register, Vol. 86, No. 247, December 29, 2021.
[2] Federal Register, Vol. 87, No. 49, March 14, 2022.

Construction Equipment Fuel Efficiency Standard

The USEPA sets emission standards for construction equipment. The first federal standards (Tier 1) were adopted in 1994 for all off-road engines over 50 horsepower (hp) and were phased in by 2000. A new standard was adopted in 1998 that introduced Tier 1 for all equipment below 50 hp and established the Tier 2 and Tier 3 standards. The Tier 2 and Tier 3 standards were phased in by 2008 for all equipment. The current iteration of emissions standards for construction equipment are the Tier 4 efficiency requirements, which are contained in 40 CFR Parts 1039, 1065, and 1068 (originally adopted in 69 Federal Register 38958 [June 29, 2004], and most recently updated in 2014 [79 Federal Register 46356]). Emissions requirements for new off-road Tier 4 vehicles were to be completely phased in by the end of 2015.

STATE

Assembly Bill 2076

Pursuant to Assembly Bill 2076, the California Energy Commission (CEC) and California Air Resources Board prepared and adopted a joint-agency report in 2003, titled Reducing California's Petroleum Dependence. The report included recommendations to increase the use of alternative fuels to 20 percent of on-road transportation fuel use by 2020 and 30 percent by 2030; significantly increase the efficiency of motor vehicles; and reduce per capita vehicle miles traveled (VMT). One of the performance-based goals of Assembly Bill 2076 is to reduce petroleum demand to 15 percent below 2003 demand. Furthermore, in response to the CEC's 2003 and 2005 Integrated Energy Policy Reports (IEPR), the Governor directed the CEC to take the lead in developing a long-term plan to increase alternative fuel use.

California Energy Plan

The CEC is responsible for preparing the California Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The 2008 California Energy Plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies several strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero-emission vehicles and addressing their infrastructure needs, as well as encouragement of urban designs that reduce VMT and accommodate pedestrian and bicycle access.

California Energy Commission Integrated Energy Policy Report

In 2002, the California State legislature adopted Senate Bill (SB) 1389, which requires the CEC to develop an IEPR every two years. SB 1389 requires the CEC to conduct assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices, and use these assessments and forecasts to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the State's economy, and protect public health and safety.

The CEC adopted the 2019 IEPR on February 20, 2020. The 2019 IEPR provides the results of the CEC's assessments of various energy issues facing California and covers a broad range of topics, including implementation of SB 100 (Statewide GHG reduction targets), integrated resource planning, distributed energy resources, transportation electrification, solutions to

increase resiliency in the electricity sector, energy efficiency, transportation electrification, barriers faced by disadvantaged communities, demand response, transmission, landscape-scale planning, electricity and natural gas demand forecast, transportation energy demand forecast, renewable gas, updates on Southern California's electricity reliability, natural gas outlook, and climate adaptation and resiliency.

Renewables Portfolio Standards

First established in 2002 under SB 1078, California's Renewables Portfolio Standards (RPS) requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent by 2020 and 50 percent by 2030. SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. The objectives of SB 350 are to (1) increase the procurement of electricity from renewable sources from 33 percent to 50 percent and (2) double the energy savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation. On September 10, 2018, Governor Jerry Brown signed SB 100, which further increased California's RPS and requires retail sellers and local publicly owned electric utilities to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030, and states that the California Air Resources Board should plan for 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045.

The California Public Utilities Commission and the CEC jointly implement the RPS program. The California Public Utilities Commission's responsibilities include:

- Determining annual procurement targets and enforcing compliance;
- Reviewing and approving each investor-owned utility's renewable energy procurement plan;
- Reviewing contracts for RPS-eligible energy; and
- Establishing the standard terms and conditions used in contracts for eligible renewable energy.

California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6)

In 1978, the CEC established Title 24, Part 6 of the California Code of Regulations, which are California's energy efficiency standards for residential and nonresidential buildings. Title 24, Part 6, also referred to as the California Energy Code, was codified in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and provide energy efficiency standards for residential and nonresidential buildings. California's energy efficiency standards are updated on an approximate three-year cycle. The 2022 California Energy Code became effective on January 1, 2023, and will apply to the Project.

California Green Building Standards (Title 24, Part 11)

The California Green Building Standards Code (Title 24, Part 11), commonly referred to as the CALGreen Code, is a Statewide mandatory construction code that was developed and adopted by the California Building Standards Commission and the California Department of Housing and Community Development. CALGreen standards require new residential and commercial buildings to comply with mandatory measures under five topical areas: planning and design; energy

efficiency; water efficiency and conservation; material conservation and resource efficiency; and environmental quality. CALGreen also provides voluntary tiers and measures that local governments may adopt which encourage or require additional measures in the five green building topics. The most recent update to the CALGreen Code was adopted in 2022 and became effective on January 1, 2023.

LOCAL

City of Santa Clarita General Plan

Applicable goals, objectives, and policies from the City of Santa Clarita General Plan Conservation and Open Space Element are listed below:

Conservation and Open Space Element: Greenhouse Gas Reduction

- Goal CO 8: Development designed to improve energy efficiency, reduce energy and natural resource consumption, and reduce emissions of greenhouse gases.
    - Objective CO 8.3: Encourage the following green building and sustainable development practices on private development Projects, to the extent reasonable and feasible. emissions.
        - Policy CO 8.3.1: Evaluate site plans proposed for new development based on energy efficiency pursuant to LEED (Leadership in Energy and Environmental Design) standards for New Construction and Neighborhood Development, including the following: a) location efficiency; b) environmental preservation; c) compact, complete and connected neighborhoods; and d) resource efficiency, including use of recycled materials and water.
        - Policy CO 8.3.2: Promote construction of energy efficient buildings through requirements for LEED certification or through comparable alternative requirements as adopted by local ordinance.
        - Policy CO 8.3.6: Require new development to use passive solar heating and cooling techniques in building design and construction, which may include but are not limited to building orientation, clerestory windows, skylights, placement and type of windows, overhangs to shade doors and windows, and use of light-colored roofs, shade trees, and paving materials.
        - Policy CO 8.3.7: Encourage the use of trees and landscaping to reduce heating and cooling energy loads, through shading of buildings and parking lots.
        - Policy CO 8.3.8: Encourage energy-conserving heating and cooling systems and appliances, and energy-efficiency in windows and insulation, in all new construction.
        - Policy CO 8.3.9: Limit excessive lighting levels and encourage a reduction of lighting when businesses are closed to a level required for security.

City of Santa Clarita Green Building Standards Code

Santa Clarita Municipal Code Section 25.01.010, Adoption of the City Green Building Standards Code, regulates the planning, design, operation, construction, use and occupancy of every new

building or structure to ensure buildings have a more positive environmental impact and encourage sustainable construction practices.

City of Santa Clarita Energy Conservation Code

Santa Clarita Municipal Code Section 24.01.010, Adoption of the City Energy Conservation Code, regulates the design, construction, alteration, installation, or repair of building envelopes, space-conditioning systems, water-heating systems, indoor lighting systems of buildings, outdoor lighting and signage, and certain equipment to enhance the efficiency and reduce energy use of buildings.

4.5.3 THRESHOLDS OF SIGNIFICANCE

The significance thresholds used to evaluate the impacts of the Project related to energy resources are based on Appendix G of the CEQA Guidelines. In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to energy resources if it would:

Threshold 4.5(a): ***Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation; or***

Threshold 4.5(b): ***Conflict with or obstruct a State or local plan for renewable energy or energy efficiency.***

4.5.4 METHODOLOGY

The analysis of impacts related to energy use considered the improvements on the Project Site, as well as the Project's improvements off-site, including a Class I multi-purpose path along the frontage of the Project on 13th, Arch, and 12th Streets; widening of 13th Street, Arch Street, and 12th Street; installation of public hydrants along the frontage of the Project on 13th, Arch, and 12th Streets; and railroad crossing improvements at 13th Street, including the installation of a bike path/trail on the north side of the crossing, widening of the crossing at 13th Street and Railroad Avenue to accommodate the wider turning radii, installation of drainage on Railroad Avenue and 13th Street, new gates, modifications on Railroad Avenue at 13th Street to accommodate the revised intersection geometry and provide increased efficiency, implementation of ADA requirements for pedestrians, and implementation of line-of-sight requirements at the grade crossing. The analysis also considered the modifications to the Dockweiler Drive Extension Project in the immediate vicinity of the Project Site, including roadway improvements to 13th Street, Arch Street, 12th Street and Placerita Canyon Road that differ from previous approved plans, including accommodating the additional lane geometry at the Arch Street/13th Street intersection to widen the railroad crossing; construction of a pedestrian and bike bridge from the Jan Heidt Newhall Metrolink Station on Railroad Avenue to the future extension of Dockweiler Drive; and implementation of temporary storm drain improvements to accommodate surface water runoff from Dockweiler Drive prior to the completion of the Project.

The analysis in this section utilizes the assumptions identified in the Shadowbox Studios-Santa Clarita Project Air Quality and Greenhouse Gas Emissions Study, prepared by Rincon Consultants and dated February 2023, provided in **Appendix C** of this Draft EIR. Specifically, the inputs and outputs from the California Emissions Estimator Model (CalEEMod), Version 2020.4.0 were utilized for data. **Table 4.5-1** lists the type and size of buildings that would be constructed as part of the Project and the comparable CalEEMod land use.

Table 4.5-1
PROPOSED BUILDING TYPES AND LAND USES

Building Use	CalEEMod Land Use	Unit Size
Sound Stages	Industrial Park	476,000 sf
Catering and Specialty Services	Office Park	33,700 sf
Parking Structure (covered)	Enclosed Parking with Elevator	822 spaces 389,163 sf
Production and Administrative Office	General Office Building	210,000 sf
Production Support	Industrial Park	571,000 sf
Parking Structure (uncovered)	Unenclosed Parking with Elevator	247 spaces
On-site Ground Level Parking	Parking Lot	2,366 spaces 821,548 sf
Paving	Other Asphalt Surfaces	1,042,894 sf

Notes:
sf = square feet
Source: Rincon Consultants Inc., Energy Utilization Study, August 2022.

This analysis evaluates energy demand and consumption resulting from the Project during construction, operation and maintenance, and decommissioning of the solar facility.

Construction

Project construction would require temporary energy consumption primarily through the use of fuel for construction equipment, construction worker vehicle trips to and from the Project Site, and the import and export of earth materials to and from the Project Site by heavy trucks. Energy consumption during construction, including gasoline and diesel fuel consumption from construction equipment, hauling trips, vendor trips, and worker trips, was estimated using the assumptions and factors from CalEEMod. A detailed description of the assumptions and factors utilized is provided in the Energy Report, which is included as **Appendix F** to this Draft EIR.

Additionally, the analysis included the additional parking features as part of the overall parking construction. These features included the proposed bridge across Placerita Creek to access a graded employee parking area on the north side of Placerita Creek, and the adjacent 11.4-acre Metropolitan Water District (MWD) right-of-way parcel, which may potentially be used for overflow parking, subject to agreement with MWD.

Operation

The Project would require energy use in the form of electricity, natural gas, and fuel consumption.

Energy Sources

The annual electricity and natural gas consumption were approximated using energy consumption data for the Shadowbox Studios based in Atlanta, Georgia. The peak month electricity (kWh) and natural gas (kilo-Btu [kBtu]) consumption were selected and used to estimate the approximate annual energy consumption. The annual electricity and natural gas values from the Shadowbox Studios in Atlanta were then increased based on the square footage difference (52 percent

increase) between the Atlanta site and the Project. The annual electricity and natural gas consumed by the Project would be approximately 8,460,355 kWh and 3,700,855 kBtu, which is conservatively high since the peak month usage were used to approximate an annual usage.

Mobile Sources

VMT was calculated in CalEEMod using the trip generation rates, which are discussed in detail in the Transportation Assessment for Shadowbox Studios, Santa Clarita, California, prepared by Gibson Transportation Consulting, Inc. and dated January 2023, which is provided as **Appendix L** to this Draft EIR. The assumed vehicle fleet mix provided in CalEEMod for the opening year of 2025 was used to determine the total annual fuel consumption of the Project.[3] A detailed list of assumptions used for this analysis is provided in the Energy Report, which is included as **Appendix F** to this Draft EIR.

CEQA Guidelines Appendix F is an advisory document that assists EIR preparers in determining whether a project will result in the inefficient, wasteful, and unnecessary consumption of energy. The analysis in **Threshold 4.5(a)** relies upon Appendix F of the CEQA Guidelines, which includes the following criteria to determine whether this threshold of significance is met:

- **Criterion 1**: The Project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the Project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials may be discussed.
- **Criterion 2**: The effects of the Project on local and regional energy supplies and on requirements for additional capacity.
- **Criterion 3**: The effects of the Project on peak and base period demands for electricity and other forms of energy.
- **Criterion 4**: The degree to which the Project complies with existing energy standards.
- **Criterion 5**: The effects of the Project on energy resources.
- **Criterion 6**: The Project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

4.5.5 PROJECT DESIGN FEATURES

No specific Project Design Features are proposed with respect to energy resources. However, Project Design Features PDF-GHG-1 and PDF-GHG-2 in Section 4.7, Greenhouse Gas Emissions, of this Draft EIR would reduce the Project's energy consumption.

4.5.6 ANALYSIS OF PROJECT IMPACTS

Threshold 4.5(a): Would the Project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?

[3] Although the Project buildout year is 2026, utilizing a 2025 buildout year provides a more conservative analysis due to more stringent regulations that would apply in subsequent years.

Impact Analysis

Construction

Project construction, including the off-site improvements, would primarily consume fuel energy in two ways: (1) the operation of heavy construction equipment and off-road vehicles; and (2) the use of construction tools and equipment, haul truck trips, and vehicle trips generated from construction workers traveling to and from the Project Site. According to the CalEEMod analysis, construction activities would result in the consumption of 608,836 gallons of diesel fuel from construction equipment and vendor, hauling, and water truck trips, and approximately 353,662 gallons of gasoline from construction worker vehicle trips.

Construction activities and corresponding fuel energy consumption would be temporary and localized, as the use of diesel fuel and heavy-duty equipment would not be a common or ongoing condition of the Project. In addition, construction contractors would be required to comply with the provisions of California Code of Regulations Title 13, Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes and would minimize unnecessary fuel consumption. Construction equipment would be subject to the USEPA Construction Equipment Fuel Efficiency Standard, which would also minimize inefficient, wasteful, or unnecessary fuel consumption. Furthermore, per applicable regulatory requirements such as the 2022 CALGreen Code, the Project would comply with construction waste management practices to divert a minimum of 65 percent of construction debris. These practices would result in the efficient use of energy necessary for Project construction. Therefore, the Project would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and construction impacts would be less than significant.

Operation

Operation of the Project would result in the consumption of electricity, natural gas, and gasoline and diesel fuels. Natural gas and electricity would be used for heating and cooling systems, lighting, appliances, and water and wastewater conveyance for the proposed buildings. Gasoline and diesel consumption would be associated with vehicle trips generated by employees and guests.

Table 4.5-2 summarizes the estimated annual operational energy consumption for the Project (Criterion 1). As shown, operation would require approximately 1,088,710 gallons of gasoline and 192,858 gallons of diesel for transportation fuels, 8,460,355 kWh of electricity, and 37,009 therms of natural gas. The transportation fuel consumption for gasoline and diesel represents the highest amount used from Project operation.

Criterion 2 considers the effects of the Project on local and regional energy supplies and on requirements for additional capacity, Criterion 3 considers the effects of the Project on peak and base period demands for electricity and other forms of energy, and Criterion 5 considers the effects of the Project on energy resources. As shown in **Table 4.5-2**, operational fuel consumption associated with the Project would account for less than 1 percent of Los Angeles County's gasoline and diesel use. The Project's electricity demand would represent 0.01 percent of SCE's total electricity demand for its service population, and the Project's natural gas demand would be nominal compared to SoCalGas' total natural gas demand for its service population. Therefore, the Project's energy use for operation would not represent a substantial portion of the County's or service providers' available supply. In addition, SCE and SoCalGas have not provided any indication that they would have insufficient energy supplies to serve the Project. As such, the Project would not

Table 4.5-2
PROJECT'S ANNUAL OPERATIONAL ENERGY CONSUMPTION

Source	Project Energy Consumption	2020 Consumption[a]	Project Percentage
Gasoline	1,088,710 gallons	2,770 million gallons	0.04%
Diesel	192,858 gallons	299 million gallons	0.06%
Electricity	8,460,355 kWh	83,533 GWh	0.01%
Natural Gas	37,009 therms	5,231 million therms	<0.01%

kWh = kilowatt-hours; GWh = gigawatt-hours.
1 GWh = 1,000,000 kWh.
*[a] Gasoline and diesel consumption is for Los Angeles County, electricity consumption is for the SCE service area, and natural gas consumption is for the SoCal Gas service area. See Subsection 4.5.1, above, and Tables 2, 3, and 4 of the Energy Report provided as **Appendix F** of this Draft EIR.*
Source: Rincon Consultants Inc., Energy Utilization Study, August 2022; Michael Baker International, 2023.

result in an increase in energy demand that would exceed available supplies of gasoline or diesel fuels, or available supplies during base and peak periods for SCE and SoCalGas.

Criterion 4 considers the degree to which the Project complies with existing energy standards. The Project would be required to comply with the 2022 California Energy Code, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during Project operation. The 2022 California Energy Code requires newly constructed buildings to meet energy performance standards set by the CEC, which are specifically targeted for new buildings to result in energy efficient performance. The Project would also comply with the 2022 CALGreen Code, which requires implementation of energy-efficient light fixtures and building materials into the design of new construction projects. Pursuant to the CALGreen Code, all plumbing fixtures used for the Project would be high-efficiency fixtures, which would reduce energy use related to water and wastewater. In addition, the Project would utilize electricity from SCE, which is required to procure a certain percentage of electricity from renewable resources. Moreover, in accordance with Project Design Feature PDF-GHG-2, the Project would install rooftop photovoltaic (PV) systems and solar panels for all the sound stage buildings and the support building for localized use, which would exceed California Energy Code standards and reduce the Project's demand on SCE supplies.

Criterion 6 considers the Project's estimated transportation energy use requirements and its overall use of efficient transportation alternatives. Project amenities, such as bicycle parking spaces and proximity to multiple public transit options, would reduce anticipated transportation fuel use by encouraging alternative modes of transportation. The Project would provide a total of 170 bicycle parking spaces on-site. In addition, Santa Clarita Transit serves Routes 12 and 757, and Antelope Valley Transit serves Route 790 with stops along Railroad Avenue, adjacent to the Project Site. These routes also have stops at the Jan Heidt Newhall Metrolink Station, which is approximately 0.5 mile south of the Project Site, or a 10-minute walk. The Jan Heidt Newhall Metrolink Station, located at 25663 Stanford Avenue, includes additional Santa Clarita Transit bus routes (796, 797, and 799), the Amtrak Thruway Bus Route 1, and the Antelope Valley commuter rail line. The commuter rail provides stops from Lancaster to the Los Angeles Union Station. Furthermore, the Project Site would provide EV charging stations and EV-ready parking spaces pursuant to Project Design Feature PDF-GHG-1, which would reduce fuel usage. Although the EV charging stations would represent an increase in electricity use, the resulting use of EVs would offset gasoline and/or diesel fuel consumption.

Based on the above, the Project would not involve the inefficient, wasteful, and unnecessary use of energy during operation, and operational impacts would be less than significant.

Mitigation Measures

Impacts with regard to Thresholds 4.5(a) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Thresholds 4.5(a) were determined to be less than significant without mitigation.

Threshold 4.5(b): Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Impact Analysis

The applicable state and local plans or policies for renewable energy and energy efficiency include the 2022 California Energy Code, the 2022 CALGreen Code, and the City's General Plan. The Project's consistency with these plans is discussed below.

State Energy Regulations

The Project would be required to comply with the nonresidential mandatory measures in the 2022 CALGreen Code and 2022 California Energy Code to reduce energy consumption compared to standard building practices, which include measures such as low-flow plumbing fixtures, water-efficient irrigation systems, and energy-efficient lighting and healing and cooling systems. Furthermore, in accordance with PDF-GHG-1 and PDF-GHG-2, the Project Site would provide EV charging stations and EV-ready parking spaces pursuant to the requirements of the CALGreen Code, and install rooftop PV systems and solar panels for all the sound stage buildings and the support building for localized use. As the Project would be required to comply with these regulations, and would exceed the requirements of these regulations with the implementation of Project Design Features, the Project would not conflict with or obstruct state plans for renewable energy or energy efficiency.

City of Santa Clarita General Plan

The City's General Plan's Goal CO 8 is directed at improving energy efficiency, reducing energy and natural resource consumption, and reducing GHG emissions associated with development. The Project would be required to comply with the 2022 CALGreen Code, the 2022 California Energy Code, the City's Green Building Standards Code, and the City's Energy Conservation Code. The Project would also incorporate a number of sustainable design features, including but not limited to installation of energy-efficient light fixtures, high-efficiency plumbing fixtures, EV parking spaces, and rooftop PV systems and solar panels to reduce energy consumption. Moreover, the Project would reduce VMT and associated GHG emissions by constructing a large employment generator in a housing-rich area of the SCAG region near multiple public transit options, which would provide employment opportunities to those who already live near the Project Site or in the Santa Clarita Valley. Additionally, the Project would include on-site amenities (e.g., private park, picnic areas, and food truck stations), bicycle parking spaces, and electrical golf carts, which would contribute to vehicle trip and associated GHG emissions reductions. Therefore, the Project would be consistent with the applicable goals, objectives, and policies of the City's General Plan.

Based on the above, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

Mitigation Measures

Impacts with regard to Threshold 4.5(b) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.5(b) were determined to be less than significant without mitigation.

4.5.7 CUMULATIVE IMPACTS

Impact Analysis

As detailed in Section 3.0, Environmental Setting, of this Draft EIR, there are 36 related projects that propose varying levels of development, redevelopment, or modifications to existing land uses or structures in the Project vicinity. The geographic context for the cumulative analysis of electricity consumption is SCE's service area and the geographic context for the cumulative analysis of natural gas consumption is SoCalGas' service area. While the geographic context for transportation-related energy use is more difficult to define, it is meaningful to consider the Project in the context of countywide consumption. Growth within these areas is anticipated to increase the demand for electricity, natural gas, and transportation energy, as well as the need for energy infrastructure, such as new or expanded energy facilities.

Electricity and Natural Gas

Buildout of the Project, the 36 related projects located in the Project vicinity, and additional growth forecasted to occur in the SCE and SoCalGas service areas would increase electricity and natural gas consumption. Therefore, the Project and related projects would cumulatively increase the need for electrical and natural gas supplies and infrastructure capacity, potentially including new or expanded electrical and natural gas facilities. However, as discussed in Subsection 4.5.6, Analysis of Project Impacts, the Project's electricity demand would represent less than 1 percent of SCE's total electricity demand for its service population, and the Project's natural gas demand would be nominal compared to SoCalGas' total natural gas demand for its service population. Although future development would result in the use of renewable and nonrenewable electricity and natural gas resources during construction and operation, which could limit future availability, the use of such resources would be on a relatively small scale given the sizes and types of uses proposed by the related projects and would be reduced by measures being similarly implemented for the Project. In addition, SCE and SoCalGas implement long-range planning methods that would account for regional and local growth expectations for their respective service areas. Furthermore, other future development projects and related projects would be expected to incorporate energy conservation features, comply with applicable regulations, including the CALGreen Code and California Energy Code standards, and incorporate mitigation measures, as necessary. As such, the Project's contribution to cumulative impacts related to the wasteful, inefficient, and unnecessary use of electricity and natural gas would not be cumulatively considerable and, therefore, would be less than significant.

Transportation Fuel

Buildout of the Project, the related projects, and additional forecasted growth would cumulatively increase the demand for transportation-related fuel in the state and region. As analyzed above, Project transportation fuel usage would represent a small percentage of total fuel consumption within Los Angeles County. As with the Project, other future development projects would be expected to reduce VMT by encouraging the use of alternative modes of transportation and other design features that promote VMT reductions. As such, the Project's contribution to cumulative impacts related to the wasteful, inefficient, and unnecessary use of transportation fuel would not be cumulatively considerable and, therefore, would be less than significant.

Consistency with Applicable Plans

The related projects within the Project vicinity and future development projects would be required to comply with the California Energy Code, CALGreen Code, and the City of Santa Clarita's Green Building Standards Code and Energy Conservation Code. As related projects would be required to meet the same energy consumption standards, there would be no significant cumulative impacts with regard to consistency with applicable energy conservation plans. Therefore, the Project's contribution to cumulative impacts related to consistency with adopted energy conservation plans or state/local energy standards for renewable energy or energy efficiency would not be cumulatively considerable and, therefore, would be less than significant.

Mitigation Measures

The Project's contribution to cumulative energy impacts is not cumulatively considerable. Therefore, cumulative energy impacts are less than significant and no mitigation measures are required.

Level of Significance After Mitigation

The Project's contribution to cumulative energy impacts is not cumulatively considerable and cumulative energy impacts are less than significant without mitigation.

4.6 GEOLOGY AND SOILS

This section of the Draft EIR describes the existing geologic and soils conditions on the Project Site and evaluates the potential impacts resulting from seismic hazards and soils constraints. Potential impacts to paleontological resources (i.e., fossil materials) are also discussed.

Information and analyses presented in this section are based on the *Geologic and Geotechnical Engineering Investigation, Proposed Commercial Development, Northwest of 13th and Arch Streets, City of Santa Clarita, California,* prepared by LGC Valley, Inc., dated September 2021, as provided in **Appendix G** of this Draft EIR. Additionally, Project impacts related to paleontological resources were analyzed based on the findings of the *Phase 1 Paleontological and Archaeological Resources Assessment for the Shadowbox Studios Project, City of Santa Clarita, Los Angeles County, California,* prepared by ArchaeoPaleo Resource Management, Inc., dated August 2022, and also provided in **Appendix E** of this Draft EIR.

4.6.1 ENVIRONMENTAL SETTING

REGIONAL GEOLOGY AND TOPOGRAPHY

The Project Site is located within the Santa Clarita Valley, which lies in the region of the Transverse Ranges Geomorphic Province of California. The Transverse Ranges Geomorphic Province is characterized by east-west trending mountains and faults. Sedimentary basins within the Transverse Ranges Geomorphic Province include the Ventura, Soledad, and Ridge Basins, and the San Fernando Valley, which continue to accumulate alluvial sediments because of the continuous shifting of the San Andreas Fault and the Transverse Ranges fault systems.

The Santa Clarita Valley is surrounded by the Santa Susana Mountains to the south and west, the San Gabriel Mountains to the southeast, and the Sierra Pelona Mountains to the north, all of which are part of the Transverse Ranges Geomorphic Province. Smaller hills and ridgelines bisect the valley floor, which contains the drainage courses of the Santa Clara River and its tributaries. Within the Santa Clarita Valley, about 168,345 acres of land contain slopes greater than 10 percent, and 7,866 acres of land contain slopes of 25 percent or greater.[1]

PROJECT SITE GEOLOGY AND TOPOGRAPHY

Geology

The distribution, thicknesses, and characteristics of near-surface soils in the Santa Clarita area have been previously mapped at multiple scales for purposes of seismic zonation and are available through the National Geologic Map Database. To determine existing subsurface conditions, multiple test pits and borings were excavated/advanced across the Project Site. The surface geology of the Project Site contains unconsolidated deposits of Quaternary alluvium, potentially occurring to a depth of several hundred feet. North of Placerita Creek, a small, rugged ridgeline consisting of older dissected surficial alluvial gravel deposits and the Quaternary/Tertiary Saugus Formation rises to an elevation of approximately 1,343 feet above sea level (amsl).[2]

[1] Los Angeles County Department of Regional Planning, *Santa Clarita Valley Area Plan, Conservation and Open Space*, 2012.

[2] LGC Valley, Inc., *Geologic and Geotechnical Engineering Investigation, Proposed Commercial Development, Northwest of 13th and Arch Streets, City of Santa Clarita, California,* September 2021.

The Project Site is underlain by artificial fill (undocumented), alluvium, older alluvium, talus/slopewash, and the Pacoima Formation. The Project Site has been tilled for weed abatement. Artificial fill ranges in depth from 3 inches to 2 feet. Additionally, alluvial soils are present across most of the Project Site. In general, the alluvium consists of silty fine to coarse sands, gravels, and cobble zones; silt and clay layers are present but minor. Older alluvial soils are present in the southern portion of the Project Site; these deposits are yellow to reddish brown silty and clayey gravels and cobbles that are very dense and tightly packed. However, the upper few feet of these older alluvial soils are loose, dry, and weathered. The lower portion of the ridge on the northern end of the Project Site consists of talus, which is rock fragments lying at the base of a steep slope, and slopewash, which is soil and rock material that has moved down slope via gravity assisted by running water that is not confined to channels. The native slope of this ridge also consists of Pacoima Formation Bedrock, which is characterized by unconsolidated sands, gravels, and cobbles. No clay beds or weak layers were found within the ridge composition. Based on field mapping, bedding of this native slope was crude/massive and was found to be generally horizontal to dipping into slope at angles of less than 10 degrees. In addition, this native slope has performed well over the years with no evidence of landslides or failures. The western portion of the ridge exposes a steep topographic expression at a cobble and boulder layer that may be subject to rockfall.[3]

Topography

The Project Site is located within the southeastern portion of the Newhall (7 ½-minute) quadrangle in the Newhall area of the City of Santa Clarita. Placerita Creek traverses the northern portion of the Project Site from the southeast toward the northwest. The topography of the Project Site gently slopes towards the northwest from 12th Street to Placerita Creek, at approximate elevations of 1,258 to 1,220 feet amsl), respectively.[4]

The north side of Placerita Creek consists of steeply ascending hillside terrain, which reaches an approximate elevation of 1,340 feet amsl. Placerita Creek along the eastern boundary of the Project Site is confined within a graded channel that is approximately 30 feet wide. Within the Project Site, Placerita Creek widens to approximately 300 feet, then narrows to approximately 75 feet as it exits the Project Site beneath the railroad tracks and Railroad Avenue bridge to the west.[5]

SEISMICITY, FAULTING, AND RELATED EFFECTS

Seismicity

The California Geological Survey (CGS) defines a fault as a fracture or zone of closely associated fractures in the earth's crust, along which rocks on one side have been displaced relative to those on the other side.[6] Faults are classified as active, potentially active, or inactive. These classifications are based on the length of time since they experienced activity: active faults have had activity in the last 11,000 years, potentially active faults have had activity between 11,000 and 1.6 million years ago, and inactive faults last moved more than 1.6 million years ago. Surface rupture occurs when movement along a fault causes the earth's surface to be displaced; not all earthquakes or fault ruptures cause surface rupture. However, surface rupture can occur

[3] LGC Valley, Geotechnical Engineering Investigation, 2021.
[4] LGC Valley, Geotechnical Engineering Investigation, 2021.
[5] LGC Valley, Geotechnical Engineering Investigation, 2021.
[6] California Geological Survey, California Department of Conservation, "Guidelines for Evaluating and Mitigating Seismic Hazards in California," CGS Special Publication 117A, 2008.

suddenly during an earthquake or over a period of time. Sudden surface ruptures are often more damaging.

The geologic structure of Southern California is dominated by northwest-trending faults associated with the San Andreas system. Faults, such as the Newport-Inglewood, the Whittier-Elsinore, the San Jacinto, and various segments of the San Andreas fault itself, are all major faults associated with this system. They are all known to be seismically active, and most are known to have ruptured the ground surface in historical times. In addition, within the Southern California region are a number of west-trending, low-angle reverse (thrust) faults that are similarly active. The majority of these faults occur as north-dipping planes, which trend along the south-facing flanks of the Transverse Ranges. The Cucamonga, Sierra Madre, Santa Monica, and Hollywood faults are the known active thrust faults in the region. As is the case with much of Southern California, the Project Site is located in a region that is characterized by moderate to high seismic activity. The Project Site and vicinity have experienced strong ground shaking due to earthquakes on a number of occasions in historical times.

During an earthquake, ground motion is produced by two blocks of the earth's crust slipping past each other. The following factors are considered to determine how much the ground moved: focal depth, proximity to the fault rupture, fault mechanism, duration of shaking, local structure, source direction of the earthquake, subsurface conditions, and topography. Ground motion is usually described in terms of the Moment Magnitude scale, which measures an earthquake's strength based on seismic movement.

Faulting

The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone.[7] There are no known active or potentially active faults on-site. Therefore, there is no possibility of damage due to ground rupture from an earthquake fault since active faults are not known to cross the Project Site.

However, the Project Site is in proximity of active faults, including the Holser, San Gabriel, and San Fernando faults, which are capable of producing significant ground shaking. Secondary effects of seismic shaking resulting from large earthquakes on the major faults in the Southern California region include shallow ground rupture; soil liquefaction; and seismically induced settlements, seiches, and tsunamis. In general, these secondary effects are a possibility throughout the Southern California region and are dependent on the distance between the site and causative fault and the on-site geology. The major active fault that could produce these secondary effects is the San Fernando fault, located less than 5 miles south of the Project Site. Other active faults that may result in shaking at the Project Site include, but are not limited to, the Holser, San Gabriel, Santa Susana, and San Andreas faults. A discussion of these secondary seismic effects is provided below.

Shallow Ground Rupture

Shallow ground rupture due to active faulting is not likely to occur on-site due to the distance from likely seismic events. Although this phenomenon is possible at any location, it is not considered a significant hazard at the Project Site.

[7] E. W. Hart and W. A. Bryant, "Fault-Rupture Hazard Zones in California, Alquist-Priolo Earthquake Fault Zoning Act with Index to Earthquake Fault Zones Maps," California Department of Conservation, Division of Mines and Geology, Special Publication 42, Revised 1997, Supplements 1 and 2 Added 1999.

Liquefaction

Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when exposed to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: (1) shallow groundwater; (2) low density non-cohesive (granular) soils; and (3) high-intensity ground motion. Liquefaction is typified by a buildup of pore-water pressure in the affected soil layer to a point where a total loss of shear strength occurs, causing the soil to behave as a liquid. Studies indicate that saturated, loose to medium dense, near surface cohesionless soils exhibit the highest liquefaction potential, while dry, dense, cohesionless soils and cohesive soils exhibit low to negligible liquefaction potential.

The Project Site is not located in a State of California Seismic Hazard Zone for liquefaction.[8] Based on the depth to the historic high groundwater at the Project Site, the potential for liquefaction impacting the majority of the Project Site is very low.

Seismically Induced Settlement

During a strong seismic event, seismically induced settlement can occur within loose to moderately dense, dry or saturated granular soil. Settlement caused by ground shaking is often non-uniformly distributed, which can result in differential settlement. Based on the results of soils exploration conducted at the Project Site, the potential for seismically induced dry sand settlements ranges from 0.23 to 1.48 inches. The estimated differential settlement that should be considered in site development is up to approximately 1 inch.

Landslides

The northeastern corner of the Project Site is located in a State of California Seismic Hazard Zone for landslide.[9] The native slope along the ridge in the northern portion of the Project Site consists of Pacoima Formation bedrock. According to the Geotechnical Investigation conducted for the Project, this native slope has performed well over the years with no evidence of landslides or failures. However, the western portion of the native ridge exposes a steep topographic expression at a cobble and boulder layer that may be subject to rockfall.

Subsidence

Subsidence is the settling and compaction of soil with little or no horizontal motion. Subsidence is usually caused by the extraction of something from below the surface, such as gas, oil, or water. While it can happen quickly, subsidence usually takes place over a long period of time and can cause severe structural impacts, such as cracks in a building foundation or dislocated pipelines and drains. Based on the characteristics of on-site soils, subsidence is not anticipated to occur at the Project Site.

Expansive Soils

Soil that contains a significant concentration of clay particles is referred to as expansive soil. This is due to the fact that the clay particles can release or absorb water, causing the particles to shrink or expand, respectively. Expansive soils can cause changes in volume, which have the potential for placing additional stress on buildings and other material placed on the expansive soil. Soil

[8] California Geologic Survey, State of California Seismic Hazard Zone Map for the Newhall Quadrangle, 1998.
[9] California Geologic Survey, State of California Seismic Hazard Zone Map for the Newhall Quadrangle, 1998.

testing conducted during the Geotechnical Investigation for the Project indicated that near-surface soils have a medium expansion potential.

PALEONTOLOGICAL RESOURCES

Section 6301 of the federal Paleontological Resources Preservation Act defines paleontological resources as "any fossilized remains, traces, or imprints of organisms, preserved in or on the earth's crust, that are of paleontological interest and that provide information about the history of life on earth," except for when these materials are associated with archaeological resources or cultural items.

According to the Phase 1 Paleontological and Archaeological Resources Assessment prepared for the Project, a review of the geologic background for the Project region revealed that sediments within the Project Site included surficial Holocene-age alluvial gravels, sand, and clay potentially originating from the Placerita Creek and Pleistocene-age unconsolidated alluvial fan and terrace sediments. Underlying these sediments are deposits of the 1.8-million-year-old marine deposited Pliocene- to Pleistocene-age Saugus Formation that are known to occur approximately 25 feet below the ground surface and produce various fossil specimens throughout the Santa Clarita region. The Saugus Formation is composed mostly of sandstone, conglomerate deposits, with rare occurrences of limestone and laminated mudstone. The Saugus Formation is approximately 2,130 feet thick and was deposited in a shallow marine environment adjacent to a wave-dominated river delta.

Based on the field reconnaissance performed for the Project, no fossil-bearing rock outcropping, sites, or fossil remains were observed on the surface of the Project Site. However, data gathered during boring log monitoring and additional information confirmed that the sediments underlying the Project Site are Holocene/Pleistocene alluvial sediments and sedimentary deposits of the Saugus Formation. These observations also confirmed that the depths and locations for which these sediments occur below the ground surface are unpredictable and vary across the Project Site.

An interview with a contact from the Natural History Museum of Los Angeles County concluded that fossil localities have been recorded in similar sedimentary deposits that are also found at the Project Site, but there is no record of known fossil localities within the boundaries of the Project Site. Holocene/Pleistocene alluvial sediments have produced fossil specimens of bison, mastodon, horse, deer, and a rare species of tapir in the region, but depths of these discoveries are not known due to unrecorded data. Additionally, sandstone layers within the Saugus Formation are very rich in invertebrate fossils and have produced various marine and terrestrial animal fossil specimens, including shallow marine snails and clams, at depths ranging from surface level to unknown depths. A review of the Paleobiology Database search also found that multiple occurrences of marine-based fossils, such as gastropods, mollusks, and spined fishes, have been recovered across similar sediments found in the Project vicinity.

Based on the findings of the Phase 1 Paleontological and Archaeological Resources Assessment, the Project area is considered sensitive for paleontological resources.

4.6.2 REGULATORY AND PLANNING FRAMEWORK

FEDERAL

Earthquake Hazards Reduction Act of 1977

The Earthquake Hazards Reduction Act established the National Earthquake Hazards Reduction Program as a long-term earthquake risk reduction program for the United States.[10] The act focuses on creating effective measures to reduce earthquake hazards; promoting the adoption of earthquake hazard reduction activities by federal, state, and local governments; improving the public's knowledge of earthquakes by increasing the overall understanding of the effects of earthquake on humans and their surroundings; and developing and maintaining systems for advancing these causes. The National Earthquake Hazards Reduction Program designates the Federal Emergency Management Agency (FEMA) as the lead agency of the program and assigns FEMA planning, coordinating, and reporting responsibilities.

Occupational Safety and Health Administration Regulations

The Occupational Safety and Health Administration (OSHA) Excavation and Trenching Standard covers requirements for excavation and trenching operations.[11] OSHA requires that all excavations in which employees could potentially be exposed to cave-ins be protected by sloping or benching the sides of the excavation, supporting the sides of the excavation, or placing a shield between the side of the excavation and the work area.

Paleontological Resources Preservation Act of 2002

The Paleontological Resources Preservation Act was enacted to codify the generally accepted practice of limiting the collection of vertebrate fossils and other rare and scientifically significant fossils to qualified researchers. These researchers must obtain a permit from the appropriate state or federal agency and agree to donate any materials recovered to recognized public institutions, where they will remain accessible to the public and to other researchers.

STATE

California Building Code

The California Building Code (CBC), codified in Title 24 of the California Code of Regulations (CCR), Part 2, was promulgated to safeguard public health, safety, and general welfare by establishing minimum standards related to structural strength, means of egress facilities, and general stability of buildings. The purpose of the CBC is to regulate and control the design, construction, quality of materials, use/occupancy, location, and maintenance of all buildings and structures within its jurisdiction. Title 24 is administered by the California Building Standards Commission, which, by law, is responsible for coordinating all building standards. Under State law, all building standards must be centralized in Title 24 or those standards are not enforceable. The provisions of the CBC apply to the construction, alteration, movement, replacement, location, and demolition of every building, structure, or appurtenance connected or attached to such buildings or structures throughout California.

[10] 42 United States Code Section 7701 et seq.
[11] 29 Code of Federal Regulations Part 1926(P) et seq.

The 2022 edition of the CBC is based on the 2021 International Building Code published by the International Code Council. The code is updated triennially, and the 2022 edition of the CBC was published by the California Building Standards Commission on July 1, 2022, effective January 1, 2023. Every three years, the State adopts new codes (known collectively as the California Building Standards Code) to establish uniform standards for the construction and maintenance of buildings, electrical systems, plumbing systems, mechanical systems, and fire and life safety systems. Sections 17922, 17958 and 18941.5 of the California Health and Safety Code require that the latest edition of the California Building Standards Code apply to local construction 180 days after publication.

California Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act (Alquist-Priolo Act) was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. The act requires the State Geologist to delineate earthquake fault zones along faults that are "sufficiently active" and "well defined." The act requires that proposed developments incorporating tracts of four or more dwelling units investigate the potential for ground rupture within designated Alquist-Priolo zones. These zones serve as an official notification of the probability of ground rupture during potential earthquake events. Where such zones are designated, no building may be constructed on the line of fault, and before any construction is allowed, a geologic study must be conducted to determine the location of all active fault lines within the zone. In general, local agencies are required to regulate development proposed within such designated fault zones.

California Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act addresses the effects of strong ground shaking, liquefaction, landslides, and other ground failures due to seismic events. Under the Seismic Hazards Mapping Act, the State Geologist is required to delineate "seismic hazard zones." Cities and counties must regulate certain development projects within these zones until the geologic and soil conditions of their project sites have been investigated and appropriate mitigation measures, if any, have been incorporated into development plans. The State Mining and Geology Board provides additional regulations and policies to assist municipalities in preparing the safety element of their general plans and to encourage the adaptation of land use management policies and regulations to reduce and mitigate seismic hazards to protect public health and safety. Under Public Resources Code (PRC) Section 2697, cities and counties must require, prior to the approval of a project located in a seismic hazard zone, submission of a geotechnical report defining and delineating any seismic hazards.

Southern California Catastrophic Earthquake Preparedness Plan

The Southern California Catastrophic Earthquake Preparedness Plan was adopted in 2008. The plan examines initial impacts of earthquakes, inventories available resources, prepares to provide for the wounded and homeless, and develops a long-term recovery process in the event of a catastrophic earthquake. The process of long-term regional recovery provides a mechanism for coordinating federal support to the State or to tribal, regional, and local governments, nongovernmental organizations, and the private sector to encourage recovery from the consequences of catastrophic disasters.

LOCAL

City of Santa Clarita Unified Development Code and Building Code

The City of Santa Clarita Unified Development Code, Chapter 17.86, provides design criteria and construction standards regarding import and export of earth materials, excavation, grading, earthwork construction, fills, ridgeline and hillside development, and slope setbacks. In its Building Code Standards (Chapter 18.02 of the Santa Clarita Municipal Code), the City has adopted the 2022 CBC, including provisions of Chapter 16, Structural Design, and Chapter 18, Soils and Foundations, to address the effects of earthquake ground motions. Compliance with these standards is demonstrated and verified through the City's grading plan review and permit process. The City Engineer may require geological and soil engineering reports, including seismic hazard zone studies, to verify site conditions and the sufficiency of proposed design and construction measures. The City has adopted the County of Los Angeles Department of Public Works *Manual for Preparation of Geotechnical Reports*, dated July 1, 2013.

Santa Clarita General Plan

Applicable goals, objectives, and policies from the City of Santa Clarita General Plan Conservation and Open Space Element,[12] Land Use Element,[13] and Safety Element are listed below:[14]

Conservation and Open Space Element

- Goal CO 2: Conserve the Santa Clarita Valley's hillsides, canyons ridgelines, soils, and minerals, which provide the physical setting for the natural and built environments.
    - Objective CO 2.1: Control soil erosion, waterway sedimentation, and airborne dust generation, and maintain the fertility of topsoil.
        - Policy CO 2.1.1: Review soil erosion and sedimentation control plans for development-related grading activities, where appropriate, to ensure mitigation of potential erosion by water and air.
        - Policy CO 2.1.2: Promote conservation of topsoil on development sites by stockpiling for later reuse, where feasible.
        - Policy CO 2.1.3: Promote soil enhancement and waste reduction through composting, where appropriate.

Land Use Element

- Goal LU 3: Healthy and safe neighborhoods for all residents.
    - Objective LU 3.3: Ensure that the design of residential neighborhoods considers and includes measures to reduce impacts from natural or man-made hazards.

[12] City of Santa Clarita, General Plan, Conservation and Open Space Element, June 2011.
[13] City of Santa Clarita, General Plan, Land Use Element, June 2011.
[14] City of Santa Clarita, General Plan, Safety Element, May 2022.

- Policy LU 3.3.1: Identify areas subject to hazards from seismic activity, unstable soils, excessive noise, unhealthful air quality, or flooding, and avoid designating residential uses in these areas unless adequately mitigated.

Safety Element

- Goal S 1: Protection of public safety and property from hazardous geological conditions, including seismic rupture and ground shaking, soil instability, and related hazards.
  - Objective S 1.2: Regulate new development in areas subject to geological hazards to reduce risks to the public from seismic events or geological instability.
    - Policy S 1.2.3: Require soils and geotechnical reports for new construction in areas with potential hazards from faulting, landslides, liquefaction, or subsidence, and incorporate recommendations from these studies into the site design as appropriate.
    - Policy S 1.2.4: Enforce seismic design and building techniques in local building codes.

4.6.3 THRESHOLDS OF SIGNIFICANCE

The significance thresholds used to evaluate the impacts of the Project related to geology and soils are based on Appendix G of the CEQA Guidelines and the City's Initial Study Checklist.

CEQA GUIDELINES APPENDIX G

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to geology and soils if it would:

Threshold 4.6(a): ***Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:***

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

ii. Strong seismic ground shaking;

iii. Seismic-related ground failure, including liquefaction;

iv. Landslides;

Threshold 4.6(b): ***Result in substantial soil erosion or the loss of topsoil;***

Threshold 4.6(c): ***Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse;***

Threshold 4.6(d): ***Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property;***

Threshold 4.6(e): ***Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater; or***

Threshold 4.6(f): ***Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.***

CITY'S INITIAL STUDY CHECKLIST

In addition, in accordance with the City's Initial Study Checklist, a project would have a significant impact related to geology and soils if it would:

Threshold 4.6(g): ***Result in a change in topography or ground surface relief features.***

Threshold 4.6(h): ***Result in earth movement (cut and/or fill) of 10,000 cubic yards or more.***

Threshold 4.6(i): ***Involve development and/or grading on a slope greater than 10% natural grade.***

Threshold 4.6(j): ***Result in the destruction, covering, or modification of any unique geologic or physical feature.***

ISSUES NOT EVALUATED FURTHER

The Proposed Project would not result in significant impacts related to the following significance thresholds from Appendix G of the CEQA Guidelines or the City's Initial Study Checklist, as determined in the Initial Study (**Appendix A**), and, therefore, are not evaluated further in this Draft EIR:

Threshold 4.6(a): ***Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:***

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

Threshold 4.6(e): ***Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?***

4.6.4 METHODOLOGY

The analysis of impacts related to geology and soils considered the improvements on the Project Site, as well as the Project's improvements off-site, including a Class I multi-purpose path along

the frontage of the Project on 13th, Arch, and 12th Streets; widening of 13th Street, Arch Street, and 12th Street; installation of public hydrants along the frontage of the Project on 13th, Arch, and 12th Streets; and railroad crossing improvements at 13th Street, including the installation of a bike path/trail on the north side of the crossing, widening of the crossing at 13th Street and Railroad Avenue to accommodate the wider turning radii, installation of drainage on Railroad Avenue and 13th Street, new gates, modifications on Railroad Avenue at 13th Street to accommodate the revised intersection geometry and provide increased efficiency, implementation of ADA requirements for pedestrians, and implementation of line-of-sight requirements at the grade crossing. The analysis also considered the modifications to the Dockweiler Drive Extension Project in the immediate vicinity of the Project Site, including roadway improvements to 13th Street, Arch Street, 12th Street and Placerita Canyon Road that differ from previous approved plans, including accommodating the additional lane geometry at the Arch Street/13th Street intersection to widen the railroad crossing; construction of a pedestrian and bike bridge from the Jan Heidt Newhall Metrolink Station on Railroad Avenue to the future extension of Dockweiler Drive; and implementation of temporary storm drain improvements to accommodate surface water runoff from Dockweiler Drive prior to the completion of the Project.

The analysis of impacts related to geology and soils is based, in part, on the *Geologic and Geotechnical Engineering Investigation, Proposed Commercial Development, Northwest of 13th and Arch Streets, City of Santa Clarita, California,* prepared by LGC, dated September 2021 (provided in **Appendix G**). Information, conclusions, and recommendations included in this assessment are based on site-specific data, which includes information obtained from subsurface investigations at the Project Site followed by laboratory testing of the material obtained therein. The LGC report was prepared in accordance with the County of Los Angeles Department of Public Works, Geotechnical and Materials Engineering Division, *Manual for Preparation of Geotechnical Reports*, as well as the *Guidelines for Geotechnical Investigation and Reporting Low Impact Development Stormwater Infiltration*. The LGC report was supported by resources and followed guidance available from the US Geological Survey, the 2019 CBC, the Earthquake Seismic Hazard Zone Maps produced by the California Geological Survey, Alquist-Priolo Special Studies Zones Maps, results from prior on-site borings and laboratory test data, and other available resources. In addition, GMU Geotechnical, Inc., performed a professional technical peer review of the LGC report on behalf of the City of Santa Clarita.

The analysis of Project effects on paleontological resources is based on the *Phase 1 Paleontological and Archaeological Resources Assessment for the Shadowbox Studios Project, City of Santa Clarita, Los Angeles County, California,* prepared by ArchaeoPaleo Resource Management, Inc., and dated August 2022, provided in **Appendix E** of this Draft EIR. The palaeontologic research included in this report was based on a field reconnaissance survey and a paleontological records/Paleobiology Database search from the Los Angeles County Natural History Museum.

4.6.5 PROJECT DESIGN FEATURES

The following Project Design Features are proposed with respect to geology and soils:

PDF-GEO-1: Site earthwork for the Project will be performed in accordance with the recommendations in the Geotechnical Investigation related to site preparation, removal and recompaction, temporary stability of excavations, fill placement and

compaction, and trench backfill and compaction. Recommendations include, but are not limited to, the following:

- Compressible materials within areas planned to support the proposed building structures will be excavated to competent material and replaced with compacted fill soils.
- Excavations over 5 feet will be slot-cut, shored, or cut to a 1:1 slope gradient. Surface water will be diverted away from the exposed cut and not be allowed to pond on top of the excavations.
- Areas prepared to receive structural fill and/or other surface improvements will be scarified to a minimum depth of 6 inches, brought to at least optimum moisture content, and recompacted to at least 90 percent relative compaction.
- Trench backfill will be compacted in uniform lifts (generally not exceeding 8 inches in compacted thickness) by mechanical means to at least 90 percent relative compaction.
- The western portion of the ridge will have a debris fence for slope stability, to catch the cobbles and boulders that may dislodge from the slope.

PDF-GEO-2: Foundation design and construction for the Project will adhere to the recommendations in the Geotechnical Investigation. Upon design finalization, the Geotechnical Consultant will review and verify structural loads for the proposed buildings. The proposed buildings will utilize the recommended foundations: conventional foundations, post-tension foundations, or mat slabs. The proposed bridge will adhere to the preliminary recommendations for deepened foundations.

PDF-GEO-3: If retaining walls are implemented as part of the Project, they will be backfilled with low expansive soils if no on-site soils fit the required minimum parameters. Embedded structural walls will be designed to withstand the lateral earth pressures. All retaining wall structures will be provided with appropriate drainage and appropriately waterproofed. Shallow foundations recommendations and bearing capacities will be designed per the Geotechnical Investigation.

PDF-GEO-4: Pavement used for construction of the Project will adhere to the recommendations of the Geotechnical Investigation for minimum pavement sections. Final pavement sections will be confirmed by the Project civil engineer based upon the Project traffic index and the City of Santa Clarita minimum requirements, as necessary.

PDF-GEO-5: Concrete in contact with on-site soils will be designed in accordance with the American Concrete Institute Criteria for soils having a negligible sulfate exposure condition. Concrete will be designed in accordance with the minimum guidelines outlined in the Geotechnical Report for minimum thickness, pre-saturation, reinforcement, crack control, and subgrade compaction.

PDF-GEO-6: The proposed structures will have positive drainage of surface water that flows away from the structures. Positive drainage may be accomplished by providing

drainage away from buildings at a gradient of at least 2 percent for a distance of at least 5 feet, and further maintained by a swale or drainage path at a gradient of at least 1 percent. Where necessary, drainage paths may be shortened by use of area drains and collector pipes.

PDF-GEO-7: During construction, the interpolated subsurface conditions will be checked in the field by the Geotechnical Consultant. The Geotechnical Consultant will also perform observation and testing during future grading, excavations, backfill of utility trenches, preparation of pavement subgrade and placement of aggregate base, foundation or retaining wall construction, or when an unusual soil condition is encountered at the Project Site. The Geotechnical Consultant will review grading plans, foundation plans, and final Project drawings prior to construction.

4.6.6 ANALYSIS OF PROJECT IMPACTS

Threshold 4.6(a.ii): Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Impact Analysis

The Project Site is located in seismically active Southern California. The type and magnitude of seismic hazards that may affect the Project Site are dependent on both the distance to causative faults and the intensity and duration of the seismic event. In compliance with the CBC, ground-shaking hazards posed by earthquakes occurring along regional active faults would be considered in the design and construction of the proposed structures within the Project Site.

The Project, including the proposed off-site improvements, would not exacerbate underlying geologic and seismic conditions that produce ground shaking. The major active fault that could produce seismic shaking at the subject property is the San Fernando fault, located approximately 4.7 miles south of the site. Other active faults that may result in shaking at the site include the Holser, San Gabriel, Santa Susana, and San Andreas faults, among others. The nearest faults, the Holser and the Gabriel faults, are located within 2 miles of the Project Site. Therefore, the origin of potential seismic ground shaking would occur miles off-site at one of several regional faults. Additionally, the Proposed Project Site alterations and development would have no effect on regional faults or the intensity of seismic ground shaking that could occur during the lifetime of the Project.

The Project would be designed to reduce potential impacts due to strong seismic ground shaking, in compliance with the recommendations in the site-specific Geotechnical Investigation, the CBC, and the Santa Clarita Building Code. Provided that the proposed structures are designed and constructed in accordance with the current edition of the CBC and the City's Building Code, impacts posed by seismically induced strong ground shaking at the Project Site would be less than significant.

Additionally, the Project would implement Project Design Features PDF-GEO-1 through PDF-GEO-7, as specified in Subsection 4.6.5, Project Design Features, above, which would further reduce impacts related to seismically induced strong ground shaking at the Project Site.

Mitigation Measures

Impacts with regard to Threshold 4.6(a.ii) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.6(a.ii) were determined to be less than significant without mitigation.

Threshold 4.6(a.iv): Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Impact Analysis

As discussed, the Project Site is located in a State of California Seismic Hazard Zone for landslides. The rock bedding of the slope along the northern ridge of the Project Site has been stable over the years with no evidence of landslides or failures. The western portion of the native ridge exposes a steep topographic expression with a cobble and boulder layer that may be subject to rockfall. As recommended in the Geotechnical Investigation and identified in Subsection 4.6.5, Project Design Features, above, a debris fence would be incorporated as part of the Project design to catch any cobbles or boulders that may dislodge from the slope of the western portion of the ridge.

In addition, the City's Building Code requires mitigation of landslide areas in all new developments, guided by the findings and recommendations of the site-specific Geotechnical Investigation, along with the applicable design criteria set forth in the CBC. The Project would implement the recommendations in the Geotechnical Investigation, including excavation and remedial grading in areas planned to support the proposed building structures. The compressible materials would be excavated to competent material and replaced with compacted fill soils. Additional excavation and grading may be performed during Project construction when deemed necessary by the Geotechnical Consultant based on observations during grading. The remedial grading would remove all undocumented fills and unsuitable alluvium to be replaced with compacted soil for a more stable foundation.

Provided that remedial grading and design within the Project Site are performed in accordance with the site-specific recommendations provided by the Geotechnical Consultant, and as verified by the City in its plan check and grading permit process, impacts related to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides, would be less than significant.

Furthermore, the Project would implement Project Design Features PDF-GEO-1, PDF-GEO-3, and PDF-GEO-7 to ensure soil stability within the Project Site.

Mitigation Measures

Impacts with regard to Threshold 4.6(a.iv) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.6(a.iv) were determined to be less than significant without mitigation.

Threshold 4.6(b): Would the Project result in substantial soil erosion or the loss of topsoil?

Threshold 4.6(g): Would the Project result in a change in topography or ground surface relief features?

Threshold 4.6(h): Would the Project result in earth movement (cut and/or fill) of 10,000 cubic yards or more?

Impact Analysis

Construction

The Project Site is currently vacant and has previously been used for parking, outdoor events, movie sets, and fire department helicopter landings. Construction of the Project, including the proposed off-site improvements, would include site clearance and preparation, grading with approximately 400,000 cubic yards of cut and fill, planting of vegetation in the graded area to provide soil stabilization, excavation and trenching for underground utilities, building construction, paving, architectural coating, and landscaping. Construction of the Project would result in a change in topography due to the grading of a portion of the base of the ridgeline north of Placerita Creek to improve the parking layout north of the creek and to eliminate the need for soil import. The vegetation on-site consists of native and non-native grasses, scrubland, and various native and non-native trees, including several oak trees. All ground surfaces would be cleared of obstructions, any existing debris, and stripped of vegetation prior to grading of areas to receive structural fill or engineered structures. The initial vegetation removal would expose subsurface soils to the effects of wind and water erosion. Erosion leads to soil particles being carried off-site where they can affect water quality, cause sedimentation (the buildup of soil in waterways), and reduce the soil stability on-site.

The Project Site occupies approximately 93 acres. Due to the site exceeding 1 acre, the Project would be required to obtain a National Pollutant Discharge Elimination System (NPDES) Construction General Permit from the Los Angeles Regional Water Quality Control Board (RWQCB). The Construction General Permit requires construction sites that disturb 1 or more acres of land to implement stormwater controls and to develop a stormwater pollution prevention plan (SWPPP). The measures identified in the SWPPP are intended to minimize the amount of sediment and other pollutants associated with construction sites from being discharged in stormwater runoff. The following best management practices (BMP) would be applied to manage and control soil erosion control during construction:

- Preserve existing vegetation where required and when feasible;
- Control the area of soil-disturbing operations such that the contractor is able to implement erosion control BMPs quickly and effectively;
- Stabilize non-active areas within 14 days of cessation of construction activities or sooner if stipulated by local requirements;

- Control erosion in concentrated flow paths by applying erosion control blankets, check dams, erosion control seeding or alternate methods; and
- Prior to the completion of construction, apply permanent erosion control to remaining disturbed soil areas.

For additional discussion, refer to Section 4.9, Hydrology and Water Quality, of this Draft EIR.

As discussed above, construction of the Project, as well as the off-site improvements, would result in a change in topography, and earth movement of 10,000 cubic yards or more. However, with compliance with the City's existing standards to provide erosion control and the Construction General Permit requirements relative to sediment and erosion control, impacts related to (1) substantial soil erosion or the loss of topsoil, or (2) a change in topography or ground surface relief features, or (3) earth movement (cut and/or fill) of 10,000 cubic yards or more would be less than significant.

Operation

Upon completion of construction activities, the proposed site improvements would include impervious surfaces from building structures, paved roads and other paved surfaces, and landscaping. These improvements would eliminate the potential for erosion to occur within areas covered by impervious surfaces and would substantially reduce the potential for erosion in landscaped areas. Additionally, proposed vegetation in the graded area would provide soil stabilization, and landscaped areas would stabilize the underlying soil materials, providing anchoring during rain or high wind events. Therefore, Project implementation would result in less-than-significant impacts with regard to (1) substantial soil erosion or the loss of topsoil, (2) a change in topography or ground surface relief features, or (3) earth movement (cut and/or fill) of 10,000 cubic yards or more.

Mitigation Measures

Impacts with regard to Thresholds 4.6(b), 4.6(g), and 4.6(h) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Thresholds 4.6(b), 4.6(g), and 4.6(h) were determined to be less than significant without mitigation.

Threshold 4.6(c): ***Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?***

Threshold 4.6(i): ***Would the Project involve development and/or grading on a slope greater than 10% natural grade?***

Impact Analysis

As discussed under Threshold 4.6(a.iv) above, the northeastern corner of the Project Site is located in a landslide hazard zone. However, the Project's grading plan would remediate existing landslide conditions; further, compliance with the provisions of the Santa Clarita Building Code

would ensure that the Project's design measures would reduce potential landslide hazards to a less than significant level.

Subsidence is typically caused by extraction of substances such as oil, water, or gas from below the ground surface and can cause severe structural impacts such as cracks in building foundations or dislocated pipelines and drains. Based on the characteristics of on-site soils, subsidence is not anticipated to occur at the site. Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subject to high-intensity ground shaking. The Project Site is not located in a State of California Seismic Hazard Zone for liquefaction. Based on the depth to the historic high groundwater in the vicinity of the Project Site, the potential for liquefaction impacting the majority of the Project Site is very low. Historic high groundwater is greater than 65 feet deep and is not anticipated to have an effect on the site during Project grading or site development.

As proposed, development of the Project Site would not result in potential for damage caused by any unstable ground areas or increase the potential for landslide, lateral spreading, subsidence, liquefaction, or collapse. Areas susceptible to landslides, which are limited to the northeastern portion of the Project Site, would have grading performed in accordance with the slope stability study of the Geotechnical Investigation Report to ensure adequate levels of slope stability. In addition, as shown in Plate 2 of the Geotechnical Investigation Report, grading in the northeastern portion of the Project Site would not occur on a slope greater than 10 percent of the natural grade. Furthermore, removal of any unstable soil materials and placement of engineered materials beneath building foundations would ensure that potential effects caused by unstable soils are reduced to below a level of significance. Therefore, with implementation of the Project design features as recommended in the Geotechnical Investigation Report and adherence to the CBC and the Santa Clarita Building Code, the Project would result in less-than-significant impacts related to (1) unstable soils resulting in landslide, lateral spreading, subsidence, liquefaction, or collapse, or (2) development and/or grading on a slope greater than 10 percent natural grade.

Additionally, the Project would implement Project Design Features PDF-GEO-1 through PDF-GEO-7 to further reduce impacts related to soil stability.

Mitigation Measures

Impacts with regard to Thresholds 4.6(c) and 4.6(i) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Thresholds 4.6(c) and 4.6(i) were determined to be less than significant without mitigation.

Threshold 4.6(d) ***Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?***

Impact Analysis

The change in soil volume due to expansion and contraction can exert enough force to cause damage to structures. Based on laboratory testing results of the on-site soils, the soil expansion potential ranges from very low to medium. However, the soil expansion potential of the as-graded

condition with engineered fill after construction activities would range from very low to low. In addition, based on the Geotechnical Investigation, on-site soils are considered suitable to support the proposed buildings using a conventional, post-tensioned, or mat slab-on-grade foundation system for very low to low expansion potential, as identified in Project Design Feature PDF-GEO-2. Therefore, it is not anticipated that proposed foundations or other structural elements would be adversely impacted by expansive soils. Provided that the proposed structures are designed and constructed in accordance with the current edition of the CBC and the Santa Clarita Building Code, impacts relative to expansive soils would be less than significant.

Additionally, the Project would implement Project Design Features PDF-GEO-1 through PDF-GEO-7 to further reduce impacts related to expansive soils.

Mitigation Measures

Impacts with regard to Threshold 4.6(d) was determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.6(d) was determined to be less than significant without mitigation.

Threshold 4.6(f): Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Threshold 4.6(j): Would the Project result in the destruction, covering, or modification of any unique geologic or physical feature?

Impact Analysis

As identified above, the Project area is sensitive for paleontological resources. Grading or shallow excavations within the Saugus Formation have the potential to uncover significant vertebrate fossils, resulting in a potential to significantly impact previously undiscovered fossils during ground-disturbing activities. Therefore, the Project, including the proposed off-site improvements, has the potential to directly or indirectly destroy unique paleontological resources, and, as such, impacts to paleontological resources would be potentially significant.

Regarding unique geologic or physical feature, the Santa Clarita Valley contains diverse topography and prominent ridgelines. The ridgeline located in the northern portion of the Project Site is classified as a “Significant Ridgeline” in the Santa Clarita General Plan Conservation and Open Space Element. Construction of the Project would involve grading a portion of the base of the ridgeline north of Placerita Creek to improve the parking layout north of the creek and to eliminate the need for soil import. However, the Project would require a Ridgeline Alteration Permit, which would be reviewed by the City of Santa Clarita for any development in the vicinity of a Significant Ridgeline designated within the Ridgeline Preservation Overlay Zone. Approval of the Ridgeline Alteration Permit would require that the Project be visually compatible with surrounding ridgeline areas and minimize the impacts of grading to preserve the ridgeline character. Therefore, with approval of and adherence to the requirements of the Ridgeline Alteration Permit, the Project would not result in the destruction, covering, or modification of any unique geologic or physical feature. As such, impacts would be less than significant.

Mitigation Measures

To reduce potential significant impacts to paleontological resources, the following mitigation measures are proposed for the Project:

MM-GEO-1 Prior to the start of construction, the Project applicant shall retain a qualified professional paleontologist as defined by Society for Vertebrate Paleontology (SVP) (2010) standards. The paleontologist shall create a Worker's Environmental Awareness Program pamphlet that shall be provided as training to construction personnel to understand regulatory requirements for the protection of paleontological resources. The training class(es) shall include examples of paleontological resources to look for and protocols to follow if discoveries are made. The paleontologist shall develop Project-specific training and supply any supplemental materials necessary to execute the training.

MM-GEO-2 Paleontological resources monitoring shall be conducted under the guidance of the qualified professional paleontologist and by a qualified paleontological resource monitor(s) as defined by SVP (2010) standards. Monitoring shall entail the visual inspection of excavated or graded area and trench sidewalls. The monitor shall have the authority to temporarily halt or divert construction equipment in order to investigate and salvage finds. The paleontological monitor shall have the authority to take sediment samples and test for microfossils at the discretion of the qualified professional paleontologist. If no significant fossils have been exposed or the qualified professional paleontologist has otherwise found that the scientific value of the resource has been exhausted, the qualified professional paleontologist may determine that full-time monitoring is no longer necessary or, with the approval of the City, may reduce or eliminate monitoring.

MM-GEO-3 In the event that a paleontological resource is encountered when a monitor is not on-site or a potentially significant resource is encountered that requires additional investigation or cannot be quickly salvaged by the paleontological monitor, all construction shall cease within 50 feet of the discovery and the qualified professional paleontologist shall be notified immediately. If the monitor is present at the time of discovery, then the monitor shall have the authority to temporarily divert the construction equipment around the find and notify the qualified professional paleontologist. The qualified professional paleontologist shall then visit the site and assess the resource for its scientific significance. Project excavations shall continue elsewhere, monitored by a paleontological resource monitor. The qualified professional paleontologist shall evaluate the find and contact the City as soon as possible with recommendations as to the significance and potential treatment of the find. Depending on the nature of the find, the determination of significance may require additional excavation, potentially including the preparation and execution of a Paleontological Testing Plan. If significant, depending on the nature of the resource, treatment shall require the preparation and execution of a Paleontological Treatment Plan. The City, acting with the advice of the qualified professional paleontologist, shall determine the significance and treatment of the discovered resources.

MM-GEO-4 All significant fossils collected shall be prepared in a properly-equipped paleontology laboratory to a point ready for permanent curation. Preparation shall include the careful removal of excess matrix from fossil materials and stabilizing and repairing specimens, as necessary. Any fossils encountered and recovered shall be prepared to the point of identification. Following the initial laboratory work, all fossil specimens shall be identified to the lowest taxonomic level, analyzed, photographed, and catalogued, before being delivered to an accredited local museum repository for permanent curation and storage.

MM-GEO-5 At the conclusion of laboratory work and preparation for museum curation, a final report shall be prepared describing the results of the paleontological mitigation monitoring efforts associated with the Project. The report shall be prepared for the lead agency and the Project applicant. The report shall include a summary of the field and laboratory methods, an overview of the geology and paleontology in the Project vicinity, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. If the monitoring efforts produced fossils, then a copy of the report shall also be submitted to the designated museum repository. Accompanying notes, maps, and photographs shall also be filed at the repository. The cost of curation is assessed by the repository and is the responsibility of the Project applicant.

Impacts related to unique geological features were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Implementation of **Mitigation Measures MM-GEO-1** through **MM-GEO-5** would reduce the potential to damage paleontological resources to a less-than-significant level. Therefore, the Project would result in less-than-significant impacts with mitigation related to the destruction of a unique paleontological resource or site.

Impacts related to unique geological features were determined to be less than significant without mitigation.

4.6.7 CUMULATIVE IMPACTS

Impact Analysis

Due to the site-specific nature of geological conditions (e.g., soils, geological features, subsurface features, seismic features), geological impacts are typically assessed on a project-by-project basis, rather than on a cumulative basis. As a result, whether a project would indirectly or directly cause substantial adverse effects, including risk of loss involving the rupture from a known earthquake fault, seismic ground shaking, liquefaction, or landslides depends on the geotechnical conditions of the individual development site. Further, grading activities on any one project site would not directly interact or combine with similar effects involving a project located miles away from the Project Site. The related projects identified in Table 3-1 are all located at significant distances from the Project Site, with the closest ones (Related Project Nos. 3, 21, and 22) located approximately 2,300 feet of the Project Site, and, thus, grading and construction activities would not affect the same land conditions. All related projects would be required to comply with California Building Code regulations that are incorporated by reference into the Santa Clarita Municipal

Code (Chapter 18.01), which mandate that structures be designed/constructed to meet seismic safety standards and to address any unsuitable soil conditions. Therefore, because Project-related impacts related to geology and soils are site-specific, and because related projects would be required to comply with building code regulations mandating design in accordance with seismic safety standards and amelioration of unsuitable soils, the combined effects of the Project and related projects would not result in significant cumulative impacts related to geology and soils. The Project's contribution to geological impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

With regard to potential cumulative impacts related to paleontological resources, the Project Site is located within an area that is sensitive for paleontological resources. As with the Project, it is anticipated that mitigation measures would be established, as necessary, to address potential impacts to paleontological resources as part of the environmental review processes for the related projects. Therefore, the Project and related projects would not result in significant cumulative impacts to paleontological resources. The Project's contribution to impacts to paleontological resources would not be cumulatively considerable, and cumulative impacts would be less than significant.

Mitigation Measures

Cumulative impacts with regard to geology and soils were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts with regard to geology and soils were determined to be less than significant without mitigation.

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4.7 GREENHOUSE GAS EMISSIONS

This section compares the Project's characteristics with applicable regulations, plans, and policies set forth by the State of California, the Southern California Association of Governments (SCAG), and the City of Santa Clarita (City) to reduce greenhouse gas (GHG) emissions to determine whether the Project is consistent with and/or would conflict with the provisions of these plans. To assist in analyzing the Project's potential to conflict with applicable regulations, plans, and policies, this section also estimates the Project's GHG emissions generated by Project construction and operations. This section relies on information included in the *Shadowbox Studios-Santa Clarita Project Air Quality and Greenhouse Gas Emissions Study*, prepared by Rincon Consultants and dated February 2023, provided in **Appendix C** of this Draft EIR.

4.7.1 ENVIRONMENTAL SETTING

GLOBAL CLIMATE CHANGE

Climate change is the observed increase in the average temperature of Earth's atmosphere and oceans over an extended period. The term "climate change" is often used interchangeably with "global warming," but climate change is preferred because it conveys changes are happening in addition to rising temperatures (such as changing wind patterns, precipitation, and storms). The baseline against which these changes are measured originates in historical records that identify temperature changes that occurred in the past, such as during previous ice ages. The global climate is changing continuously, as evidenced in the geologic record which indicates repeated episodes of substantial warming and cooling, typically at an incremental rate over the course of thousands of years. However, scientists have observed acceleration in the rate of warming over the past 150 years.

The United Nations' Intergovernmental Panel on Climate Change (IPCC) expressed that the rise and continued growth of atmospheric carbon dioxide (CO_2) concentrations is unequivocally due to human activities, which has led the climate to warm at an unprecedented rate in the last 2,000 years., An estimated total of 2,390 gigatons of anthropogenic CO_2 was emitted between 1850 and 2019. It is likely that anthropogenic activities have increased the global surface temperature by approximately 1.07 degrees Celsius (°C) between the years 2010 through 2019. Furthermore, since the late 1700s, estimated concentrations of CO_2, methane (CH_4), and nitrous oxide (N_2O) in the atmosphere have increased by over 43 percent, 156 percent, and 17 percent, respectively, primarily due to human activity. Emissions resulting from human activities are thereby contributing to an average increase in Earth's temperature.

Greenhouse Gases

Gases that absorb and re-emit infrared radiation in the atmosphere are called GHGs. GHGs are emitted by natural processes and human activities. The gases that are widely seen as the principal contributors to human-induced climate change include CO_2, CH_4, N_2O, fluorinated gases such as hydrofluorocarbons and perfluorocarbons, and sulfur hexafluoride (SF_6). Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. CO_2 emissions are usually by-products of fossil fuel combustion, and CH_4 emissions result from off-gassing associated with agricultural practices and landfills. Human-made GHGs, many of which have greater heat-absorption potential than CO_2, include fluorinated gases and SF_6. Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere, and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a timescale of generally 100 years. Because GHGs absorb different amounts of heat, CO_2 is used as a common reference gas to relate the amount of heat absorbed to the amount of the gas emitted. This relationship is referred to as a "carbon dioxide equivalent" (CO_2e), which is the amount of GHG emitted multiplied by its GWP. CO_2 has a 100-year GWP of one. By contrast, CH_4 has a GWP of 30, meaning its global warming effect is 30 times greater than CO_2 on a molecule per molecule basis.

The accumulation of GHGs in the atmosphere regulates the earth's temperature. Without the natural heat-trapping effect of GHGs, the earth's surface would be about 33°C cooler. GHG emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, are believed to have elevated the concentration of these gases in the atmosphere beyond the level of concentrations that occur naturally.

Climate Change Impacts

Globally, climate change can affect environmental resources through impacts related to future temperatures and precipitation patterns. Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the 21st century than were observed during the 20th century. Long-term trends have found that each of the past three decades has been warmer than all the previous decades in the instrumental record, and the decade from 2000 through 2010 has been the warmest. Due to past and current activities, anthropogenic GHG emissions are increasing the global mean surface temperature at a rate of 0.2°C per decade. In addition to these findings, there are identifiable signs that global warming is currently taking place, including substantial ice loss in the Arctic over the past two decades.

CLIMATE CHANGE IN CALIFORNIA

Greenhouse Gases

Based on the California Air Resources Board (CARB) California Greenhouse Gas Inventory for 2000-2019, California produced 418.2 million metric tons of CO_2e ($MMTCO_2e$) in 2019, which is 7.2 $MMTCO_2e$ lower than 2018 levels. The major source of GHG emissions in California is the transportation sector, which comprises 40 percent of the State's total GHG emissions. The industrial sector is the second largest source, comprising 21 percent of the State's GHG emissions, while electric power accounts for approximately 14 percent. The magnitude of California's total GHG emissions is due in part to its large size and population compared to other states. However, a factor that reduces California's per capita fuel use and GHG emissions as compared to other states is its relatively mild climate. In 2016, the State of California achieved its 2020 GHG emissions reduction target of reducing emissions to 1990 levels as emissions fell below 431 $MMTCO_2e$. The annual 2030 Statewide target emissions level is 260 $MMTCO_2e$.

Climate Change Impacts

Potential impacts of climate change in California may include loss in water supply from reduced snowpack; sea level rise; and an increase in extreme heat days per year, large forest fires, and drought years. Below is a summary of some of the potential effects that could be experienced in California due to climate change.

Air Quality

Scientists project that the annual average maximum daily temperatures in California could rise by 2.4 to 3.2°C in the next 50 years and by 3.1 to 4.9°C in the next century. Higher temperatures are conducive to air pollution formation, and rising temperatures could lead to worsened air quality in California. As temperatures have increased in recent years, the area burned by wildfires throughout the State has increased, and wildfires have occurred at higher elevations in the Sierra Nevada Mountains. Severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks.

Water Supply

The average early spring snowpack in the western United States, including the Sierra Nevada Mountains, decreased by about 10 percent during the last century. During the same period, sea levels rose over 0.15 meters along the Central and Southern California coasts. The Sierra snowpack provides the majority of California's water supply as snow that accumulates during wet winters is released slowly during the dry months of spring and summer. A warmer climate is predicted to reduce the fraction of precipitation that falls as snow and the amount of snowfall at lower elevations, thereby reducing the total snowpack. Year-to-year variability in Statewide precipitation levels has increased since 1980, meaning that wet and dry precipitation extremes have become more common. The overall impact of climate change on future precipitation trends and water supplies in California is uncertain, although projections indicate that the average spring snowpack in the Sierra Nevada and other mountain catchments in Central and Northern California will decline by approximately 66 percent from its historical average by 2050.

Hydrology and Sea Level Rise

Climate change could affect the intensity and frequency of storms and flooding and induce substantial sea level rise in the coming century. The rate of increase of global mean sea levels between 1993 to 2020, observed by satellites, is approximately 3.3 millimeters per year, double the twentieth century trend of 1.6 millimeters per year. A rise in sea levels could erode 31 to 67 percent of Southern California beaches and cause flooding of approximately 370 miles of coastal highways during 100-year storm events. This would also jeopardize California's water supply due to saltwater intrusion and induce groundwater flooding and/or exposure of buried infrastructure. Furthermore, increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

Agriculture

California's agricultural industry produces over a third of the country's vegetables and two-thirds of the country's fruits and nuts. Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, certain regions of agricultural production could experience water shortages of up to 16 percent, which would increase water demand as hotter conditions lead to the loss of soil moisture. In addition, crop yield could be threatened by water-induced stress and extreme heat waves, and plants may be susceptible to new and changing pest and disease outbreaks. Temperature increases could also change the time of year that certain crops, such as wine grapes, bloom or ripen, and thereby affect their quality.

Ecosystems and Wildlife

The annual average maximum daily temperatures in California could rise by 4.4 to 5.8 degrees Fahrenheit (°F) in the next 50 years and by 5.6 to 8.8°F in the next century. Rising temperatures resulting from climate change could have four major impacts on plants and animals related to: (1) timing of ecological events; (2) geographic distribution and range; (3) species' composition and the incidence of non-native species within communities; and (4) ecosystem processes, such as carbon cycling and storage. Increases in wildfire would further remove sensitive habitat; increased severity in droughts would potentially starve plants and animals of water; and sea level rise would affect sensitive coastal ecosystems.

4.7.2 REGULATORY AND PLANNING FRAMEWORK

FEDERAL

United States Supreme Court Cases

The U.S. Supreme Court in *Massachusetts et al. v. Environmental Protection Agency et al*. (549 U.S. 05-1120 [2007]) held that the U.S. Environmental Protection Agency (USEPA) has the authority to regulate motor-vehicle GHG emissions under the federal Clean Air Act (CAA). The USEPA issued a Final Rule for mandatory reporting of GHG emissions in October 2009. This Final Rule applies to fossil fuel suppliers, industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty and off-road vehicles and vehicle engines and requires annual reporting of emissions. In 2012, the USEPA issued a Final Rule that establishes the GHG permitting thresholds that determine when CAA permits under the New Source Review Prevention of Significant Deterioration and Title V Operating Permit programs are required for new and existing industrial facilities.

In 2014, the US Supreme Court in *Utility Air Regulatory Group v. EPA* (134 S. Ct. 2427 [2014]) held that the USEPA may not treat GHGs as an air pollutant for purposes of determining whether a source is a major source required to obtain a Prevention of Significant Deterioration or Title V permit. The Court also held that Prevention of Significant Deterioration permits that are otherwise required (based on emissions of other pollutants) may continue to require limitations on GHG emissions based on the application of Best Available Control Technology.

STATE

Assembly Bill 1493

Assembly Bill (AB) 1493, also known as the Pavley Bill, requires that CARB develop and adopt by January 1, 2005, regulations that achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles." On June 30, 2009, the USEPA granted the waiver of CAA preemption to California for its GHG emissions standards for motor vehicles beginning with the 2009 model year. Pavley I regulates model years from 2009 to 2016 and Pavley II, which is now referred to as "LEV (Low Emission Vehicle) III GHG," regulates model years from 2017 to 2025. The Advanced Clean Cars program coordinates the goals of the LEV, Zero Emissions Vehicles (ZEV), and Clean Fuels Outlet programs, and should provide major reductions in GHG emissions. By 2025, when the rules will be fully implemented, new automobiles will emit 34 percent fewer GHGs and 75 percent fewer smog-forming emissions from their model year 2016 levels.

Assembly Bill 32 - California Global Warming Solutions Act of 2006

California's major initiative for reducing GHG emissions is outlined in AB 32, the California Global Warming Solutions Act of 2006, which was signed into law in 2006. AB 32 codifies the Statewide goal of reducing GHG emissions to 1990 levels by 2020 and required CARB to prepare a Scoping Plan that outlines the main State strategies for reducing GHGs to meet the 2020 deadline. In addition, AB 32 required CARB to adopt regulations to require reporting and verification of Statewide GHG emissions. Based on this guidance, CARB approved a 1990 Statewide GHG level and 2020 limit of 427 $MMTCO_2e$. The Scoping Plan was approved by CARB on December 11, 2008, and included measures to address GHG emissions reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures. Many of the GHG emissions reduction measures included in the Scoping Plan (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted since approval of the Scoping Plan.

In May 2014, CARB approved the first update to the AB 32 Scoping Plan. The 2013 Scoping Plan Update defined CARB's climate change priorities for the next five years and set the groundwork to reach post-2020 Statewide goals. The update highlighted California's progress toward meeting the "near-term" 2020 GHG emission reduction goals defined in the original Scoping Plan. It also evaluated how to align the State's longer-term GHG emissions reduction strategies with other State policy priorities, including those for water, waste, natural resources, clean energy, transportation, and land use.

Senate Bill 32 - California Global Warming Solutions Act of 2016

Senate Bill (SB) 32, signed into law on September 8, 2016, extended AB 32 by requiring the State to further reduce GHGs to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remained unchanged). On December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, as well as implementation of recently adopted policies and policies, such as SB 350 and SB 1383. The 2017 Scoping Plan also puts an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan Update, the 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally appropriate quantitative thresholds consistent with Statewide per capita goals of no more than 6 $MTCO_2e$ by 2030 and 2 $MTCO_2e$ by 2050.

2022 Update to the Climate Change Scoping Plan

In response to the passage of AB 1279 and the identification of the 2045 GHG emissions reduction target, CARB published the Final 2022 Climate Change Scoping Plan in November 2022 (2022 Update). The 2022 Update builds upon the framework established by the 2008 Climate Change Scoping Plan and previous updates while identifying a new, technologically feasible, cost-effective, and equity-focused path to achieve California's climate target. The 2022 Update includes policies to achieve a significant reduction in fossil fuel combustion, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon.

The 2022 Update assesses the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan; addresses recent legislation and direction from Governor Newsom; extends and expands upon these earlier plans; and implements a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045, as well as taking an additional step of adding carbon neutrality as a science-based guide for California's climate work. As stated in the 2022 Update, "the plan outlines how carbon neutrality can be achieved by taking bold steps to reduce GHGs to meet the anthropogenic emissions target and by expanding actions to capture and store carbon through the State's natural and working lands and using a variety of mechanical approaches." Specifically, the 2022 Update achieves the following:

- Identifies a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030.
- Identifies a technologically feasible, cost-effective path to achieve carbon neutrality by 2045 and a reduction in anthropogenic emissions by 85 percent below 1990 levels.
- Focuses on strategies for reducing California's dependency on petroleum to provide consumers with clean energy options that address climate change, improve air quality, and support economic growth and clean sector jobs.
- Integrates equity and protecting California's most impacted communities as driving principles throughout the document.
- Incorporates the contribution of natural and working lands to the State's GHG emissions, as well as their role in achieving carbon neutrality.
- Relies on the most up-to-date science, including the need to deploy all viable tools to address the existential threat that climate change presents, including carbon capture and sequestration, as well as direct air capture.
- Evaluates the substantial health and economic benefits of taking action.
- Identifies key implementation actions to ensure success.

In addition to reducing emissions from transportation, energy, and industrial sectors, the 2022 Update includes emissions and carbon sequestration in natural and working lands and explores how they contribute to long-term climate goals. Under the Scoping Plan Scenario, California's 2030 emissions are anticipated to be 48 percent below 1990 levels, representing an acceleration of the current SB 32 target. Cap-and-trade regulation continues to play a large factor in the reduction of near-term emissions for meeting the accelerated 2030 reduction target. Every sector of the economy will need to begin to transition in this decade to meet these GHG emissions reduction goals and achieve carbon neutrality no later than 2045. The 2022 Update approaches decarbonization from two perspectives, managing a phasedown of existing energy sources and technologies, as well as increasing, developing, and deploying alternative clean energy sources and technology.

Senate Bill 375 - 2008 Sustainable Communities and Climate Protection Act

SB 375, signed in August 2008, enhances the State's ability to reach AB 32 goals by directing CARB to develop regional GHG emission reduction targets to be achieved from passenger

vehicles by 2020 and 2035. In addition, SB 375 directs each of the State's 18 major metropolitan planning organizations to prepare a "sustainable communities strategy" (SCS) that contains a growth strategy to meet these emission targets for inclusion in the Regional Transportation Plan (RTP). On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. SCAG was assigned targets of an 8 percent reduction in GHGs from transportation sources by 2020 and a 19 percent reduction in GHGs from transportation sources by 2035. In the SCAG region, SB 375 also provides the option for the coordinated development of subregional plans by the subregional councils of governments and the county transportation commissions to meet SB 375 requirements.

Senate Bill 100 - California Renewables Portfolio Standard Program

Adopted on September 10, 2018, SB 100 supports the reduction of GHG emissions from the electricity sector by accelerating the State's Renewables Portfolio Standard Program, which was last updated by SB 350 in 2015. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

Executive Order B-55-18 to Achieve Carbon Neutrality

On September 10, 2018, Governor Brown issued Executive Order B-55-18, which established a new Statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter. This goal is in addition to the existing Statewide GHG emissions reduction targets established by SB 375, SB 32, SB 1383, and SB 100.

California Building Standards Code

California Code of Regulations Title 24 is referred to as the California Building Standards Code. It consists of a compilation of several distinct standards and codes related to building construction, including plumbing, electrical, interior acoustics, energy efficiency, and accessibility for persons with physical and sensory disabilities. These standards are updated every three years. The most recent update, the 2022 California Building Standards, went into effect on January 1, 2023.

Part 6 – Building Energy Efficiency Standards/Energy Code

California Code of Regulations Title 24, Part 6, is the Building Energy Efficiency Standards, also referred to as the California Energy Code. This code, originally enacted in 1978, establishes energy-efficiency standards for residential and nonresidential buildings to reduce California's energy demand. New construction and major renovations must demonstrate their compliance with the current Energy Code through submittal and approval of a Title 24 Compliance Report to the local building permit review authority and the California Energy Commission. The 2022 standards continue to improve upon the previous (2019) Title 24 standards for new construction of, and additions and alterations to, residential and nonresidential buildings. The 2022 Energy Code is anticipated to reduce GHG emissions by 10 $MMTCO_2e$ over the next 30 years and result in approximately $1.5 billion in consumer savings. Compliance with Title 24 is enforced through the building permit process.

Part 11 – California Green Building Standards

Title 24, Part 11, is referred to as the California Green Building Standards (CALGreen) Code and was developed to help the State achieve its GHG emissions reduction goals under AB 32 by codifying standards for reducing building-related energy, water, and resource demand, which in

turn reduces GHG emissions from energy, water, and resource demand. The CALGreen Code establishes mandatory measures for new residential and nonresidential buildings, which include energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality.

REGIONAL

SCAG Regional Transportation Plan/Sustainable Communities Strategy

SCAG formally adopted the 2020-2045 RTP/SCS (titled Connect SoCal) on September 3, 2020, to provide a roadmap for sensible ways to expand transportation options, improve air quality, and bolster Southern California's long-term economic viability. The 2020-2045 RTP/SCS builds upon the progress made through implementation of the 2016-2040 RTP/SCS and includes ten goals focused on promoting economic prosperity, improving mobility, protecting the environment, and supporting healthy/complete communities. The SCS implementation strategies include focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, and supporting implementation of sustainability policies. The SCS establishes a land use vision of center-focused placemaking, concentrating growth in and near Priority Growth Areas, transferring of development rights, urban greening, creating greenbelts and community separators, and implementing regional advance mitigation.

LOCAL

City of Santa Clarita General Plan

The Conservation and Open Space Element of the Santa Clarita General Plan includes the following goals, objectives, and policies related to GHG emissions that would be applicable to the Proposed Project:[1]

Conservation and Open Space Element: Greenhouse Gas Reduction

- Goal CO 8: Development designed to improve energy efficiency, reduce energy and natural resource consumption, and reduce emissions of greenhouse gases.
    - Objective CO 8.1: Comply with the requirements of State law, including AB 32, SB 375 and implementing regulations, to reach targeted reductions of greenhouse gas (GHG) emissions.
        - Policy CO 8.1.3: Revise codes and ordinances as needed to address energy conservation, including but not limited to the following:
            - Strengthen building codes for new construction and renovation to achieve a higher level of energy efficiency, with a goal of exceeding energy efficiency beyond that required by Title 24;
            - Adopt a Green Building Program to encourage green building practices and materials, along with appropriate ordinances and incentives;
            - Require orientation of buildings to maximize passive solar heating during cool seasons, avoid solar heat gain during hot periods, enhance natural

[1] City of Santa Clarita, General Plan, Conservation and Open Space Element, June 2011.

ventilation, promote effective use of daylight, and optimize opportunities for on-site solar generation;

- Encourage mitigation of the "heat island" effect through use of cool roofs, light-colored paving, and shading to reduce energy consumption for air conditioning.

- Objective CO 8.3: Encourage the following green building and sustainable development practices on private development projects, to the extent reasonable and feasible.

  - Policy CO 8.3.1: Evaluate site plans proposed for new development based on energy efficiency pursuant to LEED (Leadership in Energy and Environmental Design) standards for New Construction and Neighborhood Development, including the following: a) location efficiency; b) environmental preservation; c) compact, complete, and connected neighborhoods; and d) resource efficiency, including use of recycled materials and water.

  - Policy CO 8.3.2: Promote construction of energy efficient buildings through requirements for LEED certification or through comparable alternative requirements as adopted by local ordinance.

  - Policy CO 8.3.6: Require new development to use passive solar heating and cooling techniques in building design and construction, which may include but are not limited to building orientation, clerestory windows, skylights, placement and type of windows, overhangs to shade doors and windows, and use of light colored roofs, shade trees, and paving materials.

  - Policy CO 8.3.7: Encourage the use of trees and landscaping to reduce heating and cooling energy loads, through shading of buildings and parking lots.

  - Policy CO 8.3.8: Encourage energy-conserving heating and cooling systems and appliances, and energy-efficiency in windows and insulation, in all new construction.

  - Policy CO 8.3.9: Limit excessive lighting levels, and encourage a reduction of lighting when businesses are closed to a level required for security.

  - Policy CO 8.3.10: Provide incentives and technical assistance for installation of energy-efficient improvements in existing and new buildings.

  - Policy CO 8.3.11: Consider allowing carbon off-sets for large development projects, if appropriate, which may include funding off-site projects or purchase of credits for other forms of mitigation, provided that any such mitigation shall be measurable and enforceable.

  - Policy CO 8.3.12: Reduce extensive heat gain from paved surfaces through development standards wherever feasible.

City of Santa Clarita Green Building Standards Code

Santa Clarita Municipal Code Section 25.01.010 (Adoption of the City Green Building Standards Code) regulates the planning, design, operation, construction, use, and occupancy of every new

building or structure to ensure buildings have a more positive environmental impact and to encourage sustainable construction practices.

City of Santa Clarita Energy Conservation Code

Santa Clarita Municipal Code Section 24.01.010 (Adoption of the City Energy Conservation Code) regulates the design, construction, alteration, installation, or repair of building envelopes, space-conditioning systems, water-heating systems, indoor lighting systems of buildings, outdoor lighting and signage, and certain equipment to enhance the efficiency and reduce energy use of buildings.

4.7.3 THRESHOLDS OF SIGNIFICANCE

The significance thresholds used to evaluate the impacts of the Project on GHG emissions are based on Appendix G of the CEQA Guidelines. A project would have a significant impact related to GHG emissions if it would:

Threshold 4.7(a): Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and/or

Threshold 4.7(b): Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

4.7.4 METHODOLOGY

The analysis of impacts related to GHG emissions considered the improvements on the Project Site, as well as the Project's improvements off-site, including a Class I multi-purpose path along the frontage of the Project on 13th, Arch, and 12th Streets; widening of 13th Street, Arch Street, and 12th Street; installation of public hydrants along the frontage of the Project on 13th, Arch, and 12th Streets; and railroad crossing improvements at 13th Street, including the installation of a bike path/trail on the north side of the crossing, widening of the crossing at 13th Street and Railroad Avenue to accommodate the wider turning radii, installation of drainage on Railroad Avenue and 13th Street, new gates, modifications on Railroad Avenue at 13th Street to accommodate the revised intersection geometry and provide increased efficiency, implementation of ADA requirements for pedestrians, and implementation of line-of-sight requirements at the grade crossing. The analysis also considered the modifications to the Dockweiler Drive Extension Project in the immediate vicinity of the Project Site, including roadway improvements to 13th Street, Arch Street, 12th Street and Placerita Canyon Road that differ from previous approved plans, including accommodating the additional lane geometry at the Arch Street/13th Street intersection to widen the railroad crossing; construction of a pedestrian and bike bridge from the Jan Heidt Newhall Metrolink Station on Railroad Avenue to the future extension of Dockweiler Drive; and implementation of temporary storm drain improvements to accommodate surface water runoff from Dockweiler Drive prior to the completion of the Project.

The baseline against which to compare potential impacts of the Project includes the natural and anthropogenic drivers of global climate change, including worldwide GHG emissions from human activities that have increased by about 90 percent since 1970.[2] As a result, the study area for climate

[2] USEPA, Global Greenhouse Gas Emissions Data, https://www.epa.gov/ghgemissions/global-greenhouse-gas-emissions-data, accessed September 24, 2022.

change and the analysis of GHG emissions is broad. However, the study area is also limited by CEQA Guidelines Section 15064.4(b), which directs lead agencies to consider an "indirect physical change" only if that change is a reasonably foreseeable impact, which may be caused by the Project.

CEQA Guidelines Section 15064.4 recommends that lead agencies quantify GHG emissions of projects and consider several other factors that may be used in the determination of significance of GHG emissions from a project, including the extent to which the project may increase or reduce GHG emissions; whether a project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHG emissions.

CEQA Guidelines Section 15064.4 does not establish a threshold of significance. CEQA Guidelines Section 15064.7 provides lead agencies the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies or suggested by other experts, as long as any threshold chosen is supported by substantial evidence. The City of Santa Clarita has not adopted a numerical significance threshold for assessing impacts related to GHG emissions and has not formally adopted a local plan for reducing GHG emissions subsequent to 2020. Similarly, the South Coast Air Quality Management District (South Coast CAQMD), the Governor's Office of Planning and Research, CARB, California Air Pollution Control Officers Association (CAPCOA), or any other State or applicable regional agency has yet to adopt a numerical significance threshold for assessing GHG emissions that is applicable to the Project. Therefore, the significance of the Project's potential impacts with regard to GHG emissions and climate change will be assessed solely on its consistency with plans and policies adopted for the purposes of reducing GHG emissions and mitigating the effects of climate change and the Project's ability to incorporate sustainable features and strategies in its design to reduce GHG emissions. The analysis has also quantified the Project's GHG emissions for informational purposes. The methodology for quantifying GHG emissions is the same as the methodology for quantifying criteria pollutants and is discussed in detail in Section 4.2, Air Quality, of this Draft EIR.

Individual projects do not generate sufficient GHG emissions to directly influence climate change. However, physical changes caused by a project can contribute incrementally to significant cumulative effects, even if individual changes resulting from a project are limited. As a result, the issue of climate change typically involves an analysis of whether a project's contribution towards an impact would be cumulatively considerable. According to CEQA Guidelines Section 15064(h)(1), "cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects. Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem in the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans, and plans or regulations for the reduction of GHG emissions. Therefore, a lead agency can make a finding of

less-than-significant for GHG emissions if a project complies with adopted programs, plans, policies, and/or other regulatory strategies to reduce GHG emissions.

4.7.5 PROJECT DESIGN FEATURES

The following Project Design Feature is proposed with respect to GHG emissions:

PDF-GHG-1: Subject to City and other agency approvals, rooftop photovoltaic (PV) systems and solar panels will be installed for all the sound stage buildings and the support building for localized use.

4.7.6 ANALYSIS OF PROJECT IMPACTS

Threshold 4.7(a): Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Threshold 4.7(b): Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact Analysis

Quantification of Project GHG Emissions

As discussed in Subsection 4.7.4 Methodology, Project emissions are quantified for informational purposes only as there is no applicable numeric threshold.

Construction

Construction of the Project, including the off-site improvements, would generate temporary GHG emissions primarily from construction equipment, construction worker trips to and from the Project Site, and heavy trucks to transport building materials. Construction GHG emissions are typically summed and amortized over the lifetime of a project (assumed to be 30 years), then added to the operational emissions. As shown in **Table 4.7-1,** construction associated with the Project would generate 5,884 $MTCO_2e$. Amortized over a 30-year period per South Coast AQMD guidance, construction associated with the full buildout of the Project would generate 196 $MTCO_2e$ per year.

TABLE 4.7-1
PROJECT CONSTRUCTION GREENHOUSE GAS EMISSIONS

Construction Year	Emissions ($MTCO_2e$)
2023	677
2024	3,660
2025	1,457
Total	**5,884**
Amortized Over 30 Years	**196**

Notes:
$MTCO_2e$ = metric tons of carbon dioxide equivalent.
*Refer to **Appendix C** of this Draft EIR for detailed model input/output data.*
Source: Rincon Consultants Inc., 2023.

Operation

Operation of the Project would generate direct GHG emissions associated with area sources (such as landscape maintenance), energy and water usage, vehicle trips, and wastewater and solid waste generation. Annual operational emissions resulting from full buildout of the Project are summarized in **Table 4.7-2**. The summary was calculated without the incorporation of additional Renewables Portfolio Standard attainment beyond CalEEMod defaults, incorporation of AB 341, and incorporation of Title 24 requirements for the EV charging stations. Operation of the Project would generate approximately 11,373 $MTCO_2e$ per year, which includes the amortized construction emissions.

Table 4.7-2
PROJECT OPERATION GREENHOUSE GAS EMISSIONS

Emission Source	Annual Emissions ($MTCO_2e$)
Construction[a]	196
Operation	11,177
Area	<1
Energy	1,688
Mobile	8,627
Solid Waste	774
Water	12
Generators	37
Food Trucks[b]	39
Total	**11,373**

Notes:
$MTCO_2e$ = metric tons of carbon dioxide equivalent.
[a] Amortized construction-related GHG emissions over 30 years.
[b] Food truck emissions account for electricity and waste emissions only. Mobile emissions are assumed to be part of the anticipated daily emissions quantifications and are included under mobile emissions.
*Refer to **Appendix C** of this Draft EIR for detailed model input/output data.*
Source: Rincon Consultants, Inc. 2023.

Southern California Edison, the electrical service provider for the Project Site, will need to continue to annually increase renewable electricity through 2045 in order to meet the carbon-free electricity target set by SB 100. The analysis incorporates an additional reduction in electricity for the incorporation of additional renewable sources between 2022 and the operational year of 2026.[3] The Project would need to comply with AB 341, which set a target of reducing landfill waste by 75 percent by 2020, and the Title 24 standards, which require incorporation of rooftop PV systems and solar panels, as well as electric vehicle charging capabilities. The amount of solar that will be incorporated based on Title 24 requirements was not incorporated in the reductions, as the amount would be confirmed at a later stage; therefore, the operational emissions shown in Table 4.7-3 are conservative. As shown in **Table 4.7-3**, operation of the Project with the application of the reductions discussed above would generate approximately 7,252 $MTCO_2e$ per year.

[3] GHG modeling was conducted for buildout year 2025, which is a more conservative analysis due to the more stringent regulations to reduce GHG emissions that would be applicable in subsequent years.

Table 4.7-3
PROJECT OPERATION REDUCED GREENHOUSE GAS EMISSIONS

Emission Source	Annual Emissions ($MTCO_2e$)
Construction[a]	196
Operation	7,056
Area	<1
Energy	1,688
Additional Renewables Portfolio Standard Reduction	(183)
Mobile	8,627
Electric Vehicle Charging Stations	(3,357)
Solid Waste	774
Assembly Bill 341	(581)
Water	12
Generators	37
Food Trucks[b]	39
Total	**7,252**

Notes:
$4MTCO_2e$ = metric tons of carbon dioxide equivalent.
[a] Amortized construction-related GHG emissions over 30 years.
[b] Food truck emissions account for electricity and waste emissions only. Mobile emissions are assumed to be part of the anticipated daily emissions quantifications and are included under mobile emissions.
*Refer to **Appendix C** of this Draft EIR for detailed model input/output data.*
Source: Rincon Consultants, Inc. 2023.

Project Consistency with Applicable Plans

Several plans and policies have been adopted to reduce GHG emissions in the Southern California region. The Project's consistency with the State's 2022 Scoping Plan, SCAG's 2020-2045 RTP/SCS, and the City of Santa Clarita General Plan are discussed below.

2022 Scoping Plan

The 2022 Scoping Plan strategies that are applicable to the Project include reducing fossil fuel use, energy demand, and vehicle miles traveled (VMT); maximizing recycling and diversion from landfills; and increasing water conservation. The Project would be consistent with these goals through Project design, which includes complying with the latest requirements of the CALGreen Code and Building Energy Efficiency Standards, providing EV parking spaces and charging equipment, and complying with the AB 341 waste diversion goal of 75 percent. In addition, the Project would receive electricity from Southern California Edison, which is required to reduce GHG emissions by increasing procurement from eligible renewable energy by set target years. Moreover, the Project would reduce VMT and energy demand, thereby reducing GHG emissions, by constructing a large employment generator in a housing-rich area of the SCAG region, which would provide employment opportunities to those who already live near the Project Site or in the Santa Clarita Valley; providing new employment opportunities near multiple public transit options, including the Jan Heidt Newhall Metrolink Station, located less than 0.5 mile south of the Project Site and which serves as an intermodal hub for local and regional bus lines; providing on-site bicycle parking spaces to encourage alternative modes of transportation; and incorporating a number of sustainable design features, including, but not limited, to installation of energy-efficient

light fixtures, high-efficiency plumbing fixtures, EV parking spaces, and rooftop PV systems and solar panels. Therefore, the Project would be consistent with the 2022 Scoping Plan.

SCAG 2020-2045 RTP/SCS

The 2020-2045 RTP/SCS includes ten goals with corresponding implementation strategies for focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, and supporting implementation of sustainability policies. These strategies include similar measures to the 2022 Scoping Plan, such as encouraging use of EVs. The Project's consistency with the applicable 2020-2045 RTP/SCS strategies is discussed in **Table 4.7-4**. As shown therein, the Project would be consistent with the GHG emissions reduction strategies contained in the SCAG 2020-2045 RTP/SCS.

Table 4.7-4
PROJECT CONSISTENCY WITH APPLICABLE SCAG 2020-2045 RTP/SCS STRATEGIES

Reduction Strategy	Project Consistency
Focus Growth Near Destinations & Mobility Options: • Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations • Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets • Plan for growth near transit investments and support implementation of first/last mile strategies • Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses • Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods • Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations) • Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking)	**Consistent.** The Project would be constructed on a 93.5-acre parcel at the northeast corner of Railroad Avenue and 13th Street, located within the central part of the City near existing residences and commercial uses. The Project would repurpose the existing vacant site and develop a full-service film and television studio campus. The Project Site was chosen due to its proximity to existing residences and public transit. Once operational, the Project would provide services to the local area by generating approximately 2,333 direct jobs and 3,500 indirect jobs for a total of approximately 6,000 jobs. These jobs would be available to existing and future City residents, in addition to residents in surrounding communities and cities. There are several public transit options operated by multiple agencies within a half-mile south of the Project Site. For example, there are two bus stops adjacent to the western boundary of the Project Site along Railroad Avenue serviced by Santa Clarita Transit and Antelope Valley Transit Authority. Santa Clarita Transit provides local bus routes within the City while Antelope Valley Transit Authority provides transit services in the Cities of Palmdale, Lancaster, and northern Los Angeles. These bus stops are served by Routes 12 and 757 from Santa Clarita Transit and Route 790 from Antelope Valley Transit Authority. These lines also have stops at the Jan Heidt Newhall Metrolink Station, which is a half-mile south of the Project Site, or an approximate ten-minute walk to the Project entrance at the intersection of Railroad Avenue and 13th Street. There are additional Santa Clarita Transit bus routes (796, 797, and 799), the Amtrak Thruway Bus Route 1 stop, and the Antelope Valley commuter rail line stop at the Jan Heidt Newhall Metrolink Station, located at 25663 Avenue Stanford. The commuter rail provides stops from Lancaster to the Los Angeles Union Station. The Project would also provide a total of 170 bicycle storage spaces on-site for those traveling to the site via bicycle. Given the number of public transit options and the proximity of the campus to the

Table 4.7-4
PROJECT CONSISTENCY WITH APPLICABLE SCAG 2020-2045 RTP/SCS STRATEGIES

Reduction Strategy	Project Consistency
	Jan Heidt Newhall Metrolink Station, these factors would encourage future employees to travel to the Project Site via public transit. Additionally, the Project would provide catering, specialty services (e.g., car washing and detailing service), and a gym to encourage a "park once" strategy for employees and guests of the campus to reduce daily trips generated by the Project. Therefore, the Project would focus growth near public transit and provide new employment opportunities while also reducing daily trips by providing amenities on-site.
Leverage Technology Innovations: • Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space • Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments • Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation	**Consistent.** The Project would be required to comply with the EV requirements in the CALGreen Code. Additionally, the Project would utilize electric golf carts for on-site travel and install rooftop PV systems and solar panels for all the sound stage buildings and the support building for localized use. Therefore, the Project would promote low emission technologies, improve access to services through technology, and incorporate micro-power grids.
Support Implementation of Sustainability Policies: • Pursue sustainable development implementation projects that reduce GHG emissions • Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations • Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space • Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies • Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region • Continue to support long range planning efforts by local jurisdictions • Provide educational opportunities to local decision makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy	**Consistent.** The Project is an infill development within an existing urbanized area that would provide new employment opportunities near multiple public transit options. The Project would also include on-site bicycle parking spaces to encourage biking the first/last mile to and from multiple public transit options that connect to other parts of the SCAG region. The Project would be conditioned to construct a Class I trail along the Project frontage at 12th Street, Arch Street, and 13th Street and to contribute toward connections to the Jan Heidt Newhall Metrolink Station by in-lieu fees or construction. Thus, the Project would reduce per employee VMT and corresponding GHG emissions. Constructing a large employment generator in a housing-rich area of the SCAG region would also reduce commuter trips and GHG emissions by providing job opportunities to those who already live near the Project Site or in the Santa Clarita Valley. Furthermore, the Project would incorporate a number of sustainable design features, including, but not limited to, installation of energy-efficient light fixtures, high-efficiency plumbing fixtures, EV parking spaces, and rooftop PV systems and solar panels to further reduce GHG and air pollutant emissions. As such, the Project would be consistent with the 2020-2045 RTP/SCS and would not hinder implementation of Statewide legislation that aims to reduce GHG emissions. Moreover, as discussed below, the Project would be consistent with the City of Santa Clarita's

Table 4.7-4
PROJECT CONSISTENCY WITH APPLICABLE SCAG 2020-2045 RTP/SCS STRATEGIES

Reduction Strategy	Project Consistency
	General Plan and would support implementation of applicable sustainability policies.
Promote a Green Region: • Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards • Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration • Integrate local food production into the regional landscape • Promote more resource efficient development focused on conservation, recycling, and reclamation • Preserve, enhance, and restore regional wildlife connectivity • Reduce consumption of resource areas, including agricultural land • Identify ways to improve access to public park space	**Consistent.** The Project Site is on a vacant parcel within the boundaries of the City of Santa Clarita. The Project Site is located in an urbanized area of the City with residences, commercial uses, and office uses in the surrounding area. Since the area in proximity is already developed, the Project would not interfere with regional wildlife connectivity or convert agricultural land. Therefore, the Project would not interfere with the promotion and development of a green region.
Source: SCAG, 2020-2045 RTP/SCS, September 2020	

City of Santa Clarita General Plan

The City's General Plan includes Goal CO 8, which is directed at improving energy efficiency, reducing energy and natural resource consumption, and reducing GHG emissions associated with development. The Project would be required to comply with the applicable requirements of the CALGreen Code and California Energy Code, the City's Green Building Standards Code, and the City's Energy Conservation Code. The Project would be constructed in compliance with the 2022 Title 24 (CALGreen and Energy Code) standards and would be located within walking distance to the Jan Heidt Newhall Metrolink Station. In addition, the Project would include on-site amenities (private park, picnic areas, food truck stations), bicycle parking spaces, and electrical golf carts, which would contribute to vehicle trip reductions. Therefore, the Project would be consistent with the applicable goals, objectives, and policies in the City's General Plan.

Conclusion

In summary, the Project, including the off-site improvements, would be consistent with the plans, policies, regulations, and GHG emissions reduction actions/strategies outlined in the 2022 Scoping Plan Update, 2020-2045 RTP/SCS, and the Santa Clarita General Plan. Furthermore, because the Project is consistent and does not conflict with these plans, policies, and regulations, the Project's incremental increase in GHG emissions as described above would not result in a significant impact on the environment. Therefore, Project-related impacts related to GHG emissions would be less than significant.

Mitigation Measures

Impacts with regard to Thresholds 4.7(a) and 4.7(b) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Thresholds 4.7(a) and 4.7(b) were determined to be less than significant without mitigation.

4.7.7 CUMULATIVE IMPACTS

Impact Analysis

The geographic scope for related projects considered in the cumulative impact analysis for GHG emissions is global because impacts of climate change are experienced on a global scale regardless of the location of GHG emission sources. Therefore, GHG emissions and climate change are, by definition, cumulative impacts. As discussed in Subsection 4.7.1, adverse environmental impacts of cumulative GHG emissions, including sea level rise, increased average temperatures, more drought years, and more large forest fires, are already occurring. As a result, cumulative impacts related to GHG emissions are significant. Thus, the issue of climate change involves an analysis of whether a Project's contribution towards an impact is cumulatively considerable. As discussed under Subsection 4.7.6, the Project would not conflict with applicable regulations or plans and would further certain GHG emission reduction initiatives in these plans as a result of the Project's GHG emission reducing features, including proximity and access to multiple transit opportunities, location within a developed area with a mix of residential and commercial uses, incorporation of EV charging capabilities, expansion of the City's bicycle network, and generation of renewable energy with the provision of rooftop PV solar systems. Therefore, the Project's contribution to impacts related to GHG emissions and climate change would not be cumulatively considerable, and, as such, cumulative impacts would be less than significant.

Mitigation Measures

Cumulative impacts related to GHG emissions were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts related to GHG emissions were determined to be less than significant without mitigation.

4.8 HAZARDS AND HAZARDOUS MATERIALS

This section describes the existing and historical hazardous conditions of the Project Site and vicinity, discusses the regulatory framework involving hazards and hazardous materials, and analyzes the Project's potential hazards and hazardous materials impacts that could occur during Project construction and operation. The analysis in this section relies on information included in the *Phase I Environmental Site Assessment* (ESA), dated March 2020, and prepared for the Project by Environmental HELP, Inc., which is included as **Appendix H** of this Draft EIR.

4.8.1 ENVIRONMENTAL SETTING

Hazardous substances are defined by State and federal regulations as substances that must be regulated in order to protect public health and the environment. Hazardous materials have certain chemical, physical, or infectious properties that cause them to be hazardous. California Code of Regulations (CCR) Title 22, Division 4.5, Chapter 11, Article 2, Section 66261.10 defines a hazardous material as a substance or combination of substances which, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may either "cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible illness; or pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported, or disposed of or otherwise managed."

According to Title 22 (CCR Chapter 11, Article 3), substances having the characteristics of toxicity (i.e., poisonous), ignitability (i.e., can be ignited by open flame), corrosivity (i.e., corrode other materials), or reactivity (i.e., react violently, explode, or generate vapors when mixed with water) are considered hazardous. Hazardous wastes are hazardous substances that no longer have a practical use, such as material that has been abandoned, discarded, spilled, or contaminated, or which is being stored prior to disposal.

Toxic substances may cause short-term or long-term health effects, ranging from temporary effects to permanent disability or death. Examples of toxic substances include most heavy metals, pesticides, benzene, gasoline, hexane, natural gas, sulfuric acid, lye, explosives, pressurized canisters, and radioactive and biohazardous materials. Soils may also be toxic because of accidental spilling of toxic substances.

EXISTING PROJECT SITE CONDITIONS

The Project Site is located at the northeastern corner of Railroad Avenue and 13th Street and bounded by 12th Street, Arch Street, and 13th Street on the south; a railroad right-of-way (ROW) and Railroad Avenue on the west; Metropolitan Water District (MWD) ROW on the east; and slopes maintained by the adjacent residential uses to the north. The Project Site comprises an undeveloped piece of land that has been cleared of the majority of its natural vegetation. Although the Project Site is vacant under existing conditions, there are signs of past disturbance because the site has previously been used for parking, outdoor events, movie sets, and fire department helicopter landings.

The northern portion of the Project Site, which contains the Placerita Creek bed and is characterized by native and non-native vegetation, is located within a Very High Fire Hazard Severity Zone/Local Responsibility Area where fire protection is the responsibility of the Los

Angeles County Fire Department (LACoFD).[1] Hilly, undeveloped terrain is located farther north of the Project Site, beyond Placerita Creek, which may be susceptible to wildfire that could spread toward the Project Site under the right weather conditions.

HISTORICAL USES ON THE PROJECT SITE AND THE SURROUNDING AREA

The Project Site, adjoining properties, and surrounding area include various current and past uses and conditions. The Project Site has been undeveloped since early 1947. Residential uses have been developed on the adjoining properties as early as 1947, and various office, commercial, and retail uses have been developed as early as 1959. The historical aerial photographs from 1947 and 1959 show the Project Site as vacant land with roadways. The Phase I ESA did not identify any prior developed land uses or any farming or agricultural uses within the Project Site boundaries.

ENVIRONMENTAL DATABASE SEARCH RESULTS

The Project Site is not listed in any of the State or federal environmental databases that were searched as part of the Phase I ESA. The Phase I ESA included a review of federal, State, tribal, and local databases that identify underground fuel tank sites, leaking underground fuel tank sites, hazardous waste generation sites, and hazardous waste storage and disposal facility sites within the American Society for Testing and Materials (ASTM) International approximate minimum search radii that range from approximately 300 feet to 1 mile.

The Phase I ESA identified eight nearby sites of potential concern as listed in **Table 4.8-1**. The sites were evaluated and found to have no ability to impact the Project Site, had closed cases according to the GeoTracker or EnviroStor databases, or were not likely to contaminate the Project Site based on location. None of the eight sites represent a recognized environmental condition (REC), historical recognized environmental condition (HREC), or controlled recognized environmental condition (CREC) in connection with the Project Site. The ASTM Standard Practice E1527-13, which identifies standard practice for environmental site assessments, defines an REC, HREC, and CREC, as follows:

- An REC is the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.
- An HREC is a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (e.g., property use restrictions, activity and use limitations, institutional controls, or engineering controls).
- A CREC is an REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (e.g., as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (e.g., property use restrictions, activity and use limitations, institutional controls, or engineering controls).

[1] California Department of Forestry and Fire Prevention, Very High Fire Hazard Severity Zones in the LRA, Santa Clarita, 2011.

TABLE 4.8-1
ENVIRONMENTAL STATUS OF NEARBY SITES OF CONCERN

Site Name	Site Location	Environmental Status
LAC Budget Rent-A-Car	24743 Railroad Avenue	UST; Not an active permit – Removed; Cross-gradient Not an *REC*
LAC M&B Automotive	24953 Railroad Avenue	DPW Removed File No Further Action letter issued 9/27/19 Not an *REC*
Just For You Laundromat	24725 Railroad Avenue	Active No Notices of Violation Co-op Self-Service Not an *REC*
LAC LACoFD Fire Station #73	24875 Railroad Avenue	2015 CERS File Closed Permit Not Active Not an *REC*
LAC R C Becker & Sons Inc	22422 W 12th Street	Permit Not Active File Removed Not an *REC*
LA CO DPW Road Rd 553C	22310 Placerita Canyon Road	DPW Removed File Case closed 6/9/92 Not an *REC*
LAC Newhall School District/ Facilities	22245 Placerita Canyon Road	File Closed No Longer Active Permit Case Closed 6/9/92 Not an *REC*
Newhall School District	22245 Placerita Canyon Road	Active UST Permit No Reported Leaks Not an *REC*
Notes: REC = Recognized Environmental Condition *CREC = Controlled Recognized Environmental Condition* *HREC = Historical Recognized Environmental Condition*		

HAZARDOUS MATERIALS AND WASTE GENERATION

The Project Site is undeveloped and, therefore, there are no hazardous materials used or hazardous waste generated on the Project Site. Based on the site reconnaissance conducted as part of the Phase I ESA, one debris pile of non-hazardous waste was observed, but no evidence of past or present handling of oil or hazardous materials or presence of underground storage tanks (USTs) was found on the Project Site. Furthermore, asbestos containing materials (ACM) or materials containing lead-based paint (LBP) and polychlorinated biphenyls (PCB) were not observed because there are no existing structures on the Project Site. Accordingly, no evidence of hazardous or unidentified substances was observed on the Project Site. Similarly, no evidence of dry wells, irrigation wells, injection wells, abandoned wells, or other wells was found on the Project Site during site reconnaissance. The closest groundwater well is located approximately 0.25 mile southwest of the Project Site. Due to the absence of potential contamination and no evidence of RECs on the Project Site, soil sampling was not conducted.

Several sites within 0.25 mile of the Project Site were recorded to have USTs or aboveground (fuel) storage tanks (ASTs); however, no evidence of significant unauthorized releases was identified or observed on the Project Site. The AST/UST sites are either cross-gradient, down-gradient, located at sufficient distances from the Project Site, or the USTs have been removed and the cases closed.

4.8.2 REGULATORY AND PLANNING FRAMEWORK

FEDERAL

Occupational Safety and Health Act of 1970

The Occupational Safety and Health Act of 1970, which is implemented by the federal Occupational Safety and Health Administration (OSHA), contains provisions for the handling of hazardous materials. OSHA was created to ensure safe and healthful working conditions by setting and enforcing standards and by providing training, outreach, education, and assistance. OSHA provides standards for general and construction industry on hazardous waste operations and emergency response. OSHA requirements, as set forth in Title 29 of Code of Federal Regulations (CFR) Section 1910, et. seq., are designed to promote worker safety, worker training, and a worker's right–to-know.

Hazardous Materials Transportation Act

The U.S. Department of Transportation prescribes strict regulations for the safe transportation of hazardous materials including requirements for hazardous waste containers and licensed haulers who transport hazardous waste on public roads. The Secretary of the Department of Transportation receives the authority to regulate the transportation of hazardous materials from the Hazardous Materials Transportation Act (HMTA) as amended and codified in Title 49 of United States Code (USC) Section 5101 et seq. The HMTA was enacted in 1975 and serves the purpose of protecting against "the risks to life, property, and the environment that are inherent in the transportation of hazardous material in intrastate, interstate, and foreign commerce." The HMTA was passed to improve the uniformity of existing regulations for transporting hazardous materials and to prevent spills and illegal dumping from endangering the public and the environment. In addition, it requires drivers be trained in function and commodity specific requirements and requires vehicles transporting certain quantities of hazardous materials to display placards.

STATE

California Environmental Protection Agency

The California Environmental Protection Agency (CalEPA) has been granted primary responsibility by the U.S. Environmental Protection Agency (USEPA) for administering and enforcing hazardous materials management plans within California. The Department of Toxic Substances Control (DTSC), a division of CalEPA, regulates hazardous waste. The DTSC defines a hazardous material as a waste with a chemical composition or other properties that make it capable of causing illness, death, or some other harm to humans and other life forms when mismanaged or released into the environment. California regulations governing hazardous materials include detailed planning and management requirements to ensure that hazardous materials are properly handled, stored, and disposed of in order to reduce human health risks. In particular, the State has acted to regulate the transfer and disposal of hazardous waste. Hazardous waste haulers are required to comply with regulations that establish numerous standards, including criteria for handling, documenting, and labeling the shipment of hazardous waste. Hazardous waste treatment, storage, and disposal facilities are also regulated and must meet standard criteria for processing, containment, and disposal of hazardous materials.

California Division of Occupational Safety and Health

The U.S. Department of Labor has delegated the authority to administer OSHA regulations to the State of California. The California OSHA program (Cal/OSHA) (codified in CCR Title 8 and in Labor Code Sections 6300-6719) is administered and enforced by the Division of Occupational Safety and Health. Cal/OSHA is very similar to the federal OSHA program in that it is responsible for developing and enforcing workplace safety standards and ensuring worker safety in the handling and use of hazardous materials. Among other requirements, Cal/OSHA requires entities handling specified amounts of certain hazardous chemicals to prepare injury and illness prevention plans and chemical hygiene plans and provides specific regulations to limit exposure of construction workers to lead.

REGIONAL

South Coast Air Quality Management District Rule 1113

The South Coast Air Quality Management District (South Coast AQMD) Rule 1113, Architectural Coatings, requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings. The South Coast AQMD primarily achieves emission reductions by placing limits on the VOC content of various coating categories.

LOCAL

Los Angeles County Certified Unified Program Agency

The Los Angeles County CUPA is managed by the Los Angeles County Fire Department (LACoFD) Health Hazardous Materials Division. The Health Hazardous Materials Division administers the following programs in Los Angeles County:

- Hazardous Waste Generator Program
- Hazardous Materials Release Response Plans and Inventory Program
- California Accidental Release Prevention Program
- Aboveground Petroleum Storage Tank Program
- Underground Storage Tank Program

Los Angeles County Municipal Code, Title 32, Fire Code

The Los Angeles County Municipal Code, Title 32, contains regulations consistent with the California Fire Code and nationally recognized accepted practices for safeguarding, to a reasonable degree, life and property from the hazards of fire and explosion; hazardous conditions in the use or occupancy of buildings or premises; and dangerous conditions arising from the storage, handling, and use of hazardous materials and devices. Additionally, the Fire Code addresses wildland fire prevention items that pertain to the adequate provision of access roads and road widths, the clearance of brush, and the inclusion of defensible space in wildland fire risk areas.

City of Santa Clarita General Plan

The applicable goals, objectives, and policies from the City of Santa Clarita General Plan Safety, Land Use, and Circulation Elements pertaining to hazards and hazardous materials are listed below.[2]

Safety Element: Fire Hazards

- Goal S 3: Protection of public safety and property from fires.
    - Objective S 3.2: Provide for the specialized needs of fire protection services in both urban and wildland interface areas.
        - Policy S 3.2.1: Identify areas of the Santa Clarita Valley that are prone to wildland fire hazards and address these areas in fire safety plans.
        - Policy 3.2.2: Enforce standards for maintaining defensible space around structures through clearing of dry brush and vegetation.
        - Policy S 3.2.3: Establish landscape guidelines for fire prone areas with recommended plant materials and to provide this information to builders and members of the public.
        - Policy S 3.2.4: Require sprinkler systems, fire resistant building materials, and other construction measures deemed necessary to prevent loss of life and property from wildland fires.
        - Policy S 3.2.5: Ensure adequate secondary and emergency access for fire apparatus, which includes minimum requirements for road width, surface material, grade, and staging areas.

Safety Element: Hazardous Materials

- Goal S 4: Protection of public safety and property from hazardous materials.
    - Objective S 4.1: Identify sites that are contaminated with chemicals and other hazardous materials and promote clean-up efforts.
        - Policy S 4.1.2: Coordinate with other agencies to address contamination of soils and groundwater from hazardous materials on various sites and require that contamination be cleaned up to the satisfaction of the City and other responsible agencies prior to issuance of any permits for new development.

Land Use Element: Healthy Neighborhoods

- Goal LU 3: Healthy and safe neighborhoods for all residents.
    - Objective LU 3.3: Ensure that the design of residential neighborhoods considers and includes measures to reduce impacts from natural or man-made hazards.
        - Policy LU 3.3.2: In areas subject to wildland fire danger, ensure that land uses have adequate setbacks, fuel modification areas, and emergency access routes.

[2] City of Santa Clarita, General Plan, Safety Element, May 2022; Land Use Element, June 2011; Circulation Element, June 2011.

Circulation Element: Street and Highway System

- Goal C 2: A unified and well-maintained network of streets and highways which provides safe and efficient movement of people and goods between neighborhoods, districts, and regional centers, while maintaining community character.
    - Objective C 2.5: Consider the needs for emergency access in transportation planning.
        - Policy C 2.5.2: Ensure that new development is provided with adequate emergency and/or secondary access for purposes of evacuation and emergency response; require two points of ingress and egress for every subdivision or phase thereof, except as otherwise approved for small business subdivisions where physical constraints preclude a second access point.

2021 Santa Clarita Local Hazard Mitigation Plan

The City of Santa Clarita 2021 Local Hazard Mitigation Plan (HMP) serves the purposes of documenting known hazards and identifying community actions that can be implemented over the short and long term to reduce future risk and loss in the City. The HMP was prepared in response to the Disaster Mitigation Act of 2000, and the 2021 HMP is a federally mandated update that ensures continuing eligibility for the Hazard Mitigation Grant Program funding. The HMP addresses several key topics, including the following:

- Planning Process: Provides a record of public process and involvement from committee members and stakeholders;
- Community Profile: Presents the history, geography, demographics, and socioeconomics of the City to provide historical context of hazards;
- Hazard Identification and Risk Assessment: Provides information on hazard identification, vulnerability, and risk associated with hazards in the City; and
- Mitigation Strategy: Describes existing mitigation and the mitigation process.

In addition, the HMP addresses the process of plan review, evaluation, implementation, and adoption. The HMP provides context and planning for hazard identification, risk, and mitigation strategies for wildfires, earthquakes, energy disruption, drought, severe weather events, pandemics, man-made hazards, such as cyber-attacks and terrorism, the release of hazardous materials, landslides, and flooding.

4.8.3 THRESHOLDS OF SIGNIFICANCE

The significance thresholds used to evaluate the impacts of the Project related to hazards and hazardous materials are based on Appendix G of the CEQA Guidelines and the City's Initial Study Checklist.

CEQA GUIDELINES APPENDIX G

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to hazards and hazardous materials if it would:

Threshold 4.8(a): Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;

Threshold 4.8(b): ***Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment;***

Threshold 4.8(c): ***Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;***

Threshold 4.8(d): ***Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment;***

Threshold 4.8(e): ***Result in a safety hazard for people residing or working in the project area for a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport;***

Threshold 4.8(f): ***Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and/or***

Threshold 4.8(g): ***Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.***

CITY'S INITIAL STUDY CHECKLIST

In addition, in accordance with the City's Initial Study Checklist, a project would have a significant impact related to hazards and hazardous materials if it would:

Threshold 4.8(h): ***Result in a safety hazard for people residing or working in the project area for a project within the vicinity of a private airstrip; or***

Threshold 4.8(i): ***Expose people to existing sources of potential health hazards (e.g., electrical transmission lines, gas lines, oil pipelines).***

ISSUES NOT EVALUATED FURTHER

The Project would not result in significant impacts related to the following significance thresholds from Appendix G of the CEQA Guidelines or the City's Initial Study Checklist as determined in the Initial Study (**Appendix A**); therefore, they are not evaluated further in this Draft EIR:

Threshold 4.8(e): ***Result in a safety hazard for people residing or working in the project area for a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport;***

Threshold 4.8(h): ***Result in a safety hazard for people residing or working in the project area for a project within the vicinity of a private airstrip; or***

Threshold 4.8(i): ***Expose people to existing sources of potential health hazards (e.g., electrical transmission lines, gas lines, oil pipelines).***

4.8.4 METHODOLOGY

The analysis of potential hazards and hazardous materials impacts due to disturbance of soils that may have been contaminated by past land use activities is based on the Phase I ESA that was prepared in conformance with the scope and limitations of USEPA Regulation found in 40 CFR Part 312 – All Appropriate Inquiries, and the ASTM Standard Practice E1527-13.

The Phase I ESA included a site reconnaissance and interviews as well as reviews of State environmental databases, standard historical sources, physical setting sources, and records on the California Geologic Energy Management Division (CalGEM) website. Analysis of possible impairment of an adopted emergency response plan or emergency response plan is based on a review of the City's HMP. Assessment of impacts involving wildland fire hazards is addressed in Section 4.17, Wildfire, of this Draft EIR.

4.8.5 PROJECT DESIGN FEATURES

No Project Design Features are proposed with respect to hazards and hazardous materials.

4.8.6 ANALYSIS OF PROJECT IMPACTS

Threshold 4.8(a): Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Impact Analysis

As discussed in Subsection 4.8.1, Environmental Setting, materials are generally considered hazardous if they are poisonous (toxicity), can be ignited by open flame (ignitability), corrode other materials (corrosivity), or react violently, explode, or generate vapors when mixed with water (reactivity). The transportation, use, storage, and disposal of such materials are closely regulated by State and federal laws, as described in Subsection 4.8.2, Regulatory and Planning Framework.

Construction

Project construction activities, including those associated with the proposed off-site improvements, would be temporary in nature and involve the limited transport, storage, use, and disposal of hazardous materials. Such hazardous materials could include on-site fueling/servicing of construction equipment and the transport of fuels, lubricating fluids, and solvents. The use, handling, and storage of these materials could increase the opportunity for hazardous materials releases and, subsequently, the exposure of people and the environment to hazardous materials. However, the storage, handling, and disposal of these materials are regulated by the DTSC, USEPA, OSHA, LACoFD, and the Los Angeles County Department of Public Health. In addition, the Project, including the use of paint and solvent on proposed buildings, would comply with South Coast AQMD Rule 1113. The transport, use, and disposal of construction-related hazardous materials would occur in accordance with applicable federal, State, and local regulations governing such activities and, as a result, would not create a significant hazard to the public or the environment. Therefore, short-term construction impacts regarding hazards and hazardous materials would be less than significant.

Operation

The Project Site is currently undeveloped and vacant, and hazardous materials are not used or stored on the Project Site. Long-term operation of the Project would involve the limited transport, storage, use, and disposal of hazardous materials related to studio operations, such as set or stage work in the sound stages, cleaning, and landscaping maintenance, as well as operations of the parking structure, support building, office building, and catering building. These operations could use hazardous materials, including cleaning products; paints, solvents, adhesives, and other chemical materials used in building maintenance, interior improvements, and set building; automotive lubricants; small combustion engine fuels and lubricants; pesticides and herbicides; and electronic waste, all of which are typical of commercial land uses. The level of hazardous materials usage required for a commercial development would not present a significant threat to the environment because the Project would not include the routine transport, use, or disposal of hazardous materials at volumes or concentrations that require special provisions, permits, or approvals, such as those required for certain industrial land uses. The storage, handling, and disposal of the materials anticipated to be used by the Project would be regulated by the applicable regulatory authorities, including the DTSC, USEPA, OSHA, LACoFD, and the Los Angeles County Department of Public Health. The transport, use, and disposal of operation-related hazardous materials would occur in accordance with applicable federal, State, and local regulations governing such activities. Therefore, potential impacts related to the routine transport, use, or disposal of hazardous materials during Project operation would be less than significant.

Mitigation Measures

Impacts with regard to Threshold 4.8(a) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.8(a) were determined to be less than significant without mitigation.

Threshold 4.8(b): Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Impact Analysis

As discussed in Threshold 4.8(a), hazardous materials are not currently used, stored, or generated on the Project Site because it is undeveloped. In addition, the Project Site does not present any RECs as determined by the Phase I ESA. In addition to the lack of hazardous materials currently on the Project Site, the Phase I ESA did not identify any evidence of past treatment, storage, disposal, or generation of hazardous substances; USTs or ASTs; PCBs; heating or cooling equipment; waste disposal systems; ACMs; structures containing LBP; sources of odor; stressed vegetation; or evidence of dry wells, irrigation wells, injection wells, abandoned wells, or other wells on the Project Site. The Phase I ESA identified one construction debris pile within the Project Site; however, there is no evidence that hazardous materials are present within this debris pile. This debris pile would be removed as part of the initial Project Site clearance in the construction program and disposed of through an arrangement with the local trash disposal company. The Phase I ESA identified eight nearby sites of potential concern. However, these

sites were evaluated and were found to have no ability to impact the Project Site, or have closed cases according to the GeoTracker or EnviroStor databases, or were not likely to contaminate the Project Site based on location. None of the eight sites represent an REC in connection with the Project Site.

Construction activities, including those associated with the implementation of the off-site improvements, may include refueling and minor maintenance of construction equipment on-site and off-site, which could lead to minor fuel and oil spills. However, the Project would implement materials management control practices, consisting of procedural and structural best management practices (BMP) for the handling, storing, and use of hazardous materials during Project construction and operation to prevent the release of those materials into the environment. These would include, but are not limited to, stockpile management, spill prevention and control, solid waste management, and hazardous waste management. These construction control measures are discussed further in Section 4.9, Hydrology and Water Quality, of this Draft EIR.

Because there is no evidence that the Project Site contains contaminated soils that could be upset and released during ground-disturbing activities and the Project would implement BMPs for the handling of hazardous materials, and, since Project operation does not include the storage of hazardous materials other than commercially available facility maintenance products, there would not be a significant hazard to the public involving the accidental release of hazardous materials into the environment during Project construction or operation. As such, impacts would be less than significant.

Mitigation Measures

Impacts with regard to Threshold 4.8(b) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.8(b) were determined to be less than significant without mitigation.

Threshold 4.8(c): Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Impact Analysis

The Project Site is located within 0.25 mile of Newhall Elementary School and approximately 0.30 mile from Placerita Junior High School and William S. Hart High School. As discussed in Threshold 4.8(a), the Project would involve the routine transport, use, and disposal of limited quantities of hazardous materials related to studio operations, such as set or stage work in the sound stages, cleaning, and landscaping maintenance, as well as operations for the parking structure, support building, office building, and catering building. While the Project would be located within 0.25 mile of an existing school, all handling and disposal of hazardous materials would be regulated by local and State laws enforced by authorized agencies.

As discussed in Section 4.2, Air Quality, of this Draft EIR, the Project, including the off-site improvements, would not result in significant levels of localized air pollutant emissions during construction or operation or expose sensitive receptors to substantial pollutant concentrations. The on-site construction emissions of carbon monoxide, nitrogen oxides, and respirable and fine

particulate matter would not exceed South Coast AQMD localized significance thresholds screening levels during any phase of construction. In addition, the levels of local concentrations of air pollutants during construction and operation were analyzed at a distance of 164 feet from the Project Site for nitrogen oxides and 82 feet for the remaining pollutants. Emission levels would be lower at Newhall Elementary School because the school is located greater than 164 feet from the Project Site and due to atmospheric dispersion that takes place over distance. Since the localized thresholds were developed by the South Coast AQMD as a method of assessing the potential for adverse health impacts to sensitive members of the population, this is an indication that the Project's construction and operation emissions would not result in hazardous conditions to nearby sensitive receptors, including the closest schools. As such, impacts related to hazardous emissions, materials, substances, or waste within one-quarter mile of an existing or proposed school would be less than significant.

Mitigation Measures

Impacts with regard to Threshold 4.8(c) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.8(c) were determined to be less than significant without mitigation.

Threshold 4.8(d): Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Impact Analysis

The Project Site is currently vacant. The Phase I ESA conducted for the Project identified eight nearby sites of potential concern; however, these sites were evaluated and were found to have no ability to impact the Project Site. In addition, the Phase I ESA determined that the Project Site is not listed in any city, county, State, or federal environmental hazard databases. Therefore, the Project would not be located on a hazardous materials site and would not result in a hazard to the public or the environment. As such, impacts would be less than significant.

Mitigation Measures

Impacts with regard to Threshold 4.8(d) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.8(d) were determined to be less than significant without mitigation.

Threshold 4.8(f): Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Impact Analysis

Both the City and County emergency plans provide operational concepts, describe responsibilities, and outline procedures for emergency response. The County has adopted an

Operational Area Emergency Response Plan, which describes the planned responses to emergencies associated with natural and man-made disasters and technological incidents. The emergency management responses identified in this plan are specific to Los Angeles County agencies. In addition, the City of Santa Clarita has adopted and implemented the National Incident Management System, which provides a proactive, systematic approach to guide government departments and the private sector to work seamlessly to prevent, protect against, respond to, recover from, and mitigate effects of man-made and natural incidents.

The City's HMP, described above in Subsection 4.8.2, Regulatory and Planning Framework, provides a framework for communications, decisions, and actions by emergency response personnel during emergencies. The command structure would assess local conditions in a dynamic, ongoing manner to identify locations and severity of threats to homes and businesses and any other land uses that are associated with man-made or natural incidents. Based on those assessments, decisions would be made at a local level regarding when and/or where to implement emergency evacuations. In relation to emergency evacuation, the Santa Clarita Valley has freeway access along three routes—Interstate 5 and State Route 14 going north and south and State Route 126 going east and west—to use in the event of an emergency, such as a fire or an earthquake. In addition, detour routes can be established through the Santa Clarita Valley if the local freeways are closed. An emergency could require partial or total evacuation of the Project Site and/or sheltering in place for some parts of the community. The City's existing emergency response system would be sufficient to address emergency evacuation scenarios in the event of natural or man-made incidents in the Project area that result in a need to evacuate some or all of the existing residents of the adjacent communities and future Project employees.

The Project would utilize several exits in the event of evacuation, including the main entrance and two other access-controlled gates, one located immediately east of the main entrance at the eastern leg of the intersection of Arch Street and 13th Street, and one along 12th Street immediately east of the proposed gym building. The Project would also provide off-site improvements for trails, roadways, a pedestrian and bike bridge, and a railroad crossing along with modifications to the Dockweiler Drive Extension Project in conjunction with the Project. If necessary, local evacuation routes could be adjusted based on instruction from local emergency management authorities. Project development would not adversely affect or physically interfere with the emergency response protocols established by the City's HMP or current best practices. Therefore, the Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant. Impacts related to wildland fire evacuation and related ingress/egress are further discussed in Section 4.17, Wildfire.

Mitigation Measures

Impacts with regard to Threshold 4.8(f) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.8(f) were determined to be less than significant without mitigation.

Threshold 4.8(g): Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Impact Analysis

As stated above, the northeastern portion of the Project Site is located within a Fire Zone as designated on the City of Santa Clarita Fire Zone Map. Wildland fire hazards are discussed in detail in Section 4.17, Wildfire, of this Draft EIR. As discussed therein, the Project would be designed to comply with the Los Angeles County Fire Code standards, which require removal of existing flammable vegetation and replacement with fuel management zones that provide non-flammable buffer areas around homes and living spaces, sufficient emergency vehicle access and sufficient emergency escape outlets from the project site, ignition resistant building materials, and adequate water supply and pressure to support fire engine pumping units. As identified in Project Design Features PDF-WF-1 and PDF-WF-2 in Section 4.17, Wildfire, of this Draft EIR, a construction fire prevention plan would be implemented to require training of construction crews to prevent and respond to accidental fires and restrict activities that could result in accidental ignitions and complete installation of fuel management zones and hydrants prior to delivery of combustible materials to the Project Site. As stated above, the City's existing Local HMP and emergency response and evacuation management procedures are considered to be effective and would be sufficient to respond to potential threats to the proposed project site and surrounding neighborhoods, in the event of local wildland fires spreading into the Project area. Given all of these design features, compliance with regulatory requirements as detailed in Section 4.17, Wildfire, of this Draft EIR, and the existing wildland fire emergency response resources and command procedures in place, the project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires. As such, impacts related to wildland fires would be less than significant

Mitigation Measures

Impacts with regard to Threshold 4.8(g) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.8(g) were determined to be less than significant without mitigation.

4.8.7 CUMULATIVE IMPACTS

Impact Analysis

As detailed in Section III, Environmental Setting, of this Draft EIR, there would be a total of 36 related projects in the Project area that propose varying levels of development, redevelopment, or modifications to existing land uses or structures in the Project vicinity. Development of the Project, in combination with the related projects, has the potential to increase the risk for an accidental release of hazardous materials. Each of the related projects would be required to evaluate any potential threats to public safety, including those associated with the use, storage, and/or disposal of hazardous materials, ACMs, LBP, PCBs, and oil and gas. Related projects would be required to comply with all applicable local, State, and federal laws, rules, and regulations as discussed above in Subsection 4.8.2, Regulatory and Planning Framework. Because environmental safety issues are largely site-specific, this evaluation would occur on a case-by-case basis for each individual project affected in conjunction with development proposals on these properties. Therefore, with compliance with all applicable local, State, and federal laws,

rules, and regulations, as well as implementation of site-specific recommendations for the Project, significant cumulative impacts related to hazards and hazardous materials would not occur. As such, the Project would not have a cumulatively considerable contribution to a significant cumulative impact, and, as such, cumulative impacts would be less than significant.

Mitigation Measures

Cumulative impacts related to hazards and hazardous materials were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts related to hazards and hazardous materials were determined to be less than significant without mitigation.

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4.9 HYDROLOGY AND WATER QUALITY

This section describes the existing surface water and groundwater hydrology, as well as water quality within the Project Site and vicinity; discusses the regulatory framework involving hydrology and water quality; and assesses Project impacts involving water quality, drainage, and flooding. This section relies on information included in the *Hydrology Report, City of Santa Clarita, Shadowbox Studios (Offsite),* dated August 2022, the *Hydrology Report, City of Santa Clarita, Shadowbox Studios,* dated September 2022, and the *Low Impact Development Report*, dated September 2022, all prepared by Alliance Land Planning & Engineering. The section also utilizes information included in the *Stormwater Pollution Prevention Plan*, dated April 2022, prepared by Storm Water Resources, Inc.; and the *Hydraulic and Sediment Transport Analyses for Blackhall Studios*, dated January 19, 2022, prepared by Chang Consultants. These reports are included in **Appendix I** of this Draft EIR.

4.9.1 ENVIRONMENTAL SETTING

REGIONAL

Surface Water

Hydrology

Throughout the Santa Clarita Valley, there are many natural streams and creeks that function as storm drain channels, conveying surface runoff into the Santa Clara River. From its headwaters in the San Gabriel Mountains to its mouth at the Pacific Ocean, the Santa Clara River drains a watershed of 1,643 square miles. Ninety percent of the river's watershed consists of mountainous terrain, while the remaining portion is a mix of valley floor, floodplain, and coastal plain. Within the headwater areas of the City, discharge during rainfall events tends to be rapid due to the steep terrain. High intensity rainfalls, in combination with alluvial soils, sparse vegetation, erosion, and steep gradients, can result in substantial debris-laden flash floods.

The Santa Clara River and its tributary streams play a major part in moving a large volume of runoff generated from the valley and surrounding foothills and mountains. The drainage system, including natural streams, as well as constructed storm drain infrastructure within the City, is adequate to handle normal precipitation in the region (8 to 22 inches per year). With the rapid urbanization of the Santa Clarita Valley since 1960, stormwater volumes have increased due to an increase in impervious surface area from parking lots, rooftops, and streets. Flood control facilities have been constructed to alleviate the impacts of development on drainage patterns throughout the City. Some streams have been channelized into soft bottom channels with concrete sides to allow for development in the floodplain of the Santa Clara River.[1]

Water Quality

The Project Site is located approximately 2.3 miles south of the Santa Clara River (Reach 6) within the Santa Clara Watershed. The Santa Clara River (Reach 6), which is under the jurisdiction of the Los Angeles Regional Water Quality Control Board (LARWQCB), is not listed for water quality impairment on the most recent Clean Water Act Section 303(d) List of Impaired

[1] City of Santa Clarita, General Plan - One Valley One Vision, Draft Program EIR, Section 3.12, Hydrology and Water Quality, September 2010.

Waters for sediment and pH but is impacted regionally by urban and natural runoff with the pollutants of chlorpyrifos, coliform bacteria, diazinon, toxicity, and chloride.[2] These pollutants impact the beneficial uses, which include groundwater recharge, water contact and non-contact recreation, freshwater replenishment, and wildlife habitat.[3]

Maintaining the surface water quality of the Santa Clara River is the responsibility of both the County of Los Angeles and the City of Santa Clarita through National Pollutant Discharge Elimination System (NPDES) permits issued by the LARWQCB and other programs, such as public outreach.

Groundwater

Hydrology

Groundwater is concentrated into natural hydrogeological units called basins. An aquifer is a subsurface area where water collects, concentrates, and can be extracted within a basin. Multiple aquifers may be located within each basin. The two major groundwater basins underlying the Santa Clarita Valley are the Santa Clara River Valley Groundwater Basin (East Subbasin) and the Acton Valley Groundwater Basin. The East Subbasin encompasses the upper Santa Clara River Valley and comprises two aquifer systems, the Alluvium (also referred to as the Alluvial Aquifer) and the Saugus Formation. The Alluvial Aquifer generally underlies the Santa Clara River and its tributaries, and the Saugus Formation underlies nearly the entire Upper Santa Clara River area. Groundwater from the East Subbasin generally flows from east to west, following the movement of the Santa Clara River. The East Subbasin is the sole source of local groundwater for urban water supply in the City of Santa Clarita.

As up to 80 percent of the average annual precipitation occurs between November and March, most groundwater infiltration is in the form of winter-storm flow. However, the East Subbasin is also replenished by percolation from irrigation of agricultural lands, urban irrigation, septic tanks and leach field systems, and treated effluent from water reclamation plants.

The Acton Valley Groundwater Basin encompasses approximately 17 square miles and is bounded by the Sierra Pelona Mountains on the north and the San Gabriel Mountains on the south, east, and west. Groundwater in the Acton Valley Groundwater Basin is unconfined and found in alluvium and stream terrace deposits. The regional direction of groundwater flow is in a southwesterly direction toward Soledad Canyon. Replenishment of the Acton Valley Groundwater Basin is through percolation of direct rainfall and infiltration of surface water runoff, agriculture and irrigation, and septic tanks.

Natural or soft bottom drainage channels and wide natural floodways and floodplains maximize the groundwater recharge and help to replenish the aquifers. As an unchannelized river, the Santa Clara River and its tributaries provide opportunities for groundwater recharge. The best available

[2] Storm Water Resources, Inc, Stormwater Pollution Prevention Plan for Shadowbox Studios-Santa Clara, April 2022; Los Angeles Regional Water Quality Control Board, Santa Clara River Watershed Impaired Waters, https://www.waterboards.ca.gov/losangeles/water_issues/programs/regional_program/Water_Quality_and_Watersheds/santa_clara_river_watershed/303.shtml, 2018, accessed November 18, 2022.

[3] Los Angeles Regional Water Quality Control Board, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, 2014.

evidence shows that no adverse impacts on basin recharge have occurred due to the existing or projected use of local groundwater supplies.[4]

Water Quality

The East Subbasin and the Acton Valley Groundwater Basin are the two major groundwater basins underlying the Santa Clarita Valley, where the Project Site is located. The quality of groundwater of these basins is compared to water quality objectives set by the LARWQCB, while monitoring is performed by the Santa Clarita Valley Water Agency (SCV Water). Constituents occurring in the groundwater of these basins include total dissolved solids, chloride, nitrate, and sulfate.[5] Long-term groundwater quality monitoring data for these constituents show a consistent pattern of meeting drinking water standards although groundwater quality appears to be intermittently affected by wet and dry cycles, and constituent levels are trending upward due to increased human activity. Additionally, groundwater quality in the Santa Clarita Valley is impacted by perchlorate and volatile organic compounds, which are due to anthropogenic activity.

As previously stated, SCV Water is responsible for groundwater monitoring and working with regulatory agencies, specifically the California Department of Toxic Substances Control (DTSC) and LARWQCB, to respond appropriately to detections of pollutants and constituents of concern exceeding the maximum contaminant levels (MCLs). If MCL limits are exceeded or pollutants are detected, wells are taken out of service, and wellhead treatment systems are utilized.

Flooding

Two areas, which include portions of Sand Canyon and Placerita Canyon, within the City are known to have periodic flooding problems. During storm events, transmission of storm flows within the street rights-of-way may cause localized flooding making some roads impassable (e.g., Sand Canyon Road and Placerita Canyon Road). However, most streets in the City are designed to accommodate stormwater flow.

Along with heavy, prolonged rainfall, flooding within the City could also occur due to the leakage or collapse of nearby dams, the rupture of the Los Angeles Aqueduct, or on a smaller scale, within areas that have been cleared of vegetation by fires or mudslides. However, within the City, the primary flood hazard areas occur in and along natural drainage channels within the 100-year floodplain.[6]

LOCAL

Surface Water

The Project Site is currently undeveloped land, bordered by 12th Street, Arch Street, and 13th Street on the south; a railroad right-of-way and Railroad Avenue on the west; Metropolitan Water District right-of-way on the east; and slopes maintained by the adjacent residential uses to the north. Placerita Creek traverses the northern portion of the Project Site with grades sloping downward to a detention basin.

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4 City of Santa Clarita, General Plan - One Valley One Vision, Draft Program EIR, Section 3.12, Hydrology and Water Quality, September 2010.

5 Santa Clara River Valley East Groundwater Subbasin Groundwater Sustainability Plan, Section 5, Groundwater Conditions, January 2022.

6 City of Santa Clarita, General Plan - One Valley One Vision, Draft Program EIR, Section 3.12, Hydrology and Water Quality, September 2010.

The Project Site is located within flatland terrane with the exception of the north-northeastern portion of the Project Site, which has moderate to steep south-southwestern facing hillside terrain.[7] The elevation of the Project Site ranges from approximately 1,257 to 1,315 feet above mean sea level. The Project Site is bisected by the west-flowing Placerita Creek at the northerly side of the Project Site. Placerita Creek flows into the northwest-flowing Newhall Creek, creating the South Fork of the Santa Clara River.

Surface drainage currently flows to the west-northwest and southwest at the Project Site's northernmost side to either Placerita Creek or Newhall Creek, and ultimately to the Santa Clara River and the Pacific Ocean. Stormwater is conveyed through surface runoff. The existing drainage area extends east and upstream, then flows over land where it crosses under 12th Street via an existing 48-inch publicly maintained pipe for small or medium storms. The drainage area flows over land and across 12th Street via the same pipe for large storms. Stormwater discharges from the Project Site are not considered direct discharges, as defined by the State Water Resources Control Board. Section 303(d) of the federal Clean Water Act (CWA) requires states to identify water bodies that are "impaired" or those that do not meet water quality standards and are not supporting their beneficial uses. The Project Site discharges to the Santa Clara River Reach 6, which is not listed for water quality impairment on the most recent CWA Section 303(d) List of Impaired Waters for sediment and pH.[8]

Groundwater

Groundwater was not encountered in any excavations on-site to a depth of 98 feet. Historic high groundwater is greater than 65 feet and is not anticipated to be encountered or have an effect on the Project Site during site grading. The groundwater gradient is toward the west-northwest portion of the Project Site.[9]

Flooding

A portion of the Project site is located within a Federal Emergency Management Agency (FEMA) Zone A floodplain.[10] Zone A areas have a one-percent annual chance of flooding, which is also called the 100-year flood. For the Project Site, this floodplain is associated with Placerita Creek and covers the area from the creek and extending north to the base of the ridge north of Placerita Creek.

4.9.2 REGULATORY AND PLANNING FRAMEWORK

FEDERAL

Clean Water Act

The CWA, formerly known as the Water Pollution Control Act, was first introduced in 1948 with major amendments in 1961, 1966, 1970, 1972, 1977, and 1987. The CWA authorizes federal, State, and local entities to cooperatively create comprehensive programs for eliminating or

[7] Flatland terrane: A fault-bounded area or region with a distinctive stratigraphy, structure, and geological history.
[8] Storm Water Resources, Inc, Stormwater Pollution Prevention Plan for Shadowbox Studios-Santa Clara, April 2022.
[9] LGC Valley, Inc. Geotechnical Consulting, Geologic and Geotechnical Engineering Investigation, September 2021.
[10] Federal Emergency Management Agency, FEMA's National Flood Hazard Layer Viewer; Search by Address, https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd, accessed November 2022.

reducing the pollution of State waters and tributaries. Amendments enacted in 1970 created the U.S. Environmental Protection Agency (USEPA), while amendments enacted in 1972 established the NPDES permit program, which prohibits discharge of pollutants into the nation's waters without procurement of a NPDES permit from the USEPA. Although federally mandated, the NPDES permit program is generally administered at the State level.

Amendments enacted in 1977 mandated development of a Best Management Practices (BMP) Program at the state level and renamed the Water Pollution Control Act to the CWA, which is universally used today. The CWA was amended in 1987 to require the USEPA to create specific requirements for discharges. In response to the 1987 amendments, Phase I of the USEPA NPDES Program required NPDES permits for (1) municipal separate storm sewer systems (MS4) permits generally serving, or located in, incorporated cities with 100,000 or more people (referred to as municipal permits); (2) 11 specific categories of industrial activity (including landfills); and (3) construction activity that disturbs five acres or more of land. As of March 2003, Phase II of the NPDES Program extended the requirements for NPDES permits to numerous small MS4s, construction sites of one to five acres, and industrial facilities owned or operated by small MS4s, which were previously exempted from permitting.

The USEPA delegated the responsibility of administering portions of the CWA to state and regional agencies, including the State of California. In California, the NPDES stormwater permitting program is administered by the State Water Resources Control Board (SWRCB). The SWRCB was created by the California legislature in 1967. The joint authority of water distribution and water quality protection allows the SWRCB to provide protection for the State's waters, through its nine RWQCBs. The RWQCBs develop and enforce water quality objectives and implement plans that will best protect California's waters, acknowledging areas of different climate, topography, geology, and hydrology. The RWQCBs develop "basin plans" for their hydrologic areas, issue waste discharge requirements, enforce action against stormwater discharge violators, and monitor water quality.

National Flood Insurance Program

The National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973 mandate FEMA to evaluate flood hazards. FEMA provides flood insurance rate maps (FIRM) for local and regional planners to promote comprehensive land use and development practices by identifying potential flood areas based on the current conditions. To delineate a FIRM, FEMA conducts engineering studies referred to as flood insurance studies. Using information gathered in these studies, FEMA engineers and cartographers delineate special flood hazard areas (SFHA) on FIRMs. In addition, the Flood Disaster Protection Act requires owners of all structures in these identified SFHAs to purchase and maintain flood insurance as a condition of receiving federal or federally-related financial assistance, such as mortgage loans from federally-insured lending institutions. Community members within designated areas are able to participate in the National Flood Insurance Program (NFIP), managed by FEMA and offered to the public by a network of insurance companies.

Federal Antidegradation Policy

The Federal Antidegradation Policy (40 Code of Federal Regulations 131.12), incorporated into the CWA, requires states to develop and identify methods for implementing Statewide antidegradation policies. Pursuant to the Code of Federal Regulations, State antidegradation policies and implementation methods shall, at a minimum, protect and maintain (1) existing in-

stream water uses; (2) existing water quality, where the quality of the waters exceeds levels necessary to support existing beneficial uses, unless the State finds that allowing lower water quality is necessary to accommodate economic and social development in the area; and (3) water quality in waters considered as an outstanding national resource.

Safe Drinking Water Act

The Safe Drinking Water Act (SDWA) is the primary federal law that ensures the quality of the nation's drinking water. The SDWA was originally passed by Congress in 1974 to protect public health by regulating the nation's public drinking water supply and its sources: rivers, lakes, reservoirs, springs, and groundwater wells. Under SDWA, the USEPA sets standards for drinking water quality and oversees the states, localities, and water suppliers that implement the standards. The USEPA has delegated the California Department of Public Health the responsible agency for administering California's drinking water program. The SDWA regulates contaminants of concern in domestic water supply, such as maximum contaminant levels, which are established under the Title 22 Standards.

STATE

Porter-Cologne Water Quality Act (California Water Code)

The Porter-Cologne Water Quality Control Act, also known as Division 7 of the California Water Code (CWC), established the principal legal and regulatory framework for California's water quality control. The CWC authorizes the SWRCB to implement the provisions of the CWA, including the authority to regulate waste disposal and require cleanup of discharges of hazardous materials and other pollutants.

Under the CWC, the State of California is divided into nine RWQCBs, which govern the implementation and enforcement of the CWC and the CWA. The Project Site is located within Region 4, also known as the Los Angeles Region, and governed by the Los Angeles RWQCB (LARWQCB). The RWQCBs develop and enforce water quality objectives and implement plans that will best protect California's waters, acknowledging areas of different climate, topography, geology, and hydrology. Each RWQCB is required to formulate and adopt a water quality control plan or basin plan for its region, and is given authority to issue waste discharge requirements, enforce actions against stormwater discharge violators, and monitor water quality. The basin plan must adhere to the policies set forth in the CWC and established by the SWRCB. The LARWQCB developed the Los Angeles Basin Plan (Basin Plan) on August 29, 2014, for the Coastal Watersheds of Los Angeles and Ventura Counties.

California Antidegradation Policy

In 1968, the SWRCB adopted the California Antidegradation Policy, otherwise known as the Statement of Policy with Respect to Maintaining High Quality Water in California. Unlike the Federal Antidegradation Policy, the California Antidegradation Policy applies to all waters of the State, not just surface waters. The policy states that whenever the existing quality of a water body is better than the quality established in individual basin plans, the higher quality shall be maintained. In addition, discharges to that water body shall not unreasonably affect present or anticipated beneficial use of the water resource.

California Toxic Rule

In 2000, the California Environmental Protection Agency (CalEPA) promulgated the California Toxic Rule, which establishes water quality criteria for certain toxic substances to be applied to waters in the State. CalEPA promulgated this rule based on their determination that the numeric criteria of specific concentrations of regulated substances are necessary for the State to protect human health and the environment. The California Toxics Rule establishes acute (i.e., short-term) and chronic (i.e., long-term) standards for bodies of water, such as inland surface waters, enclosed bays, and estuaries, that are designated by the RWQCBs as having beneficial uses that are protective of aquatic life or human health.

Sustainable Groundwater Management Act of 2014

The Sustainable Groundwater Management Act of 2014 (SGMA) requires the designation of groundwater sustainability agencies (GSAs) by one or more local agencies and the adoption of groundwater sustainability plans (GSPs) for basins designated as medium- or high-priority by the California Department of Water Resources (DWR). SGMA grants new powers to GSAs, including the power to adopt rules, regulations, ordinances, and resolutions; regulate groundwater extractions; and impose fees and assessments. SGMA also allows the SWRCB to intervene if local agencies will not or do not meet the SGMA requirements, in addition to mandating that critically over-drafted basins be sustainable by 2040, and be designated as medium or high priority by 2042.

California Green Building Standards Code

The California Green Building Standards (CALGreen) Code, Part 11 of the California Building Standards Code (Title 24), is designed to improve public health, safety, and general welfare by utilizing design and construction methods that reduce the negative environmental impact of development and encourage sustainable construction practices. The CALGreen Code provides mandatory direction to developers of all new construction of residential and nonresidential structures with regard to all aspect of design and construction, including, but not limited to, site drainage design, stormwater management, and water use efficiency. Required measures are accompanied by a set of voluntary standards designed to encourage developers and cities to aim for a higher standard of development.

REGIONAL

Los Angeles Regional Water Quality Control Board Basin Plan

As required by the CWC, the LARWQCB has adopted the Basin Plan which addresses the following objectives:

- Designates beneficial uses for surface and ground waters;
- Sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's Antidegradation Policy; and
- Describes implementation programs to protect all waters in the Los Angeles Region.

In addition, the Basin Plan incorporates (by reference) all applicable State and LARWQCB plans and policies and other pertinent water quality policies and regulations. The Basin Plan is a resource for the LARWQCB, entities who use water and/or discharge wastewater in the Los

Angeles Region, and other agencies and organizations involved in environmental permitting and resource management activities.

NPDES Permit Program

The NPDES permit program was first established under authority of the CWA to control the discharge of pollutants from any point source into the waters of the United States. As discussed, in California, the NPDES stormwater permitting program is administered by the SWRCB through its nine RWQCBs. The joint authority of water distribution and water quality protection allows the Board to provide protection for the State's waters through the RWQCBs. The LARWQCB issues combined NPDES permits under the CWA and waste discharge requirements (under the CWC) to point dischargers of waste to surface waters. To ensure protection of water quality, NPDES permits may contain effluent limitations for pollutants of concern, pollutant monitoring frequencies, reporting requirements, schedules of compliance when appropriate, operating conditions, BMPs, and administrative requirements. NPDES permits apply to publicly-owned treatment works discharges, industrial wastewater discharges, and municipal, industrial, and construction site stormwater discharges. Further discussion of the LARWQCB stormwater discharge permitting activities is provided below.

Construction General Permit

The SWRCB has issued a Statewide NPDES Construction General Permit for stormwater discharges associated with construction activities (known as the Construction General Permit [SWRCB Order No. 2009-0009-DWQ]). Order No. 2009-0009-DWQ was amended by Order No. 2010-0014-DWQ in November 2010 and by Order No. 2012-0006-DWQ in July 2012.[11] Dischargers whose projects disturb one or more acres of soil or whose projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres are required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity. Construction activity subject to this permit includes clearing, grading, and ground disturbance, (e.g., stockpiling or excavation) but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The main objectives of the Construction General Permit are to:

- Reduce erosion;
- Minimize or eliminate sediment in stormwater discharges;
- Prevent materials used at a construction site from contacting stormwater;
- Implement a sampling and analysis program;
- Eliminate unauthorized non-stormwater discharges from construction sites;
- Implement appropriate measures to reduce potential impacts on waterways both during and after construction of projects; and
- Establish maintenance commitments on post-construction pollution control measures

California requires all construction activities disturbing more than one acre of land to develop and implement Stormwater Pollution Prevention Plans (SWPPP). The SWPPP documents the

[11] State Water Resources Control Board, 2009-0009-DWQ Construction General Permit Fact Sheet, January 2013.

selection and implementation of BMPs for a specific construction project, charging owners with stormwater quality management responsibilities. A construction site subject to the Construction General Permit must prepare and implement a SWPPP that meets the requirements of the Construction General Permit.

LOCAL

Los Angeles County Hydrology Manual

The Los Angeles County Department of Public Works' (LACDPW) Hydrology Manual provides a basis of design for storm drainage facilities.[12] The LACDPW's Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm event and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. Areas with sump conditions are required to have a storm drain conveyance system capable of conveying flow from a 50-year storm event.[13] Los Angeles County also limits the allowable discharge into existing storm drain facilities based on its MS4 permit, which is enforced on all new developments that discharge directly into the MS4 system.

As required by LACDPW, all public storm facilities must be designed in conformity with the standards set forth by Los Angeles County. LACDPW reviews and approves MS4 plans prior to construction. Any proposed increases in discharge directly into Los Angeles County facilities, or proposed improvements of Los Angeles County-owned MS4 facilities, such as catch basins and drainage lines, require approval from the Los Angeles County Flood Control District (LACFCD) to ensure compliance with the municipal NPDES permit requirements.

Los Angeles County Sedimentation Manual

The Los Angeles County Sedimentation Manual established LACDPW's sedimentation design criteria. The procedures and standards contained in the Sedimentation Manual were developed by LACDPW as the need arose to design erosion control structures, sediment retention structures, and channels carrying sediment-laden flows. These sedimentation techniques are applicable in the design of local debris basins, storm drains, retention and detention basins, and channel projects within Los Angeles County.

Los Angeles County MS4 Permit

The State's Municipal Storm Water Permitting Program regulates stormwater discharges from MS4s. Under Phase I of the Program, which began in 1990, the RWQCBs have adopted NPDES stormwater permits for medium (serving between 100,000 and 250,000 people) and large (serving minimum 250,000 people) municipalities. Most of these permits were issued to a group of co-permittees encompassing an entire metropolitan area.

In 2001, the LARWQCB issued an NPDES Permit and Waste Discharge Requirements (Order No. 01-182) under the CWA and the Porter-Cologne Act for discharges of urban runoff in public storm drains in Los Angeles County. The NPDES permit was amended on April 14, 2011, pursuant to the peremptory writ of mandate in Los Angeles Superior Court Case No. BS122724, which voided and set aside a 2006 amendment. The permittees are the Los Angeles County incorporated cities (including the City of Los Angeles but excluding the City of Long Beach) and

[12] Los Angeles County Department of Public Works, Hydrology Manual, 2006.
[13] Sump condition: A condition where water is restricted to an inlet area because the inlet is located at a low point.

the County (collectively the co-permittees). An important element incorporated into the NPDES MS4 permit is the requirements associated with development or redevelopment of a site. The NPDES MS4 permit requires many development projects to incorporate permanent (post-construction) stormwater management facilities/techniques to reduce the quantity and improve the quality of stormwater runoff that leaves a site.

To implement the requirements of the NPDES permit, the co-permittees have created development planning guidance and control measures that control and mitigate stormwater quality and quantity impacts to receiving waters as a result of new development and redevelopment. The co-permittees are also required to implement other municipal source detection and elimination programs, as well as maintenance measures.

Enhanced Watershed Management Program

The City of Santa Clarita, Los Angeles County, and LACFCD jointly developed an Enhanced Watershed Management Program (EWMP), which allows collaboration among agencies on multi-beneficial regional projects to retain both non-stormwater and stormwater runoff, as well as facilitating flood control and increase water supply. Nearly 90 percent of the Upper Santa Clara River Watershed (USCRW) is open space, with approximately 88 percent being undeveloped land and containing one of the last remaining natural rivers in Southern California. The USCRW presents unique challenges for maintaining the balance of population growth, conserving endangered species habitat and wildlife corridors, and managing floodplains and water supply that depend on the Santa Clara River and its floodplain. The EWMP has been developed to protect these beneficial uses of the USCRW receiving waters, while recognizing these unique characteristics.

Santa Clarita Valley Groundwater Sustainable Agency Groundwater Sustainability Plan

The Santa Clarita Valley Groundwater Sustainable Agency (SCV-GSA) is responsible for sustainably managing groundwater in the East Subbasin. In January 2022, SCV Water, the City of Santa Clarita, Los Angeles County, and the Los Angeles County Waterworks District No. 36 signed a legal agreement to collaborate as the SCV-GSA. The SCV-GSA GSP provides information regarding the East Subbasin's setting; quantitative methods for evaluating the health of the East Subbasin; monitoring networks, projects and management actions to achieve sustainability; and the implementation plan for the GSP. The GSP assembles historical data and studies conducted in the East Subbasin relating to water demand, water supply, and water quality over the past five decades. The GSP also considers the interests of all those who depend on groundwater in the East Subbasin, including domestic well owners, agricultural interests, municipal well owners and operators, and interest groups and individuals who work to protect groundwater dependent ecosystems.

City of Santa Clarita Stormwater and Urban Runoff Pollution Control (SCMC Chapter 10.04)

Section 10.04.070 (Construction Activity Stormwater Measures) of Chapter 10.04 of the Santa Clarita Municipal Code (SCMC) identifies specific requirements related to water runoff and discharges during construction within the City. These requirements include, but are not limited to, the implementation of a grading and construction activity runoff control program adequate to accomplish the following:

- Retain on-site the sediments generated on or brought to the project site, using treatment control or structural BMPs;
- Retain construction-related materials and wastes, spills, and residues at the project site and prevent discharges to streets, drainage facilities, the MS4, receiving waters, or adjacent properties;
- Contain non-stormwater runoff from equipment and vehicle washing at the project site; and
- Control erosion from slopes and channels through use of effective BMPs, such as limitation of grading during the wet season; inspection of graded areas during rain events; planting and maintenance of vegetation on slopes, if any; and covering any slopes susceptible to erosion.

City of Santa Clarita Floodplain Management Ordinance (SCMC Chapter 10.06)

The City of Santa Clarita participates in the NFIP. The intention of the NFIP is to reduce the financial devastation caused by flooding in communities across the United States. The NFIP is a voluntary program based on a mutual agreement between FEMA and a local community. Participation in the program makes federally-backed flood insurance available to City residents and allows them to obtain direct federal relief following declared flood disasters.

In cooperation with FEMA, the City has adopted a Floodplain Management Ordinance (Chapter 10.06 of the SCMC), which governs development in the City's floodplains. In order to remain an NFIP community, the City must regulate development in its flood hazard areas per the requirements of the Floodplain Management Ordinance along with other various technical documents published by FEMA. In order to accomplish reducing flood losses, the Floodplain Management Ordinance requires the following:

- Restrict or prohibit uses which are dangerous to health, safety, and property due to water or erosion hazards, or which result in damaging increases in erosion or flood heights or velocities;
- Require that uses vulnerable to floods, including facilities that serve such uses, be protected against flood damage at the time of initial construction;
- Control the alteration of natural floodplains, stream channels, and natural protective barriers, which help accommodate or channel floodwaters;
- Control filling, grading, dredging and other development, which may increase flood damage; and
- Prevent or regulate the construction of flood barriers, which will unnaturally divert floodwaters or which may increase flood hazards in other areas.

City of Santa Clarita Stormwater Mitigation Plan Implementation (SCMC Chapter 17.95)

Chapter 17.95 of the SCMC identifies certain requirements for post-construction stormwater activities for development projects to comply with the NPDES and MS4 permits. This chapter requires that each project develop and implement a mitigation plan to lessen the water quality impacts of development by using smart growth practices, BMPs, and to integrate Low Impact

Development (LID) design principles to mimic pre-development hydrology conditions through infiltration, evapotranspiration, rainfall harvest, and use.

4.9.3 THRESHOLDS OF SIGNIFICANCE

The significance thresholds used to evaluate the impacts of the Project on hydrology and water quality are based on Appendix G of the CEQA Guidelines and the City's Initial Study Checklist.

CEQA GUIDELINES APPENDIX G

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to hydrology and water quality if it would:

Threshold 4.9(a): ***Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality;***

Threshold 4.9(b): ***Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;***

Threshold 4.9(c): ***Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:***

- ***i. Result in substantial erosion or siltation on- or off-site;***
- ***ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; or***
- ***iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or***
- ***iv. Impede or redirect flood flows.***

Threshold 4.9(d): ***In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; and/or***

Threshold 4.9(e): ***Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.***

CITY'S INITIAL STUDY CHECKLIST

In addition, in accordance with the City's Initial Study Checklist, a project would have a significant impact related to hydrology and water quality if it would:

Threshold 4.9(f): ***Otherwise substantially degrade water quality.***

Threshold 4.9(g): ***Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.***

Threshold 4.9(h): ***Place within a 100-year flood hazard area structures which would impede or redirect flood flows.***

Threshold 4.9(i): ***Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam.***

Threshold 4.9(j): ***Result in changes in the rate of flow, currents, or the course and direction of surface water and/or groundwater.***

Threshold 4.9(k): ***Result in other modification of a wash, channel creek, or river.***

Threshold 4.9(l): ***Impact stormwater management in any of the following ways:***

- ***i. Potential impact of project construction and project post-construction activity on stormwater runoff.***
- ***ii. Potential discharges from areas for materials storage, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling or storage, delivery areas or loading docks, or other outdoor work areas.***
- ***iii. Significant environmentally harmful increase in the flow velocity or volume of stormwater runoff.***
- ***iv. Significant and environmentally harmful increases in erosion of the Project Site or surrounding areas.***
- ***v. Stormwater discharges that would significantly impair or contribute to the impairment of the beneficial uses of receiving waters or areas that provide water quality benefits (e.g., riparian corridors, wetlands, etc.).***
- ***vi. Cause harm to the biological integrity of drainage systems, watersheds, and/or water bodies.***
- ***vii. Include provisions for the separation, recycling, and reuse of materials both during construction and after project occupancy.***

ISSUES NOT EVALUATED FURTHER

The Proposed Project would not result in a significant impact related to the following significance thresholds from Appendix G of the CEQA Guidelines or the City's Initial Study Checklist, as determined in the Initial Study (**Appendix A**), which are, therefore, not evaluated further in this Draft EIR:

Threshold 4.9(g): ***Would the Project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?***

Threshold 4.9(i): ***Would the Project expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?***

Threshold 4.9(l): ***Would the Project impact stormwater management in any of the following ways:***

vii. Include provisions for the separation, recycling, and reuse of materials both during construction and after project occupancy?

4.9.4 METHODOLOGY

The analysis of Project impacts is based on the Hydrology Report, LID Report, Hydraulic Analysis Technical Memorandum, and the SWPPP prepared for the Proposed Project, included in the **Appendix I** of this Draft EIR

The analysis of impacts related to hydrology and water quality considered the improvements on the Project Site, as well as the Project's improvements off-site, including a Class I multi-purpose path along the frontage of the Project on 13th, Arch, and 12th Streets; widening of 13th Street, Arch Street, and 12th Street; installation of public hydrants along the frontage of the Project on 13th, Arch, and 12th Streets; and railroad crossing improvements at 13th Street, including the installation of a bike path/trail on the north side of the crossing, widening of the crossing at 13th Street and Railroad Avenue to accommodate the wider turning radii, installation of drainage on Railroad Avenue and 13th Street, new gates, modifications on Railroad Avenue at 13th Street to accommodate the revised intersection geometry and provide increased efficiency, implementation of ADA requirements for pedestrians, and implementation of line-of-sight requirements at the grade crossing. The analysis also considered the modifications to the Dockweiler Drive Extension Project in the immediate vicinity of the Project Site, including roadway improvements to 13th Street, Arch Street, 12th Street and Placerita Canyon Road that differ from previous approved plans, including accommodating the additional lane geometry at the Arch Street/13th Street intersection to widen the railroad crossing; construction of a pedestrian and bike bridge from the Jan Heidt Newhall Metrolink Station on Railroad Avenue to the future extension of Dockweiler Drive; and implementation of temporary storm drain improvements to accommodate surface water runoff from Dockweiler Drive prior to the completion of the Project.

The Hydrology Report was prepared to assess the existing and proposed drainage conditions, both on-site and off-site. The Hydrology Report utilized the methods currently outlined in the Los Angeles County's Hydrology Manual. The County's HydroCalc software was used to calculate time of concentration (TC) values.[14] To calculate TCs, HydroCalc uses a subarea's acreage, flow path length/slope, amount of imperviousness, and additional hydrologic parameters specific to the Project Site. Flow rates were calculated using the Modified Rational Method and County's LAR04 software.[15]

The LID Report was prepared to assess the existing and proposed drainage conditions at the Project Site, as well as to address requirements of the Urban Stormwater Mitigation Plan (USMP). The County's HydroCalc software was used to calculate the required stormwater quality design

[14] The time required for runoff to travel from the hydraulically most distant point in the watershed to the outlet.
[15] The volume of fluid which passes per unit time.

volume and stormwater quality design flow rate as prescribed by the LID Standards Manual of the LACDPW.

The Hydraulic and Sediment Transport Analyses Report was prepared to establish the proposed condition 100-year water surface elevation and determine the potential for creek erosion on the Project Site.

4.9.5 PROJECT DESIGN FEATURES

No Project design features are proposed with respect to hydrology and water quality.

4.9.6 ANALYSIS OF PROJECT IMPACTS

Threshold 4.9(a): ***Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?***

Threshold 4.9(f): ***Would the Project otherwise substantially degrade water quality?***

Threshold 4.9(l.ii): ***Would the Project impact stormwater management through potential discharges from areas for materials storage, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling or storage, delivery areas or loading docks, or other outdoor work areas?***

Threshold 4.9(l.v): ***Would the Project impact stormwater management through stormwater discharges that would significantly impair or contribute to the impairment of the beneficial uses of receiving waters or areas that provide water quality benefits (e.g., riparian corridors, wetlands, etc.)?***

Threshold 4.9(l.vi): ***Would the Project impact stormwater management by causing harm to the biological integrity of drainage systems, watersheds, and/or water bodies?***

Impact Analysis

Construction

Construction activities on and off the Project Site could contribute to pollutants in stormwater runoff that flows into Placerita Creek, Newhall Creek, or local storm drains. Construction activities would include, but not be limited to, vegetation removal, soil excavation, installation of utilities, building construction, and use of construction equipment and vehicles. Pollutant categories associated with these activities may include nutrients, metals, synthetic organics (e.g., adhesives, cleaners, sealants, and solvents), oil and grease, and gross pollutants (e.g., trash, debris, floatables). The primary pollutants of concern anticipated for the Proposed Project are associated with landscaped areas, private driveways, buildings, and trash enclosures.

The Project Site would disturb greater than one acre of land. Therefore, a SWPPP has been prepared and would be implemented for the Project to comply with the NPDES Construction General Permit. The SWPPP includes specific BMPs for pre-construction, during construction,

and post-construction. The following BMPs would be applied to manage and control soil erosion during construction:

- Preserve existing vegetation where required and when feasible;
- Control the area of soil disturbing operations such that the contractor is able to implement erosion control BMPs quickly and effectively;
- Stabilize non-active areas within 14 days of cessation of construction activities or sooner if stipulated by local requirements;
- Control erosion in concentrated flow paths by applying erosion control blankets, check dams, erosion control seeding or alternate methods; and
- Prior to the completion of construction, apply permanent erosion control to remaining disturbed soil areas.

In addition, the Project would implement sediment controls to complement the erosion control BMPs, such as a sediment basin, silt fence, and check dam. The Project would also include non-stormwater controls for non-stormwater discharges, as well as material management controls, to prevent the release of construction materials or pollutants into stormwater discharges. Therefore, with the implementation of the BMPs identified in the SWPPP and sediment controls proposed by the Project in compliance with the Construction General Permit, construction of the Project, including the off-site improvements, would not (1) violate any water quality standards or waste discharge requirements; (2) otherwise substantially degrade surface or groundwater quality; (3) impact stormwater management through potential discharges from areas for materials storage, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling or storage, delivery areas or loading docks, or other outdoor work areas; (4) impact stormwater management through the impairment of the beneficial uses of receiving waters or areas that provide water quality benefits; or (5) impact stormwater management that would cause harm to the biological integrity of drainage systems, watersheds, and/or water bodies. As such, construction impacts would be less than significant.

Operation

The Project would implement stormwater treatment features to satisfy the City's USMP requirements for water quality control. Pursuant to these requirements, the Project would incorporate an infiltration and drainage basin, multiple catch basins, covered trash storage areas, and landscape designed to minimize or eliminate runoff. On-site runoff from the Project Site would be captured in a closed pipe system and conveyed to Placerita Creek. Prior to discharging into Placerita Creek, the first-flush runoff would be routed through the underground infiltration chambers or infiltration/drainage basin proposed for the Project. Additionally, a portion of the off-site stormwater, during peak storm events, would be routed to the infiltration/drainage basin. The existing stormwater flows from 13th Street would be conveyed through the Project Site to the existing downstream Metrolink drain lines. The 13th Street drainage system is part of the City's Dockweiler Roadway plans and would be maintained by the LACFCD.

In addition, the SWPPP provides post-construction BMPs, which are permanent measures installed during construction, designed to reduce or eliminate pollutant discharges from the site after construction is completed. The Project would implement post-construction BMPs, such as

continuous deflective separation units to trap pollutants, infiltration chambers, water quality basins, and infrastructure maintenance. Therefore, with the implementation of stormwater treatment control BMPs, operation of the Project would not (1) violate any water quality standards or waste discharge requirements; (2) otherwise substantially degrade surface or groundwater quality; (3) impact stormwater management through potential discharges from areas for materials storage, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling or storage, delivery areas or loading docks, or other outdoor work areas; (4) impact stormwater management through the impairment of the beneficial uses of receiving waters or areas that provide water quality benefits; or (5) impact stormwater management that would cause harm to the biological integrity of drainage systems, watersheds, and/or water bodies. As such, the Project would result in less-than-significant impacts related to surface or groundwater quality.

Mitigation Measures

Impacts with regard to Thresholds 4.9(a), 4.9(f), 4.9(l.ii), 4.9(l.v), and 4.9(l.vi) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Thresholds 4.9(a), 4.9(f), 4.9(l.ii), 4.9(l.v), and 4.9(l.vi) were determined to be less than significant without mitigation.

Threshold 4.9(b): Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?

Impact Analysis

As discussed in Section 4.6, Geology and Soils, of this Draft EIR, groundwater was not encountered in any on-site excavations extending to a depth of 98 feet. Historic high groundwater is greater than 65 feet and is not anticipated to be encountered or have an effect on the Project during site grading. Therefore, no disruption to any existing groundwater production would result during Project construction. In addition, according to the Hydraulic Analysis Technical Memorandum prepared for the Project, there is a surplus in primary water supply under existing conditions for the Project. The Project is anticipated to result in an incremental increase in the maximum day demand (MDD) of 278 gpm. With implementation of the Project, there would still be adequate groundwater and imported water supply to meet the primary supply criteria. The existing sources of water supply would be capable of supplying the MDD for the Project while providing sufficient storage volume replacement. Furthermore, the Project would incorporate BMPs to reduce or eliminate any impacts to groundwater, including slope drains which would intercept and direct surface runoff or groundwater into a stabilized watercourse, trapping device, or stabilized area; and streambank stabilization measures, such as vegetated buffers on slopes to trap sediment and promote groundwater recharge. Therefore, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin. As such, impacts would be less than significant.

Mitigation Measures

Impacts with regard to Threshold 4.9(b) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.9(b) were determined to be less than significant without mitigation.

Threshold 4.9(c.i): Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?

Threshold 4.9(l.i): Would the Project potentially impact stormwater management through project construction and project post-construction activity on stormwater runoff?

Threshold 4.9(l.iv): Would the Project impact stormwater management through significant and environmentally harmful increases in erosion of the Project Site or surrounding areas?

Impact Analysis

Construction

Construction activities for the Project would include grading, which would be balanced on-site in terms of its cut and fill quantities, currently based on approximately 400,000 cubic yards of cut. This would involve grading a portion of the base of the ridgeline north of Placerita Creek to improve the parking layout north of the creek and to eliminate the need for soil import. In addition, shrubs and/or trees would be planted in the graded area to provide soil stabilization. Such activities would have the potential to disturb existing on-site drainage patterns during the construction phase. Although Project grading may alter current surface runoff patterns, thus resulting in a temporary increase in the potential for on-site erosion or sedimentation to occur, the Project would be subject to requirements of the NPDES Construction General Permit and the Project-specific SWPPP. As discussed in Threshold 4.9(a), the SWPPP would include construction BMPs for erosion and sediment control. With implementation of these BMPs, construction activities associated with the Project, including the off-site improvements, would not result in significant and environmentally harmful increases in erosion of the Project Site and surrounding areas or substantial alterations to existing drainage patterns that would cause substantial erosion or siltation on- or off-site associated with stormwater runoff. As such, construction impacts related to erosion and stormwater runoff would be less than significant.

Operation

The proposed site improvements include impervious surfaces from building structures, paved roads and other paved surfaces, and landscaping. These improvements would eliminate the potential for erosion to occur in areas covered by impervious surfaces and significantly reduce the potential for erosion in landscaped areas. In addition, the Project would implement post-construction BMPs, such as continuous deflective separation units to trap pollutants, infiltration

chambers, water quality basins, and infrastructure maintenance. Vegetation would also be planted in the graded area to provide soil stabilization. Accordingly, Project operation would not substantially alter the existing drainage pattern of the site or area in a manner that would result in significant and environmentally harmful increases in erosion of the Project Site and surrounding areas or cause substantial erosion or siltation on- or off-site associated with stormwater runoff. As such, operational impacts related to erosion and stormwater runoff would be less than significant.

Mitigation Measures

Impacts with regard to Thresholds 4.9(c.i), 4.9(l.i), 4.9(l.iv) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.9(c.i), 4.9(l.i), and 4.9(l.iv) were determined to be less than significant without mitigation.

Threshold 4.9(c.ii): Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Threshold 4.9(c.iii): Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Threshold 4.9(j): Would the Project result in changes in the rate of flow, currents, or the course and direction of surface water and/or groundwater?

Threshold 4.9(k): Would the Project result in other modification of a wash, channel creek, or river?

Threshold 4.9(l.iii): Would the Project impact stormwater management through the significant environmentally harmful increase in the flow velocity or volume of stormwater runoff?

Impact Analysis

The Project Site is currently undeveloped and has a flow rate of approximately 125 cubic feet per second (cfs). With Project implementation, the flow rate generated by the Project would be approximately 183 cfs. To bring the total Project outlet flow rate down to or below the existing tributary flow rate and in compliance with the City's and County's standards to manage stormwater runoff, at least 100 cfs of stormwater would be conveyed to the proposed underground infiltration chambers or infiltration/drainage basin. The Project would implement hydromodifications to collect and treat on-site runoff and provide enhanced flood control protection along Placerita Creek.

Additionally, a portion of the off-site stormwater, during peak storm events, would be routed to the infiltration/drainage basin. A 50-year storm event was also modeled for off-site subareas. The total existing flow rate generated by the off-site drainage area is approximately 375 cfs, and the flow rate generated by the Project would be approximately 197 cfs. To bring the total on-site Project flow rate down to the existing flow rate, approximately 178 cfs (during storms greater than or equal to the 10-year storm) would be split from the total off-site flow and diverted to a desilting inlet, conveyed through the Project, and sent to the drainage basin in the northern portion of the Project Site. A splitter manhole would allow up to 40 cfs from a storm event to pass through to Placerita Creek. An outlet from a splitter manhole would divert additional flow from larger storms, before passing through a weir that would continue through the manhole and outlet to Placerita Creek.[16]

The Project design would allow for stormwater to be contained and treated on-site through the use of an infiltration/detention basin and underground infiltration chambers, then released to Placerita Creek, ensuring that stormwater runoff rates and volumes entering the creek do not exceed existing stormwater runoff rates and volumes; provide additional sources of polluted runoff; or change the currents, course, or direction of surface water that would affect Placerita Creek and/or groundwater as a result of Project implementation. Only treated runoff and at quantities equal to or less than the existing volume would be released. Therefore, Project implementation would not substantially alter the existing drainage pattern of the site or area; substantially increase the rate or amount of surface runoff in a manner that would be significantly harmful to the environment; result in flooding on-site or off-site; result in other modification of a wash, channel creek, or river; or provide additional sources of polluted runoff. As such, impacts would be less than significant.

Mitigation Measures

Impacts with regard to Thresholds 4.9(c.ii), 4.9(c.iii), 4.9(j), 4.9(k), and 4.9(l.iii) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Thresholds 4.9(c.ii), 4.9(c.ii), 4.9(j), 4.9(k), and 4.9(l.iii) were determined to be less than significant without mitigation.

Threshold 4.9(c.iv): Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

Threshold 4.9(h): Would the Project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Impact Analysis

A portion of the Project Site is located within a FEMA Zone A floodplain. For the Project Site, this floodplain is associated with Placerita Creek and covers the entire proposed development area

[16] Weir: A dam in a stream or river to raise the water level or divert its flow over a certain elevation.

that extends north of creek, ending at the base of the ridgeline that forms the northern boundary of the Project Site.

The Hydrology Report modeled a 25-year storm event for on-site developed subareas. To ensure the total Project outlet flow rate would be equal to or below the existing tributary flow rate, at least 100 cfs of stormwater would be conveyed to an infiltration/drainage basin. Runoff from the Project would be routed through the underground infiltration chambers or infiltration/drainage basin proposed for the Project. The Hydrology Report also modeled a 50-year storm event. To ensure the total Project off-site flow rate would be equal to or below the existing off-site flow rate, approximately 178 cfs (during storms greater than or equal to the 10-year storm) would be diverted, conveyed through the Project, and sent to the drainage basin on the north side of the site. A splitter manhole would allow up to 40 cfs (the low flow) from a storm event to pass through to Placerita Creek. An outlet from a splitter manhole would divert additional flow from larger storms, before passing through a weir that would continue through the manhole and outlet to Placerita Creek. With these proposed hydromodifications, the Project would not substantially alter the existing drainage pattern of the site or area, or substantially increase the rate or amount of surface runoff in a manner which would impede or redirect flood flows. In addition, there are no proposed structures to be placed within Placerita Creek or north of Placerita Creek. As such, impacts would be less than significant.

Mitigation Measures

Impacts with regard to Thresholds 4.9(c.iv) and 4.9(h) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Thresholds 4.9(c.iv) and 4.9(h) were determined to be less than significant without mitigation.

Threshold 4.9(d): Would the Project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?

Impact Analysis

Seiches are oscillations generated in enclosed bodies of water usually as a result of earthquake-related ground shaking. A seiche wave has the potential to overflow the sides of a containing basin to inundate adjacent or downstream areas. Seiches primarily cause damage to properties that are adjacent to a body of water. Bouquet Reservoir is located approximately 15 miles northeast of the Project Site and Castaic Lake is located approximately 9 miles northwest of the Project Site. Although a seiche could occur at either reservoir, there would be a low risk of seiche resulting in damage to the Project due to distance to the reservoirs from the Project Site.

Tsunamis are large ocean waves caused by sudden water displacement that results from an underwater earthquake, landslide, or volcanic eruption. Tsunamis affect low-lying areas along the coastline. As the Pacific Ocean lies approximately 26 miles to the south Project Site, the Project would not be exposed to potential flooding from a tsunami event.

Although a portion of the Project site is located within a FEMA Zone A floodplain, the Project would be designed to eliminate floodplain hazards within the proposed development footprint. In addition, the Project would implement materials management control practices consisting of

procedural and structural BMPs for the handling, storing, and use of hazardous materials during Project construction and operation to prevent the release of those materials into stormwater discharges. These would include, but are not limited, to stockpile management, spill prevention and control, solid waste management, and hazardous waste management. Therefore, the Project Site would not be subject to inundation from flood hazards, including from tsunami or seiche, that would risk the release of pollutants off-site. As such, impacts would be less than significant.

Mitigation Measures

Impacts with regard to Threshold 4.9(d) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.9(d) were determined to be less than significant without mitigation.

Threshold 4.9(e): Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impact Analysis

As discussed in the Regulatory Setting, the Project Site falls within the jurisdiction of the LARWQCB (Region 4) Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties. The RWQCB is given authority to issue waste discharge requirements, enforce actions against stormwater discharge violators, and monitor water quality. In California, the NPDES stormwater permitting program is administered by the SWRCB. The County and the City are two of the co-permittees under the Los Angeles County NPDES MS4 permit and, as such, are required to implement development planning guidance and control measures regarding water quality impacts from new development.

The Los Angeles County MS4 permit contains provisions for implementation and enforcement of the City's USMP. The City supports the requirements of the Los Angeles County MS4 permit through SCMC Chapters 10.04 and 17.95, which identify requirements for pre- and post-construction stormwater activities, respectively, for development projects to comply with the NPDES and MS4 permits. The Project would be subject to the requirements of the NPDES Construction General Permit, which includes the preparation and implementation of a SWPPP. In addition, the Project would comply with the requirements of SCMC Section 10.04.070 (Construction Activity Stormwater Measures) and SCMC Chapter 17.95 (Stormwater Mitigation Plan) to ensure impacts to water quality would be less than significant.

The Project would not conflict with the SCV-GSA GSP. As noted in the discussion regarding Threshold 4.9(b), construction-related excavation would not reach depths where groundwater occurs. In addition, compliance with regulatory requirements would serve to prevent pollution of groundwater beneath the Project Site. Accordingly, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and impacts would be less than significant.

Mitigation Measures

Impacts with regard to Threshold 4.9(e) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.9(e) were determined to be less than significant without mitigation.

4.9.7 CUMULATIVE IMPACTS

Impact Analysis

Surface Water and Groundwater Quality

The geographic scope considered for cumulative impacts to surface water and groundwater is the Santa Clara River Watershed and East Subbasin, respectively. As detailed in Section III, Environmental Setting of this Draft EIR, there would be a total of 36 related projects that propose varying levels of development, redevelopment, or modifications to existing land uses or structures in the Project vicinity. The related projects primarily include residential, assisted living/nursing home, commercial, hotel, industrial, and office uses.

As described in Subsection 4.9.6, Analysis of Project Impacts, above, stormwater runoff from most urban development sites has the potential to introduce pollutants into the stormwater and groundwater systems. Potential pollutants generated by the related projects may include sediment, nutrients, metals, synthetic organics, and oil and grease. Similar to the Project, related projects in the City and Santa Clara River Watershed would be required to comply with NPDES permit requirements, such as implementation of an SWPPP during both construction and operation, for projects disturbing more than one acre, as well as implementation of a LID plan and incorporation of associated BMPs into project design. In addition, related projects in the City would implement stormwater treatment features to satisfy the City's USMP requirements. With adherence to applicable regulations related to water quality, the related projects' potential cumulative impacts to surface water and groundwater quality during construction and operation would be less than significant. Therefore, the Project's contribution to surface water quality and groundwater quality impacts would not be cumulatively considerable during construction or operation, and, as such, cumulative impacts would be less than significant.

Surface Water and Groundwater Hydrology

In accordance with City requirements, related projects and other future developments would be required to implement BMPs to manage stormwater in accordance with LID and NPDES requirements. Furthermore, the LACDPW and/or the City would review each future development project on a case-by-case basis to ensure sufficient local and regional stormwater drainage infrastructure is available to accommodate stormwater runoff. As described in Subsection 4.9.6, Analysis of Project Impacts, the Project would be subject to the requirements of the NPDES Construction General Permit and the Project-specific SWPPP during construction. During operation, Project design would allow for stormwater to be contained and treated on-site through the use of an infiltration/detention basin and underground infiltration chambers, then released to Placerita Creek, ensuring that stormwater runoff rates and volumes would not result in significant impacts to Placerita Creek and/or groundwater as a result of Project implementation. In addition, as discussed, there is a surplus in primary water supply under existing conditions, meaning there would still be adequate groundwater and imported water supply to meet the primary supply criteria for the Project. Therefore, the Project's contribution to surface water and groundwater hydrology

impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

Flood Hazards

As discussed in Subsection 4.9.6, Analysis of Project Impacts, a portion of the Project Site is located within a FEMA Zone A floodplain, and related projects in the City and greater Santa Clara River Watershed may be located within FEMA-designated floodplains. However, the Project and related projects would be designed to eliminate floodplain hazards within their respective development footprints. Similar to the Project, related projects and other future developments would implement materials management control practices, consisting of procedural and structural BMPs for the handling, storing, and use of hazardous materials during construction and operation to prevent the release of those materials into stormwater discharges. In addition, if related projects are located within flood hazard zones, project-specific design features, such as the infiltration/detention basin and underground infiltration chambers features proposed for the Project, would be implemented to ensure less-than-significant impacts to flood rates and flows. Therefore, the Project's contribution to flood hazard impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

Mitigation Measures

Cumulative impacts with regard to hydrology and water quality were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts with regard to hydrology and water quality were determined to be less than significant without mitigation.

4.10 LAND USE AND PLANNING

This section of the Draft EIR analyzes the Project's potential impacts with regard to land use and planning. This section identifies on-site and surrounding land use conditions and relevant land use policies and regulations, as set forth by the City of Santa Clarita (City), and other State and regional plans. The analysis in this section evaluates whether the Project would conflict with any land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect.

Analyses of consistency and/or potential conflicts with plans that are more directly related to other environmental topics are addressed in other sections of this Draft EIR (specifically, Section 4.2, Air Quality; Section 4.3, Biological Resources; Section 4.7, Greenhouse Gas Emissions; Section 4.12, Population and Housing, and Section 4.14, Transportation).

4.10.1 ENVIRONMENTAL SETTING

ON-SITE LAND USES

The Project Site is located in the southwestern portion of Santa Clarita, in the Newhall community, which is one of the first established communities in the Santa Clarita Valley. The Project Site, which is located at the northeastern corner of Railroad Avenue and 13th Street, is a 93.5-acre area that comprises an undeveloped piece of land that has been cleared of the majority of its natural vegetation. The Project Site also includes an additional 11.4-acre property owned by the Metropolitan Water District (MWD). The northern portion of the Project Site includes natural features, such as a prominent ridgeline, which transects the northeastern corner of the Project Site, and a natural creek and creek wash area (Placerita Creek). The Project Site also includes a drainage ditch running along the northeastern boundary of the Project Site, adjacent to the western edge of the MWD property, and a drainage ditch running along the southwestern boundary of the Project Site, adjacent to Railroad Avenue and a railroad line used by Metrolink and Union Pacific Railroad. The southwesterly drainage ditch discharges into a culvert underneath the railroad tracks approximately 370 feet southeast of the Railroad Avenue bridge over Placerita Creek. The ridgeline, which transects a portion of the Project Site's northern boundary, is identified in the City's General Plan Conservation and Open Space Element as a "significant ridgeline." This ridgeline slopes downward to the southwest toward Placerita Creek and the creek wash area, which also transects the northern portion of the Project Site.

The Project Site is located in the North Newhall Area (NNA) and has General Plan land use designations of MX-N (Mixed Use Neighborhood) and NU5 (Non-Urban 5, one dwelling unit per acre) with identical zoning classifications. The previously disturbed areas of the Project Site, encompassing the central and southeastern portions of the Project Site, are designated MX-N, and the undulating and hilly portions of the Project Site to the northwest, containing portions of Placerita Creek, are designated NU5. The majority of the Project Site is located in the Planned Development overlay, which requires the approval of a conditional use permit (CUP) for any proposed development activity. The Project Site is also within the Placerita Canyon Special Standards District (PCSSD), which establishes additional development standards for development with the District.

SURROUNDING LAND USES

The Project Site is bounded on the northeast by a linear open space area (another MWD easement that is not a part of the Project Site) with developed single-family homes fronting Alderbrook Drive beyond with their rear yards abutting the MWD easement. To the north/northwest of the Project Site is a neighborhood of single-family homes located beyond the ridgeline on the northwestern boundary of the Project Site. A mix of commercial, storage, and automotive-related businesses are located to the southeast of the Project Site across 12th and 13th Streets. A mix of commercial uses and a mobile home park are located to the southwest of the Project Site across the railroad tracks and Railroad Avenue. In general, the Project Site is located between two communities with distinctive land use patterns. East of the Project Site, the Placerita Canyon community is a semi-rural residential area, characterized by equestrian-oriented residential uses among oak woodlands. Old Town Newhall, centered along Lyons Street and Main Street and located approximately 900 feet south of the Project Site, includes a mix of uses within a commercial district.

4.10.2 REGULATORY AND PLANNING FRAMEWORK

FEDERAL

There are no federal regulations or planning programs that apply to the Project regarding land use and planning.

STATE

Senate Bill 375

On September 30, 2008, Senate Bill (SB) 375 was instituted to help achieve the greenhouse gas (GHG) emission reduction goals set by Assembly Bill (AB) 32 through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) achievement of GHG emission reduction targets for the transportation sector set forth in AB 32. SB 375 establishes a process for the California Air Resource Board (CARB) to develop GHG emission reduction targets for each region as opposed to individual local governments or households. SB 375 also requires metropolitan planning organizations to prepare a Sustainable Communities Strategy (SCS) in the Regional Transportation Plan (RTP) that guides growth while accounting for transportation, housing, environmental, and economic needs of the region. SB 375 uses California Environmental Quality Act (CEQA) streamlining as an incentive to encourage the development of residential or mixed-use residential projects, which helps achieve AB 32 goals to reduce GHG emissions.

Senate Bill 743

In September 2013, Governor Edmund G. Brown signed SB 743, which made several changes to CEQA for projects located in areas served by transit. SB 743 added Public Resources Code (PRC) Section 21099, which provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” PRC Section 21099(a) defines the following:

- "Infill site" means a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.
- "Transit priority area" means an area within 0.5 mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program or applicable regional transportation plan.

PRC Section 21064.3 defines "major transit stop" as a site containing (a) an existing rail transit station, (b) a ferry terminal served by either a bus or rail transit service, or (c) the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

REGIONAL

On September 3, 2020, the Southern California Association of Governments (SCAG) Regional Council adopted the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2020–2045 RTP/SCS presents a long-term transportation vision through the year 2045 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. The 2020–2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning and the provision of services by other regional agencies.

The 2020–2045 RTP/SCS builds upon the sustainability goals established in previous RTPs, which reflected the ever-evolving needs and priorities of the SCAG region. The performance measures developed in support of the 2020–2045 RTP/SCS are focused on a set of outcomes that aim to continue to strengthen land use and transportation connections by focusing growth in Priority Growth Areas (PGA), which include, but are not limited to, job centers, Transit Priority Areas (TPA), and High Quality Transit Areas (HQTA);[1] enhance the health of the SCAG region's residents; reduce GHG emissions; and address the effects of climate change. SCAG found that implementation of the 2020–2045 RTP/SCS would result in the following:[2]

- A 3 percent increase in the combined percentage of work trips made by carpooling, active transportation, and public transit, with a commensurate reduction in the number of commuters traveling by single-occupancy vehicle;
- A reduction in vehicle miles traveled (VMT) per capita by 5 percent and vehicle hours traveled per capita by 9 percent (for automobiles and light/medium-duty trucks) as a result of more efficient land use strategies and improved regional transit service;
- A 2-percent increase in transit use for work trips as a result of improved transit service and more transit-oriented, mixed-use development;
- A 26-percent reduction in travel delay per capita;

[1] SCAG defines PGAs as areas where many of the strategies of the 2020–2045 RTP/SCS can be fully realized; TPAs are PGAs that are within 0.5 miles of existing or planned major transit stops in the region; HQTAs are corridor-focused TPAs.

[2] SCAG, *Connect SoCal: The 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy*, September 3, 2020.

- A 26-percent reduction in heavy-duty truck travel delay;
- The creation of more than 264,500 new jobs annually due to an increased level of economic competitiveness throughout the SCAG region and improved regional economic performance. This more competitive economic environment would be the result of an improved regional transportation system and reduced levels of congestion; and
- A 29-percent reduction in greenfield development. Conservation of open space, agricultural lands, and other rural land uses may be achieved by focusing new residential and commercial development in higher density areas that are already equipped with the urban infrastructure that would adequately serve planned growth.

SCAG's overarching strategy for achieving its goals is to integrate land use and transportation. SCAG policies are directed toward the development of regional land use patterns that contribute to reductions in VMT and improvements to the transportation system. The 2020–2045 RTP/SCS intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the region's overall quality of life.

LOCAL

City of Santa Clarita General Plan

The City of Santa Clarita's General Plan establishes goals and policies related to land use, transportation, population growth and distribution, development, open space, resource preservation and utilization, air and water quality, noise impacts, public safety, infrastructure, and other related physical, social, and economic factors. In addition to serving as a guide for local decision making, the General Plan establishes a clear set of development guidelines for citizens, developers, neighboring jurisdictions, and agencies, and provides the community with an opportunity to participate in the planning process. The purpose of the City's General Plan is to comply with State requirements and to provide the City with a comprehensive, long-range policy guideline for future development. Applicable elements of the City's General Plan are summarized below.

Land Use Element

The purpose of the Land Use Element is to designate land for housing, business, industry, and open space, as well as guiding and directing the physical development of the community. The Land Use Element is the City's long-term blueprint for development to meet the Santa Clarita Valley's future needs for housing, retail, office, industrial, parks, open space, and other uses. The Land Use Element includes goals, policies, and programs designed to address the development issues facing the City through a variety of land use planning strategies, along with the type, intensity, quality, and location of future uses within the planning area. The Land Use Element also provides the standards and targets for residential population density and building intensity, with a framework for focusing sustainable future growth.

Circulation Element

The Circulation Element plans for the continued development of efficient, cost-effective, and comprehensive transportation systems that are consistent with regional plans, local needs, and the Santa Clarita Valley's community character. The Circulation Element complements and supports the Land Use Element. The Circulation Element recommends techniques such as

development of alternative travel modes and support facilities; increased efficiency and capacity of existing systems through management strategies; and coordination of land use planning with transportation planning by promoting concentrated, mixed-use development near transit facilities.

Noise Element

The Noise Element provides a comprehensive program for planners to include noise management in the planning process and to achieve and maintain land uses that are compatible with existing and future environmental noise levels. The Noise Element identifies current noise conditions, noise-sensitive land uses, and noise sources within the planning area and projects future noise impacts resulting from continued growth allowed by the Land Use Element.

Conservation and Open Space Element

The combined Conservation and Open Space Element establishes a policy framework for the designation and long-term preservation of open space within the planning area and addresses community benefits derived from open space, such as providing land for park and recreational facilities, habitat preservation, scenic views, and water recharge and watershed protection.

Safety Element

The Safety Element provides guidelines for protecting public health and safety and addresses natural and man-made hazards that may affect existing and future residents. The Safety Element establishes policies and standards designed to minimize risks from hazards, informs citizens about hazardous conditions, and assists policy makers in making land use and development decisions.

Santa Clarita Municipal Code

All development activity on the Project Site is subject to the Santa Clarita Municipal Code (SCMC), particularly Title I7, Zoning. The Planning and Zoning Code establishes requirements for the Project Site with respect to permitted uses, building height, density, yard setbacks, and parking.

SCMC Section 17.38.060 – Planned Development Overlay Zone

The Planned Development overlay zone regulations are intended to provide additional discretion for previously vacant or underutilized parcels as identified on the City's zoning map. All new development or redevelopment in excess of 50 percent valuation of the existing structures, as determined by the Building Official, whether permitted, minor, or conditionally permitted, shall be subject to the approval of a CUP.

SCMC Section 17.39.020 – Placerita Canyon Special Standards District

The purpose of the PCSSD is to protect, maintain, preserve, and enhance the secluded, rural equestrian character of the community; enhance the community's unique appeal; ensure that new and expanded structures are compatible with the characteristics of surrounding single-family residential neighborhoods; and protect the light, air, and privacy of existing single-family residences from negative impacts. These standards are also intended to minimize the need for installation of infrastructure, such as sewers, streetlights, concrete sidewalks, and concrete flood control systems, that would alter the community's character, while providing for adequate drainage and other community safety features.

Specific to the NNA, future uses and development in this area are required to address each of the following subject areas, as applicable to the Project:

- Public Participation/Outreach: Public participation and outreach led by the applicant(s) or the applicant's representative, at the onset of and during conceptual planning and prior to formal submittal of a proposed project to the City, with outreach including, but not limited to, the Placerita Canyon property owners' association.
- Traffic Intrusion/Gateways: Be pedestrian-oriented and have bicycle amenities and accommodations; minimize impacts to equestrian and pedestrian circulation in the existing neighborhood; discourage additional trips into Placerita Canyon; include defined entry gateways or monuments, complete with landscaping and architectural elements; and preparation of a traffic study for all new developments that are projected to generate 250 or more new daily trips.
- Buffering and Transitions: Provide buffers and graduated transitional design to ensure existing neighborhood protection and compatibility of character resulting from any proposed development and require use of the MWD right-of-way as a landscaped buffer between the NNA and the rest of Placerita Canyon.
- Architecture: Provide 360-degree architectural design with pedestrian-scaled building massing and forms where adjacent to existing residences, with the use of landscaping to visually soften hard edges of buildings.
- Flood Control: Maintain natural appearance maintenance of waterway bottoms and sides; no fencing across riverbeds or waterways that denies or interferes with easy trail access; and implementation of on-site flood control mitigation to provide assistance or relief to other hydrology/drainage impacts within Placerita Canyon due to changes of topography on NNA properties.
- Economic Development: Be support of revitalization efforts with an appropriate mix of retail, office, restaurant, and general commercial square footage based on the NNA's proximity to the Metrolink station and Old Town Newhall.
- Recreation: Include a site-specific and a community-based recreational component.

SCMC Section 17.23.170 – Oak Tree Permit

The purpose of SCMC Section 17.23.170 is to establish procedures and requirements to protect and preserve oak trees in the City and to provide regulatory measures designed to accomplish this purpose. The provisions of this section apply to the removal, relocation, encroachment, or impacting of any oak tree. As specified in Subsection C.2.d, the City's Planning Commission shall review a Class IV oak tree permit application when the request involves the removal of any oak tree designated as a heritage oak tree. In addition, Subsection E, the City, as the approving authority, shall make a finding before granting an oak tree permit that "it is necessary to remove, relocate, prune, cut or encroach into the protected zone of an oak tree to enable reasonable use of the subject property which is otherwise prevented by the presence of the tree and no reasonable alternative can be accommodated due to the unique physical development constraints of the property" and that no heritage oak tree shall be removed unless a finding is "made and the review authority also finds that the heritage oak tree's continued existence would prevent any reasonable development of the property and that no reasonable alternative can be

accommodated due to the unique physical constraints of the property. It shall further be found that the removal of such heritage oak tree will not be unreasonably detrimental to the community and surrounding area."

SCMC Section 17.26.130 – Ridgeline Alteration Permit

The purpose of SCMC Section 17.26.130 is to establish procedures and requirements to regulate development in the ridgeline preservation overlay zone in an effort to achieve the City's objective to preserve the ridgelines within City limits for the public health, safety, and welfare for the long-term benefit of the community; maintain the unique visual characteristics, resources, and ridgeline integrity; and achieve a higher quality of life for its residents. As specified in Subsection F, the City Council shall approve an application only after the following findings are made: "(1) the use or development will not be materially detrimental to the visual character of the neighborhood or community or endanger the public health, safety, or general welfare; (2) the appearance of the use or development will not be substantially different than the appearance of adjoining ridgeline areas so as to cause depreciation of the ridgeline appearance in the vicinity; (3) the establishment of the proposed use or development will not impede the normal and orderly development and improvement of surrounding properties, nor encourage inappropriate encroachments to the ridgeline area; (4) the proposed use or development demonstrates creative site design resulting in a project that will complement the community character and provide a direct benefit to current and future community residents of not only the proposed use or development, but the residents of the City as a whole; (5) the use or development minimizes the effects of grading to the extent practicable to ensure that the natural character of the ridgeline is preserved; (6) the proposed use or development is designed to mimic the existing topography to the greatest extent possible through the use of landform contour grading; and (7) the proposed use or development does not alter natural landmarks and prominent natural features of the ridgelines."

SCMC Section 17.51.040 – Oak Tree Preservation

The purpose of SCMC Section 17.51.040 is to protect and preserve oak trees in the City and to provide regulatory measures designed to accomplish this purpose. The provisions of this section apply to the removal, pruning, cutting, and/or encroachment into the protected zone of oak trees. As stated in Subsection B, "No person shall cut, prune, remove, relocate, endanger, damage or encroach into the protected zone of any oak tree on any public or private property within the City except in accordance with the conditions of a valid oak tree permit issued by the City, in conformance with Section 17.23.170 (Oak Tree Permit)," as described above.

City of Santa Clarita Community Character and Design Guidelines

The purpose of the Santa Clarita Community Character and Design Guidelines is to guide the creation of new residential, commercial, mixed-use, and industrial developments or the renovation and redevelopment of built areas. The Design Guidelines include up-to-date planning trends and guidelines to promote the high quality standards that the City and the community value, which include architectural variety, quality development, and that both existing and new developments exhibit the following:

- Compatibility in size, scale, and appearance with the character of Santa Clarita.
- Attractiveness and being an asset to the community.
- Preservation and enhancement of natural features of a site.

- Incorporation of quality articulation, community character features, multiple building forms, desirable building details, and other elements that display excellence in design.
- Provision of pedestrian-oriented design to enrich the pedestrian experience.
- Inclusion of pedestrian-friendly amenities, such as pedestrian connections, plazas, seating, bike racks, fountains, and other similar features, for the enjoyment of the community and visitors.
- Use of high-quality materials.
- Well-landscaped parking lots with efficient pedestrian and vehicular circulation.
- Improvement of the environmental performance of projects through the strategic incorporation of green building components.

The Design Guidelines also lay the foundation for development in the City by exploring relevant and successful neighborhood design concepts, including the following and their core principles:

- Smart Growth: Mix of land uses, walkable neighborhood, distinctive and attractive communities with a strong sense of place, preservation of natural beauty and critical environmental areas, development toward existing communities, variety of transportation choices, and community and stakeholder collaboration in development decisions.
- New Urbanism: Discernible center, well-connected network of streets and pedestrian paths to provide a variety of pedestrian and vehicular routes to any destination, shade trees along City streets, placement of buildings in a neighborhood center close to the street, and parking lot locations away from the street.
- Transit-Oriented Development: Enhanced access to public transportation by placing development around a transit station.
- Valley of Villages: Mix of land uses; a variety of transit alternatives, including rail and bus; outdoor, pedestrian-oriented gathering places with amenities; quality architecture design elements that promote a pedestrian-oriented environment; reduced need for vehicle use and travel outside the village for employment, goods, and services; and trail and roadway linkages throughout the village and to other villages.
- Low Impact Development: Incorporation of best management practices, including, but not limited to, vegetated swales, porous pavements, bioretention, wet ponds, infiltration basins, and rain gardens.
- Sustainable Design Principles: A variety of green building practices and the availability of pedestrian-oriented amenities; development within and near existing communities or public transit; neighborhood connectedness; minimization of erosion to protect habitats; and parking design that leaves building frontages and streetscapes free of parking facilities.
- General Design Principles: Design elements that include richness of material surface and texture; muted earth tone colors; significant wall articulation; full-sloped roofs and multi-planed roofs; roof overhangs, articulated eaves, and parapets; compatible window configurations with the design of the building; articulated building mass and form; and landscape elements.

In addition to these general design concepts, the Design Guidelines have specific requirements to address the identity of the Newhall community, including identifying appropriate primary wall surfaces, wall articulation and accents, roofing materials, and color palettes.

4.10.3 THRESHOLDS OF SIGNIFICANCE

The significance thresholds used to evaluate the impacts of the Project related to land use and planning are based on Appendix G of the CEQA Guidelines and the City's Initial Study Checklist.

CEQA GUIDELINES APPENDIX G

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to land use and planning if it would:

Threshold 4.10(a): ***Physically divide an established community; or***

Threshold 4.10(b): ***Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.***

CITY'S INITIAL STUDY CHECKLIST

In addition, in accordance with the City's Initial Study Checklist, a project would have a significant impact related to land use and planning if it would:

Threshold 4.10(c): ***Conflict with any applicable habitat conservation plan, natural community conservation plan, and/or policies by agencies with jurisdiction over the Project.***

ISSUES NOT EVALUATED FURTHER

The Project would not result in significant impacts related to the following significance thresholds from Appendix G of the CEQA Guidelines or the City's Initial Study Checklist, as determined in the Initial Study (**Appendix A**); therefore, they are not evaluated further in this Draft EIR:

Threshold 4.10(a): ***Physically divide an established community; or***

Threshold 4.10(c): ***Conflict with any applicable habitat conservation plan, natural community conservation plan, and/or policies by agencies with jurisdiction over the Project.***

4.10.4 METHODOLOGY

The analysis of impacts related to land use and planning considered the improvements on the Project Site, as well as the Project's improvements off-site, including a Class I multi-purpose path along the frontage of the Project on 13th, Arch, and 12th Streets; widening of 13th Street, Arch Street, and 12th Street; installation of public hydrants along the frontage of the Project on 13th, Arch, and 12th Streets; and railroad crossing improvements at 13th Street, including the installation of a bike path/trail on the north side of the crossing, widening of the crossing at 13th Street and Railroad Avenue to accommodate the wider turning radii, installation of drainage on Railroad Avenue and 13th Street, new gates, modifications on Railroad Avenue at 13th Street to accommodate the revised intersection geometry and provide increased efficiency,

implementation of ADA requirements for pedestrians, and implementation of line-of-sight requirements at the grade crossing. The analysis also considered the modifications to the Dockweiler Drive Extension Project in the immediate vicinity of the Project Site, including roadway improvements to 13th Street, Arch Street, 12th Street and Placerita Canyon Road that differ from previous approved plans, including accommodating the additional lane geometry at the Arch Street/13th Street intersection to widen the railroad crossing; construction of a pedestrian and bike bridge from the Jan Heidt Newhall Metrolink Station on Railroad Avenue to the future extension of Dockweiler Drive; and implementation of temporary storm drain improvements to accommodate surface water runoff from Dockweiler Drive prior to the completion of the Project.

The determination of consistency with applicable land use policies and ordinances is based upon a review of the 2020–2045 RTP/SCS, the City's General Plan elements, and the SCMC. CEQA Guidelines Section 15125(d) requires that an EIR discuss any inconsistencies with applicable general plans, specific plans, and regional plans. Under State Planning and Zoning law (Government Code Section 65000 et seq.), strict conformity with all aspects of a plan is not required. Generally, agencies are responsible for determining whether a project is consistent with the plan. As discussed in the State of California General Plan Guidelines, a proposed project should be considered consistent with a general plan or elements of a general plan if, considering all its aspects, it will further the objectives and policies of the general plan and will not inhibit their attainment. In addition, the following excerpt is from the ruling in *Sequoyah Hills Homeowners Association v. City of Oakland*:[3]

> *[s]tate law does not require an exact match between a [project] and the applicable general plan. Rather, to be "consistent," the [project] must be "compatible with the objectives, policies, general land uses, and programs specified" in the applicable plan…. A [project] must be "in agreement or harmony" with the applicable land use plan.*

4.10.5 PROJECT DESIGN FEATURES

No specific Project Design Features are proposed in regard to land use beyond the Project features discussed in Section 2.0, Project Description, of this Draft EIR.

4.10.6 ANALYSIS OF PROJECT IMPACTS

Threshold 4.10(b): Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Impact Analysis

Consistency with the 2020–2045 RTP/SCS

The general consistency of the Project, including the off-site improvements, with the applicable goals identified in the SCAG 2020–2045 RTP/SCS is presented in **Table 4.10-1**. As shown in the table, the Project would not conflict with the goals, principles, and strategies identified in the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating environmental effects. Specifically, the Sustainable Communities Strategy Technical Report of the RTP/SCS identifies Priority Growth Areas

[3] California Court of Appeal (First District, Division 2), *Sequoyah Hills Homeowners Association v. City of Oakland*, 23 Cal.App.4th 704, 719, November 1993.

(PGA) in the region where growth is forecasted to occur due to proximity to existing and planned transit, existing job centers, existing and planned infrastructure to support more walkable communities, and the use of alternative transportation modes; the Project Site is located in an area of the City that has been identified as a PGA. Furthermore, the Project would support the goals of the 2020–2045 RTP/SCS to improve mobility, accessibility, reliability, and travel safety for people and goods and support healthy communities by developing a large employment generator on a Project Site that is well-served by a variety of nearby mass transit options, including rail and bus lines. Public transit is available and accessible in the Project area as evidenced by the Project Site's location within a SCAG-designated HQTA and a TPA. The Project would promote walking and use of bicycles by constructing a Class I trail along the Project frontage at 12th Street, Arch Street, and 13th Street. In addition, the Project would be conditioned to either (1) pay an in-lieu fee to contribute toward improvements or (2) construct a connection to provide a link for pedestrians and bicyclists between the Project Site and the Jan Heidt Newhall Metrolink Station, which is located approximately 2,500 feet south of the Project Site and where there are stops for the Santa Clarita Transit (SCT), Amtrak Thruway Bus, and Antelope Valley Transit Authority (AVTA) services; and the Old Town Newhall dining and entertainment district. The Project would also provide 170 bicycle parking spaces (145 long-term spaces and 25 short-term spaces), as well as parking spaces with electric vehicle (EV) charging stations and parking spaces that would be EV-ready pursuant to the requirements of the California Green Building Standards (CALGreen) Code. Accordingly, the Project would support the reduction in GHG emissions by encouraging the use of EVs and alternative modes of transportation (i.e., walking, biking, public transit), which would reduce dependency on single-occupancy vehicles. Therefore, as detailed in **Table 4.10-1**, the Project would not conflict with the applicable goals, objectives, and policies of the 2020–2045 RTP/SCS adopted for the purpose of avoiding or mitigating an environmental effect.

Table 4.10-1
2020–2045 RTP/SCS CONSISTENCY ANALYSIS

Goals, Principles, and Strategies	Consistency Assessment
Goal 1. Encourage regional economic prosperity and global competitiveness.	**Not Applicable.** This goal is directed toward SCAG and local jurisdictions and does not apply to individual development projects.
Goal 2. Improve mobility, accessibility, reliability, and travel safety for people and goods.	**Consistent.** The Project Site is located within the Newhall community of the City of Santa Clarita within a SCAG-designated HQTA and TPA and less than 0.5 mile north of the Jan Heidt Newhall Metrolink Station. This station is an intermodal hub that, in addition to providing access to the Metrolink passenger rail system, is served by (1) SCT local lines, which connect the Newhall community to other parts of the City, including Bouquet Canyon, Plum Canyon, and Canyon Country, as well as to the McBean Regional Transit Center and the Santa Clarita (Soledad) Metrolink Station; (2) SCT commuter express lines, which connect Santa Clarita to North Hollywood and the Metro B and G Lines; Woodland Hills, Canoga Park, and Chatsworth; UCLA, Westwood, and Century City; and Union Station and Downtown Los Angeles; (3) Amtrak Thruway buses, which offer a connection between the Jan Heidt Newhall Metrolink Station and the Amtrak Bakersfield Station, a transfer point to and from the San Joaquins trains to Oakland and Sacramento; and (4) the AVTA North County TRANSporter, which travels between the Palmdale Transportation Center and the Jan Heidt Newhall Metrolink Station, connecting Antelope Valley residents to Santa Clarita Valley. Accordingly, the Project's location near multiple public transit options would improve mobility, accessibility, reliability, and travel safety for Project employees. Therefore, the Project would be consistent with this goal.

Table 4.10-1
2020–2045 RTP/SCS CONSISTENCY ANALYSIS

Goals, Principles, and Strategies	Consistency Assessment
Goal 3. Enhance the preservation, security, and resilience of the regional transportation system.	**Not Applicable.** This goal is directed toward SCAG and does not apply to individual development projects. However, the Project would support the regional transportation system by situating a large employment generator near multiple public transit options to help increase Metrolink and bus ridership.
Goal 4. Increase person and goods movement and travel choices within the transportation system.	**Consistent.** The Project, which is a large employment generator, would be located within a TPA and HQTA near multiple public transit options. In addition, the Project would construct a Class I trail along the Project frontage at 12th Street, Arch Street, and 13th Street and would be conditioned to either (1) pay an in-lieu fee to contribute toward improvements or (2) construct a connection to a future Class I trail along Railroad Avenue and future connection to the Jan Heidt Newhall Metrolink Station and various retail, commercial, and entertainment uses in Old Town Newhall. Therefore, the Project's location near multiple public transit options would increase person movement and travel choices within the transportation system. As such, the Project would be consistent with this goal. See Goal 2 for additional details.
Goal 5. Reduce greenhouse gas emissions and improve air quality. **Goal 6.** Support healthy and equitable communities.	**Consistent.** As discussed under Goals 2 and 4, the Project would be located near multiple public transit options. In addition, the Project would include 170 on-site bicycle parking spaces to encourage biking the first/last mile to and from multiple public transit options that connect to other parts of the SCAG region. Furthermore, the Project would construct a Class I trail along the Project frontage at 12th Street, Arch Street, and 13th Street and would be conditioned to either (1) pay an in-lieu fee to contribute toward improvements or (2) construct a connection to provide a link for pedestrians and bicyclists between the Project Site and the Jan Heidt Newhall Metrolink Station and various retail, commercial, and entertainment uses in Old Town Newhall. Thus, the Project would support the use of alternative modes of transportation, including walking, biking, and public transit, which would reduce per employee VMT and corresponding GHG and air pollutant emissions. Constructing a large employment generator in a housing-rich area of the SCAG region would also reduce commuter trips and GHG emissions by providing job opportunities to those who already live near the Project Site or in the Santa Clarita Valley. Furthermore, the Project would incorporate a number of sustainable design features, including but not limited to installation of energy-efficient light fixtures, high-efficiency plumbing fixtures, electric vehicle (EV) parking spaces, and rooftop photovoltaic (PV) systems and solar panels. These sustainability features would further reduce GHG and air pollutant emissions. The Project's contribution to GHG emissions reduction and air quality improvement, as well as providing diverse job opportunities, would in turn contribute to supporting healthy and equitable communities. Therefore, the Project is consistent with these goals.
Goal 7. Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**Not Applicable.** This goal is directed toward SCAG and does not apply to individual development projects. However, the Project would support an integrated regional development pattern by situating the Project in a PGA and a transportation network by situating a large employment generator in a SCAG-designated HQTA and TPA.
Goal 8. Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	**Not Applicable.** This goal is directed toward SCAG and does not apply to individual development projects. However, the Project would include EV parking spaces and secure bicycle parking areas for Project employees and visitors to promote low-emission technologies and alternative low-carbon modes of transportation.
Goal 9. Encourage development of diverse housing types in areas that	**Not Applicable.** The Project does not include a residential component. However, the Project would create a large employment generator in a housing-

Table 4.10-1
2020–2045 RTP/SCS CONSISTENCY ANALYSIS

Goals, Principles, and Strategies	Consistency Assessment
are supported by multiple transportation options.	rich area of the SCAG region and in an area that is supported by multiple public transit options.
Goal 10. Promote conservation of natural and agricultural lands and restoration of habitats.	**Not Applicable.** This goal is directed toward SCAG and does not apply to individual development projects. However, the Project Site is not zoned for agricultural use or open space or located within a Significant Ecological Area. Although undeveloped, the Project Site is composed primarily of land that has been cleared of the majority of its natural vegetation. Nevertheless, as identified in Section 4.3, Biological Resources, of this Draft EIR, the Project would be required to implement mitigation measures to reduce impacts to special-status species, riparian habitat, wetlands, and protected oak trees to less-than-significant levels.
Principle 1. Base transportation investments on adopted regional performance indicators and MAP-21/FAST Act regional targets.	**Not Applicable.** This principle is directed toward SCAG and does not apply to individual development projects.
Principle 2. Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability, and safety, and that preserve the existing transportation system.	**Not Applicable.** This principle is directed toward SCAG and does not apply to individual development projects. However, the Project would support this principle by locating the proposed development near multiple public transit options, which would improve mobility, accessibility, reliability, and travel safety for Project employees within the existing transportation system, as discussed under Goal 2.
Principle 3. Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.	**Not Applicable.** This principle is directed toward SCAG and does not apply to individual development projects. However, the Project would support this principle by locating the proposed development near multiple public transit options and implementing sustainability features that promote the use of sustainable transportation options, such as walking, biking, or public transit, as discussed under Goals 5 and 6.
Principle 4. Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices.	**Not Applicable.** This principle is directed toward SCAG and does not apply to individual development projects. However, the Project is located within a SCAG-designated HQTA and TPA and would promote the use of public transportation and other alternative modes of transportation that reduce single-occupancy vehicle use.
Principle 5. Encourage transportation investments that will result in improved air quality and public health, and reduced greenhouse gas emissions.	**Not Applicable.** This principle is directed toward SCAG and local jurisdictions and does not apply to individual development projects. However, the Project would support this principle by improving air quality and public health and reducing per capita GHG emissions as discussed under Goals 5 and 6.
Principle 6. Monitor progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies.	**Not Applicable.** This principle is directed toward SCAG and does not apply to individual development projects.
Principle 7. Regionally, transportation investments should reflect best-known science regarding climate change vulnerability, in order to design for long-term resilience.	**Not Applicable.** This principle is directed toward SCAG and local jurisdictions and does not apply to individual development projects.

Table 4.10-1
2020–2045 RTP/SCS CONSISTENCY ANALYSIS

Goals, Principles, and Strategies	Consistency Assessment
Strategy 1 – Focus Growth Near Destinations & Mobility Options	
a) Emphasize land use patterns that facilitate multimodal access to work, educational, and other destinations.	**Consistent.** Please refer to the discussion under Goals 5 and 6 above. The Project would develop a land use that would facilitate multimodal access to work from other parts of the Santa Clarita Valley, the SCAG region, and other areas. Therefore, the Project would be consistent with this strategy.
b) Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets.	**Consistent.** Please refer to the discussion under Goals 5 and 6 above. The Project would develop a large employment generator in a housing-rich area of the SCAG region and near multiple public transit options to contribute to the jobs/housing balance and reduce commute times and distances. Therefore, the Project would be consistent with this strategy.
c) Plan for growth near transit investments and support implementation of first/last mile strategies.	**Consistent.** Please refer to the discussion under Goals 5 and 6 above. The Project would be located near multiple public transit options and provide features to support implementation of first/last mile strategies. Therefore, the Project would be consistent with this strategy.
d) Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses.	**Not Applicable.** The Project Site is vacant and has not been previously developed and does not include underperforming retail developments and other outmoded nonresidential uses.
e) Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods.	**Consistent.** The Project would develop approximately 1.3 million square feet of a full-service film and television studio campus on a vacant infill site within a SCAG-designated HQTA and TPA. The Project would construct a Class I trail along the Project frontage at 12th Street, Arch Street, and 13th Street and would be conditioned to either (1) pay an in-lieu fee to contribute toward improvements or (2) construct a connection to provide a link for pedestrians and bicyclists between the Project Site and the Jan Heidt Newhall Metrolink Station and various retail, commercial, and entertainment uses in Old Town Newhall. Therefore, the Project would be consistent with this strategy.
f) Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations).	**Consistent.** Please refer to the discussion under Goals 5 and 6 above. The Project would be located near multiple public transit options and provide features to support implementation of first/last mile strategies to reduce the reliance on and number of solo car trips. Therefore, the Project would be consistent with this strategy.
g) Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking).	**Consistent.** In conformance with the City's Uniform Development Code, the Project would be required to provide 2,969 parking spaces. However, the Project would provide 2,684 parking spaces as allowed under the Jobs Creation Overlay Zone that would be extended to the Project Site as part of the Project's entitlements. Therefore, the Project would be consistent with this strategy.
Strategy 2 – Promote Diverse Housing Choices	
a) Preserve and rehabilitate affordable housing and prevent displacement.	**Not Applicable.** The Project Site is currently vacant. There is no affordable housing on-site that could be preserved, rehabilitated, or displaced.
b) Identify funding opportunities for new workforce and affordable housing development.	**Not Applicable.** This strategy is directed toward SCAG and local jurisdictions and does not apply to individual development projects. However, the Project would create diverse job opportunities near housing in the Newhall community and the City.
c) Create incentives and reduce regulatory barriers for building	**Not Applicable.** This strategy is directed toward SCAG and local jurisdictions and does not apply to individual development projects. In addition, the Project

Table 4.10-1
2020–2045 RTP/SCS CONSISTENCY ANALYSIS

Goals, Principles, and Strategies	Consistency Assessment
context-sensitive accessory dwelling units to increase housing supply.	does not propose residential uses to allow building of accessory dwelling units to increase the housing supply.
d) Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions.	**Not Applicable.** This strategy is directed toward SCAG and does not apply to individual development projects. However, as discussed under Goals 5 and 6, the Project would support the reduction of GHG emissions.
Strategy 3 – Leverage Technology Innovations	
a) Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing, and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging, and parking/drop-off space.	**Not Applicable.** This strategy is directed toward SCAG and local jurisdictions and does not apply to individual development projects. However, the Project would support this strategy by locating the proposed development near multiple public transit options and implementing sustainability features that promote the use of sustainable transportation options, such as walking, biking, or public transit, by constructing a Class I trail along the Project frontage at 12th Street, Arch Street, and 13th Street. In addition, the Project would be conditioned to either (1) pay an in-lieu fee to contribute toward improvements or (2) construct a connection to provide a link for pedestrians and bicyclists between the Project Site and the Jan Heidt Newhall Metrolink Station and the Old Town Newhall dining and entertainment district, as discussed under Goals 5 and 6.
b) Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a “mobility wallet,” an app-based system for storing transit and other multi-modal payments.	**Not Applicable.** This strategy is directed toward SCAG and local jurisdictions and does not apply to individual projects.
c) Identify ways to incorporate “micro-power grids” in communities, for example solar energy, hydrogen fuel cell power storage, and power generation.	**Not Applicable.** This strategy is directed toward SCAG and local jurisdictions and does not apply to individual development projects. However, subject to City and other agency approvals, the Project would install rooftop PV systems and solar panels on all the sound stage buildings and the support building for localized use.
Strategy 4 – Support Implementation of Sustainability Policies	
a) Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions.	**Not Applicable.** This strategy is directed toward SCAG and local jurisdictions and does not apply to individual development projects. However, as discussed under Goals 5 and 6, the Project would support the reduction of GHG emissions.
b) Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations.	**Not Applicable.** This strategy is directed toward SCAG and local jurisdictions and does not apply to individual development projects. However, the Project would be located within a TPA and HQTA near multiple public transit options, including the Jan Heidt Newhall Metrolink Station located less than 0.5 mile south of the Project Site.
c) Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment	**Not Applicable.** This strategy is directed toward SCAG and does not apply to individual projects.

Table 4.10-1
2020–2045 RTP/SCS CONSISTENCY ANALYSIS

Goals, Principles, and Strategies	Consistency Assessment
Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space.	
d) Work with local jurisdictions/ communities to identify opportunities and assess barriers to implement sustainability strategies.	**Not Applicable.** This strategy is directed toward SCAG and does not apply to individual projects.
e) Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region.	**Not Applicable.** This strategy is directed toward SCAG and does not apply to individual projects.
f) Continue to support long range planning efforts by local jurisdictions.	**Not Applicable.** This strategy is directed toward SCAG and does not apply to individual projects. However, the Project is proposed in a PGA, where growth is forecasted to occur due to proximity to existing and planned transit and infrastructure to support the use of alternative transportation modes.
g) Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy.	**Not Applicable.** This strategy is directed toward SCAG and does not apply to individual projects.
Strategy 5 – Promote a Green Region	
a) Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards.	**Not Applicable.** This strategy is directed toward SCAG and local jurisdictions and does not apply to individual development projects. However, the Project would improve community resiliency to natural hazards resulting from climate change, such as wildfires, by removing the existing wildfire fuel loads on the vacant Project Site and developing hardscapes, sound stages, and support buildings, and irrigated/managed landscaped areas, which would reduce fuel loads on the Project Site, thereby reducing the wildfire risks.
b) Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.	**Not Applicable.** This strategy is directed toward SCAG and local jurisdictions. However, the Project would support this strategy as the Project proposes to install rooftop PV systems and solar panels on all the sound stage buildings and the support building for localized use in accordance with the California Energy Code, which the City has adopted as its Energy Conservation Code. In addition, although the Project would remove 13 oak trees from the Project Site to accommodate the proposed development, the Project would replace the removed trees with the planting of 450 trees of different non-oak varieties, as well as 211 oak trees, and provide approximately 528,156 square feet of landscaping throughout the Project Site. These trees and landscaping would help reduce urban heat islands and contribute to carbon sequestration.
c) Integrate local food production into the regional landscape.	**Not Applicable.** This strategy is directed toward SCAG and local jurisdictions and does not apply to individual projects.
d) Promote more resource efficient development focused on conservation, recycling and reclamation.	**Not Applicable.** This strategy is directed toward SCAG and local jurisdictions and does not apply to individual development projects. However, the Project would support this strategy by complying with Title 24 (California Building Energy Efficiency Standards). Energy-saving and sustainable design features

Table 4.10-1
2020–2045 RTP/SCS CONSISTENCY ANALYSIS

Goals, Principles, and Strategies	Consistency Assessment
	would be incorporated, including but not limited to installation of energy-efficient light fixtures, high-efficiency plumbing fixtures, EV parking spaces, and rooftop PV systems and solar panels. In addition, the Project would comply with the City's Construction and Demolition (C&D) Ordinance (05-09), which requires all new commercial projects over 1,000 square feet to recycle a minimum of 65 percent of all inert materials and 65 percent of all other materials. Upon completion, the Project would be required to maintain a minimum diversion rate of 50 percent and encouraged to meet the City's solid waste diversion goal of 75 percent.
e) Preserve, enhance and restore regional wildlife connectivity.	**Not Applicable.** This strategy is directed toward SCAG and local jurisdictions and does not apply to individual projects. However, the Project Site is not located within a Significant Ecological Area and is surrounded on all sides by urban development. The Project Site does not connect habitat areas or provide a meaningful conduit by which wildlife could reach the areas necessary for their life history (e.g., areas for feeding, sheltering, finding mates, dispersal). Although undeveloped, the Project Site is primarily composed of land that has been cleared of the majority of its natural vegetation. Nevertheless, as identified in Section 4.3, Biological Resources, of this Draft EIR, the Project would be required to implement mitigation measures to reduce impacts to special-status species, riparian habitat, wetlands, and protected oak trees to less-than-significant levels. Therefore, the Project would neither support nor conflict with the preservation, enhancement, or restoration of regional wildlife connectivity.
f) Reduce consumption of resource areas, including agricultural land.	**Consistent.** The Project Site is not located within any resource areas. In addition, the City of Santa Clarita General Plan land use designations for the Project Site are MX-N (Mixed Use Neighborhood) and NU5 (Non-Urban, one dwelling unit per acre). Furthermore, the Project Site is not within a Significant Ecological Area and is surrounded on all sides by development. Although undeveloped, the Project Site is primarily composed of land that has been cleared of the majority of its natural vegetation. Nevertheless, as identified in Section 4.3, Biological Resources, of this Draft EIR, the Project would be required to implement mitigation measures to reduce impacts to special-status species, riparian habitat, wetlands, and protected oak trees to less-than-significant levels.
g) Identify ways to improve access to public park space.	**Not Applicable.** This strategy is directed toward SCAG and local jurisdictions and does not apply to individual projects.
Sources: SCAG, 2020–2045 RTP/SCS, September 2020; Michael Baker International, 2023.	

Consistency with the City of Santa Clarita General Plan

The proposed buildings have been designed to be consistent with the Old Town Newhall Specific Plan standards, including its development standards and architectural style standards. The Project would reflect the Project area's character, architecture, and history by featuring various design elements that commemorate the filmmaking heritage of Santa Clarita, as well as designing the Project's gateway and ancillary buildings to convey some characteristics of Craftsman-style architecture with low-pitched roofs and overhangs that rest on decorative stone columns. The Project, including the off-site improvements, would also comply with the requirements of the PCSSD and City's Design Guidelines, specifically for the Newhall community.

In addition, the Project would be required to comply with the California Building Standards Code, the CALGreen Code, and the Building Energy Efficiency Standards to support the State's and the City's energy and water conservation efforts. The general consistency of the Project with the applicable

policies identified in the City's General Plan is presented in **Table 4.10-2**. As shown, the Project would generally not conflict with the policies identified in the City's General Plan elements, including the Land Use Element, Circulation Element, Noise Element, Conservation and Open Space Element, and Safety Element, adopted for the purpose of avoiding or mitigating environmental effects, for the reasons described above, the additional reasons discussed in **Table 4.10-2,** and the same reasons identified in **Table 4.10-1** regarding the Project's consistency with the 2020–2045 RTP/SCS.

Table 4.10-2
CITY OF SANTA CLARITA GENERAL PLAN CONSISTENCY ANALYSIS

Applicable General Plan Policies	Project Consistency Analysis
LAND USE ELEMENT	
Goal LU 1: An interconnected Valley of Villages providing diverse lifestyles, surrounded by a greenbelt of natural open space.	
Objective LU 1.1: Maintain an urban form for the Santa Clarita Valley that preserves an open space greenbelt around the developed portions of the Valley, protects significant resources from development, and directs growth to urbanized areas served with infrastructure.	
Policy LU 1.1.2: On the Land Use Map, concentrate urban development within flatter portions of the Santa Clarita Valley floor in areas with limited environmental constraints and served with infrastructure.	**Consistent.** The Project would be an urban development that would include a full-service film and television studio campus to be located on a generally flat, vacant, infill site within a SCAG-designated HQTA and TPA, as well as in a PGA. As an infill site, the Project Site has limited environmental constraints beyond Placerita Creek's traversing the northern portion of the Project Site. In addition, existing infrastructure has been established to serve the adjacent residential and commercial land uses to the east, south, and west of the Project Site and would be extended to serve the proposed development. Therefore, the Project would be consistent with this Land Use Element policy.
Policy LU 1.1.3: Discourage urban sprawl into rural areas by limiting non-contiguous, "leap-frog" development outside of areas designated for urban use.	**Consistent.** The majority of the Project Site is zoned and designated MX-N for urban use. In addition, the Project Site is an infill site surrounded on all four sides by residential and commercial uses. Accordingly, the Project would not be considered a "leap-frog" development. Therefore, the Project would be consistent with this Land Use Element policy.
Policy LU 1.1.4: Preserve community character by maintaining natural features that act as natural boundaries between developed areas, including significant ridgelines, canyons, rivers and drainage courses, riparian areas, topographical features, habitat preserves, or other similar features, where appropriate.	**Consistent.** The Project would involve grading activities at the base of the hillside and, as such, the ridgeline that forms the northern boundary of the Project Site, as well as Placerita Creek that traverses the northern portion of the Project Site, would be preserved. The Project Site is primarily composed of land that has been cleared of the majority of its natural vegetation. However, as identified in Section 4.3, Biological Resources, of this Draft EIR, the Project would be required to implement mitigation measures to reduce impacts to Placerita Creek, riparian habitat, and wetlands, to less-than-significant levels. Therefore, the Project would be consistent with this Land Use Element policy.
Policy LU 1.1.5: Increase infill development and re-use of underutilized sites within and adjacent to developed urban areas to achieve maximum benefit from existing infrastructure and minimize loss of open space, through	**Consistent.** The Project would be located on a vacant, underutilized, infill site surrounded on all four sides by residential and commercial uses. The northern portion of the Project Site would be rezoned and redesignated from

Table 4.10-2
CITY OF SANTA CLARITA GENERAL PLAN CONSISTENCY ANALYSIS

Applicable General Plan Policies	Project Consistency Analysis
redesignation of vacant sites for higher density and mixed use, where appropriate.	NU5 (Non-Urban 5, one dwelling unit per acre) to MX-N to match the zoning and land use designation of the rest of the Project Site to allow for the development of the Project. The Project would utilize existing infrastructure that has already been established to serve the surrounding uses. Therefore, the Project would be consistent with this Land Use Element policy.
Objective LU 1.2: Maintain the distinctive community character of villages and neighborhoods throughout the planning area by establishing uses, densities, and design guidelines appropriate to the particular needs and goals of each area, including but not limited to the following:	
Policy LU 1.2.1: In Newhall, provide opportunities for new business and housing by implementing the Downtown Newhall Specific Plan, provide incentives to promote infill development and re-use of underutilized sites, and continue to plan for the future development of North Newhall.	**Consistent.** The Project Site is located adjacent to the Downtown Newhall Specific Plan area but would provide new job opportunities on an underutilized infill site to contribute to the future development of the North Newhall community. Therefore, the Project would be consistent with this Land Use Element policy.
Policy LU 1.2.6: In Placerita Canyon, ensure compatibility of development with existing rural, equestrian lots and the adjacent National Forest land; maintain community character in accordance with the City's existing Placerita Canyon Special Standards District (PCSSD); provide an orderly transition between existing rural and low-density residential uses and proposed new development; and require the provision of needed infrastructure. The City and the Placerita Canyon Property Owners Association shall work together to amend the PCSSD in the Unified Development Code (UDC) to provide additional certainty and expectations for the developed areas within the District and to create flexibility and continuity, subject to the provisions outlined above, for undeveloped properties in the District. These changes will include transitional density provisions, specific UDC rules and regulations that will clearly outline development codes within Placerita Canyon.	**Consistent.** The Project would be required to undergo several City processes prior to Project approval, including architectural design review, development review, landscape plan review, and hillside review, to ensure that the Project complies with the requirements of the PCSSD and is compatible with the surrounding area, particularly the residential uses immediately east of the Project Site in Placerita Canyon. The Project would utilize the MWD right-of-way behind the residences that front on Alderbrook Drive as a plant nursery, which would provide both visual screening and an orderly transition between these residential uses and the Project. In addition, the Project's location in the North Newhall Area already imposes the requirement of public participation and outreach to the Placerita Canyon Property Owners Association, which the Project applicant had conducted at the onset upon submittal of the Project application to the City. Therefore, the Project would be consistent with this Land Use Element policy.
Objective LU 1.3: Plan for density and intensity of development that respects and is reflective of the natural terrain.	
Policy LU 1.3.2: Substantially retain the integrity and natural grade elevations of significant natural ridgelines and prominent landforms that form the Valley's skyline backdrop.	**Consistent.** The Project would require a portion of the base of the ridgeline north of Placerita Creek to be graded to improve the parking layout north of the creek and to eliminate the need for soil import. However, the integrity and natural grade elevation of this ridgeline would be retained. Therefore, the Project would be consistent with this Land Use Element policy.
Policy LU 1.3.3: Discourage development on ridgelines and lands containing 50% slopes so that these areas are maintained as natural open space.	**Consistent.** The Project would not disturb the area beyond the base of the ridgeline north of Placerita Creek (see Policy LU 1.3.2 above). Accordingly, the Project would maintain this ridgeline as natural open space. Therefore, the Project would be consistent with this Land Use Element policy.
Policy LU 1.3.6: Encourage retention of natural drainage patterns and the preservation of significant	**Consistent.** As identified in Section 4.9, Hydrology and Water Quality, of this Draft EIR, the Project design would allow for stormwater to be contained and treated on-site

Table 4.10-2
CITY OF SANTA CLARITA GENERAL PLAN CONSISTENCY ANALYSIS

Applicable General Plan Policies	Project Consistency Analysis
riparian areas, both of which are commonly located in hillside areas.	through the use of an infiltration/detention basin and underground infiltration chambers, then released to Placerita Creek, which will retain the natural drainage pattern by ensuring that stormwater runoff rates and volumes entering the creek do not exceed existing stormwater runoff rates and volumes; provide additional sources of polluted runoff; or change the currents, course, or direction of surface water that would affect Placerita Creek. In addition, as identified in Section 4.3, Biological Resources, of this Draft EIR, the Project would be required to implement mitigation measures to reduce impacts to riparian habitat to a less-than-significant level. Therefore, the Project would be consistent with this Land Use Element policy.
Objective LU 2.2: Protect significant community resources from encroachment by incompatible uses, where feasible and appropriate.	
Policy LU 2.2.1: Identify areas of scenic or aesthetic value to the community, and minimize the designation of uses in these areas that would diminish their aesthetic quality.	**Consistent.** The ridgeline on the northern boundary of the Project site is identified in the City's General Plan Conservation and Open Space Element Hillsides and Ridgeline Exhibit (Exhibit CO-1) with a slope between 11 and 15 percent. This ridgeline is at an elevation of approximately 1,340 feet above mean sea level (amsl).[a] The average elevation of the Project Site south of Placerita Creek is approximately 1,240 feet amsl. With the sound stages being the tallest structures at 55 feet, the Project would not completely block views of the ridgeline from the south. In addition, the Project would be located on the eastern end of Placerita Canyon, which is one of the major scenic canyon areas identified in the City's General Plan Conservation and Open Space Element. Accordingly, the Project would not obstruct views of the scenic features of Placerita Canyon, including its shaded oak groves; seasonal streams lined with cottonwoods, willows, and sycamores; sandstone formations; seasonal waterfall and hiking trails; the Placerita State Park and Nature Center; and the "Oak of the Golden Dream," which is the site of California's first gold discovery in 1842 and a designated State Historic Landmark. Therefore, the Project would be consistent with this Land Use Element policy.
Policy LU 2.2.2: Identify sites and areas with historical or cultural value to the community, and ensure that uses in or adjacent to these areas will not impact their historical integrity.	**Consistent.** Section 4.4, Cultural Resources, of this Draft EIR, addressed impacts to historical resources and determined that the Project would not have direct or indirect impacts to any historical resource as no historic resources were identified on the Project Site, and no historic buildings are located in the immediate vicinity of the Project Site or have a direct line-of-sight of the Project Site. Therefore, the Project would be consistent with this Land Use Element policy.
Goal LU 4: A diverse and healthy economy.	
Objective LU 4.1: Promote creation of strong and regional local economies.	

Table 4.10-2
CITY OF SANTA CLARITA GENERAL PLAN CONSISTENCY ANALYSIS

Applicable General Plan Policies	Project Consistency Analysis
Policy LU 4.1.3: Direct business creation and expansion for larger companies within and adjacent to existing and planned business centers and major transportation corridors.	**Consistent.** The Project would be located adjacent to the commercial uses in Old Town Newhall and less than 0.5 mile north of the Jan Heidt Newhall Metrolink Station. Therefore, the Project would be consistent with this Land Use Element policy.
Objective LU 4.2: Promote job creation, focusing on employment generators in the technical and professional sectors.	
Policy LU 4.2.1: Pursue business attraction and expansion programs for clean industries that provide job opportunities for local residents, particularly in the areas of film/entertainment, biotechnology, aerospace, and technology.	**Consistent.** The Project would provide job opportunities in the film and entertainment industry. The Project would be located near multiple public transit options and include 170 on-site bicycle parking spaces to encourage biking the first/last mile to and from multiple public transit options that connect to other parts of the SCAG region. Thus, the Project would support the use of alternative modes of transportation, including walking, biking, and public transit, which would reduce GHG and air pollutant emissions. Constructing a large employment generator in a housing-rich area of the SCAG region would also reduce commuter trips and GHG emissions by providing job opportunities to those who already live near the Project Site or in the Santa Clarita Valley. The Project would contribute to the expansion of clean industries (i.e., an industry that does not emit smoke, noise, offensive odors, or harmful industrial wastes) in the City that would provide job opportunities for local residents, particularly in the areas of film and entertainment. Therefore, the Project would be consistent with this Land Use Element policy.
Policy LU 4.2.3: Encourage businesses to locate in all appropriate areas of the community to encourage job creation in closer proximity to workforce housing.	**Consistent.** Please refer to Policy LU 4.2.1 above.
Objective LU 4.3: Enhance older commercial and industrial areas.	
Policy LU 4.3.4: Promote business development that upgrades and revitalizes older commercial corridors, including Lyons Avenue, Railroad Avenue/Newhall Avenue, Main Street and Soledad Canyon Road, in a manner that reflects each area's character, architecture, and history.	**Consistent.** The Project would contribute to the revitalization of the Railroad Avenue corridor. The proposed buildings have been designed to be consistent with the Old Town Newhall Specific Plan standards, including its development standards and architectural style standards. In addition, the Project reflects the area's character, architecture, and history by featuring various design elements that commemorate the filmmaking heritage of Santa Clarita, as well as designing the Project's gateway and ancillary buildings to convey some characteristics of Craftsman-style architecture with low-pitched roofs and overhangs that rest on decorative stone columns similar to those found at the Old Town Newhall Library buildings and the Jan Heidt Metrolink Station south of the Project Site. Therefore, the Project would be consistent with this Land Use Element policy.
Objective LU 4.5: Ensure creation of attractive and technology-friendly business environments to attract tenants and employees.	
Policy LU 4.5.2: Encourage the provision of usable open space that is accessible to employees and	**Consistent.** The Project would include a small park (i.e., Shadow Oak Park) in the center of a courtyard formed

Table 4.10-2
CITY OF SANTA CLARITA GENERAL PLAN CONSISTENCY ANALYSIS

Applicable General Plan Policies	Project Consistency Analysis
visitors, and discourage the provision of large areas of water-consuming landscaping that are not usable or accessible.	by the three catering buildings in the southeastern portion of the Project Site. Patios are provided in front of each catering building. In addition, several outdoor seating and picnic areas are proposed along the western façade of the proposed support building and outdoor break areas between the sound stage buildings. Furthermore, a basketball half court is proposed along the western façade of the proposed support building (between the two picnic areas), as well as a small dog park at the northern end of the proposed support building. Therefore, the Project would be consistent with this Land Use Element policy.
Policy LU 4.5.3: Promote the inclusion of state-of-the-art technology within business complexes for telecommunications, heating and cooling, water and energy conservation, and other similar design features.	**Consistent.** The Project would be required to comply with the California Building Standards Code, which includes the CALGreen Code, which requires implementation of energy-efficient light fixtures and building materials into the design of new construction projects, as well as high-efficiency plumbing fixtures. Furthermore, the 2022 Building Energy Efficiency Standards require newly constructed buildings to meet energy performance standards set by the California Energy Commission. These standards are specifically crafted for new buildings to result in energy-efficient performance. Therefore, the Project would be consistent with this Land Use Element policy.
Policy LU 4.5.4: Encourage the provision of support services for employees within business park areas, such as dining and personal services where appropriate, to reduce vehicle trips and promote pedestrian-friendly work environments.	**Consistent.** The Project would include a catering building, as well as the designated food truck stations in the southeastern portion of the Project Site. Each station would provide an electrical connection to commercial food trucks that are able to run on wired connection points to avoid utilizing generators. In addition, the Project would construct a Class I trail along the Project frontage at 12th Street, Arch Street, and 13th Street and would be conditioned to either (1) pay an in-lieu fee to contribute toward improvements or (2) construct a connection to provide a link for pedestrians and bicyclists between the Project Site and the Jan Heidt Newhall Metrolink Station and various retail, commercial, and entertainment uses in Old Town Newhall to promote a pedestrian-friendly environment. Therefore, the Project would be consistent with this Land Use Element policy.
Goal LU 5: Enhanced mobility through alternative transportation choices and land use patterns.	
Objective LU 5.1: Provide for alternative travel modes linking neighborhoods, commercial districts, and job centers.	
Policy LU 5.1.1: Require safe, secure, clearly delineated, adequately illuminated walkways and bicycle facilities in all commercial and business centers.	**Consistent.** The Project would provide adequate illumination to building interiors and exteriors, bike parking/storage areas, parking lots, and the parking structure. The pedestrian- and bicycle-friendly multi-use pathway that would connect the Project Site to the Jan Heidt Newhall Metrolink Station and various retail, commercial, and entertainment uses in Old Town Newhall would also be adequately illuminated to ensure safety and security of pedestrians and bicyclists.

Table 4.10-2
CITY OF SANTA CLARITA GENERAL PLAN CONSISTENCY ANALYSIS

Applicable General Plan Policies	Project Consistency Analysis
	Therefore, the Project would be consistent with this Land Use Element policy.
Policy LU 5.1.2: Require connectivity between walkways and bikeways serving neighborhoods and nearby commercial areas, schools, parks, and other supporting services and facilities.	**Consistent.** The Project would construct a Class I trail along the Project frontage at 12th Street, Arch Street, and 13th Street and would be conditioned to either (1) pay an in-lieu fee to contribute toward improvements or (2) construct a connection to a future Class I trail along Railroad Avenue and future connection to the Jan Heidt Newhall Metrolink Station and various retail, commercial, and entertainment uses in Old Town Newhall. Therefore, the Project would be consistent with this Land Use Element policy.
Objective LU 5.2: Coordinate land use designations with support services and public transit in order to encourage vehicle trip reduction.	
Policy LU 5.2.3: Promote location of non-polluting businesses providing employment opportunities in proximity to neighborhoods, to encourage walking to work.	**Consistent.** Please refer to Policy LU 4.2.1.
Goal LU 6: A scenic and beautiful urban environment that builds on the community's history and natural setting.	
Objective LU 6.3: Beautify streetscapes and gateways to the community.	
Policy LU 6.3.4: Require undergrounding of utility lines for new development where feasible, and plan for undergrounding of existing utility lines in conjunction with street improvement projects where economically feasible.	**Consistent.** The Project would connect to existing utilities but would underground all the connections. Therefore, the Project would be consistent with this Land Use Element policy.
Objective LU 6.4: Protect the Santa Clarita Valley's significant historical and cultural resources in a scenic setting through appropriate land use designations.	
Policy LU 6.4.1: Maintain the historic buildings in Newhall, including the William Hart Regional Park buildings, the Tom Mix cottages at Heritage Junction, the American Theater, the Melody Ranch, and various other commercial and residential structures designated as local historic resources, through implementation of preservation measures in the Downtown Newhall Specific Plan.	**Consistent.** Please refer to Policy LU 2.2.2.
Policy LU 6.4.6: Through the environmental review and development review processes, evaluate impacts on historic and cultural sites from proposed development and require appropriate mitigation.	**Consistent.** Please refer to Policy LU 2.2.2. Mitigation measures are proposed to reduce potential construction impacts to archaeological resources to a less-than-significant level. Therefore, the Project would be consistent with this Land Use Element policy.
Objective LU 6.5: Promote high quality development that enhances the urban environment and builds long-term value.	
Policy LU 6.5.1: Require use of high quality, durable, and natural-appearing building materials pursuant to applicable ordinances.	**Consistent.** The Project would comply with the Santa Clarita Community Character and Design Guidelines, which require the use of high-quality materials. Therefore, the Project would be consistent with this Land Use Element policy.

Table 4.10-2
CITY OF SANTA CLARITA GENERAL PLAN CONSISTENCY ANALYSIS

Applicable General Plan Policies	Project Consistency Analysis
Policy LU 6.5.2: Encourage the use of designs and architectural styles that incorporate classic and timeless architectural features.	**Consistent.** The Project would comply with the Design Guidelines, which require the Project to be compatible in size, scale, and appearance with the character of Santa Clarita, and to incorporate articulation, community character features, multiple building forms, and desirable building details. In addition, the Project would feature various design elements that commemorate the filmmaking heritage of Santa Clarita, including a mural featuring film stars, such as Charlie Chaplin, Gene Autry, and William S. Hart, from Santa Clarita Valley's past. Furthermore, the design of the Project's gateway and ancillary buildings would convey some characteristics of Craftsman-style architecture with low-pitched roofs and overhangs that rest on decorative stone columns similar to those found at the Old Town Newhall Library buildings and the Jan Heidt Metrolink Station south of the Project Site. Therefore, the Project would be consistent with this Land Use Element policy.
Policy LU 6.5.3: Require architectural enhancement and articulation on all sides of buildings (360 degree architecture), with special consideration at building entrances and corners, and along facades adjacent to major arterial streets.	**Consistent.** The Project would comply with the PCSSD, which requires buildings to provide 360-degree architectural design with pedestrian-scaled building massing and forms and include defined entry gateways or monuments, complete with landscaping and architectural elements. Therefore, the Project would be consistent with this Land Use Element policy.
Policy LU 6.5.4: Evaluate new development in consideration of its context, to ensure that buildings create a coherent living environment, a cohesive urban fabric, and contribute to a sense of place consistent with the surrounding neighborhoods.	**Consistent.** Please refer to Policy LU 6.5.2.
Goal LU 7: Environmentally responsible development through site planning, building design, waste reduction, and responsible stewardship of resources.	
Objective LU 7.1: Achieve greater energy efficiency in building and site design.	
Policy LU 7.1.1: Require shade trees within parking lots and adjacent to buildings to reduce the heat island effect, in consideration of Fire Department fuel modification restrictions.	**Consistent.** The Project would provide a total of 661 trees, the majority of which are shade trees, including 211 oak trees, within parking lots and adjacent to the proposed buildings, as shown in **Figures 2-12** through **2-14**. These trees would contribute to the reduction in the heat island effect. Therefore, the Project would be consistent with this Land Use Element policy.
Policy LU 7.1.2: Promote the use of solar panels and renewable energy sources in all projects.	**Consistent.** The Project would install rooftop PV systems and solar panels on all the sound stage buildings and the support building. Therefore, the Project would be consistent with this Land Use Element policy.
Policy LU 7.1.3: Encourage development of energy-efficient buildings, and discourage construction of new buildings for which energy efficiency cannot be demonstrated.	**Consistent.** Please refer to Policy LU 4.5.3.
Objective LU 7.2: Ensure an adequate water supply to meet the demands of growth.	

Table 4.10-2
CITY OF SANTA CLARITA GENERAL PLAN CONSISTENCY ANALYSIS

Applicable General Plan Policies	Project Consistency Analysis
Policy LU 7.2.3: Require that all new development proposals demonstrate a sufficient and sustainable water supply prior to approval.	**Consistent.** The Santa Clarita Valley Water Agency (SCV Water) prepared a water supply assessment for the Project, which determined that an adequate water supply would be available to serve the Project. Therefore, the Project would be consistent with this Land Use Element policy.
Objective LU 7.3: Protect surface and ground water quality through design of development sites and drainage improvements.	
Policy LU 7.3.2: Maintain stormwater runoff onsite by directing drainage into rain gardens, natural landscaped swales, rain barrels, permeable areas, and use of drainage areas as design elements, where feasible and reasonable.	**Consistent.** The Project design would allow for stormwater to be contained and treated on-site through the use of an infiltration/detention basin and underground infiltration chambers, then released to Placerita Creek. Therefore, the Project would be consistent with this Land Use Element policy.
Policy LU 7.3.3: Seek methods to decrease impermeable site area where reasonable and feasible, in order to reduce stormwater runoff and increase groundwater infiltration, including use of shared parking and other means as appropriate.	**Consistent.** Please refer to Policy LU 7.3.2.
Policy LU 7.3.4: Implement best management practices for erosion control throughout the construction and development process.	**Consistent.** The Project would implement the following BMPs to manage and control soil erosion during construction: • Preserve existing vegetation where required and when feasible; • Control the area of soil-disturbing operations such that the contractor is able to implement erosion control BMPs quickly and effectively; • Stabilize non-active areas within 14 days of cessation of construction activities or sooner if stipulated by local requirements; • Control erosion in concentrated flow paths by applying erosion control blankets, check dams, erosion control seeding or alternate methods; and • Prior to the completion of construction, apply permanent erosion control to remaining disturbed soil areas. Therefore, the Project would be consistent with this Land Use Element policy.
Policy LU 7.3.5: Limit development within flood-prone areas to minimize downstream impacts.	**Consistent.** As identified in Section 4.9, Hydrology and Water Quality, of this Draft EIR, although the northern portion of the Project Site north of Placerita Creek is located within a FEMA Zone A floodplain, stormwater runoff would be routed through the underground infiltration chambers or infiltration/drainage basin proposed for the Project to ensure that the total Project outlet flow rate would be equal to or below the existing tributary flow rate. In addition, other hydromodifications, such as installing a splitter manhole and an outlet from a splitter manhole, would divert additional flow from larger storms before passing through a weir that would continue through the manhole and outlet to Placerita Creek. With these proposed hydromodifications, the

Table 4.10-2
CITY OF SANTA CLARITA GENERAL PLAN CONSISTENCY ANALYSIS

Applicable General Plan Policies	Project Consistency Analysis
	Project would not substantially alter the existing drainage pattern of the site or area, or substantially increase the rate or amount of surface runoff in a manner that would result in downstream impacts. Therefore, the Project would be consistent with this Land Use Element policy.
Policy LU-7.3.6: Support emerging methods and technologies for the onsite capture, treatment, and infiltration of stormwater and greywater, and amend the City Code to allow these methods and technologies when they are proven to be safe and feasible.	**Consistent.** Please refer to Policy LU 1.3.6.
Objective LU 7.4: Promote water conservation through building and site design.	
Policy LU 7.4.1: Require the use of drought tolerant landscaping, native California plant materials, and evapotranspiration (smart) irrigation systems.	**Consistent.** As shown in **Figures 2-12** through **2-14**, the majority of the proposed trees would be drought tolerant. All landscape plans and irrigation systems would be required to adhere to the City's Design Guidelines and SCMC requirements. Therefore, the Project would be consistent with this Land Use Element policy.
Policy LU 7.4.2: Require the use of low-flow fixtures in all non-residential development and residential development with five or more dwelling units, which may include but are not limited to water conserving shower heads, toilets, waterless urinals and motion-sensor faucets, and encourage use of such fixtures in building retrofits as appropriate.	**Consistent.** The Project would comply with the California Building Standards Code, which includes the CALGreen Code, which includes provisions related to the installation of high-efficiency plumbing fixtures to achieve the required 20 percent reduction in indoor water use. Therefore, the Project would be consistent with this Land Use Element policy.
Objective LU 7.5: Promote waste reduction through site and building design.	
Policy LU 7.5.1: Ensure that all new development provides adequate space for recycling receptacles and bins on site.	**Consistent.** The Project would comply with the City's recycling program by including adequate, accessible, and convenient areas for collecting and loading recyclable materials, consistent with the provisions of AB 341. Therefore, the Project would be consistent with this Land Use Element policy.
Objective LU 7.6: Protect natural habitats through site design where reasonable and feasible.	
Policy LU 7.6.1: Limit outdoor lighting levels to the minimum needed for safety and security, and encourage lower lighting levels when businesses are closed.	**Consistent.** The Project would comply with the City's outdoor lighting standards as established in SCMC Section 17.51.050 and would limit outdoor lighting to the minimum needed for safety and security of employees and guests of the Project. In addition, Project lighting would not increase lighting levels beyond the Project Site boundaries with the exception of an increase of 0.1 foot-candle in the existing ambient lighting levels along 12th Street at the Gate 3 driveway entrance and between the Gate 3 driveway entrance and Gate 1 driveway entrance. Therefore, the Project would be consistent with this Land Use Element policy.
Circulation Element	
Goal C 1: An inter-connected network of circulation facilities that integrates all travel modes, provides viable alternatives to automobile use, and conforms with regional plans.	
Objective C 1.1: Provide multi-modal circulation systems that move people and goods efficiently while protecting environmental resources and quality of life.	

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Applicable General Plan Policies	Project Consistency Analysis
Policy C 1.1.1: Reduce dependence on the automobile, particularly single-occupancy vehicle use, by providing safe and convenient access to transit, bikeways, and walkways.	**Consistent.** The Project would be located within a SCAG-designated HQTA and TPA and would promote the use of public transportation and other alternative modes of transportation that reduce single-occupancy vehicle use. The Project would provide 170 on-site bicycle parking spaces and be conditioned to either (1) pay an in-lieu fee to contribute toward improvements or (2) construct a connection to provide a link for pedestrians and bicyclists between the Project Site and the Jan Heidt Newhall Metrolink Station and various retail, commercial, and entertainment uses in Old Town Newhall to reduce dependence on the automobile. Therefore, the Project would be consistent with this Circulation Element policy.
Policy C 1.1.3: Work with local and regional agencies and employers to promote an integrated, seamless transportation system that meets access needs, including local and regional bus service, dial-a-ride, taxis, rail, van pools, car pools, bus pools, bicycling, walking, and automobiles.	**Consistent.** Please refer to Policy C 1.1.1.
Policy C 1.1.5: Plan for efficient links between circulation systems at appropriate locations, including but not limited to bus-rail connections and pedestrian-bus connections.	**Consistent.** Please refer to Policy C 1.1.1.
Policy C 1.1.6: Provide adequate facilities for multi-modal travel, including but not limited to bicycle parking and storage, expanded park-and-ride lots, and adequate station and transfer facilities in appropriate locations.	**Consistent.** Please refer to Policy C 1.1.1.
Policy C 1.1.7: Consider the safety and convenience of the traveling public, including pedestrians and cyclists, in design and development of all transportation systems.	**Consistent.** Please refer to Policy C 1.1.1.
Policy C 1.1.8: Acquire and/or reserve adequate right-of-way in transportation corridors to accommodate multiple travel modes, including bus turnouts, bus rapid transit (BRT), bikeways, walkways, and linkages to trail systems.	**Consistent.** Please refer to Policy C 1.1.1.
Policy C 1.1.10: Provide for flexibility in the transportation system to accommodate new technology as it becomes available, in order to reduce trips by vehicles using fossil fuels where feasible and appropriate.	**Consistent.** The Project would include EV and EV-ready parking spaces for Project employees and visitors to accommodate new technology and reduce trips by vehicles using fossil fuels. Therefore, the Project would be consistent with this Circulation Element policy.
Objective C 1.2: Coordinate land use and circulation planning to achieve greater accessibility and mobility for users of all travel modes.	
Policy C 1.2.1: Develop coordinated plans for land use, circulation, and transit to promote transit-oriented development that concentrates higher density housing, employment, and commercial areas in proximity to transit corridors.	**Consistent.** The Project, which is a large employment generator, would be located within a TPA and HQTA near multiple public transit options. The Project Site is located less than 0.5 mile north of the Jan Heidt Newhall Metrolink Station. Therefore, the Project would be consistent with this Circulation Element policy.

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CITY OF SANTA CLARITA GENERAL PLAN CONSISTENCY ANALYSIS

Applicable General Plan Policies	Project Consistency Analysis
Policy C 1.2.3: Require that new commercial and industrial development provide walkway connections to public sidewalks and transit stops, where available.	**Consistent.** Please refer to Policy C 1.1.1.
Policy C 1.2.4: Consider location, availability, and accessibility of transit in evaluating new development plans.	**Consistent.** Please refer to Policy C 1.2.1.
Policy C 1.2.8: Provide safe pedestrian connections across barriers, which may include but are not limited to major traffic corridors, drainage and flood control facilities, utility easements, grade separations, and walls.	**Consistent.** Please refer to Policy C 1.1.1.
Policy C 1.2.9: Emphasize providing right-of-way for non-vehicular transportation modes so that walking and bicycling are the easiest, most convenient modes of transportation available for short trips.	**Consistent.** Please refer to Policy C 1.1.1.
Policy C 1.2.11: Reduce vehicle miles traveled (VMT) through the use of smart growth concepts.	**Consistent.** Please refer to Policy C 1.1.1.
Policy C 1.2.12: Balance the anticipated volume of people and goods movement with the need to maintain a walkable and bicycle friendly environment.	**Consistent.** Please refer to Policy C 1.1.1.
Goal C 3: Reduction of vehicle trips and emissions through effective management of travel demand, transportation systems, and parking.	
Objective C 3.1: Promote the use of travel demand management strategies to reduce vehicle trips.	
Policy C 3.1.1: In evaluating new development projects, require trip reduction measures as feasible to relieve congestion and reduce air pollution from vehicle emissions.	**Consistent.** The Project would be located near multiple public transit options, including a Metrolink station and bus stops for the SCT and AVTA lines immediately adjacent to the Project Site. In addition, the Project would include 170 on-site bicycle parking spaces to encourage biking the first/last mile to and from multiple public transit options that connect to other parts of the SCAG region. In addition, the Project would construct a Class I trail along the Project frontage at 12th Street, Arch Street, and 13th Street and would be conditioned to either (1) pay an in-lieu fee to contribute toward improvements or (2) construct a connection to a future Class I trail along Railroad Avenue and future connection to the Jan Heidt Newhall Metrolink Station and various retail, commercial, and entertainment uses in Old Town Newhall. Accordingly, the Project would support the use of alternative modes of transportation, including walking, biking, and public transit, to reduce per employee VMT and corresponding GHG and air pollutant emissions. In addition, constructing a large employment generator in a housing-rich area of the SCAG region would reduce commuter trips and air pollution from vehicle emissions by providing job opportunities to those who already live near the Project Site or in the Santa Clarita Valley. Therefore, the Project would be consistent with this Circulation Element policy.
Objective C 3.2: Encourage reduction in airborne emissions from vehicles through use of clean vehicles and transportation system management.	

Table 4.10-2
CITY OF SANTA CLARITA GENERAL PLAN CONSISTENCY ANALYSIS

Applicable General Plan Policies	Project Consistency Analysis
Policy C 3.2.3: When available and feasible, provide opportunities and infrastructure to support use of alternative fuel vehicles and travel devices.	**Consistent.** Please refer to Policy C 1.1.10.
Objective C 3.3: Make more efficient use of parking and maximize economic use of land, while decreasing impervious surfaces in urban areas, through parking management strategies.	
Policy C 3.3.1: Evaluate parking standards and reduce requirements where appropriate, based on data showing that requirements are in excess of demand.	**Consistent.** In conformance with the City's Uniform Development Code, the Project would be required to provide 2,969 parking spaces. However, the Project would provide 2,684 parking spaces as allowed under the Jobs Creation Overlay Zone that would be extended to the Project Site as part of the Project's entitlements. Therefore, the Project would be consistent with this Circulation Element policy.
Goal C 6: A unified and well-maintained bikeway system with safe and convenient routes for commuting, recreational use and utilitarian travel, connecting communities and the region.	
Objective C 6.2: Encourage provision of equipment and facilities to support the use of bicycles as an alternative means of travel.	
Policy C 6.2.1: Require bicycle parking, which can include bicycle lockers and sheltered areas at commercial sites and multi-family housing complexes for use by employees and residents, as well as customers and visitors.	**Consistent.** Please refer to Policy C 1.1.1.
Goal C 7: Walkable communities, in which interconnected walkways provide a safe, comfortable and viable alternative to driving for local destinations.	
Objective C 7.1: A continuous, integrated system of safe and attractive pedestrian walkways, paseos and trails linking residents to parks, open space, schools, services, and transit.	
Policy C 7.1.4: Identify and develop an improvement program to connect existing walkways and paseos to transit and services, where needed and appropriate.	**Consistent.** Please refer to Policy C 1.1.1.
Policy C 7.1.10: Continue to expand and improve the Valley's multi-use trail system to provide additional routes for pedestrian travel.	**Consistent.** Please refer to Policy C 1.1.1.
Noise Element	
Goal N 1: A healthy and safe noise environment for Santa Clarita Valley residents, employees, and visitors.	
Objective N 1.1: Protect the health and safety of the residents of the Santa Clarita Valley by the elimination, mitigation, and prevention of significant existing and future noise levels.	
Policy N 1.1.2: Continue to implement the adopted Noise Ordinance and other applicable code provisions, consistent with state and federal standards, which establish noise impact thresholds for noise abatement and attenuation, in order to reduce potential health hazards associated with high noise levels.	**Consistent.** Section 4.11, Noise, of this Draft EIR, addressed the noise impacts of the Project. As determined in that section, Project impacts during construction and operation would not exceed any noise impact thresholds, including those established in the City's Noise Ordinance, and, as such, the Project would not expose adjacent sensitive uses to potential health hazards associated with high noise levels. Therefore, the Project would be consistent with this Noise Element policy.

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CITY OF SANTA CLARITA GENERAL PLAN CONSISTENCY ANALYSIS

Applicable General Plan Policies	Project Consistency Analysis
Policy N 1.1.3: Include consideration of potential noise impacts in land use planning and development review decisions.	**Consistent.** The Project's noise impacts have been considered in Section 4.11, Noise, of this Draft EIR. As determined in that section, Project impacts during construction and operation would not exceed any noise thresholds and, as such, would result in less-than-significant impacts. Therefore, the Project would be consistent with this Noise Element policy.
Policy N 1.1.4: Control noise sources adjacent to residential, recreational, and community facilities, and those land uses classified as noise sensitive.	**Consistent.** Please refer to Policy N 1.1.2.
Goal N 4: Protection of sensitive uses from commercial and industrial noise generators.	
Objective N 4.1: Prevent, mitigate, and minimize noise spillover from commercial and industrial uses into adjacent residential neighborhoods and other noise sensitive uses.	
Policy N 4.1.1: Implement and enforce the applicable Noise Ordinance to control noise from commercial and industrial sources that may adversely impact adjacent residential neighborhoods and other sensitive uses.	**Consistent.** Please refer to Policy N 1.1.2.
Policy N 4.1.2: Require appropriate noise buffering between commercial or industrial uses and residential neighborhoods and other sensitive uses.	**Consistent.** Please refer to Policy N 1.1.2. In addition, the Project would utilize the MWD right-of-way behind the residences that front on Alderbrook Drive as a plant nursery, which would provide a buffer between the Project and the Placerita Canyon neighborhood. Therefore, the Project would be consistent with this Noise Element policy.
Policy N 4.1.3: Adopt and enforce standards for the control of noise from commercial and entertainment establishments when adjacent to residential neighborhoods and other sensitive uses.	**Consistent.** Please refer to Policy N 1.1.2.
Conservation and Open Space Element	
Goal CO 1: A balance between the social and economic needs of Santa Clarita Valley residents and protection of the natural environment, so that these needs can be met in the present and in the future.	
Objective CO 1.5: Manage urban development and human-built systems to minimize harm to ecosystems, watersheds, and other natural systems, such as urban runoff treatment trains that infiltrate, treat and remove direct connections to impervious areas.	
Policy CO 1.5.1: Promote the use of environmentally-responsible building design and efficiency standards in new development, and provide examples of these standards in public facilities.	**Consistent.** The Project would be required to comply with the California Building Standards Code, the CALGreen Code, and the 2022 Building Energy Efficiency Standards, which require new development to use environmentally responsible building design and efficiency standards related to energy and water conservation and waste reduction. Therefore, the Project would be consistent with this Conservation and Open Space Element policy.
Policy CO 1.5.5: Promote concentration of urban uses within the center of the Santa Clarita Valley through incentives for infill development and rebuilding, in order to limit impacts to open space, habitats, watersheds, hillsides, and other components of the Valley's natural ecosystems.	**Consistent.** The Project would develop an infill site, which has limited environmental constraints beyond Placerita Creek's traversing the northern portion of the Project Site. In addition, mitigation measures are proposed to reduce impacts to biological resources to less-than-significant levels. Therefore, the Project would

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Applicable General Plan Policies	Project Consistency Analysis
	be consistent with this Conservation and Open Space Element policy.
Policy CO 1.5.6: Through the development review process, consider the impacts of development on the entire watershed of the Santa Clara River and its tributaries, including hydromodification.	**Consistent.** Please refer to Policy LU 7.3.5.
Policy CO 1.5.7: Consider the principles of environmental sustainability, trip reduction, walkability, stormwater management, and energy conservation at the site, neighborhood, district, city, and regional level, in land use decisions.	**Consistent.** Project impacts related to trip reduction and walkability, stormwater management, and energy conservation have been addressed in Sections 4.14, Transportation; 4.9, Hydrology and Water Quality; and 4.5, Energy, of this Draft EIR, respectively. The principles of environmental sustainability have been addressed in each of these sections, as relevant. In addition, cumulative impacts, typically at the City or regional level, have been addressed in each of the sections. Therefore, the Project would be consistent with this Conservation and Open Space Element policy.
Goal CO 2: Conserve the Santa Clarita Valley's hillsides, canyons, ridgelines, soils, and minerals, which provide the physical setting for the natural and built environments.	
Objective CO 2.1: Control soil erosion, waterway sedimentation, and airborne dust generation, and maintain the fertility of topsoil.	
Policy CO 2.1.1: Review soil erosion and sedimentation control plans for development-related grading activities, where appropriate, to ensure mitigation of potential erosion by water and air.	**Consistent.** Project impacts related to soil erosion and sedimentation have been addressed in Sections 4.6, Geology and Soils, and Section 4.9, Hydrology and Water Quality, of this Draft EIR. Compliance with applicable codes and regulations, including, but not limited to, the California Building Code (incorporated by reference in SCMC Chapter 18.01) and NPDES Construction General Permit requirements, would ensure that development-related grading activities would result in less-than-significant impacts related to erosion by water and air. Therefore, the Project would be consistent with this Conservation and Open Space Element policy.
Policy CO 2.1.2: Promote conservation of topsoil on development sites by stockpiling for later reuse, where feasible.	**Consistent.** The Project proposes a balanced on-site grading in terms of its cut and fill quantities. Accordingly, the Project would conserve topsoil for use as fill on-site. Therefore, the Project would be consistent with this Conservation and Open Space Element policy.
Objective CO 2.2: Preserve the Santa Clarita Valley's prominent ridgelines and limit hillside development to protect the valuable aesthetic and visual qualities intrinsic to the Santa Clarita Valley landscape.	
Policy CO 2.2.1: Locate development and designate land uses to minimize the impact on the Santa Clarita Valley's topography, minimizing grading and emphasizing the use of development pads that mimic the natural topography in lieu of repetitive flat pads, to the extent feasible.	**Consistent.** The Project would be developed on a generally flat, vacant, infill site. Although the Project would require a portion of the base of the ridgeline north of Placerita Creek to be graded, the integrity and natural grade elevation of this ridgeline would be retained. Therefore, the Project would be consistent with this Conservation and Open Space Element policy.
Policy CO 2.2.3: Preserve designated natural ridgelines from development by ensuring a minimum distance for grading and development from these ridgelines of 50 feet or more if determined appropriate by the reviewing	**Consistent.** The proposed sound stages, support building, office building and parking structure, and ancillary buildings would be constructed in the portion of the Project Site south of Placerita Creek, which is at least

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Applicable General Plan Policies	Project Consistency Analysis
authority based on site conditions, to maintain the Santa Clarita Valley's distinctive community character and preserve the scenic setting.	500 feet from the base of the ridgeline. However, the Project would require a hillside review and a ridgeline alteration permit, which would require provisions to ensure that implementation of the Project would maintain the community character and preserve the scenic setting. Therefore, the Project would be consistent with this Conservation and Open Space Element policy.
Goal CO 3: Conservation of biological resources and ecosystems, including sensitive habitats and species.	
Objective CO 3.1: In review of development plans and projects, encourage conservation of existing natural areas and restoration of damaged natural vegetation to provide for habitat and biodiversity.	
Policy CO 3.1.1: On the Land Use Map and through the development review process, concentrate development into previously developed or urban areas to promote infill development and prevent sprawl and habitat loss, to the extent feasible.	**Consistent.** The majority of the Project Site is zoned and designated MX-N for urban use. In addition, the Project Site is an infill site surrounded on all four sides by residential and commercial uses. Accordingly, the Project would not result in sprawl or significant habitat loss. Therefore, the Project would be consistent with this Conservation and Open Space Element policy.
Policy CO 3.1.2: Avoid designating or approving new development that will adversely impact wetlands, floodplains, threatened or endangered species and habitat, and water bodies supporting fish or recreational uses, and establish an adequate buffer area as deemed appropriate through site specific review.	**Consistent.** As identified in Section 4.3, Biological Resources, of this Draft EIR, the Project would be required to implement mitigation measures to reduce impacts to Placerita Creek, riparian habitat, and wetlands to less-than-significant levels. As such, the Project would not adversely impact wetlands, floodplains, and water bodies supporting fish or recreational uses upon implementation of mitigation measures. Therefore, the Project would be consistent with this Conservation and Open Space Element policy.
Policy CO 3.1.5: Promote the use of site-appropriate native or adapted plant materials, and prohibit use of invasive or noxious plant species in landscape designs.	**Consistent.** The Project would comply with the City's landscaping standards as established in SCMC Section 17.51.030 and, as such, would not use invasive or noxious plant species as listed by the California Invasive Plant Council. Therefore, the Project would be consistent with this Conservation and Open Space Element policy.
Policy CO 3.1.6: On development sites, preserve and enhance natural site elements including existing water bodies, soil conditions, ecosystems, trees, vegetation and habitat, to the extent feasible.	**Consistent.** The Project would preserve the natural elements of Placerita Creek and the ridgeline north of the Project Site. Although the Project would require the removal of 13 oak trees, 211 oak trees and 450 trees of different non-oak varieties are proposed to be planted throughout the Project Site. Therefore, the Project would be consistent with this Conservation and Open Space Element policy.
Policy CO 3.1.8: On development sites, require tree planting to provide habitat and shade to reduce the heat island effect caused by pavement and buildings.	**Consistent.** Please refer to Policy LU 7.1.1.
Policy CO 3.1.9: During construction, ensure preservation of habitat and trees designated to be protected through use of fencing and other means as appropriate, so as to prevent damage by grading, soil compaction, pollution, erosion or other adverse construction impacts.	**Consistent.** As identified in Section 4.3, Biological Resources, of this Draft EIR, the Project would be required to implement mitigation measures to reduce impacts to riparian habitat. More specifically, **Mitigation Measures MM-BIO-1** and **MM-BIO-3** require delineation of construction limits or establishment of an appropriate avoidance buffer to reduce potential impacts to sensitive or special-status species. In addition, an oak tree permit

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Applicable General Plan Policies	Project Consistency Analysis
	would be secured prior to the commencement of construction activities. Therefore, the Project would be consistent with this Conservation and Open Space Element policy.
Objective CO 3.2: Identify and protect areas which have exceptional biological resource value due to a specific type of vegetation, habitat, ecosystem, or location.	
Policy CO 3.2.1: Protect wetlands from development impacts, with the goal of achieving no net loss (or functional reduction) of jurisdictional wetlands within the planning area.	**Consistent.** As identified in Section 4.3, Biological Resources, of this Draft EIR, the Project would comply with the permitting requirements of the U.S. Army Corps of Engineers (Clean Water Act Section 404 permit), Regional Water Quality Control Board (Clean Water Act Section 401 permit and Section 401 Certification), and California Department of Fish and Wildlife (California Fish and Game Code Section 1600 agreement) to ensure that impacts to wetlands would be reduced to less-than-significant levels. Therefore, the Project would be consistent with this Conservation and Open Space Element policy.
Policy CO 3.2.2: Ensure that development is located and designed to protect oak, and other significant indigenous woodlands.	**Consistent.** Please refer to Policy CO 3.1.6.
Policy CO 3.2.3: Ensure protection of any endangered or threatened species or habitat, in conformance with State and federal laws.	**Consistent.** Please refer to Policy CO 3.1.9.
Objective CO 3.3: Protect significant wildlife corridors from encroachment by development that would hinder or obstruct wildlife movement.	
Policy CO 3.3.1: Protect the banks and adjacent riparian habitat along the Santa Clara River and its tributaries, to provide wildlife corridors.	**Consistent.** Please refer to Policy CO 3.1.9.
Objective CO 3.5: Maintain, enhance, and manage the urban forest throughout developed portions of the Santa Clarita Valley to provide habitat, reduce energy consumption, and create a more livable environment.	
Policy CO 3.5.2: Where appropriate, promote planting of trees that are native or climactically appropriate to the surrounding environment, emphasizing oaks, sycamores, maple, walnut, and other native species in order to enhance habitat, and discouraging the use of introduced species such as eucalyptus, pepper trees, and palms except as ornamental landscape features.	**Consistent.** In addition to 450 trees of different non-oak varieties, the Project would plant 211 oak trees, including coast live oak, Engelmann oak, Saratoga laurel, and southern live oak. No eucalyptus or pepper trees are proposed in the landscaping plan. Therefore, the Project would be consistent with this Conservation and Open Space Element policy.
Policy CO 3.5.3: Pursuant to the requirements of the zoning ordinance, protect heritage oak trees that, due to their size and condition, are deemed to have exceptional value to the community.	**Inconsistent.** The Project would remove 13 oak trees, including 7 heritage trees. Therefore, the Project would be inconsistent with this Conservation and Open Space Element policy. However, the Project would require an oak tree permit for the encroachment into the protected zone and the removal of the 13 oak trees. The Project would be required to comply with permit requirements, including, but not limited to, the relocation of the impacted oak trees on-site or off-site to offset the loss of the trees; the payment of a fee; or donation of boxed trees to the City or another approved public agency.
Objective CO 3.6: Minimize impacts of human activity and the built environment on natural plant and wildlife communities.	

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Applicable General Plan Policies	Project Consistency Analysis
Policy CO 3.6.1: Minimize light trespass, sky-glow, glare, and other adverse impacts on the nocturnal ecosystem by limiting exterior lighting to the level needed for safety and comfort; reduce unnecessary lighting for landscaping and architectural purposes, and encourage reduction of lighting levels during non-business nighttime hours.	**Consistent.** Please refer to Policy LU 7.6.1.
Goal CO 4: An adequate supply of clean water to meet the needs of present and future residents and businesses, balanced with the needs of natural ecosystems.	
Objective CO 4.1: Promote water conservation as a critical component of ensuring adequate water supply for Santa Clarita Valley residents and businesses.	
Policy CO 4.1.5: Promote the use of low-flow and/or waterless plumbing fixtures and appliances in all new non-residential development and residential development of five or more dwelling units.	**Consistent.** Please refer to Policy LU 7.4.2.
Policy CO-4.1.10: Support emerging methods and technologies for the onsite capture, treatment, and infiltration of stormwater and greywater, and amend the City Code to allow these methods and technologies when they are proven to be safe and feasible.	**Consistent.** Please refer to Policy LU 1.3.6.
Objective CO 4.2: Work with water providers and other agencies to identify and implement programs to increase water supplies to meet the needs of future growth.	
Policy CO 4.2.6: Require that all new development proposals demonstrate a sufficient and sustainable water supply prior to approval.	**Consistent.** Please refer to Policy LU 7.2.3.
Objective CO 4.3: Limit disruption of natural hydrology by reducing impervious cover, increasing on-site infiltration, and managing stormwater runoff at the source.	
Policy CO 4.3.1: On undeveloped sites proposed for development, promote onsite stormwater infiltration through design techniques such as pervious paving, draining runoff into bioswales or properly designed landscaped areas, preservation of natural soils and vegetation, and limiting impervious surfaces.	**Consistent.** Please refer to Policy LU 1.3.6.
Policy CO 4.3.7: Reduce the amount of pollutants entering the Santa Clara River and its tributaries by capturing and treating stormwater runoff at the source, to the extent possible.	**Consistent.** Please refer to Policy LU 1.3.6.
Objective CO 4.4: Promote measures to enhance water quality by addressing sources of water pollution.	
Policy CO 4.4.3: Discourage the use of chemical fertilizers, herbicides and pesticides in landscaping to reduce water pollution by substances hazardous to human health and natural ecosystems.	**Consistent.** Any chemical fertilizers, herbicides, and pesticides used in landscaping that would affect the quality of stormwater runoff would be treated on-site as described in Policy LU 1.3.6. Therefore, the Project would be consistent with this Conservation and Open Space Element policy.
Policy CO 4.4.4: Promote the extension of sanitary sewers for all urban uses and densities, to protect groundwater quality, where feasible.	**Consistent.** The Project would connect to local sewer lines, which convey wastewater to the Santa Clarita Valley Sanitation District's San Fernando Road trunk sewer. No septic tanks would be used by the Project.

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Applicable General Plan Policies	Project Consistency Analysis
	Therefore, the Project would be consistent with this Conservation and Open Space Element policy.
Goal CO 5: Protection of historical and culturally significant resources that contribute to community identity and a sense of history.	
Objective CO 5.2: Protect and enhance the historic character of Downtown Newhall.	
Policy CO 5.2.1: In keeping with the Downtown Newhall Specific Plan policies, ensure that the scale and character of new development is compatible with and does not detract from the context of historic buildings and block patterns.	**Consistent.** Please refer to Policy LU 2.2.2 and Policy LU 4.3.4.
Policy CO 5.2.3: Ensure that all aspects of community design in Newhall, including street furniture, lighting, trash collection and storage areas, seating, and other accessory structures, are of a design and scale appropriate for the historic character of the district, while maintaining a sense of authenticity.	**Consistent.** The proposed buildings have been designed to be consistent with the Old Town Newhall Specific Plan standards, including its development standards and architectural style standards. The Project would also comply with the requirements of the PCSSD and the City's Design Guidelines. As such, the Project's design would be consistent with the scale and historic character of the adjacent Old Town Newhall and Placerita Canyon. Therefore, the Project would be consistent with this Conservation and Open Space Element policy.
Objective CO 5.3: Encourage conservation and preservation of Native American cultural places, including prehistoric, archaeological, cultural, spiritual, and ceremonial sites on both public and private lands, throughout all stages of the planning and development process.	
Policy CO 5.3.1: For any proposed general plan amendment, specific plan, or specific plan amendment, notify and consult with any California Native American tribes on the contact list maintained by the California Native American Heritage Commission that have traditional lands located within the City's jurisdiction, regarding any potential impacts to Native American resources from the proposed action, pursuant to State guidelines.	**Consistent.** The City has consulted with the Fernandeño Tataviam Band of Mission Indians and has come to an agreement on the mitigation measures (identified as **Mitigation Measures MM TCR-1** through **MM TCR-7** in Section 4.15, Tribal Cultural Resources, of this Draft EIR) to be implemented by the Project during construction activities to reduce potential impacts to Native American resources. Therefore, the Project would be consistent with this Conservation and Open Space Element policy.
Policy CO 5.3.2: For any proposed development project that may have a potential impact on Native American cultural resources, provide notification to California Native American tribes on the contact list maintained by the Native American Heritage Commission that have traditional lands within the City's jurisdiction, and consider the input received prior to a discretionary decision.	**Consistent.** Please refer to Policy CO 5.3.1.
Policy CO 5.3.3: Review and consider a cultural resources study for any new grading or development in areas identified as having a high potential for Native American resources, and incorporate recommendations into the project approval as appropriate to mitigate impacts to cultural resources.	**Consistent.** A Phase 1 paleontological and archaeological resources assessment was conducted for the Project to identify impacts to Native American resources. The results and findings of this assessment were presented in Section 4.15, Tribal Cultural Resources, of this Draft EIR, which also identified **Mitigation Measures MM TCR-1** through **MM TCR-7** to reduce potential impacts to Native American resources during Project construction. Therefore, the Project would

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Applicable General Plan Policies	Project Consistency Analysis
	be consistent with this Conservation and Open Space Element policy.
Goal CO 6: Preservation of scenic features that keep the Santa Clarita Valley beautiful and enhance quality of life, community identity, and property values.	
Objective CO 6.1: Protect the scenic character of local topographic features.	
Policy CO 6.1.2: Preserve significant ridgelines, as shown on the Exhibit CO-7, as a scenic backdrop throughout the community by maintaining natural grades and vegetation.	**Consistent.** Please refer to Policy LU 1.1.4, Policy LU 1.3.2, and Policy 2.2.1.
Objective CO 6.2: Protect the scenic character of view corridors.	
Policy CO 6.2.1: Where feasible, encourage development proposals to have varied building heights to maintain view corridor sight lines.	**Consistent.** The Project would develop buildings with varied heights, ranging from 18 feet for the catering buildings to 55 feet for the sound stages. The ridgeline to the north would remain visible from the east, west, and north and would be partially visible from the south. As discussed under Policy LU 2.2.1, with the sound stages being the tallest structures at 55 feet, the Project would not completely block views of the ridgeline from the south. Therefore, the Project would be consistent with this Conservation and Open Space Element policy.
Objective CO 6.6: Limit adverse impacts by humans on the scenic environment.	
Policy CO 6.6.1: Enhance views of the night sky by reducing light pollution through use of light screens, downward directed lights, minimized reflective paving surfaces, and reduced lighting levels, as deemed appropriate by the reviewing authority.	**Consistent.** Please refer to Policy LU 7.6.1.
Policy CO 6.6.2: Improve views of the Santa Clarita Valley through various policies to minimize air pollution and smog, as contained throughout the General Plan.	**Consistent.** Please refer to Policy C 3.1.1.
Policy CO 6.6.4: Where appropriate, require new development to be sensitive to scenic viewpoints or viewsheds through building design, site layout and building heights.	**Consistent.** Please refer to Policy CO 6.2.1 and Policy LU 2.2.1.
Policy CO 6.6.5: Encourage undergrounding of all new utility lines, and promote undergrounding of existing lines where feasible and practicable.	**Consistent.** Please refer to Policy LU 6.3.4.
Goal CO 7: Clean air to protect human health and support healthy ecosystems.	
Objective CO 7.1: Reduce air pollution from mobile sources.	
Policy CO 7.1.1: Through the mixed land use patterns and multi-modal circulation policies set forth in the Land Use and Circulation Elements, limit air pollution from transportation sources.	**Consistent.** Please refer to Policy C 3.1.1.
Policy CO 7.1.2: Support the use of alternative fuel vehicles.	**Consistent.** Please refer to Policy C 1.1.10.
Policy CO 7.1.3: Support alternative travel modes and new technologies, including infrastructure to support alternative fuel vehicles, as they become commercially available.	**Consistent.** Please refer to Policy C 1.1.10.

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Applicable General Plan Policies	Project Consistency Analysis
Goal CO 8: Development designed to improve energy efficiency, reduce energy and natural resource consumption, and reduce emissions of greenhouse gases.	
Objective CO 8.3: Encourage the following green building and sustainable development practices on private development projects, to the extent reasonable and feasible.	
Policy CO 8.3.5: Encourage on-site solar generation of electricity in new retail and office commercial buildings and associated parking lots, carports, and garages, in concert with other significant energy conservation efforts.	**Consistent.** Please refer to Policy LU 7.1.2.
Policy CO 8.3.7: Encourage the use of trees and landscaping to reduce heating and cooling energy loads, through shading of buildings and parking lots.	**Consistent.** Please refer to Policy LU 7.1.1.
Policy CO 8.3.8: Encourage energy-conserving heating and cooling systems and appliances, and energy-efficiency in windows and insulation, in all new construction.	**Consistent.** Please refer to Policy LU 4.5.3.
Policy CO 8.3.9: Limit excessive lighting levels, and encourage a reduction of lighting when businesses are closed to a level required for security.	**Consistent.** Please refer to Policy LU 7.6.1.
Objective CO 8.4: Reduce energy consumption for processing raw materials by promoting recycling and materials recovery by all residents and businesses throughout the community.	
Policy CO 8.4.4: Promote commercial and industrial recycling, including recycling of construction and demolition debris.	**Consistent.** The Project would comply with the City's standards related to recycling of construction and demolition debris as established in SCMC Chapter 15.46. Therefore, the Project would be consistent with this Conservation and Open Space Element policy.
Policy CO 8.4.5: Develop and implement standards for refuse and recycling receptacles and enclosures to accommodate recycling in all development.	**Consistent.** Please refer to Policy LU 7.5.1.
Goal CO 10: Preservation of open space to meet the community's multiple objectives for resource preservation.	
Objective CO 10.2: Ensure the inclusion of adequate open space within development projects.	
Policy CO 10.2.1: Encourage provision of vegetated open space on a development project's site, which may include shallow wetlands and ponds, drought tolerant landscaping, and pedestrian hardscape that includes vegetated areas.	**Consistent.** Please refer to Policy LU 4.5.2.
Policy CO 10.2.2: Encourage that open space provided within development projects be usable and accessible, rather than configured in unusable strips and left-over remnants, and that open space areas are designed to connect to each other and to adjacent open spaces, to the extent reasonable and practical.	**Consistent.** Please refer to Policy LU 4.5.2.
Safety Element	
Goal S 1: Protection of public safety and property from hazardous geological conditions, including seismic rupture and ground shaking, soil instability, and related hazards.	

Table 4.10-2
CITY OF SANTA CLARITA GENERAL PLAN CONSISTENCY ANALYSIS

Applicable General Plan Policies	Project Consistency Analysis
Objective S 1.2: Regulate new development in areas subject to geological hazards to reduce risks to the public from seismic events or geological instability.	
Policy S 1.2.3: Require soils and geotechnical reports for new construction in areas with potential hazards from faulting, landslides, liquefaction, or subsidence, and incorporate recommendations from these studies into the site design as appropriate.	**Consistent.** A geologic and geotechnical engineering investigation was conducted for the Project to identify constraints related to geology and soils, including potential hazards associated with faulting, landslides, liquefaction, and subsidence. The results and findings of this investigation were presented in Section 4.6, Geology and Soils, of this Draft EIR, which determined that, since the Project would be required to comply with California Building Code regulations that are incorporated by reference into SCMC Chapter 18.01, which mandate that structures be designed/constructed to meet seismic safety standards, any impacts related to unsuitable soil conditions would be reduced to less-than-significant levels. Therefore, the Project would be consistent with this Safety Element policy.
Goal S 2: Protection of public safety and property from unreasonable risks due to flooding.	
Objective S 2.1: Plan for flood protection as part of a multi-objective watershed management approach for the Santa Clara River and its tributaries.	
Policy S 2.1.2: Promote Low Impact Development standards on development sites, including but not limited to minimizing impervious surface area and promoting infiltration, in order to reduce the flow and velocity of stormwater runoff throughout the watershed.	**Consistent.** Please refer to Policy LU 7.3.2 and Policy 7.3.4.
Goal S 3: Protection of public safety infrastructure and property from fires.	
Objective S 3.1: Provide adequate fire protection infrastructure to maintain acceptable service levels as established by the Los Angeles County Fire Department.	
Policy S 3.1.3: Require adequate fire flow and adequate fire protection as a condition of approval for all new development. (Change required to meet Board of Forestry standards)	**Consistent.** The Project would be required to comply with the California Building Code and the Los Angeles County Fire Code regarding fire flow, water mains, fire hydrants, fire lane, building access, apparatus access, and fuel modification plan. Specific fire and life safety requirements will be addressed at the Los Angeles County Fire Department building plan check review. Therefore, the Project would be consistent with this Safety Element policy.
Objective S 3.2: Provide for the specialized needs of fire protection services in both urban and wildland interface areas.	
Policy S 3.2.4: Require sprinkler systems, fire resistant roofs and building materials, and other construction measures deemed necessary to prevent loss of life and property from wildland fires. (Required change to meet Board of Forestry standards)	**Consistent.** Please refer to Policy S 3.1.3.
Policy S 3.2.5: Ensure adequate secondary and emergency access for fire apparatus, which includes minimum requirements for road width, surface material, grade, and staging areas.	**Consistent.** Please refer to Policy S 3.1.3.
Objective S 3.4: Maintain development standards and land use regulations that prioritize fire safe development.	
Policy S 3.4.1: Ensure that all new development and redevelopment in Fire Hazard Severity Zones comply	**Consistent.** The northern portion of the Project Site is located within a fire hazard severity zone. According to

Table 4.10-2
CITY OF SANTA CLARITA GENERAL PLAN CONSISTENCY ANALYSIS

Applicable General Plan Policies	Project Consistency Analysis
with Board of Forestry requirements, Fire Safe Regulations, and current versions of the California Building Code (CBC), California Fire Code (CFC), and Title 14 of the California Code of Regulations (CCR).	the Los Angeles County Fire Department, the Project would be required to prepare and submit a fuel modification plan to its Fuel Modification Unit prior to the issuance of the building permit to ensure that the Project complies with Fire Safe Regulations, California Building Code, California Fire Code, and Board of Forestry and Title 14 requirements. Therefore, the Project would be consistent with this Safety Element policy.
Policy S 3.4.4: Require new development in Very High Fire Hazard Severity Zones to develop fire protection plans and enter into long term vegetation landscape maintenance agreements, and maintain access for emergency response vehicles, and require new residential development to maintain Fuel Modification Plans.	**Consistent.** Please refer to Policy S 3.4.1.
Goal S 6: Reduced risk to public safety and property damage from accidental occurrences.	
Objective S 6.2: Increase public safety through the design of public facilities and urban spaces.	
Policy S 6.2.1: In designing or reviewing development plans, ensure that lighting levels are adequate to provide safe and secure nighttime use of each site, while limiting excessive or unnecessary light and glare.	**Consistent.** Please refer to Policy LU 7.6.1.
Policy S 6.2.2: In reviewing development plans, consider Crime Prevention Through Environmental Design (CPTED) principles to increase public safety through establishing defensible space, clearly delineated public and private areas, and effective surveillance of common areas.	**Consistent.** The Project would incorporate CPTED principles in its design plans. More specifically, a 12-foot-tall security fence would be installed along the majority of the perimeter of the Project Site. Open rail wrought-iron fencing would be installed along the southwestern corner of the Project Site, adjacent to the proposed office building. In addition, closed-circuit television security cameras would be installed throughout the Project Site. These surveillance cameras would be monitored full-time at a manned security station on-site. Furthermore, licensed security personnel would be provided to patrol the Project Site at all times (i.e., 24 hours per day, seven days per week). Additional stage security would also be provided at key entry points to and within individual building areas. Therefore, the Project would be consistent with this Safety Element policy.

Notes:

a LGC Valley, Inc., Geologic and Geotechnical Engineering Investigation, Proposed Commercial Development, Northwest of 13th and Arch Streets, City of Santa Clarita, California, September 10, 2021.

Source: City of Santa Clarita, General Plan, 2011; Michael Baker International, 2023.

Consistency with the City of Santa Clarita Municipal Code

All development activities associated with the Project on- and off-site are subject to the SCMC, particularly Title I7, Zoning. The Planning and Zoning Code establishes requirements for the Project, with respect to permitted uses, building height, density, yard setbacks, and parking.

SCMC Section 17.38.060 – Planned Development Overlay Zone

The Project would require a CUP as a new development within the Planned Development Overlay Zone in accordance with the requirements of this section. Therefore, the Project would be consistent with this regulation.

SCMC Section 17.39.020 – Placerita Canyon Special Standards District

The Project, including the proposed off-site improvements, would implement the following components in accordance with the provisions of the PCSSD specifically for the North Newhall Area:

- The Project would be internally and externally pedestrian-oriented with bicycle amenities and accommodations. The Project would construct a Class I trail along the Project frontage at 12th Street, Arch Street, and 13th Street and would be conditioned to either (1) pay an in-lieu fee to contribute toward improvements or (2) construct a connection to a future Class I trail along Railroad Avenue and future connection to the Jan Heidt Newhall Metrolink Station and various retail, commercial, and entertainment uses in Old Town Newhall to promote a pedestrian friendly environment.
- The Project would include a defined entry gateway with landscaping and architectural elements with signage.
- The Project would utilize the MWD right-of-way behind the residences that front on Alderbrook Drive as a plant nursery, which would provide a transition between the residential uses immediately east of the Project Site and the Project.
- The majority of the Project's landscaping would use drought-tolerant trees.
- The proposed buildings would provide 360-degree architectural design with pedestrian-scaled building massing and forms.
- The Project would develop buildings with varied heights, ranging from 18 feet for the catering buildings to 55 feet for the sound stages, as permitted upon extension of the boundaries of the Jobs Creation Overlay Zone to incorporate the entire Project Site.

The Project, including the proposed off-site improvements, would be required to undergo several City processes prior to Project approval, including architectural design review, development review, landscape plan review, and hillside review, to ensure that the Project complies with the requirements of the PCSSD and is compatible with the surrounding area, particularly the residential uses immediately east of the Project Site in Placerita Canyon. Therefore, the Project would be consistent with this regulation.

SCMC Sections 17.23.170 – Oak Tree Permit and 17.51.040 – Oak Tree Preservation

Sixteen oak trees protected by the City's Oak Tree Preservation Ordinance are present on the Project Site. The Project would remove 13 of these trees, including 7 heritage trees. Accordingly, the Project would require an oak tree permit for the encroachment into the protected zone and the removal of the 13 oak trees. The Project would be required to comply with permit requirements, including, but not limited to, the relocation of the impacted oak trees on-site or off-site to offset the loss of the trees; the payment of a fee; or donation of boxed trees to the City or another approved public agency. The fee or boxed trees would be required to be equivalent to the type of oak trees removed from the Project Site. In addition, the Project would replace the removed trees with 450 trees of different non-oak varieties, including Bubba desert willow,

Tuscarora crape myrtle, Brisbane box, little gem magnolia, fruitless olive, Canary Island pine, icee blue podocarpus, and Columbia plane tree, as well as 211 oak trees, including coast live oak, Engelmann oak, Saratoga laurel, and southern live oak. Therefore, the Project would not conflict with the City's Oak Tree Preservation Ordinance with compliance with the oak tree permit requirements and the proposed planting of 661 trees, including 211 oak trees, on-site. Therefore, the Project would be consistent with this regulation.

SCMC Section 17.26.130 – Ridgeline Alteration Permit

The Project would involve grading a portion of the base of the ridgeline north of Placerita Creek to improve the parking layout north of the creek and to eliminate the need for soil import. The Project would be required to comply with permit requirements, including the submittal of topography maps, average cross slope calculations and maps, ridgeline location exhibits, and preliminary grading plans. The Project would be required to undergo several City processes prior to Project approval, including hillside review, to ensure the Project does not significantly the ridgeline's integrity or the prominent natural features of the ridgeline. Therefore, the Project would be consistent with this regulation.

Consistency with the City of Santa Clarita Community Character and Design Guidelines

The Project has been designed to comply with the City's Design Guidelines. The Project would be compatible in size, scale, and appearance with the character of Santa Clarita, specifically the Newhall community; the Project's design would be consistent with the scale and historic character of the adjacent Old Town Newhall and Placerita Canyon. The Project would incorporate articulation and accents; community character features, including a mural featuring film stars, such as Charlie Chaplin, Gene Autry, and William S. Hart, from Santa Clarita Valley's past; multiple building forms and buildings with varied heights; the use of high-quality materials on wall surfaces and roofs; the use of color palettes requires specifically for Newhall; and sustainability features, including but not limited to installation of energy-efficient light fixtures, high-efficiency plumbing fixtures, EV parking spaces, and rooftop PV systems and solar panels.

As previously discussed, as part of the proposed off-site improvements, the Project would construct a Class I trail along the Project frontage at 12th Street, Arch Street, and 13th Street and would be conditioned to either (1) pay an in-lieu fee to contribute toward improvements or (2) construct a connection to a future Class I trail along Railroad Avenue and future connection to the Jan Heidt Newhall Metrolink Station and various retail, commercial, and entertainment uses in Old Town Newhall. The Project would also provide 170 bicycle parking spaces (145 long-term spaces and 25 short-term spaces).

In addition, the majority of the proposed trees would be drought tolerant. All landscape plans and irrigation systems would be required to adhere to the City's Design Guidelines and SCMC requirements.

The Project design would also allow for stormwater to be contained and treated on-site through the use of an infiltration/detention basin and underground infiltration chambers, then released to Placerita Creek, while ensuring the natural drainage pattern of the creek is retained. Treatment on-site would ensure that the Project does not generate additional sources of polluted runoff.

Accordingly, the Project would be consistent with the City's Design Guidelines.

Mitigation Measures

Impacts with regard to Threshold 4.10(b) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.10(b) were determined to be less than significant without mitigation.

4.10.7 CUMULATIVE IMPACTS

Impact Analysis

As indicated in Section 3.0, Environmental Setting, of this Draft EIR, cumulative growth in the Project vicinity includes 36 specific known related projects, as well as general ambient growth projected to occur. The related projects primarily include residential, assisted living/nursing home, commercial, hotel, industrial, and office uses. As with the Project, related projects would be required to comply with relevant land use policies and regulations. Therefore, the Project and the related projects would not have cumulatively significant land use impacts. In addition, as discussed above, as the Project would not substantially conflict with applicable land use plans, policies, and the provisions of the SCMC, the Project would not incrementally contribute to cumulative inconsistencies with respect to land use plans, policies, and regulations. Therefore, cumulative impacts with regard to land use consistency would be less than significant.

Mitigation Measures

Cumulative impacts related to land use and planning were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts related to land use and planning were determined to be less than significant without mitigation.

4.11 NOISE

This section evaluates the potential noise and vibration impacts of the Project. Estimated future noise and vibration levels at surrounding sensitive land uses resulting from construction and operation of the Project are provided. This section relies, in part, on information identified in the *Shadowbox Studios - Santa Clarita Project Noise and Vibration Study*, prepared by Rincon Consultants and dated July 2022, provided in **Appendix J** of this Draft EIR.

4.11.1 ENVIRONMENTAL SETTING

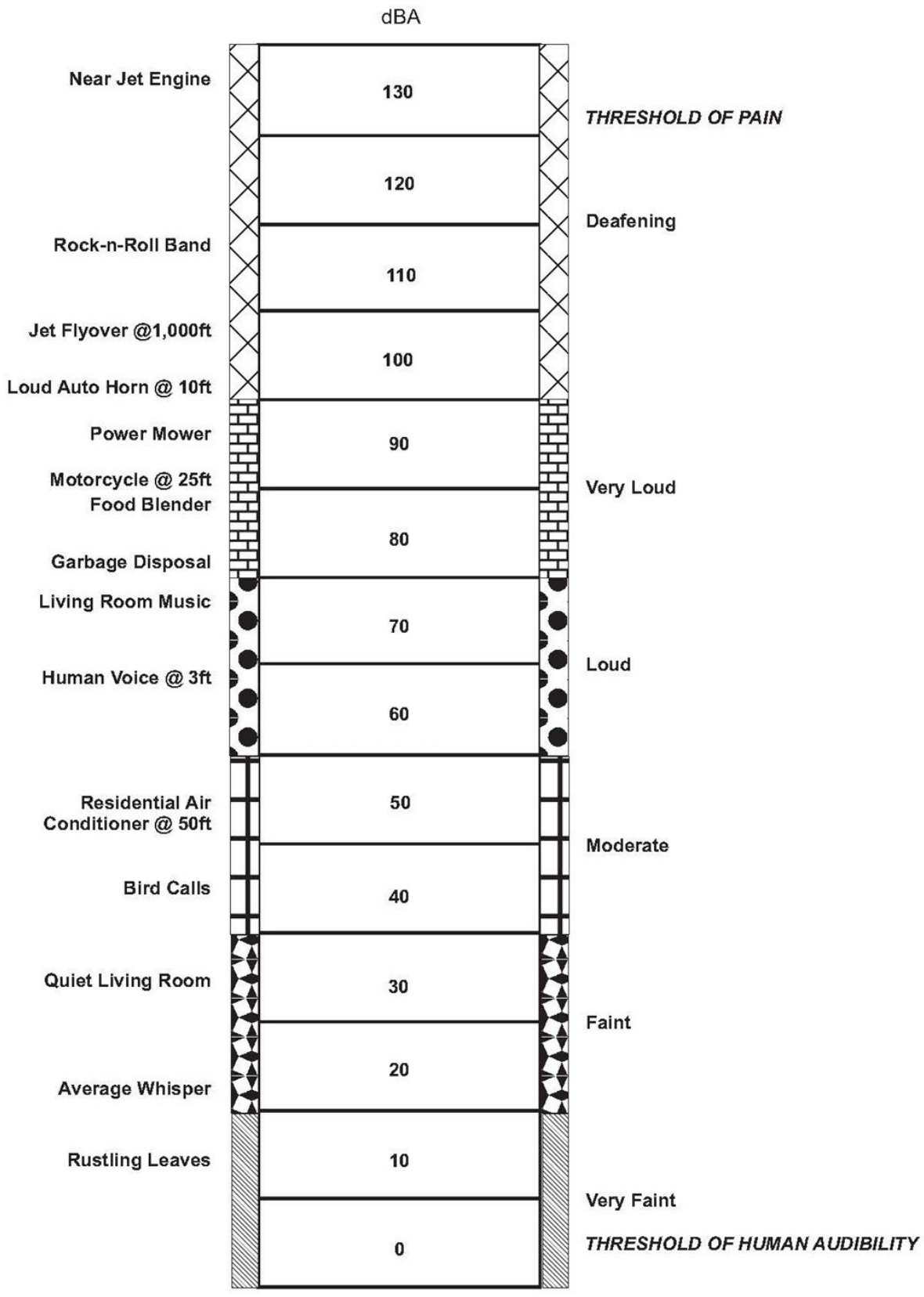
NOISE CHARACTERISTICS AND EFFECTS

Sound is a vibratory disturbance created by a moving or vibrating source which is capable of being detected by hearing organs. Noise is defined as sound that is loud, unpleasant, unexpected, or undesired. Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response, which is most sensitive to frequencies around 4,000 hertz (Hz) and less sensitive to frequencies around and below 100 Hz. Decibels are measured on a logarithmic scale that quantifies sound intensity. A doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dBA. A reduction of the energy of a noise source in half would decrease the noise level by 3 dBA. **Figure 4.11-1** provides examples of A-weighted noise levels from common sounds.

The perception of sound is not linear in terms of dBA or in terms of sound energy because the human perception of noise has no simple correlation with sound energy. For example, two sources of sound do not sound twice as loud as one source. The following observations are widely accepted: the average healthy ear can barely perceive changes of 3 dBA and can readily perceive changes of 5 dBA, and an increase or decrease of 10 dBA sounds twice or half as loud. Sound changes in both level and frequency as it travels from the source to the receiver. The most obvious change is the decrease in level of sound as the distance from the source increases. The manner in which noise reduces with distance depends on multiple factors, including the type of source (e.g., point or line), the path sound travels, site conditions, and obstructions. Noise levels from a point source (e.g., construction, industrial machinery, ventilation units) typically attenuate at a rate of 6 dBA per doubling of distance.[1] Noise levels from a line source (e.g., roadway, pipeline, railroads) typically attenuate at about 3 dBA per doubling of distance. The propagation of noise is also affected by the intervening ground, known as ground absorption. A hard site, such as a parking lot or smooth body of water, receives no additional ground attenuation and the changes in noise levels with distance (i.e., drop-off rate) result from the geometric spreading of the source. An additional ground attenuation value of 1.5 dBA per doubling of distance applies to a soft site, such as soft dirt, grass, or scattered bushes and trees.

Noise levels may also be reduced by intervening structures. The amount of attenuation provided by intervening structures depends on the size of the object and the frequencies of the noise levels. Natural terrain features, such as hills and dense woods, and man-made features, such as buildings and walls, can substantially alter noise levels. Generally, any large structure blocking the line-of-sight will provide at least a 5-dBA reduction in source noise levels at the receiver. Structures can also substantially reduce exposure to noise. For example, the Federal Highway

[1] Attenuation is a damping of sound, an interruption that diminishes the volume and quality of the sound wave.



Source: Cowan, James P., Handbook of Environmental Acoustics. November, 2015

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A-Weighted Noise Levels

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Figure 4.11-1

Administration's (FHWA) guidelines indicate that modern building construction generally provides an exterior-to-interior noise level reduction of 20 to 35 dBA with closed windows.

The impact of noise is not a function of loudness alone. Other factors that affect noise impacts include the time of day when noise occurs and the duration of the noise. Most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors have been developed. One of the most frequently used metrics is the equivalent noise level (L_{eq}), which considers both duration and sound power level. L_{eq} is defined as the steady sound pressure level which, over a given period of time, has the same total energy as the actual fluctuating noise. Typically, L_{eq} is summed over a one-hour period. Other noise metrics include L_{max}, which is defined as the highest root mean squared (RMS) sound pressure level within a sampling period, and L_{min}, which is the lowest RMS sound pressure level within a measuring period. In addition, noise that occurs at night tends to be more disturbing than that occurring during the day. Community noise is usually measured using the Day-Night Average Level (L_{dn}) which is the 24-hour average noise level with an increase in 10 dBA penalty for noise occurring during nighttime hours (10:00 p.m. to 7:00 a.m.). Similarly, the Community Noise Equivalent Level (CNEL) is the average sound level over a 24-hour period with an increase in 5 dBA penalty for evening hours (7:00 p.m. to 10:00 p.m.) and an increase in 10 dBA penalty for nighttime hours (10:00 p.m. to 7:00 a.m.).

The effects of noise on people can be placed into four general categories—subjective, interference, physiological, and physical effects. Although exposure to high noise levels has been demonstrated to cause physical and physiological effects, the principal human responses to typical environmental noise exposure are related to subjective effects and interference with activities. Interference effects interrupt daily activities and include interference with human communication activities, such as normal conversations and interference with sleep. The World Health Organization's Guidelines for Community Noise detail the adverse health effects of high noise levels, including hearing impairment, speech intelligibility, sleep disturbance, physiological functions (e.g., hypertension and cardiovascular effects), mental illness, performance of cognitive tasks, social and behavioral effects (e.g., feelings of helplessness, aggressive behavior), and annoyance.[2] With regard to the subjective effects, the responses of individuals to similar noise events are diverse and influenced by many factors, including the type of noise, the perceived importance of the noise, the appropriateness of the noise to the setting, the duration of the noise, the time of day and the type of activity during which the noise occurs, and individual noise sensitivity. Overall, there is no completely satisfactory way to measure the subjective effects of noise, or the corresponding reactions of annoyance and dissatisfaction on people. A wide variation in individual thresholds of annoyance exists, and different tolerances to noise tend to develop based on an individual's past experiences with noise. Accordingly, an important way of predicting a human reaction to a new noise environment is the way it compares to the existing environment to which one has adapted (i.e., comparison to the ambient noise environment). In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level will be judged by those hearing it.

VIBRATION CHARACTERISTICS AND EFFECTS

For environmental analysis purposes, groundborne vibration of concern consists of the oscillatory waves that move from a source through the ground to adjacent structures. The number of cycles per second of oscillation makes up the vibration frequency, described in terms of hertz (Hz). The frequency of a vibrating object describes how rapidly it oscillates. The normal frequency range of

[2] World Health Organization Team, Guidelines for Community Noise, edited by Birgitta Berglund, Thomas Lindvall, and Dietrich H. Schwela, 1999.

most groundborne vibration that can be felt by the human body starts from a low frequency of less than 1 Hz and up to a high of about 200 Hz. While humans have varying sensitivities to vibrations at different frequencies, they generally are most sensitive to low-frequency vibration. Vibration in buildings, such as from nearby construction activities, may cause windows or household items to rattle. Vibration of building components can also take the form of an audible low-frequency rumbling noise, referred to as groundborne noise. Groundborne noise is usually only a problem when the originating vibration spectrum is dominated by frequencies in the upper end of the range (60 to 200 Hz) or when foundations or utilities, such as sewer and water pipes, physically connect the structure and the vibration source. Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern from vibration is that it can be intrusive and annoying to building occupants and vibration-sensitive land uses (e.g., hospitals, schools).

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. High-frequency vibrations diminish much more rapidly than low frequencies, so low frequencies tend to dominate the spectrum at large distances from the source.

Vibration amplitudes are usually expressed in peak particle velocity (PPV) or RMS vibration velocity. The PPV and RMS velocity are normally described in inches per second (in/sec). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal and is most frequently used to describe vibration impacts to buildings.

SENSITIVE RECEPTORS

Sensitive land uses are those in which persons occupying the land use are particularly sensitive to the effects of noise. The City of Santa Clarita General Plan Noise Element lists noise-sensitive uses, including housing, schools, medical facilities, libraries, social care facilities, and similar facilities. The following land uses were identified as sensitive receptors in the Project vicinity:

- Single-family residences along Alderbrook Drive (immediately adjacent to the east of the Project Site) and Circle J Ranch Road (approximately 1,400 feet to the east),
- Single-family residences south of Via Princessa (approximately 300 feet to the north),
- Single-family residences along Placeritos Boulevard (approximately 220 feet to the southeast), and
- Mobile home park residences at 24833 Railroad Avenue (approximately 160 feet to the west).

There are two churches in the general Project vicinity, Newhall Christian Church, approximately 300 feet to the east, and Village Church, approximately 525 feet to the west of the Project Site. However, these uses would not have direct line-of-sight to the Project Site due to intervening structures, consisting of residential or commercial uses. Likewise, nearby schools, including Placerita Junior High School, Hart High School, Newhall Elementary School, and the Master's University, are also shielded by intervening commercial and residential uses and are located more than 900 feet from the Project Site.

PROJECT SITE NOISE SOURCES

The primary sources of noise in the vicinity are vehicular traffic along Railroad Avenue and 12th Street and railroad activity. To characterize ambient noise levels at and near the Project Site, sound

measurements were taken using an Extech Sound Level Meter on November 18, 2021. Noise monitoring locations are shown in **Figure 4.11-2**, and the resulting noise measurements are listed in **Table 4.11-1**. Measurements were taken in the afternoon with light winds (five miles per hour or lower), light cloud cover, and temperatures between 75 to 80 degrees Fahrenheit. Field observations indicate that primary noise sources occurred from vehicular traffic for each measurement along with some measurements picking up noise from intermittent sources, such as airplanes and dogs barking.

Table 4.11-1
NOISE MONITORING RESULTS

Measurement	Location	Sample Times	Primary Noise Sources	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)
NM1	Residential area north of Project Site	12:51 p.m. – 1:06 p.m.	Railroad Avenue (approximately 450 feet from roadway centerline)	43	36	55
NM2	Residential area north of Project Site	1:11 p.m. – 1:26 p.m.	Wind, airplanes, birds	41	34	54
NM3	Residential area northeast of Project Site	1:31 p.m. – 1:46 p.m.	Circle J Ranch Road (275 feet from roadway centerline)	58	56	87
NM4	Residential backyard area east of Project Site	1:58 p.m. – 2:13 p.m.	12th Street (475 feet from roadway centerline)	49	41	64
NM5	Mixed of uses west of Project Site	2:22 p.m. – 2:57 p.m.	Railroad Avenue (45 feet from roadway centerline)	70	49	87
NM6	Residential backyard area east of Project Site	2:58 p.m. – 3:13 p.m.	Railroad Avenue (1,240 feet from roadway centerline), dogs barking, wind	47	39	66

Source: Rincon Consultants, Inc., Blackhall Studios-Santa Clarita Project, Noise and Vibration Study, July 2022.

4.11.2 REGULATORY AND PLANNING FRAMEWORK

Regulatory requirements related to environmental noise are typically promulgated at the local level. However, federal and state agencies provide standards and guidelines to the local jurisdictions.

FEDERAL

Federal Transit Administration

The Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual* identifies the vibration level thresholds for potential building damage due to construction activities. The FTA has also adopted standards associated with human annoyance for determining the groundborne vibration and noise impacts from groundborne noise. Please refer to Subsection 4.11.3, Thresholds of Significance, for the numeric thresholds used in the noise impacts analyses.

Source: Rincon Consultants, Inc., Blackhall Studios-Santa Clarita Project Noise and Vibration Study, July 2022.

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Noise Measurement Locations

Figure 4.11-2

STATE

Office of Planning and Research Guidelines and California Government Code

The State of California has not adopted statewide standards for environmental noise, but the Governor's Office of Planning and Research (OPR) has established guidelines for evaluating the compatibility of various land uses as a function of community noise exposure. The purpose of these guidelines is to maintain acceptable noise levels in a community setting for different land use types. Noise levels are divided into four general categories, which vary in range according to land use type: "normally acceptable," "conditionally acceptable," "normally unacceptable," and "clearly unacceptable."

In addition, California Government Code Section 65302(f) mandates that the legislative body of each county, town, and city adopt a noise element as part of their comprehensive general plan. The local noise element must recognize the land use compatibility guidelines shown in **Table 4.11-2**. The guidelines also rank noise land use compatibility in terms of "normally acceptable," "conditionally acceptable," "normally unacceptable," and "clearly unacceptable" noise levels for various land use types. Single-family homes are "normally acceptable" in exterior noise environments up to 60 CNEL and "conditionally acceptable" up to 70 CNEL. Multi-family residential uses are "normally acceptable" up to 65 CNEL and "conditionally acceptable" up to 70 CNEL. Schools, libraries, and churches are "normally acceptable" up to 70 CNEL, as are office buildings and business, commercial, and professional uses.

Table 4.11-2
LAND USE COMPATIBILITY FOR COMMUNITY NOISE ENVIRONMENTS

Land Use Category	Community Noise Exposure (L_{dn} or CNEL, dBA)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential – Low Density, Single-Family, Duplex, Mobile Homes	50 – 60	55 – 70	70 – 75	75 – 85
Residential – Multiple Family	50 – 65	60 – 70	70 – 75	70 – 85
Transient Lodging – Motel, Hotels	50 – 65	60 – 70	70 – 80	80 – 85
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 – 70	60 – 70	70 – 80	80 – 85
Auditoriums, Concert Halls, Amphitheaters	NA	50 – 70	NA	65 – 85
Sports Arenas, Outdoor Spectator Sports	NA	50 – 75	NA	70 – 85
Playgrounds, Neighborhood Parks	50 – 70	NA	67.5 – 75	72.5 – 85
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 – 70	NA	70 – 80	80 – 85
Office Buildings, Business Commercial and Professional	50 – 70	67.5 – 77.5	75 – 85	NA
Industrial, Manufacturing, Utilities, Agriculture	50 – 75	70 – 80	75 – 85	NA

Notes: NA = not applicable; L_{dn} = day/night average; CNEL = community noise equivalent level; dBA = A-weighted decibels

Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

Conditionally Acceptable - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.

Normally Unacceptable - New construction or development should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

Clearly Unacceptable - New construction or development should generally not be undertaken.

Source: Office of Planning and Research, 2003.

LOCAL

City of Santa Clarita General Plan Noise Element

The City of Santa Clarita General Plan Noise Element is a comprehensive program for including noise management in the planning process and for providing a tool for planners to use in achieving and maintaining land uses that are compatible with existing and future environmental noise levels. The Noise Element identifies current noise conditions within the planning area and projects future noise impacts resulting from continued growth allowed by the Land Use Element. It adopts the noise/land use compatibility classifications established by the California Government Code noted above and shown in **Table 4.11-2**.

In addition, the Noise Element identifies noise-sensitive land uses and noise sources and defines areas of noise impact for the purpose of developing programs to ensure that residents in the City's planning area will be protected from excessive noise intrusion. The Noise Element of the Santa Clarita General Plan includes the following goals, objectives, and policies related to noise that would be applicable to the Proposed Project:[3]

Noise Environment

- Goal N 1: A healthy and safe noise environment for Santa Clarita Valley residents, employees, and visitors.
    - Objective N 1.1: Protect the health and safety of the residents of the Santa Clarita Valley by the elimination, mitigation, and prevention of significant existing and future noise levels.
        - Policy N 1.1.1: Use the Noise and Land Use Compatibility Guidelines [see **Table 4.11-2**], which are consistent with State guidelines, as a policy basis for decisions on land use and development proposals related to noise.
        - Policy N 1.1.2: Continue to implement the adopted Noise Ordinance and other applicable code provisions, consistent with state and federal standards, which establish noise impact thresholds for noise abatement and attenuation, in order to reduce potential health hazards associated with high noise levels.
        - Policy N 1.1.3: Include consideration of potential noise impacts in land use planning and development review decisions.
        - Policy N 1.1.4: Control noise sources adjacent to residential, recreational, and community facilities, and those land uses classified as noise sensitive.

Reduction of Noise from Traffic

- Goal N 2: Protect residents and sensitive receptors from traffic-generated noise.
    - Objective N 2.1: Prevent and mitigate adverse effects of noise generated from traffic on arterial streets and highways through implementing noise reduction standards and programs.

[3] City of Santa Clarita, General Plan, Noise Element, June 2011.

- Policy N 2.1.1: Encourage owners of existing noise-sensitive uses, and require owners of proposed noise sensitive land uses, to construct sound barriers to protect users from significant noise levels, where feasible and appropriate.
- Policy N 2.1.4: Reduce significant noise levels related to through-traffic in residential areas by promoting subdivision circulation designs to contain a hierarchy of streets, which efficiently direct traffic to highways.
- Policy N 2.1.7: Require vehicle owners to properly maintain their equipment to avoid generating excessive noise levels.

Residential Neighborhoods

- Goal N 3: Protect residential neighborhoods from excessive noise.
  - Objective N 3.1: Prevent and mitigate significant noise levels in residential neighborhoods.
    - Policy N 3.1.1: Require that developers of new single-family and multi-family residential neighborhoods in areas where the ambient noise levels exceed 60 CNEL provide mitigation measures for the new residences to reduce interior noise levels to 45 CNEL, based on future traffic and railroad noise levels.
    - Policy N 3.1.2: Require that developers of new single-family and multi-family residential neighborhoods in areas where the projected noise levels exceed 65 CNEL provide mitigation measures (which may include noise barriers, setbacks, and site design) for new residences to reduce outdoor noise levels to 65 CNEL, based on future traffic conditions. This requirement would apply to rear yard areas for single-family developments, and to private open space and common recreational and open space areas for multi-family developments.
    - Policy N 3.1.3: Through enforcement of the applicable Noise Ordinance, protect residential neighborhoods from noise generated by machinery or activities that produce significant discernable noise exceeding recommended levels for residential uses.
    - Policy N 3.1.4: Require that those responsible for construction activities develop techniques to mitigate or minimize the noise impacts on residences and adopt standards that regulate noise from construction activities that occur in or near residential neighborhoods.
    - Policy N 3.1.7: Ensure that design of parks, recreational facilities, and schools minimize noise impacts to residential neighborhoods.

City of Santa Clarita Municipal Code

The City of Santa Clarita Municipal Code (SCMC) Noise Ordinance provides the following exterior noise standards within the City, which are applicable to the Proposed Project:

11.44.040 Noise Limits

A. It shall be unlawful for any person within the City to produce or cause or allow to be produced noise which is received on property occupied by another person within the

designated region, in excess of the following levels, except as expressly provided otherwise herein:

Region	Time	Sound Level (dBA)
Residential Zone	Day	65
Residential Zone	Night	55
Commercial and Manufacturing	Day	80
Commercial and Manufacturing	Night	70

At the boundary line between a residential property and a commercial and manufacturing property, the noise level of the quieter zone shall be used.

B. Corrections to Noise Limits. The numerical limits given in subsection (A) of this section shall be adjusted by the following corrections, where the following noise conditions exist:

Noise Condition	Correction (in dB)
(1) Repetitive impulsive noise	-5
(2) Steady whine, screech or hum	-5
(3) Noise occurring more than 5 but less than 15 minutes per hour	+5
(4) Noise occurring more than 1 but less than 5 minutes per hour	+10
(5) Noise occurring less than 1 minute per hour	+20

11.44.060(A) Special Noise Sources—Radios, Television Sets and Similar Devices

Use Restricted. It shall be unlawful for any person within the City to use or operate any radio receiving set, musical instrument, phonograph, television set, or other machine or device for the producing or reproducing of sound at any time in such a manner as to produce noise levels on residential land which would disturb the peace, quiet and comfort of neighboring residents or any reasonable person of normal sensitivity residing in the area.

11.44.070 Special Noise Sources—Machinery, Fans and Other Mechanical Devices

Any noise level from the use or operation of any machinery, equipment, pump, fan, air conditioning apparatus, refrigerating equipment, motor vehicle, or other mechanical or electrical device, or in repairing or rebuilding any motor vehicle, which exceeds the noise limits as set forth in SCMC Section 11.44.040 at any property line, or, if a condominium or rental units, within any condominium unit or rental unit within the complex, shall be a violation of this chapter.

11.44.080 Special Noise Sources—Construction and Building

No person shall engage in any construction work which requires a building permit from the City on sites within 300 feet of a residentially zoned property except between the hours of seven a.m. to seven p.m., Monday through Friday, and eight a.m. to six p.m. on Saturday. Further, no work shall be performed on the following public holidays: New Year's Day, Independence Day, Thanksgiving, Christmas, Memorial Day, and Labor Day.

Emergency work is permitted at all times. As defined in SCMC 11.44.020: Emergency work shall mean work made necessary to restore property to a safe condition following a public calamity, or work required to protect persons or property from an imminent exposure to danger, or work by private or public utilities when restoring utility service.

The Department of Community Development may issue a permit for work to be done "after hours" provided that containment of construction noises is provided.

11.44.090 Special Noise Sources—Amplified Sound

The noise limits as described in SCMC Section 11.44.040(A) shall apply to any use of sound-amplifying equipment.

4.11.3 THRESHOLDS OF SIGNIFICANCE

The significance thresholds used to evaluate the impacts of the Project related to noise are based on Appendix G of the CEQA Guidelines and the City's Initial Study Checklist.

CEQA GUIDELINES APPENDIX G

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to noise if it would:

Threshold 4.11(a): ***Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;***

Threshold 4.11(b): ***Result in generation of excessive groundborne vibration or groundborne noise levels; and/or***

Threshold 4.11(c): ***Expose people residing or working in the project area to excessive noise levels, for a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport.***

CITY'S INITIAL STUDY CHECKLIST

In addition, in accordance with the City's Initial Study Checklist, a project would have a significant impact related to noise if it would:

Threshold 4.11(d): ***Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.***

Threshold 4.11(e): ***Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.***

NUMERIC THRESHOLDS

To assist in answering the Appendix G and the City's Initial Study Checklist threshold questions, for the purposes of this EIR, the City utilizes the thresholds of significance established in the City's Noise Element Noise Compatibility Guidelines, SCMC, and FTA's quantitative standard for construction noise and vibration. Accordingly, noise and vibration impacts would be considered significant if the following occurs:

- Based on FTA Transit Noise and Vibration Impact Assessment criteria and because the adjacent properties are zoned residential, construction noise would be significant if noise

levels exceed 80 dBA L_{eq} for an 8-hour period or construction is conducted outside the allowable hours for construction as stated in SCMC Section 11.44.080.

- Operational noise would be significant if operational noise exceeds the daytime (7:00 a.m. to 10:00 p.m.) standard of 65 dBA L_{eq} or the nighttime (10:00 p.m. to 7:00 a.m.) standard of 55 dBA L_{eq} at residential uses and exceeds the daytime standard of 80 dBA L_{eq} or the nighttime standard of 70 dBA L_{eq} at commercial and manufacturing uses, as measured at the receiving property.
- For purposes of this analysis, a significant impact would occur when Project-related traffic increases the ambient noise environment of noise-sensitive land uses by 3 dBA, which would be a barely perceptible increase in traffic noise, if the noise level already exceeds the City's land use compatibility threshold.
- Vibration levels equal to or below 0.4 in/sec PPV at residential structures would prevent structural damage for most residential buildings, and vibration levels equal to or less than 1.0 in/sec PPV would prevent damage to more substantial construction, such as high-rise, commercial, and industrial buildings. For human annoyance, the vibration level threshold at which temporary vibration sources are considered to be distinctly perceptible is 0.24 in/sec PPV.

ISSUES NOT EVALUATED FURTHER

The Proposed Project would not result in significant impacts related to the following significance threshold from Appendix G of the CEQA Guidelines or the City's Initial Study Checklist, as determined in the Initial Study (**Appendix A**); therefore, it is not evaluated further in this Draft EIR:

Threshold 4.11(c): Expose people residing or working in the project area to excessive noise levels, for a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport.

4.11.4 METHODOLOGY

The analysis of noise impacts considered the improvements on the Project Site, as well as the Project's improvements off-site, including a Class I multi-purpose path along the frontage of the Project on 13th, Arch, and 12th Streets; widening of 13th Street, Arch Street, and 12th Street; installation of public hydrants along the frontage of the Project on 13th, Arch, and 12th Streets; and railroad crossing improvements at 13th Street, including the installation of a bike path/trail on the north side of the crossing, widening of the crossing at 13th Street and Railroad Avenue to accommodate the wider turning radii, installation of drainage on Railroad Avenue and 13th Street, new gates, modifications on Railroad Avenue at 13th Street to accommodate the revised intersection geometry and provide increased efficiency, implementation of ADA requirements for pedestrians, and implementation of line-of-sight requirements at the grade crossing. The analysis also considered the modifications to the Dockweiler Drive Extension Project in the immediate vicinity of the Project Site, including roadway improvements to 13th Street, Arch Street, 12th Street and Placerita Canyon Road that differ from previous approved plans, including accommodating the additional lane geometry at the Arch Street/13th Street intersection to widen the railroad crossing; construction of a pedestrian and bike bridge from the Jan Heidt Newhall Metrolink Station on Railroad Avenue to the future extension of Dockweiler Drive; and

implementation of temporary storm drain improvements to accommodate surface water runoff from Dockweiler Drive prior to the completion of the Project.

CONSTRUCTION

Noise Impacts

Construction noise was estimated using the FHWA Roadway Construction Noise Model (RCNM). RCNM predicts noise levels for a variety of construction operations based on empirical data and the application of acoustical propagation formulas. The RCNM provides reference noise levels for standard construction equipment, with an attenuation rate of 6 dBA per doubling of distance for stationary equipment. Construction noise levels were estimated at noise sensitive receptors near the Project Site using the RCNM.

Each phase of construction has a specific mix of equipment, depending on the work to be accomplished during that phase. Each Project phase also has its own noise characteristics. Some phases will have higher continuous noise levels than others, and some phases will have high-impact noise levels.

Vibration Impacts

Construction activities typically have the greatest potential to generate groundborne vibration affecting nearby receivers, particularly during grading and excavation. The greatest vibratory source during construction on the Project Site would be an excavator. A large bulldozer was used as a proxy for an excavator for the purpose of this analysis because bulldozers create similar vibration levels during construction activities. It should be noted that neither blasting nor pile driving would be required for the construction of the Project, including the off-site improvements.

Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors; therefore, the vibration level threshold is assessed at occupied structures, and, as such, all vibration impacts are assessed at the structure of an affected property.

OPERATION

ON-SITE SOURCES

There are no specific regulations beyond the limitation of noise levels. The primary on-site noise sources of concern during operation would be associated with heating, ventilation, and air conditioning (HVAC) units, exhaust fans, and parking lot activities. The noise assessment methodology assumed that all receivers would be downwind of stationary sources. This is considered a worst-case assumption for total noise impacts because only some receivers would be downwind at any one time. SoundPLAN was used to model parking lot noise using its database noise sources and to model on-site noise sources.

The type of mechanical equipment used for noise data was based on Project plan specifications. Typical HVAC noise levels were provided in Table 5 of **Appendix J**. For a conservative scenario, the units were assumed to operate at 100 percent for an entire hour for 24 hours. All HVAC units were modeled as being 3 feet above roof top elevation.

TRAFFIC NOISE IMPACTS

Changes in traffic caused by the Project would result in changes in noise levels along the roadways in the Project vicinity. Changes in traffic noise were calculated using the FHWA-RD-77-

108 Traffic Noise Prediction Model and traffic volumes from the Traffic Impact Analysis. The model calculates the average noise level at specific locations based on traffic volumes, average speeds, roadway geometry, and site environmental conditions. The posted speed limits for Project area roadways range from 25 to 50 miles per hour. Traffic distribution throughout the day applied to traffic noise modeling assumes 97 percent automobiles, 2 percent medium trucks, and 1 percent heavy trucks, which is considered a typical traffic distribution. Traffic distribution also assumed 80 percent of total daily vehicle traffic occurs during daytime hours and 20 percent during nighttime hours.

An off-site traffic noise impact typically occurs when a project generates a discernable increase in traffic and the resulting noise level exceeds an established noise standard. In community noise considerations, changes in noise levels greater than 3 dB are often identified as substantial, while changes less than 1 dB are considered to not be discernible by local residents. In the range of 1 to 3 dB, residents who are very sensitive to noise may perceive a slight change. In laboratory testing situations, humans are able to detect noise level changes of slightly less than 1 dB. However, this is based on a direct, immediate comparison of two sound levels. Community noise exposures occur over a long period of time and changes in noise levels occur over years (rather than the immediate comparison made in a laboratory situation). Therefore, the level at which changes in community noise levels become discernible is likely to be a value greater than 1 dB, and, therefore, 3 dB is the most commonly accepted discernable difference. A 5-dB change is generally recognized as a clearly discernable difference.

4.11.5 PROJECT DESIGN FEATURES

No Project Design Features are proposed with respect to noise.

4.11.6 ANALYSIS OF PROJECT IMPACTS

Threshold 4.11(a): ***Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?***

Threshold 4.11(d): ***Would the Project result in a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project?***

Threshold 4.11(e): ***Would the Project result in a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project?***

Impact Analysis

Construction

Construction activity, including those associated with the off-site improvements, would result in temporary noise in the Project Site vicinity and expose surrounding nearby receptors to increased noise levels. Construction noise would typically be higher during the heavier periods of initial construction (i.e., site preparation and grading) and lower during the later construction phases (i.e., building construction and paving). Typical heavy construction equipment used during grading include dozers, loaders, graders, excavators, lifts, water trucks, and dump trucks. The following assumptions would apply to the Project: diesel engines would power all construction equipment,

construction equipment would not all operate at the same time or location, and construction equipment would not be in constant use during an 8-hour operating day.

Over the course of a typical construction day, construction equipment would be located as close as 105 feet to adjacent noise sensitive receptors to the east of the Project Site but would typically be located at an average distance farther away due to the nature of construction and the lot size of the Project. For example, the equipment may operate across the horizontal distance of the site (105 to 1,050 feet) from single-family residences to the east. Therefore, it is assumed that over the course of a typical construction day the equipment would operate at an average distance of 200 feet from adjacent noise sensitive receptors. This is also a conservative estimate for off-site construction for roadway improvements that would occur on 13th Street, 12th Street, Arch Street, and Railroad Avenue. The roadway improvements would occur approximately 200 feet from the nearest residences but would average a farther distance over a typical construction day.

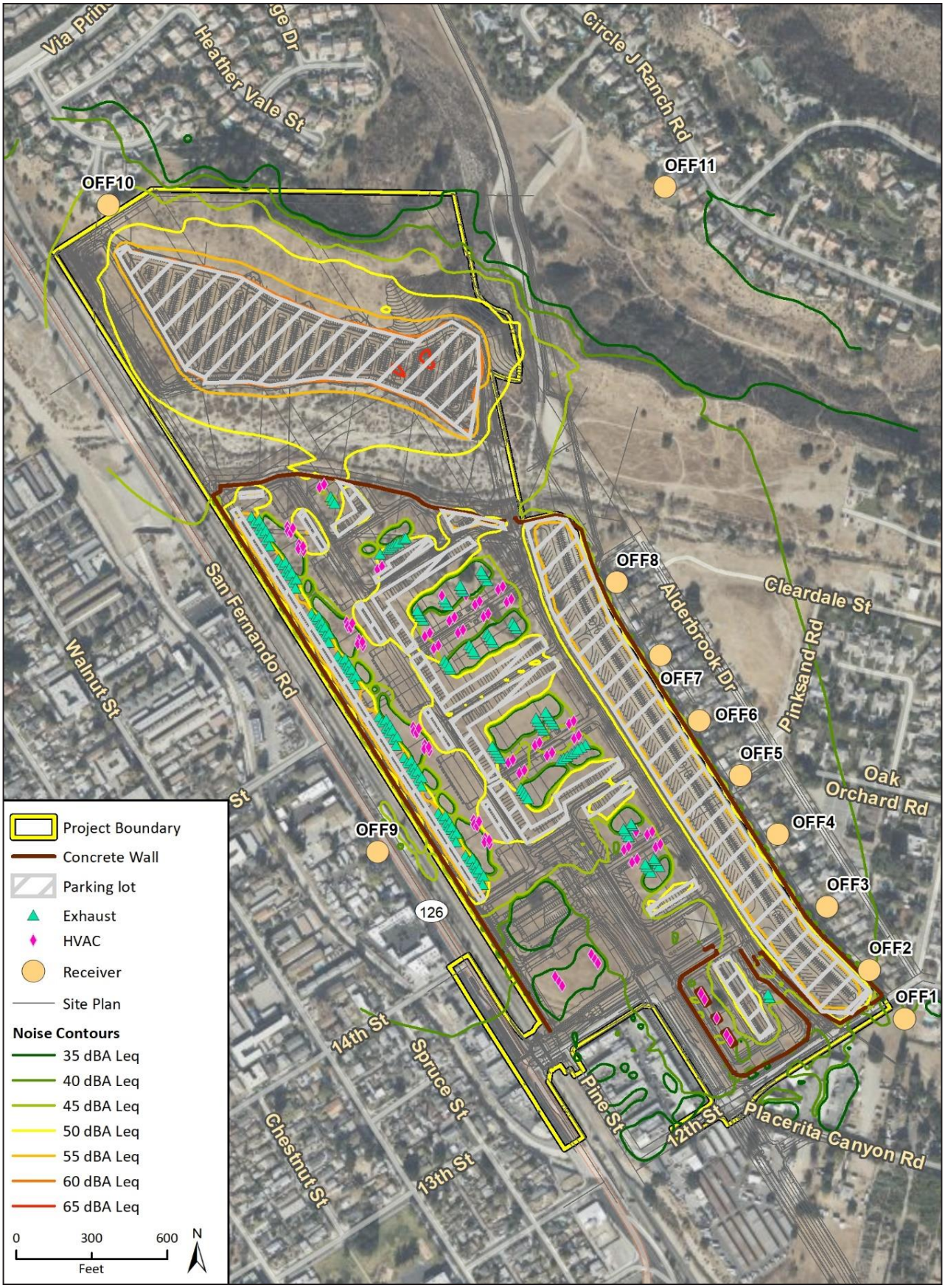
Construction noise is typically loudest during activities that involve excavation and moving soil, such as site preparation and grading. A potential construction scenario would involve the use of a grader, front-end loader, and dump truck during grading to excavate and move soil. At a distance of 200 feet, a grader, front-end loader, and dump truck would generate a noise level of 70 dBA L_{eq}. Even though construction noise levels may exceed this standard at noise-sensitive receptors adjacent to the Project Site, construction activities would be temporary and restricted to established time limitations identified in SCMC Section 11.44.080 (7:00 a.m. to 7:00 p.m., Monday through Friday, 8:00 a.m. to 6:00 p.m. on Saturday, and no construction work allowed on Sunday or listed public holidays). Because noise levels resulting from construction activities would be temporary and would comply with the provisions in the City's Noise Ordinance, construction noise impacts resulting from the construction of the Project and off-site improvements would be less than significant.

Operation

Stationary Sources

The Project would result in increased noise levels in the Project area during operation. On-site noise sources would include landscape maintenance, waste hauling, parking lot, rooftop heating, ventilation, and HVAC units and exhaust fans. Therefore, the primary stationary noise sources of concern would be associated with traffic, HVAC units, exhaust fans, and parking lot.

The Project would include new rooftop HVAC units and exhaust fans. Mechanical equipment would be associated with the sound stages (Buildings 1 through 19), production support, offices, and catering buildings. In addition, the Project would generate activities from the parking areas, such as the arrival and departure of vehicles, limited vehicle idling, vehicle door closing, passenger conversations, and vehicle startup, as well as outdoor areas, including the picnic areas, break areas, patios, food truck areas, and the private park, which are primarily shielded from the adjacent residences by the Project's buildings (e.g., the catering buildings would serve as a buffer between the residences and the private park, and the break areas and patios have been integrated along the buildings' façades facing inward and away from sensitive receptors). The combination of these activities were modeled to determine the total continuous operational noise level at adjacent land uses. The receiver locations and noise level contours for the total continuous operational noise are shown in **Figure 4.11-3** and noise levels are shown in **Table 4.11-3**. As shown in **Table 4.11-3**, operational activities on the Project Site would generate exterior noise levels ranging from 34 dBA L_{eq} to 47 dBA L_{eq} at the nearest off-site sensitive



Source: Rincon Consultants, Inc., Blackhall Studios-Santa Clarita Project Noise and Vibration Study, July 2022.

SHADOWBOX STUDIOS ENVIRONMENTAL IMPACT REPORT

Michael Baker INTERNATIONAL

NOT TO SCALE

03/2023 • JN 187935

Modeled Receivers and Noise Contours

Figure 4.11-3

Table 4.11-3
OPERATIONAL NOISE

Receiver	Description	Noise Level (dBA L_{eq})[a]	Daytime Threshold Exceeded?[b]	Nighttime Threshold Exceeded?[c]
OFF1	Residence - east	40	No	No
OFF2	Residence - east	40	No	No
OFF3	Residence - east	41	No	No
OFF4	Residence - east	42	No	No
OFF5	Residence - east	43	No	No
OFF6	Residence - east	43	No	No
OFF7	Residence - east	44	No	No
OFF8	Residence - east	44	No	No
OFF9	Mobile Home Park - west	44	No	No
OFF10	Residence - north	47	No	No
OFF11	Residence - northeast	34	No	No

Notes:
dBA = A-weighted scale
[a] Operational noise includes HVAC units, exhaust fans, and parking lot activities.
[b] Daytime thresholds would be exceeded if exterior noise levels exceed 65 dBA at residential uses and 80 dBA at commercial uses from 7:00 a.m. to 10:00 p.m.
[c] Nighttime thresholds would be exceeded if exterior noise levels exceed 55 dBA at residential uses and 70 dBA at commercial uses from 10:00 p.m. to 7:00 a.m.
See Figure 4.11-2 for receiver locations.
Source: Rincon Consultants, Inc., Blackhall Studios-Santa Clarita Project, Noise and Vibration Study, July 2022.

receivers adjacent to the Project Site. Impacts would be significant if Project-related operational noise exceeded 65 dBA L_{eq} during the daytime hours (7:00 a.m. to 10:00 p.m.) and 55 dBA L_{eq} during nighttime hours (10:00 p.m. to 7:00 a.m.) for residential uses (SCMC Section 11.44.040). The combined maximum operational noise from the HVAC, exhaust fan, and parking lot would not exceed the City's noise standards at these nearby noise-sensitive receptors. The Project would not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local General Plan or Noise Ordinance, or applicable standards of other agencies, above levels existing without the Project; as such, impacts would be less than significant.

Traffic Noise

Noise affecting the Project Site and surrounding land uses primarily originates from traffic on Railroad Avenue and Metrolink operations along the railroad right-of-way, both of which are located adjacent to and west of the Project Site. Operation of the Project would result in additional traffic on adjacent roadways, thereby increasing vehicular noise in the vicinity of existing and proposed land uses. Based on the Transportation Assessment, the Project is projected to generate a total of approximately 6,993 daily vehicle trips.

The noise levels under the existing scenarios, including without and with the Dockweiler Drive Extension Project and the railroad crossing upgrade, and the future scenarios, including without and with the Dockweiler Drive Extension Project, are compared to those with the addition of the Project in **Table 4.11-4** and **Table 4.11-5**. Due to the relatively small increase in overall Project contribution to traffic volumes, the resulting noise level increases would be less than 3 dBA for

Table 4.11-4
OFF-SITE TRAFFIC NOISE INCREASES (DBA L_{DN} AT 50 FEET) – EXISTING SCENARIOS

Roadway	Segment	Existing	Existing + Project No DDEP	Change	Existing + Project With DDEP	Change	Existing + Project RRCU	Change
Bouquet Cyn Rd	From the north to Newhall Ranch Rd	74	74	<1	74	<1	74	<1
	Newhall Ranch Rd to Soledad Cyn Rd	74	74	<1	74	<1	74	<1
	Soledad Cyn Rd to Magic Mtn Rd	73	73	<1	73	<1	73	<1
Railroad Ave	Magic Mtn Rd to Oak Ridge Dr	74	74	<1	74	<1	74	<1
	Oak Ridge Dr to 13th St	73	73	<1	73	<1	73	<1
	13th St to Lyons Ave	72	73	1	72	<1	73	1
	Lyons Ave to Newhall Ave	70	70	<1	70	<1	70	<1
Newhall Ave	Railroad Ave to Valle Del Oro	71	72	1	72	1	72	1
	Valle Del Oro to Sierra Hwy	72	72	<1	72	<1	72	<1
Arch St	13th St to 12th St	65	66	1	65	<1	65	<1
Placerita Cyn Rd	12th St to the south	61	62	1	63	2	62	1
Dockweiler Dr	Placerita Cyn Rd to Valle Del Oro	--	58	--	59	--	--	--
	Valle Del Oro to Sierra Hwy	63	63	<1	64	1	63	<1
Orchard Village Rd	Wiley Cyn Rd to Lyons Ave	69	69	<1	69	<1	69	<1
	Lyons Ave to the south	66	66	<1	66	<1	66	<1
Wiley Cyn Rd	Lyons Ave to Orchard Village Rd	70	70	<1	70	<1	70	<1
Sierra Cyn Rd	From the north to SR-14 ramps	71	71	<1	71	<1	71	<1
	SR-14 ramps to Placerita Cyn Rd	70	71	1	71	1	71	1

Table 4.11-4
OFF-SITE TRAFFIC NOISE INCREASES (dBA L_{DN} AT 50 FEET) – EXISTING SCENARIOS

Roadway	Segment	Existing	Existing + Project No DDEP	Change	Existing + Project With DDEP	Change	Existing + Project RRCU	Change
	SR-14 ramps to Placerita Cyn Rd	71	71	<1	71	<1	71	<1
	Placerita Cyn Rd to Dockweiler Rd	71	71	<1	71	<1	71	<1
	Dockweiler Rd to Newhall Ave	70	70	<1	70	<1	70	<1
	Newhall Ave to the south	74	74	<1	74	<1	74	<1
Soledad Cyn Rd	Bouquet Cyn Rd to Colden Valley Rd	70	70	<1	70	<1	70	<1
Magic Mtn Rd	Railroad Ave to Tourney Rd	66	66	<1	66	<1	66	<1
Oak Ridge Dr	Railroad Ave to Via Princessa	65	67	2	67	2	67	2
13th St Lyons Ave	Railroad Ave to Project Entrance	67	68	1	68	1	68	1
	Railroad Ave to Newhall Ave	70	70	<1	70	<1	70	<1
	Newhall Ave to Orchard Village Rd	70	71	1	71	1	71	1
	Orchard Village Rd to Wiley Cyn Rd	71	71	<1	71	<1	71	<1
	Wiley Cyn Rd to I-5 ramps	74	74	<1	74	<1	74	<1

Notes:
DDEP= Dockweiler Drive Extension Project RRCU = Railroad Crossing Upgrade
Source: Gibson Transportation Consulting, Inc., Transportation Assessment of the Shadowbox Studios Project, 2022; Rincon Consultants, Inc., Blackhall Studios-Santa Clarita Project, Noise and Vibration Study, July 2022.

Table 4.11-5

OFF-SITE TRAFFIC NOISE INCREASES (DBA L_{DN} AT 50 FEET) – FUTURE SCENARIOS

Roadway	Segment	Future No Project/ No DDEP	Future + Project No DDEP	Change	Future No Project With DDEP	Future + Project With DDEP	Change
Bouquet Cyn Rd	From the north to Newhall Ranch Rd	75	75	<1	75	75	<1
	Newhall Ranch Rd to Soledad Cyn Rd	75	75	<1	75	75	<1
	Soledad Cyn Rd to Magic Mtn Rd	74	74	<1	74	74	<1
Railroad Ave	Magic Mtn Rd to Oak Ridge Dr	76	76	<1	76	76	<1
	Oak Ridge Dr to 13th St	73	74	1	74	74	<1
	13th St to Lyons Ave	74	74	<1	73	73	<1
	Lyons Ave to Newhall Ave	71	71	<1	70	71	1
Newhall Ave	Railroad Ave to Valle Del Oro	73	73	<1	73	73	<1
	Valle Del Oro to Sierra Hwy	73	73	<1	72	72	<1
Arch St	13th St to 12th St	63	66	**3**	66	66	<1
Placerita Cyn Rd	12th St to the south	64	65	1	65	67	2
Dockweiler Dr	Placerita Cyn Rd to Valle Del Oro	--	--	–	67	68	1
	Valle Del Oro to Sierra Hwy	66	66	<1	66	66	<1
Orchard Village Rd	Wiley Cyn Rd to Lyons Ave	71	71	<1	71	71	<1
	Lyons Ave to the south	66	66	<1	66	66	<1
Wiley Cyn Rd	Lyons Ave to Orchard Village Rd	71	71	<1	71	71	<1
Sierra Cyn Rd	From the north to SR 14 ramps	75	75	<1	75	75	<1
	SR 14 ramps to Placerita Cyn Rd	74	74	<1	74	75	1
	SR 14 ramps to Placerita Cyn Rd	74	74	<1	75	75	<1

Table 4.11-5

OFF-SITE TRAFFIC NOISE INCREASES (DBA L_{DN} AT 50 FEET) – FUTURE SCENARIOS

Roadway	Segment	Future No Project/ No DDEP	Future + Project No DDEP	Change	Future No Project With DDEP	Future + Project With DDEP	Change
	Placerita Cyn Rd to Dockweiler Rd	73	73	<1	73	74	1
	Dockweiler Rd to Newhall Ave	73	72	-1	72	72	<1
	Newhall Ave to the south	74	75	1	74	74	<1
Soledad Cyn Rd	Bouquet Cyn Rd to Colden Valley Rd	73	73	<1	73	73	<1
Magic Mtn Rd	Railroad Ave to Tourney Rd	69	69	<1	69	69	<1
Oak Ridge Dr	Railroad Ave to Via Princessa	67	68	1	66	68	2
13th St Lyons Ave	Railroad Ave to Project Entrance	68	68	<1	68	69	1
	Railroad Ave to Newhall Ave	72	72	<1	72	73	1
	Newhall Ave to Orchard Village Rd	72	72	<1	72	72	<1
	Orchard Village Rd to Wiley Cyn Rd	72	72	<1	72	72	<1
	Wiley Cyn Rd to I-5 ramps	75	75	<1	75	75	<1

Notes:

DDEP= Dockweiler Drive Extension Project RRCU = Railroad Crossing Upgrade

According to the Transportation Assessment, future scenarios take into account all projects to be completed by 2028; therefore, future scenarios are essentially the same as cumulative conditions.

Source: Gibson Transportation Consulting, Inc., Transportation Assessment of the Shadowbox Studios Project, 2022; Rincon Consultants, Inc., Blackhall Studios-Santa Clarita Project, Noise and Vibration Study, July 2022.

the majority of the roadway segments. One roadway segment (Arch Street between 13th Street and 12th Street) would result in a traffic noise level increase of 3 dBA under the future scenario without the Dockweiler Drive Extension. However, only commercial and industrial uses are present on Arch Street; there are no sensitive receivers along this segment. Therefore, the Project's traffic noise increase would not exceed 3 dBA at noise-sensitive land uses or exceed the City's land use compatibility threshold. As such, impacts would be less than significant.

Mitigation Measures

Impacts with regard to Thresholds 4.11(a), 4.11(d), and 4.11(e) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Thresholds 4.11(a), 4.11(d), and 4.11(e) were determined to be less than significant without mitigation.

Threshold 4.11(b): Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?

Impact Analysis

Construction

Certain construction activities would have the potential to result in varying degrees of temporary groundborne vibration depending on the specific construction equipment used and the operations involved. Vibration generated by construction equipment spreads through the ground and diminishes in magnitude as the distance increases. The effect on buildings and people in the vicinity of the construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, and to slight damage at the highest levels. Groundborne vibrations from construction activities rarely reach levels that damage structures.

For the Project, including the off-site improvements, construction activities have the greatest potential to generate groundborne vibration affecting nearby receivers, particularly during grading and excavation of the Project Site. The greatest vibratory source during construction would be an excavator. A large bulldozer was used as a proxy for an excavator for the purpose of this analysis because bulldozers create similar vibration levels during construction activities. It should be noted that neither blasting nor pile driving would be required for Project construction. Typical vibration velocities produced by construction equipment are illustrated in **Table 4.11-6**.

Table 4.11-6
VIBRATION LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment	PPV (inch-per-second) at 25 feet
Vibratory Roller	0.0210
Large Bulldozer	0.089
Loaded Trucks	0.076
Small Bulldozer	0.003
Vibratory roller	0.0210

Notes:
PPV = peak particle velocity
Source: Federal Transit Administration, 2018.

As shown, a large bulldozer generates a vibration level of approximately 0.089 in/sec PPV at a distance of 25 feet. This would equal a vibration level of 0.061 in/sec PPV for a large bulldozer at 35 feet (nearest off-site structure during construction of a proposed 12-foot perimeter wall). This vibration level is lower than the human annoyance threshold of 0.24 in/sec PPV and the residential damage threshold of 0.4 in/sec PPV. Therefore, temporary vibration impacts associated with on-site and off-site construction would be less than significant.

Operation

The Project would not generate substantial levels of vibration during operation due to the lack of vibration-generating sources. Therefore, operational impacts related to vibration were not analyzed. The Project would not result in generation of excessive groundborne vibration or groundborne noise levels during operation, and, as such, no vibration impact would occur during Project operation.

Mitigation Measures

Impacts with regard to Threshold 4.11(b) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.11(b) were determined to be less than significant without mitigation.

4.11.7 CUMULATIVE IMPACTS

Impact Analysis

The Project, together with the related projects and future growth, could contribute to cumulative noise impacts. The potential for cumulative noise impacts to occur is specific to the distance between each related project and their stationary noise sources along with the cumulative traffic that these projects would add to the surrounding roadway network.

Construction Noise

As indicated in Section 3.0, Environmental Setting, of this Draft EIR, 36 related projects have been identified in the vicinity of the Project Site. Noise from the construction of development projects is typically localized and has the potential to affect noise-sensitive uses within 500 feet from the construction site. Thus, noise from construction activities for two projects within 1,000 feet of each other can contribute to a cumulative noise impact for receptors located midway between the two construction sites. All of the related projects are located a substantial distance (greater than 1,000 feet) from the Project Site. In addition, construction noise levels from the Project and related projects would be intermittent and temporary, and, it is anticipated that, as with the Project, the related projects would comply with applicable regulations set forth in the SCMC. Noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each individual related project and compliance with locally adopted and enforced noise ordinances. Therefore, construction noise levels resulting from the Project would not combine with construction noise levels generated by any of the related projects. Accordingly, the Project's contribution to cumulative construction noise impacts would not be considerable, and, as such, cumulative

construction noise impacts at the sensitive uses (e.g., residential uses) located in proximity to the Project Site would be less than significant.

Operational Noise

The area surrounding the Project Site has been developed with uses that have previously generated, and will continue to generate, noise from multiple community noise sources, including mechanical equipment (e.g., HVAC systems), outdoor activity areas, and vehicle travel. Similar to the Project, each related project that has been identified in the vicinity of the Project Site would also generate stationary-source and mobile-source noise due to ongoing day-to-day operations. Most of the related projects are of a residential, retail, commercial, or institutional nature, which are not typically associated with excessive exterior noise levels. However, each related project would produce traffic volumes that are capable of generating roadway noise impacts. The potential cumulative noise impacts associated with on-site and off-site noise sources are addressed below.

Due to the provisions set forth in the SCMC that limit stationary-source noise from equipment, such as rooftop mechanical equipment, noise levels would be less than significant at the property line for each related project. In addition, as discussed above, noise impacts associated with operations on the Project Site would be less than significant. Therefore, based on the distance of the related projects from the Project Site and the operational noise levels associated with the Project, the Project's contribution to cumulative stationary-source noise impacts during operations would not be considerable, and, as such, cumulative stationary-source noise impacts at the sensitive uses (e.g., residential uses) located in proximity to the Project Site would be less than significant.

The Project and related projects in the area would produce traffic volumes (off-site mobile sources) that would generate roadway noise. The "Existing Plus Project" and "Future Plus Project" scenarios are compared in **Table 4.11-4** and **Table 4.11-5**, which also take into consideration the addition or absence of the Dockweiler Drive Extension Project and railroad crossing upgrade. According to the Transportation Assessment, future scenarios take into account all projects to be completed by 2028; therefore, future scenarios are essentially the same as cumulative conditions. Due to the relatively small increase in overall Project contribution to traffic volumes, the resulting noise level increases would be less than 3 dBA for the majority of the roadway segments. One roadway segment (Arch Street between 13th Street and 12th Street) would result in a traffic noise level increase of 3 dBA under the future scenario without the Dockweiler Drive Extension. However, there are no sensitive receivers along this segment. Therefore, the Project's traffic noise increase would not exceed 3 dBA at noise-sensitive land uses and would not result in a cumulatively considerable contribution to noise levels in the Project vicinity. As such, cumulative noise impacts due to off-site mobile noise sources associated with the Project, future growth, and related projects would be less than significant.

Construction Vibration

As previously discussed, groundborne vibration decreases rapidly with distance. Potential vibration impacts due to construction activities are generally limited to buildings/structures that are located in proximity to the construction site (i.e., within 15 feet as related to building damage and 80 feet as related to human annoyance at residential uses). Based on vibration levels for construction equipment shown in **Table 4.11-6**, a large bulldozer would create approximately 0.061 in/sec PPV at 35 feet. This vibration level is lower than the human annoyance threshold of

0.24 in/sec PPV and the residential damage threshold of 0.4 in/sec PPV. Therefore, temporary vibration impacts associated with on-site and off-site construction would be less than significant.

As indicated above, there are no related projects within 1,000 feet of the Project Site. Therefore, based on distance attenuation, potential cumulative vibration impacts with respect to the building damage from the Project and related projects would be less than significant. As such, the Project's contribution to cumulative construction vibration impact with respect to building damage and human annoyance associated with construction would not be considerable, and cumulative construction vibration impacts at the sensitive uses (e.g., residential uses) located in proximity to the Project Site would be less than significant.

Operational Vibration

Vibration levels from Project operation are generally limited to mechanical equipment and vehicle circulation and would be limited to the immediate vicinity of the Project Site and the related project sites. As described above, the Project would not generate substantial levels of vibration during operation due to the lack of vibration-generating sources. As there are no related projects within 1,000 feet of the Project Site, and since groundborne vibration decreases rapidly with distance, the Project's contribution to cumulative operational vibration impacts would not be considerable, and cumulative operational vibration impacts at the sensitive uses (e.g., residential uses) located in proximity to the Project Site would be less than significant.

Mitigation Measures

Cumulative noise impacts were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Cumulative noise impacts were determined to be less than significant without mitigation.

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4.12 POPULATION AND HOUSING

This section analyzes the potential impacts of the Project's contribution to population, housing, and employment growth within the City of Santa Clarita (City), in relation to the growth forecasts established by the Southern California Association of Governments (SCAG) and to relevant goals, objectives, and policies related to population, housing, and employment contained in applicable plans. Supporting documentation, including growth calculations, is provided in **Appendix K** of this Draft EIR.

4.12.1 ENVIRONMENTAL SETTING

PROJECT SITE

As described in Section 2.0, Project Description, of this Draft EIR, although the Project Site has been disturbed by past uses, it is currently undeveloped. There are no residential, commercial, or industrial uses on the Project Site with associated residential or employee populations under existing conditions.

POPULATION, HOUSING, AND EMPLOYMENT FORECASTS

Baseline (2022) and future (2026) population, housing, and employment projections for Los Angeles County (County) and the City are based on the forecasts contained in SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS) and shown in **Table 4.12-1**, below.

Table 4.12-1
POPULATION, HOUSING, AND EMPLOYMENT FORECASTS FOR COUNTY AND CITY

	2022 (Baseline)[a]	2026 (Buildout)[a]	Growth	Percent Increase
Population (persons)				
Los Angeles County	10,433,586	10,649,310	215,724	2.1%
City of Santa Clarita	226,600	232,200	5,600	2.5%
Housing (units)				
Los Angeles County	3,484,517	3,594,862	110,345	3.2%
City of Santa Clarita	76,641	79,869	3,228	4.2%
Employment (jobs)				
Los Angeles County	4,875,207	4,963,345	88,138	1.8%
City of Santa Clarita	94,097	96,028	1,931	2.1%

Notes:
[a] *Population, housing, and employment forecasts for Los Angeles County and the City of Santa Clarita are calculated based on linear interpolation of the 2016 and 2045 values provided in Table 14 of SCAG's Demographics and Growth Forecast Technical Report.*
Source: SCAG, Connect SoCal, Demographics and Growth Forecast Technical Report, Table 14 – Jurisdiction-Level Growth Forecast, September 3, 2020; Michael Baker International, 2023.

As indicated in **Table 4.12-1**, the population projection for 2026 for the County is 10,649,310 persons, representing a 2.1 percent increase from the 2022 population of 10,433,586 persons. Similarly, the City is projected to experience a growth of approximately 2.5 percent from its 2022 population estimate of 226,600 persons to 232,200 persons in 2026.

The housing projections shown in **Table 4.12-1** estimates that housing units in the County will increase from 3,484,517 units in 2022 to 3,594,862 units in 2026, a growth of approximately 3.2 percent. The City's housing growth would be greater, at approximately 4.2 percent, from 76,641 units in 2022 to 79,869 units in 2026.

The employment projection for the County in 2026 is 4,963,345 jobs, which is an increase of approximately 1.8 percent compared to the 2022 estimate of 4,875,207 jobs. The City's employment is expected to experience a growth of approximately 2.1 percent, from 94,097 jobs in 2022 to 96,028 jobs in 2026.

4.12.2 REGULATORY AND PLANNING FRAMEWORK

FEDERAL

There are no federal regulations or planning programs that apply to the Proposed Project regarding population and housing.

STATE

Housing Element Law (California Government Code Sections 65583 and 65584[a][1])

Section 65583 of the California Government Code requires cities and counties to prepare a housing element as one of the State-mandated elements of the general plan to provide adequate housing for all income levels of the county or city. Each jurisdiction must update their housing element every eight years. The Regional Housing Needs Assessment (RHNA) is mandated by State law as part of the periodic process of updating local housing elements of the general plan. The RHNA quantifies the need for housing within each jurisdiction during specified planning periods. Pursuant to Section 65584(a)(1), the California Department of Housing and Community Development (HCD) is responsible for determining the housing needs for low-, very low-, moderate-, and above moderate-income levels for each region's planning body, known as a Council of Governments (COG). The HCD prepares an initial housing needs assessment and then coordinates with each COG to arrive at the final RHNA. SCAG is the COG serving the Southern California area. To date, there have been six housing element update cycles.

The Sustainable Communities and Climate Protection Act of 2008 (Senate Bill 375)

The Sustainable Communities and Climate Protection Act of 2008 (Senate Bill [SB] 375) focuses on aligning transportation, housing, and other land uses to achieve regional greenhouse gas (GHG) emission reduction targets established under the California Global Warming Solutions Act, also known as Assembly Bill 32. SB 375 requires metropolitan planning organizations to develop an SCS as part of the RTP, with the purpose of identifying policies and strategies to reduce per capita passenger vehicle generated GHG emissions. As set forth in SB 375, the SCS must address the following components:

- Identify the general location of land uses, residential densities, and building intensities within the region;
- Identify areas within the region sufficient to house the entire population of the region, including all economic segments of the population over the course of the planning period;
- Identify areas within the region sufficient to house an eight-year projection of the regional housing need;

- Identify a transportation network to service the regional transportation needs;
- Gather and consider the best practically available scientific information regarding resource areas and farmland in the region;
- Consider the state housing goals;
- Establish the land use development pattern for the region that, when feasible, would reduce GHG emissions from automobiles and light-duty trucks to achieve GHG emission reduction targets set by the California Air Resources Board; and
- Comply with air quality requirements established under the Clean Air Act.

Existing law requires local governments to adopt a housing element as part of their general plan and update the housing element as needed and no sooner than every five years. SB 375 lengthened the period to eight years, setting the housing element period to begin no sooner than 18 months after adoption of the RTP to encourage better coordination between housing and transportation planning. SB 375 also changes the implementation schedule required in each housing element. Previous law required the housing element to contain a program that set forth a five-year schedule to implement the goals and objectives of the housing element. The new law instead requires this schedule of actions to occur during the eight-year housing element planning period and for each action to have a timetable for implementation. In addition, SB 375 requires that the schedules for the RTP and RHNA processes be synchronized and for the RHNA to allocate housing units within the region in a manner consistent with the development pattern adopted by the SCS.

REGIONAL

SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

The City of Santa Clarita is located within the jurisdiction of SCAG, a joint powers authority established under California Government Code Section 6502 et seq. Pursuant to federal and state law, SCAG serves as a COG, a regional transportation planning agency, and the metropolitan planning organization for Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial Counties. SCAG's mandated responsibilities include developing plans and policies with respect to the region's population growth, transportation programs, air quality, housing, and economic development. On September 3, 2020, SCAG adopted Connect SoCal (the 2020-2045 RTP/SCS), which is an update to the 2016-2040 RTP/SCS. Using growth forecasts and economic trends, the 2020-2045 RTP/SCS provides a vision for transportation throughout the region for the next 25 years that achieves the statewide GHG emissions reduction targets, thus identifying the amount and location of growth expected to occur within the region.

On October 30, 2020, the California Air Resources Board accepted SCAG's determination that the SCS would achieve GHG emission reduction targets. The 2020-2045 RTP/SCS meets federal and state requirements and is a long-range plan that balances future mobility and housing needs with economic, environmental, and public health goals. The RTP/SCS contains baseline socioeconomic projections that serve as the basis for SCAG's transportation planning. Projections at the regional, county, and local jurisdictional levels include population, households, and employment.

Regional Housing Needs Assessment

SCAG prepares the RHNA mandated by State law so that local jurisdictions can use this information during their periodic updates of their housing elements. The RHNA identifies the housing needs for very low income-, low income-, moderate income-, and above moderate-

income groups, and allocates these targets among the local jurisdictions that comprise SCAG. The RHNA addresses existing and future housing needs, with the existing need determined by the most recent US Census data, and the future need determined by data on forecasted household growth, historical growth patterns, job creation, household formation rates, and other factors. The need for new housing is distributed among income groups so that each community moves closer to the regional average income distribution. The most recent RHNA allocation, the 6th Cycle RHNA Allocation Plan, was approved by HCD on March 22, 2021, and covers the planning period October 2021 through October 2029. For the 6th Cycle, SCAG received a need of 1,341,827 housing units, which was distributed to all 197 SCAG jurisdictions.

LOCAL

City of Santa Clarita General Plan Housing Element

The City of Santa Clarita's General Plan establishes goals and policies related to land use, transportation, population growth and distribution, development, open space, resource preservation and utilization, air and water quality, noise impacts, public safety, infrastructure, and other related physical, social, and economic factors. In addition to serving as a guide for local decision making, the General Plan establishes a clear set of development guidelines for citizens, developers, neighboring jurisdictions, and agencies, and provides the community with an opportunity to participate in the planning process. The purpose of the City's General Plan is to comply with State requirements and provide the City with a comprehensive, long-range policy guideline for future development.

The Housing Element of the General Plan sets forth the City's goals and policies with respect to housing and establishes a comprehensive eight-year program strategy for the October 15, 2013, to October 15, 2021, planning period. The City is in the process of updating the Housing Element to prepare planning for the 2021-2029-time frame. The Housing Element identifies strategies and programs that focus on preserving and improving housing and neighborhoods, providing adequate housing sites, assisting in the provision of affordable housing, removing governmental and other constraints to housing investment, and promoting fair and equal housing opportunities. The Project would not include any residential development; therefore, no goals, objectives, or policies would apply from the Housing Element.

As established by the 6th Cycle RHNA Allocation Plan, the City of Santa Clarita was assigned an allocation of 10,031 new housing units for the planning period between October 2021 through October 2029. This total is distributed by income category as shown in **Table 4.12-2** below.

Table 4.12-2
SANTA CLARITA'S SHARE OF REGIONAL HOUSING NEEDS

Income Category	Housing Unit Allocation
Very Low Income	3,397
Low Income	1,734
Moderate Income	1,672
Above Moderate Income	3,228
Total	10,031
Source: SCAG, 6th Cycle Final RHNA Allocation Plan.	

4.12.3 THRESHOLDS OF SIGNIFICANCE

The significance thresholds used to evaluate the impacts of the Project related to population and housing are based on Appendix G of the CEQA Guidelines.

CEQA GUIDELINES APPENDIX G

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to population and housing if it would:

Threshold 4.12(a): ***Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure); or***

Threshold 4.12(b): ***Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.***

ISSUES NOT EVALUATED FURTHER

The Project would not result in significant impacts related to the following significance threshold from Appendix G of the CEQA Guidelines, as determined in the Initial Study (**Appendix A**); therefore, it is not evaluated further in this Draft EIR:

Threshold 4.12(b): ***Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.***

4.12.4 METHODOLOGY

The analysis of impacts related to population, housing, and employment considered the improvements on the Project Site, as well as the Project's improvements off-site, including a Class I multipurpose path along the frontage of the Project on 13th, Arch, and 12th Streets; widening of 13th Street, Arch Street, and 12th Street; and railroad crossing improvements at 13th Street, including the installation of a bike path/trail on the north side of the crossing, widening of the crossing at 13th Street and Railroad Avenue to accommodate the wider turning radii, installation of drainage on Railroad Avenue and 13th Street, new gates, modifications on Railroad Avenue at 13th Street to accommodate the revised intersection geometry and provide increased efficiency, implementation of requirements compliant with the Americans with Disabilities Act for pedestrians, and implementation of line-of-sight requirements at the grade crossing. The analysis also considered the modifications to the Dockweiler Drive Extension Project in the immediate vicinity of the Project Site, including roadway improvements to 13th Street, Arch Street, 12th Street, and Placerita Canyon Road that differ from previous approved plans, including accommodating the additional lane geometry at the Arch Street/13th Street intersection to widen the railroad crossing; construction of a pedestrian and bike bridge from the Jan Heidt Newhall Metrolink Station on Railroad Avenue to the future extension of Dockweiler Drive; and implementation of temporary storm drain improvements to accommodate surface water runoff from Dockweiler Drive prior to the completion of the Project.

The Project would construct a 1,285,800-square-foot full-service film and television studio campus consisting of approximately 475,500 square feet of sound stages; approximately 565,400 square feet of workshops, warehouses, and support uses; approximately 209,300 square feet of production and administrative offices; and approximately 35,600 square feet of catering and other

specialty services. As the Project would not develop residential land uses or directly generate a residential population, the impact analysis focuses on the employment growth that would occur in the County and City as a result of Project implementation.

Employment during construction is based on the maximum number of workers on the Project Site during Project construction, which is provided in the Transportation Assessment for the Project prepared by Gibson Transportation Consulting, Inc. (refer to **Appendix L** of this Draft EIR).[1] Employment during operations is based on the VMT modeling summary prepared by Iteris, Inc., which is included in the Transportation Assessment as Appendix C.

To determine if the Project's employment growth would induce substantial unplanned population growth in the Project region, the Project's direct employment increases are compared to SCAG's growth forecasts for the County and City. Employment estimates for baseline year 2022 and buildout year 2026 are calculated based on linear interpolation of the 2016 and 2045 values provided in the SCAG 2020-2045 RTP/SCS.[2]

4.12.5 PROJECT DESIGN FEATURES

No specific Project Design Features are proposed in regard to land use beyond the Project features discussed in Section 2.0, Project Description, of this Draft EIR.

4.12.6 ANALYSIS OF PROJECT IMPACTS

Threshold 4.12(a): Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Impact Analysis

Construction

Construction of the Project, including the proposed off-site improvements, would create short-term employment opportunities that could indirectly increase the population and demand for housing in the Project vicinity. However, construction jobs differ from most other employment sectors because there is typically no regular place of work. Construction workers typically remain at a job site only for the time period that their highly specialized skills are needed to complete a specific phase of the construction process. Therefore, it is unlikely that workers would relocate their households as a result of the temporary employment associated with the construction of the Project.

Based on the Transportation Assessment for the Project, the Project may employ a maximum of 450 construction workers on the Project Site during the building construction and finishing phase.[3] It is reasonable to expect that most of these construction workers already reside in the Project region. Moreover, based on the above, those that do not are unlikely to relocate from outside the

[1] Gibson Transportation Consulting, Inc., Transportation Assessment for Shadowbox Studios, Santa Clarita, CA, January 2023.

[2] SCAG, Connect SoCal, Demographics and Growth Forecast Technical Report, Table 14 – Jurisdiction-Level Growth Forecast, September 3, 2020.

[3] Gibson Transportation Consulting, Inc., Transportation Assessment for Shadowbox Studios, Santa Clarita, CA, p. 154, January 2023.

region as a result of the temporary construction employment. Therefore, construction of the Project, including the off-site improvements, would not induce substantial unplanned population growth in the Project area, and impacts would be less than significant.

Operation

The proposed full-service film and television studio campus would directly generate approximately 2,333 total employment opportunities based on Iteris' modeling summary.[4] As shown in **Table 4.12-3**, the Project's employment growth would represent 2.6 percent of the County's estimated employment growth between 2022 and 2026 and 120.8 percent of the City's estimated employment growth for those same years. The substantial employment growth in the City by 2026 as a result of the Project is accounted for in the City's General Plan.

As stated in the City's General Plan Economic Development Element, the City seeks to enhance the quality of life for its residents by providing opportunities to work closer to home. Thus, the City has established an aggressive goal of a 2 to 1 jobs/housing balance and supports projects that would create two jobs for every new household.[5] The increase of 2,333 employment opportunities to the 2026 employment forecast of 96,028 jobs would result in 98,361 jobs in the City. This equates to a jobs/housing balance of 1.23 to 1, which would support the City's job/housing balance goal.[6] The Project may also indirectly generate an additional 3,500 employment opportunities,[7] which would result in a jobs/housing balance of 1.28 to 1.[8] The indirect employment growth generated by the Project would further improve the City's job/housing balance and support the City's goal of achieving a 2 to 1 jobs/housing. Rather than increase population growth in the City, it is anticipated that the employment growth would be filled by existing residents of the City. Therefore, the Project's substantial employment increase would have a beneficial impact.

Based on the above, the Project would be consistent with the County's forecasted employment growth between 2022 and 2026. Although the Project would result in substantial employment growth for the City compared to SCAG's forecast for the City, this growth is accounted for in the General Plan Economic Development Element and would support the City's goal of achieving a 2 to 1 jobs/housing balance. As such, the Project, including the off-site improvements, would not induce unplanned growth in the Project area, and impacts would be less than significant.

Table 4.12-3
PROJECT EMPLOYMENT GROWTH IN THE COUNTY AND CITY

	Project Increase[a]	Projected Growth 2022 to 2026[b]	Project Percentage of Growth
Los Angeles County	2,333	88,138	2.6%
Santa Clarita	2,333	1,931	120.8%

Notes:
[a] Iteris, Inc., Technical Memorandum: Blackhall Studios – City of Santa Clarita VMT Modeling Summary, August 24, 2021
[b] See Table 4.12-1.
Source: Michael Baker International, 2023

4 Iteris, Inc., Technical Memorandum: Blackhall Studios – City of Santa Clarita VMT Modeling Summary, August 24, 2021 (see Appendix C of the Gibson Transportation Assessment, included as **Appendix L** to this Draft EIR).
5 City of Santa Clarita, City of Santa Clarita General Plan – Economic Development Element, p. 14, June 2011.
6 98,361 jobs / 79,869 persons (2026 population) = 1.23 jobs/housing.
7 Indirect employment provided by the Applicant.
8 2,333 jobs (Project) + 3,500 (Indirect Project) + 96,028 jobs (2026) = 101,861 jobs.
101,861 jobs/79,869 persons (2026 population) = 1.28 jobs/housing.

Mitigation Measures

Impacts with regard to Threshold 4.12(a) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.12(a) were determined to be less than significant without mitigation.

4.12.7 CUMULATIVE IMPACTS

Impact Analysis

The cumulative impact analysis addresses the impacts of known and anticipated development in the Project area in combination with the Project, with respect to the anticipated population, housing, and employment growth. A total of 36 related projects are identified in Section 3.0, Environmental Setting, of this Draft EIR. As detailed therein, the related projects generally consist of residential, office, commercial, industrial, and mixed-use developments that would generate population, housing, and employment growth.

As shown in **Table 4.12-1**, the County's employment and housing forecasts for 2026 are 4,936,345 jobs and 3,594,862 housing units, respectively. This results in a job/housing balance of 1.38 to 1. Comparatively, the City would have a job/housing balance in 2026 of 1.2 to 1, which is lower than the County's. Implementation of the Project would improve the City's job/housing balance to 1.23 to 1 or potentially up to 1.28 to 1 with the addition of indirect employment opportunities. Moreover, the Project would create jobs in the entertainment industry, which is one of the City's four targeted industry sectors. Thus, the Project would have a cumulative positive contribution to employment in the Santa Clarita Valley as it would create more high-quality jobs for the City's residents. Moreover, the Project is unlikely to create substantial population growth as these jobs are expected to be filled by existing residents. As such, cumulative impacts related to inducing unplanned population growth in the Project area would be less than significant.

Mitigation Measures

Cumulative impacts related to population and housing were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts related to population and housing were determined to be less than significant without mitigation.

4.13 PUBLIC SERVICES

This section evaluates the potential for implementation of the Project to impact the provision of public services, including fire protection, police protection, and other public facilities (libraries). The analysis includes a description of the existing fire protection services, police services, and other public facility services in the vicinity of the Project Site. The letters in response to the Project's Notice of Preparation related to public services are included in **Appendix A** of this Draft EIR.

4.13.1 ENVIRONMENTAL SETTING

FIRE PROTECTION

The Los Angeles County Fire Department (LACoFD) provides fire protection and life safety services to over four million residents within its jurisdiction of 60 incorporated cities and all 122 unincorporated areas of the County.[1] The LACoFD participates in the California Fire Service and Rescue Emergency Mutual Aid System. In emergency services, mutual aid is an agreement among emergency responders to provide assistance across jurisdictional boundaries, in cases where an emergency response exceeds capabilities of local resources.[2]

The City of Santa Clarita and the unincorporated parts of the Santa Clarita Valley receive urban and wildland fire suppression service from the LACoFD. Division III, which consists of Battalions 4, 6, and 22, serves the Cities of La Cañada Flintridge and Santa Clarita. As of 2020, there are 11 fire stations in the City of Santa Clarita, with an additional five stations nearby. These stations include engine companies, ladder trucks, emergency medical service (EMS) paramedic squads, a Hazardous Materials Task Force, Urban Search and Rescue services, helicopters, and other firefighting and emergency transport aircraft.[3]

The LACoFD's response time goals in urban areas are five minutes or less for the first responding unit for fire and emergency medical responses, and eight minutes or less for advanced life support from the paramedic unit. LACoFD Station 73, located at 24875 Railroad Avenue, is the closest station to the Project Site, adjacent to the west across Railroad Avenue. The next closest station is LACoFD Station 126, located at 26320 Citrus Street, approximately 2.2 miles northwest.

POLICE PROTECTION

The Los Angeles County Sheriff's Department (LASD) provides general law enforcement services to 42 contract cities and 141 unincorporated communities, as well as to additional facilities, hospitals, colleges, the Los Angeles Metropolitan Authority, and Superior Courts. The LASD also participates in law enforcement mutual aid, which is maintained by the Emergency Operations Bureau.[4]

The City of Santa Clarita is a contract city with the LACoFD and the LASD; thus, the station facilities are under the County's jurisdictional authority. The Santa Clarita Valley Sheriff's Station's patrol area includes the City of Santa Clarita and unincorporated area within Santa Clarita Valley.

1 LACoFD, *2021 County of Los Angeles Fire Department Annual Report*, 2021.
2 County of Los Angeles, *Los Angeles County Fire Department 2022 Strategic Fire Plan*, 2021.
3 City of Santa Clarita, *2021 Santa Clarita Local Hazard Mitigation Plan*, 2021.
4 LASD, 2022, *5-06/020.65 - Law Enforcement Mutual Aid*, 2022.

In 2021, the City's patrol area spanned an area of 70.88 square miles with a population of 228,675 residents, and a crime rate of 107.49 crimes per 10,000 residents.[5]

The Santa Clarita Valley Sheriff's Station serves the Project Site and is located at 26201 Golden Valley Road. The travel mileage and most direct route is approximately 6 miles to the northeast from the Project Site to the sheriff's station.

OTHER PUBLIC FACILITIES

The City of Santa Clarita Public Library (SCPL) serves the City with library service and materials. The SCPL maintains three branches in the City:

- Canyon Country Jo Anne Darcy Library, located at 18601 Soledad Canyon Road and approximately 4.60 miles northeast of the Project Site;
- Old Town Newhall Library, located at 24500 Main Street and approximately 0.56 miles northeast of the Project Site; and
- Valencia Library, located at 23743 West Valencia Boulevard and approximately 2.03 miles northeast of the Project Site.

The SCPL library branches offer a variety of services to the community, such as book clubs and career resources for adults; study spaces and crafts for teens; and reading lists and games for kids.[6]

In addition to fire, sheriff, and library facilities, the City includes other public facilities, such as the Canyon Country Community Center and Newhall Community Center. These community centers provide services such as after-school programs, teen programs, open gym, and a farmer's market.

4.13.2 REGULATORY AND PLANNING FRAMEWORK

FEDERAL

Occupational Safety and Health Administration

The federal Occupational Safety and Health Administrations (OSHA), as well as California OSHA (Cal/OSHA), enforce the provisions of the federal and State Occupational Safety and Health Acts, respectively, which collectively require safety and health regulations for construction under Part 1926 of Title 29 Code of Federal Regulations. The fire-related requirements of the federal Occupational Safety and Health Act are specifically contained in Subpart F, Fire Protection and Prevention, of Part 1926. Examples of general requirements related to fire protection and prevention include maintaining fire suppression equipment specific to construction on-site; providing a temporary or permanent water supply of sufficient volume, duration, and pressure; properly operating the on-site firefighting equipment; and keeping storage sites free from accumulation of unnecessary combustible materials.

[5] LASD, Santa Clarita Valley Station 2021 Synopsis, http://shq.lasdnews.net/CrimeStats/yir9600/yir2021/sct/synopsis.htm, accessed February 23, 2022.

[6] City of Santa Clarita, City of Santa Clarita Public Library, https://www.santaclaritalibrary.com/accessed, December 20, 2022.

National Fire Protection Association Standard 1720

The National Fire Protection Association Standard 1720 is known as the Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations. The LACoFD uses this standard, which contains minimum requirements relating to the organization and deployment of fire suppression operations, emergency medical operations, and special operations to the public. The standard also addresses functions and outcomes of fire department emergency service delivery, response capabilities, and resources. In accordance with this standard, the LACoFD uses the 5-minute response time for the first arriving fire department and EMS personnel and 8-minute response time for advanced life support personnel in urban areas, and an 8-minute response time for first arriving fire department and EMS personnel and 12-minute response time for advance life support personnel in suburban areas.

STATE

California Code of Regulations, Title 24, Part 9 California Fire Code

Title 24 of the California Code of Regulations, known as the California Building Standards Code, outlines building standards and requirements throughout the state. All occupancies in California are subject to national model codes adopted into Title 24, and occupancies are further subject to amendments adopted by state agencies and ordinances implemented by local jurisdictions' governing bodies. Chapter 9 of Title 24 is known as the California Fire Code, which establishes minimum requirements for fire protection and prevention, public health and safety, and provides safety and assistance to firefighters and emergency responders during emergency operations. The California Fire Code provides building standards to increase fire resistance and regulates minimum fire safety requirements for new and existing buildings, facilities, storage, and processes, including the storage and handling of hazardous materials.

California Health and Safety Code

Sections 13000 et seq. of the California Health and Safety Code set the state regulations for fires and fire protection, which includes building standards, use of fire equipment such as fire extinguishers, fire protection and notification systems, smoke alarms, high-rise building and childcare facility standards, and fire-suppression training.

California Occupational Safety and Health Administration

Cal/OSHA sets and enforces standards for the protection of worker health and safety. Cal/OSHA has established minimum standards for fire suppression and emergency medical services in accordance with California Code of Regulations, Title 8, Sections 1270 "Fire Prevention" and 6773 "Fire Protection and Fire Fighting Equipment."

LOCAL

Los Angeles County Municipal Code, Title 32 Fire Code

Title 32 is a component of the Los Angeles County Municipal Code and is a combination of the California Fire Code and amendments that are specific to the County. The Los Angeles County Fire Code contains more stringent building standards that are deemed necessary due to local climatic, geological, and/or topographical conditions in Los Angeles County. The provisions of

Title 32 apply throughout the City of Santa Clarita, as the City contracts with the LACoFD to provide fire protection and emergency medical services.

Santa Clarita Municipal Code, Title 22 City Fire Code

Title 22 of the Santa Clarita Municipal Code, City Fire Code, states the City has adopted by reference the California Code of Regulations, Title 24, Part 9. The Santa Clarita Fire Code was adopted on November 23, 2010, and took effect on January 1, 2011. In relation to the provision of fire services, the code sets forth on a local level the standards to regulate and govern the safeguarding of life and property from fire damage. The purpose of the code is to establish the minimum requirements consistent with nationally recognized good practices to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations.

Santa Clarita Municipal Code Section 17.51.010(B): Law Enforcement Facilities Fee

The Santa Clarita Municipal Code Section 17.51.010(B) establishes the Law Enforcement Facilities Fee, which states that prior to the issuance of a building or similar permit, the amount of the fee to be imposed on a new residential, commercial, office, and/or industrial development shall not exceed the estimated reasonable cost of providing law enforcement facilities for such residential, commercial, office, and/or industrial development projects.

Crime Prevention Through Environmental Design

The LASD generally prescribes to the principles of Crime Prevention Through Environmental Design (CPTED) with the goal to reduce opportunities for criminal activities by employing physical design features that discourage anti-social behavior, while encouraging the legitimate use of the site. The overall tenets of CPTED include defensible space, territoriality, surveillance, lighting, landscaping, and physical security. Some of the design measures that can be applied at the plan level include clear well-lit paths from the street to the development through all parking and landscape areas and within the development to building entries; avoiding indistinct walkways and entries; providing adequate lighting, width of path, definition of path, and ability to see a destination; and providing obvious physical security techniques such as locks, lights, walls, gates and security signs.

City of Santa Clarita General Plan

The Safety Element and Land Use Element of the Santa Clarita General Plan include the following goals, objectives, and policies related to public services that would be applicable to the Proposed Project: [7]

Safety Element: Fire Hazards

- Goal S 3: Protection of public safety and property from fires.
    - Objective S 3.1: Provide adequate fire protection infrastructure to maintain acceptable service levels as established by the Los Angeles County Fire Department.

[7] City of Santa Clarita, City of Santa Clarita General Plan, Safety Element, June 2022; Land Use Element, June 2011.

        - Policy S 3.1.1: Coordinate on planning for new fire stations to meet current and projected needs.
        - Policy S.3.1.2: Program adequate funding for capital fire protection costs and explore all feasible funding options to meet facility needs.
        - Policy S.3.1.3: Require adequate fire flow and adequate fire protection as a condition of approval for all new development.
    - Objective S 3.3: Maintain acceptable emergency response times throughout the planning areas.
        - Policy S 3.3.1: Plan for fire response times of no more than five minutes in urban areas, eight minutes in suburban areas, and 12 minutes in rural areas.
        - Policy S 3.3.2: Require the installation and maintenance of street name signs on all new development and the posting of address numbers on all homes and businesses that are clearly visible from adjacent streets.

Safety Element: Law Enforcement

- Goal S 5: Protection of public safety through the provision of law enforcement services and crime prevention strategies.
    - Objective S 5.1: Cooperate with the Los Angeles County Sheriff's Department's plans for expansion of facility space to meet current and future law enforcement needs in the Santa Clarita Valley.
        - Policy S 5.1.3: Cooperate on implementation of funding mechanisms for law enforcement services.
    - Objective S 5.2: Cooperate with the Sheriff's Department on crime prevention programs to serve residents and businesses.
        - Policy S 5.2.1: Promote and participate in the Business Watch program to assist business owners in developing and implementing crime prevention strategies.
        - Policy S 5.2.2: Promote and support Neighborhood Watch programs to assist residents in establishing neighborhood crime prevention techniques.
        - Policy S 5.2.3: Provide code enforcement services to maintain minimum health and safety standards and as a deterrent to crime.

Land Use Element: Healthy Neighborhoods

- Goal LU 3: Healthy and safe neighborhoods for all residents.
    - Objective LU 3.3: Ensure that the design of residential neighborhoods considers and includes measures to reduce impacts from natural or man-made hazards.
        - Policy LU 3.3.4: Evaluate service levels for law enforcement and fire protection as needed to ensure that adequate response times are maintained as new residential development is occupied.

Land Use Element: Public Facilities

- Goal LU 9: Adequate public facilities and services, provided in a timely manner and in appropriate locations to serve existing and future residents and businesses.
    - Objective LU 9.1: Coordinate land use planning with provision of adequate public services and facilities to support development.
        - Policy LU 9.1.1: Ensure construction of adequate infrastructure to meet the needs of new development prior to occupancy.
        - Policy LU 9.1.2: Coordinate review of development projects with other agencies and special districts providing utilities and other services.
        - Policy LU 9.1.5: Work with the Los Angeles County Sheriff's Department to expand law enforcement facilities to meet the needs of the Santa Clarita's Valley growing population.

2021 Santa Clarita Local Hazard Mitigation Plan[8]

The City of Santa Clarita 2021 Local Hazard Mitigation Plan (HMP) serves the purposes of documenting known hazards and identifying community actions that can be implemented over the short and long term to reduce future risk and loss in the City. The HMP was prepared in response to the Disaster Mitigation Act of 2000, and the 2021 HMP is a federally mandated update that ensures continuing eligibility for the Hazard Mitigation Grant Program funding. The HMP addresses several key topics, including the following:

- Planning Process: Provides a record of public process and involvement from committee members and stakeholders;
- Community Profile: Presents the history, geography, demographics, and socioeconomics of the City to provide historical context of hazards;
- Hazard Identification and Risk Assessment: Provides information on hazard identification, vulnerability, and risk associated with hazards in the City; and
- Mitigation Strategy: Describes existing mitigation and the mitigation process.

In addition, the HMP addresses the process of plan review, evaluation, implementation, and adoption. The HMP provides context and planning for hazard identification, risk, and mitigation strategies for wildfires, earthquakes, energy disruption, drought, severe weather events, pandemics, man-made hazards such as cyber-attacks and terrorism, the release of hazardous materials, landslides, and flooding.

4.13.3 THRESHOLDS OF SIGNIFICANCE

The significance thresholds used to evaluate the impacts of the Project related to public services are based on Appendix G of the CEQA Guidelines. In accordance with Appendix G, a project would have a significant impact related to public services if it would:

[8] Interwest Consulting Group, 2021 Santa Clarita Local Hazard Mitigation Plan, October 2, 2021.

Threshold 4.13(a): ***Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:***

i. Fire protection;

ii. Police protection;

iii. Schools;

iv. Parks; and

v. Other public facilities.

ISSUES NOT EVALUATED FURTHER

The Proposed Project would not result in significant impacts related to the following significance thresholds from Appendix G of the CEQA Guidelines, as determined in the Initial Study (**Appendix A**); therefore, they are not evaluated further in this Draft EIR:

Threshold 4.13(a): ***Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:***

iii. Schools and

iv. Parks.

4.13.4 METHODOLOGY

The analysis of impacts related to public services considered the improvements on the Project Site, as well as the Project's improvements off-site, including a Class I multi-purpose path along the frontage of the Project on 13th, Arch, and 12th Streets; widening of 13th Street, Arch Street, and 12th Street; and railroad crossing improvements at 13th Street, including the installation of a bike path/trail on the north side of the crossing, widening of the crossing at 13th Street and Railroad Avenue to accommodate the wider turning radii, installation of drainage on Railroad Avenue and 13th Street, new gates, modifications on Railroad Avenue at 13th Street to accommodate the revised intersection geometry and provide increased efficiency, implementation of requirements compliant with the Americans with Disabilities Act for pedestrians, and implementation of line-of-sight requirements at the grade crossing. The analysis also considered the modifications to the Dockweiler Drive Extension Project in the immediate vicinity of the Project Site, including roadway improvements to 13th Street, Arch Street, 12th Street and Placerita Canyon Road that differ from previous approved plans, including accommodating the additional lane geometry at the Arch Street/13th Street intersection to widen the railroad crossing; construction of a pedestrian and bike bridge from the Jan Heidt Newhall Metrolink Station on Railroad Avenue to the future extension of Dockweiler Drive; and implementation of temporary storm drain improvements to accommodate surface water runoff from Dockweiler Drive prior to the completion of the Project.

The analysis of impacts related to public services is based on a review of planning documents, applicable codes, and consultation with appropriate public service providers. The letters in response to the Project's Notice of Preparation are included in **Appendix A** of this Draft EIR.

4.13.5 PROJECT DESIGN FEATURES

The following Project Design Features are proposed with respect to public services:

PDF-PUB-1: All buildings shall be accessible to LACoFD apparatus by way of access roadways, with an all-weather surface of not less than 28 feet in width. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route along the exterior of the building. The roadway shall provide approved signs and/or striping stating "No Parking – Fire Lane" and shall be maintained in accordance with the Los Angeles County Fire Code.

PDF-PUB-2: A 12-foot-tall security fence primarily made of woodcrete would be installed along the majority of the perimeter of the Project Site and open rail wrought-iron fencing would be installed along the southwestern corner of the Project Site, adjacent to the proposed office building.

PDF-PUB-3: Closed-circuit television security cameras would be installed throughout the Project Site that would be monitored full-time at a manned security station on-site.

PDF-PUB-4: Licensed security personnel would be provided to patrol the Project Site at all times (i.e., 24 hours per day, seven days per week). Additional stage security would also be provided at key entry points to and within individual building areas.

4.13.6 ANALYSIS OF PROJECT IMPACTS

FIRE PROTECTION

Threshold 4.13(a.i): Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?

Impact Analysis

Construction

Construction activities, including those related to the off-site improvements, have the potential to result in accidental on-site fires by exposing combustible materials to fire risks from machinery and equipment. Therefore, construction activities associated with the Project, including off-site improvements, could temporarily result in an incrementally increased demand for LACoFD fire protection services. However, all construction activities would be subject to compliance with the regulations enforced by OSHA and Cal/OSHA. Construction-related regulations would include maintaining fire suppression equipment specific to construction on-site; providing a temporary or

permanent water supply of sufficient volume, duration, and pressure; and keeping storage sites free from accumulation of unnecessary combustible materials.

In addition, as discussed in Section 4.8, Hazards and Hazardous Materials, of this Draft EIR, although construction activities would involve the limited transport, storage, use, and disposal of hazardous materials, such activities would be temporary in nature. The storage, handling, and disposal of these materials would be regulated by the Department of Toxic Substances Control, U.S. Environmental Protection Agency, OSHA, LACoFD, and the Los Angeles County Department of Public Health. Furthermore, the LACoFD's Land Development Unit would review specific fire and life safety requirements for the construction phase during its building plan check review.

Additionally, Project construction would result in temporary sidewalk and lane closures that may affect evacuation routes. However, emergency access for the LACoFD to the Project Site would be maintained at all times, and construction would not impede the LACoFD from maintaining its response times. Furthermore, construction activities are temporary in nature and full access to all roadways to and within the Project Site would be restored upon completion of the Project, including the off-site improvements. As such, construction-related impacts to fire protection services from the Project would be less than significant.

Operation

The Project would develop commercial uses on vacant land, thus, generating an employee population on-site and increasing demand for services from the LACoFD; no change in fire protection services demand would result from the proposed off-site improvements. The LACoFD's response time goals in urban areas are five minutes or less for the first responding unit for fire and emergency medical responses, and eight minutes or less for advanced life support from the paramedic unit. As LACoFD Station 73 is located directly across Railroad Avenue to the west of the Project Site, it can be expected that the LACoFD would be able to meet its response time goal for the Project.

The Project would be designed in accordance with the California Fire Code, which establishes minimum requirements for fire protection and prevention; the County's Title 32 Fire Code, which contains more stringent building standards related to fire safety; and the City's Title 22 City Fire Code, which establishes fire-related standards at the local level. The Project would also comply with any additional and applicable code and ordinance requirements for construction, access, water mains, fire flows, and fire hydrants, as required by the LACoFD's Land Development Unit. The Land Development Unit would review the Project design during its building plan check review to ensure adequate fire safety and access. As discussed in Section 4.16, Utilities and Service Systems, the Project would be required to install 8 public fire hydrants and 36 on-site fire hydrants to accommodate the development. The fire hydrants would meet the LACoFD's required public fire flows.

In addition, as discussed in Section 4.17, Wildfire, of this Draft EIR, the northern portion of the Project Site is located within a Very High Fire Hazard Severity Zone/Local Responsibility Area where fire protection is the responsibility of the LACoFD. However, both the City and County have emergency plans which provide operational concepts, describe responsibilities, and outline procedures for emergency response. The County's *Operational Area Emergency Response Plan* describes the planned responses to emergencies associated with natural and man-made disasters and technological incidents, and the City of Santa Clarita's National Incident

Management System provides a proactive, systematic approach to guide government departments and the private sector to work seamlessly to prevent, protect against, respond to, recover from, and mitigate effects of man-made and natural incidents.

Additionally, the City's HMP, described above in Subsection 4.13.2, Regulatory and Planning Framework, provides a framework for communications, decisions, and actions by emergency response personnel during emergencies. The command structure would assess local conditions in a dynamic, ongoing manner to identify locations and severity of threats to homes and businesses and any other land uses that are associated with man-made or natural incidents. Based on those assessments, decisions would be made at a local level regarding when and/or where to implement emergency evacuations. The City's existing emergency response system would be sufficient to address emergency evacuation scenarios in the event of natural or man-made incidents, such as a fire in the Project area, that result in a need to evacuate some or all of the existing residents of the adjacent communities and future Project employees. Further, the Project would implement Project Design Feature PDF-PUB-1, as specified in Subsection 4.13.5, Project Design Features, above, which would ensure adequate fire safety access.

With implementation of Project Design Feature PDF-PUB-1; employment of the City's HMP; compliance with federal, State, and local regulations; and upon approval of required reviews and permits by the LACoFD, the Project, including the off-site improvements, would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection. Operation-related impacts to fire protection services from the Project would be less than significant.

Mitigation Measures

Impacts with regard to Threshold 4.13(a.i) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.13(a.i) were determined to be less than significant without mitigation.

POLICE PROTECTION

Threshold 4.13(a.ii): Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?

Impact Analysis

Construction

The Project would require consultation with the LASD during the plan check process before construction. Construction activities, including those related to the off-site improvements, would

also be subject to compliance with applicable federal, State, and local regulations to reduce impacts to police protection services, such as the California Building Standards Code, which includes site access requirements and other relevant safety precautions for emergency providers. As discussed above, although Project construction, including the construction activities related to the off-site improvements, would result in temporary sidewalk and lane closures that may affect evacuation routes, emergency access to the Project Site for emergency service providers, including the LASD, would be maintained at all times. Therefore, construction would not impede the LASD from maintaining its response times. Furthermore, construction activities, including those related to the off-site improvements, are temporary in nature and full access to all roadways to and within the Project Site would be restored upon completion of the Project. As such, construction-related impacts to police protection services would be less than significant.

Operation

The LASD's Santa Clarita Valley Station is currently understaffed. Project implementation would result in an increase in demand on existing LASD services due to the generation of an employee population on-site. However, as discussed in Section 4.12, Population and Housing, of this Draft EIR, the Project, including the off-site improvements, would not include residential uses and, thus, would not induce unplanned population growth in the Project area.

In addition, as required by the County and the City's Law Enforcement Facilities Fee, the Project would be required to pay all applicable development and law enforcement mitigation fees prior to the issuance of a building or similar permit. The payment of such fees would ensure that the LASD has sufficient funding for future personnel, assets, and facility space.

The Project would also include several design features and security measures that would reduce the opportunity for criminal activity to occur on-site. As specified in Subsection 4.13.5, Project Design Features PDF-PUB-2 through PDF-PUB-4 would implement security fencing, security cameras monitored full-time at a manned security station on-site, licensed security personnel, and additional stage security throughout the Project Site. These Project Design Features would adhere to principles of CPTED, such as the installation of security cameras. Furthermore, Project development would require consultation with the LASD prior to approval of building plans and permits.

With implementation of Project Design Features PDF-PUB-2 through PDF-PUB-4 and upon approval of required reviews and permits by the LASD, the Project, including the off-site improvements, would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection. Operation-related impacts to police protection services from the Project would be less than significant.

Mitigation Measures

Impacts with regard to Threshold 4.13(a.ii) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.13(a.ii) were determined to be less than significant without mitigation.

OTHER PUBLIC FACILITIES

Threshold 4.13(a.v): Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?

Impact Analysis

As discussed, although the Project does not include residential uses, the proposed full-service film and television studio campus would directly generate employment opportunities. While some new Project employees may be anticipated to relocate to the Project vicinity, the majority are expected to already reside in the region, and, therefore, the Project would not result in a significant associated demand for other new or expanded public facilities, including libraries. Not all Project employees would be expected to use the City's library facilities, and use of such facilities would be spread out among the three existing libraries within the City (i.e., employees would use the branch closest to their residence) and not concentrated in one location.

In addition, the City of Santa Clarita undergoes an annual review of budget and need for capital improvement projects. The Capital Improvement Program (CIP) ensures that the City has adequate funding for public facility improvements, such as the public library. The City also conducts a comprehensive needs assessment and facility study for the library through the CIP. In fiscal year 2021-22, approximately $7,662,192 of funding was allocated to improvements of the public library.[9] As such, taxes and funding would continue to support current and future needs for the SCPL and associated infrastructure. Therefore, the Project, including the off-site improvements, would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for other public facilities, including libraries, and impacts would be less than significant.

Mitigation Measures

Impacts with regard to Threshold 4.13(a.v) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.13(a.v) were determined to be less than significant without mitigation.

[9] City of Santa Clarita, Operating Budget and Capital Improvement Program FY 2021-22, 2021.

4.13.7 CUMULATIVE IMPACTS

Impact Analysis

As detailed in Section 3.0, Environmental Setting, of this Draft EIR, there would be a total of 36 related projects that propose varying levels of development, redevelopment, or modifications to existing land uses or structures in the Project vicinity. Development of the Project, in combination with the related projects, has the potential to increase demand in services for the LACoFD, LASD, and SCPL (i.e., additional staffing, resources, expanded/new facilities). However, cumulative projects would be subject to all applicable laws, ordinances, and regulations in place for fire protection and emergency services. Project developers would be required to consult with the LACoFD, LASD, or any other emergency response agency during the review of development projects or land use entitlement applications.

Cumulative projects would be reviewed by the City and LACoFD to determine specific fire requirements (e.g., fire hydrant spacing, sprinkler requirements, safe vehicular access for evacuation or response, and ensuring the development would not negatively impact response times) applicable to the specific development and to ensure compliance with all applicable requirements as discussed. Cumulative projects would be reviewed by the City and LASD and expected to integrate design concepts to enhance safety and security and comply with applicable regulatory requirements related to security and safety during construction and operation. As for other public facilities including libraries, the Proposed Project would not result in a significant population increase and the City's ongoing CIP would ensure adequate funding for public facility improvements. Therefore, with full compliance with all applicable local, state, and federal laws, rules, and regulations, as well as implementation of site-specific design features, the City's HMP and the County and City emergency plans for the related projects and the Proposed Project, significant cumulative impacts related to public services would not occur. As such, the Project's contribution would not be cumulatively considerable, and cumulative impacts would be less than significant.

Mitigation Measures

Cumulative impacts related to public services were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts related to public services were determined to be less than significant without mitigation.

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4.14 TRANSPORTATION

This section analyzes the potential impacts of the Project as it relates to transportation. This section relies on information included in the *Transportation Assessment for Shadowbox Studios* (TA), prepared by Gibson Transportation Consulting, Inc. and dated January 2023, provided in **Appendix L** of this Draft EIR. The analysis of vehicle miles traveled (VMT) in the TA was prepared pursuant to the City's *Transportation Analysis Updates in Santa Clarita* (TAU), which establish the City's transportation impact thresholds and provide guidance on conducting transportation studies in the City, in accordance with the California Environmental Quality Act (CEQA) Guidelines that require transportation impacts to be evaluated based on VMT rather than level of service (LOS) or any other measure of a project's effect on automobile delay.

4.14.1 ENVIRONMENTAL SETTING

EXISTING STREET SYSTEM

The existing street system in the Study Area consists of a regional roadway system, including freeways, primary and secondary arterials, and collector and local streets, which provide regional, subregional, and local access and circulation within the Study Area.

The City of Santa Clarita General Plan Circulation Element outlines the classifications of streets within City limits as follows:

- **Regional freeway facilities** are high-volume, high-speed roadways that allow regional access to the area. These generally have limited access provided by interchanges that carry regional through-traffic and do not provide local access to adjacent land uses.
- **An arterial street system** consists of five roadway types: major highways, secondary highways, limited secondary highways, collector streets, and local streets. Most roadways are further classified as "divided" or "undivided" to denote the inclusion of turning lanes to improve the vehicular capacity of the roadway.
  - **Major highways** represent the widest streets that typically provide regional access to major destinations. These highways are at least six lanes wide, provide limited access to and from driveways and cross streets, and generally have left-turn pockets at intersections. The intent of all major highways is to accommodate most traffic between different portions of the City and adjacent communities and the freeway system. Bicycle lanes are delineated on major highways where parallel and adjacent bikeways are not available.
  - **Secondary highways** are typically four lanes wide, provide limited access from driveways and cross streets, and generally have left-turn pockets at intersections. The intent of all secondary highways is to service most through-traffic and collect traffic from limited secondary highways. Bicycle lanes are delineated on secondary highways where parallel and adjacent bikeways are not available.
  - **Limited Secondary Highways** are typically four lanes wide, provide partial control of vehicular and pedestrian access to the roadway from driveways, cross streets, and crosswalks, and do not typically have left-turn pockets at intersections. The intent of

all limited secondary highways is to provide local access to major and secondary highways. Limited on-street parking is provided.

- **Collector streets** are typically two lanes wide, provide limited access from driveways and cross streets, and generally do not provide left-turn pockets at intersections. The intent of all collector streets is to service all local traffic from residential, commercial, and industrial uses and provide access to major, secondary, and limited secondary highways.
- **Local streets** are classified as any street that must be accessed through the use of any of the four previously identified roadways. Typical local streets include residential streets, private streets, service roads, and public alleys.

Below is a brief description of the freeways and major roadways in the Study Area and their Circulation Element classifications.

Freeways

Interstate 5 (I-5) is a freeway that generally runs in the north–south direction and is located approximately 2 miles west of the Project Site. In the vicinity of the Study Area, I-5 provides four travel lanes in each direction. Access to and from I-5 is available via interchanges at Lyons Avenue. I-5 carries between 200,000 and 286,000 average daily traffic (ADT) in the Study Area.

State Route 14 (SR-14) is a freeway that generally runs in the north–south direction and is located approximately 2 miles east of the Project Site. In the vicinity of the Study Area, SR-14 provides four travel lanes in each direction. Access to and from SR-14 is available via interchanges at Newhall Avenue and Placerita Canyon Road. SR-14 carries between 155,000 and 170,000 ADT in the Study Area.

Roadways

Railroad Avenue is classified as a major highway from Magic Mountain Parkway to Lyons Avenue and classified as a secondary highway from Lyons Avenue to Newhall Avenue. It runs in the north–south direction and is located immediately west of the Project Site. It is a divided roadway between 13th Street and Drayton Street and provides four travel lanes—two lanes in each direction. On-street parking is generally not provided within the Study Area.

13th Street is classified as a collector street that runs in the east–west direction and borders the southwestern portion of the Project Site. It is a divided roadway and provides two travel lanes—one lane in each direction. On-street parking is not available within the Study Area. 13th Street has an at-grade railroad crossing between the western boundary of the Project Site and Railroad Avenue.

12th Street is classified as a collector street that runs in the east–west direction and borders the southeastern portion of the Project Site. It provides two travel lanes—one lane in each direction.

Arch Street is classified as a collector street that runs in the north–south direction between 12th Street and 13th Street and borders the southeastern portion the Project Site. It provides two travel lanes—one lane in each direction.

Soledad Canyon Road is classified as a major highway that runs in the east–west direction and is located approximately 2 miles north of the Project Site. It becomes Valencia Boulevard east of

Bouquet Canyon Road. It provides four to six travel lanes—two to three lanes in each direction. On-street parking is generally not available.

Newhall Ranch Road is classified as a major highway that runs in the east–west direction and is located 2.5 miles north of the Project Site. It is a divided roadway and provides four to six travel lanes—two to three lanes in each direction. On-street parking is generally not available.

Oak Ridge Drive is classified as a secondary highway north of Via Princessa and classified as a collector street south of Via Princessa. It runs in the north–south direction and is located approximately 0.4 miles north of the Project Site. It provides four travel lanes—two lanes in each direction, north of Via Princessa, and two travel lanes—one lane in each direction, south of Via Princessa. On-street parking is not available north of Via Princessa and is available south of Via Princessa.

Lyons Avenue is classified as a major highway that runs in the east–west direction and is located approximately 1,200 feet south of the Project Site. It is a divided roadway and provides four travel lanes—two lanes in each direction. On-street parking is available.

Wiley Canyon Road is classified as a major highway from Via Princessa to Lyons Avenue and a secondary highway south of Lyons Avenue. It generally travels in the north–south direction and is located approximately 600 feet northwest of the Project Site as it becomes Via Princessa east of Railroad Avenue. It is a divided roadway between Lyons Avenue and just west of Newhall Creek and provides four travel lanes—two lanes in each direction. On-street parking is generally not available north of Lyons Avenue and is available south of Lyons Avenue.

Orchard Village Road is classified as a major highway that runs in the north–south direction and is located approximately 0.6 miles west of the Project Site. It is a divided roadway and provides four travel lanes—two lanes in each direction. On-street parking is available.

Dockweiler Drive is classified as a secondary highway that runs in the east–west direction and is located approximately 1 mile southeast of the Project Site. It is a divided roadway north of Ivy Lane and provides two to four travel lanes—one to two lanes in each direction. On-street parking is available west of Ivy Lane. Dockweiler Drive is planned to be extended from its current terminus to Railroad Avenue at 13th Street immediately adjacent to the Project Site.

Placerita Canyon Road is classified as a collector street that runs in the east–west direction and is located immediately southeast of the Project Site. It provides two travel lanes—one lane in each direction. On-street parking is not available.

Newhall Avenue is classified as a secondary highway from 16th Street to Railroad Avenue and classified as a major highway from Railroad Avenue to SR-14. It generally runs in the east–west direction and is located approximately 0.5 miles south of the Project Site. It is a divided roadway between SR-14 and Railroad Avenue and provides six travel lanes—three lanes in each direction, east of Main Street, and two lanes, one in each direction, west of Main Street. On-street parking is not available east of Main Street.

Valle De Oro is classified as a collector street that runs in the north–south direction and is located approximately 1.4 miles southeast of the Project Site. It provides two travel lanes—one lane in each direction. On-street parking is available.

Sierra Highway is classified as a major highway that runs in the north–south direction and is located approximately 2 miles southeast of the Project Site. It is a divided roadway and provides four to six travel lanes—two to three in each direction. On-street parking is not available.

Magic Mountain Parkway is classified as a major highway that runs in the east–west direction and is located approximately 1.4 miles north of the Project Site. It is a divided roadway and provides six travel lanes—three lanes in each direction. On-street parking is generally provided within the Study Area.

Valencia Boulevard is classified as a major highway that runs in the east–west direction and is located approximately 1.8 miles northwest of the Project Site. It is a divided roadway and provides six travel lanes—three lanes in each direction. On-street parking is generally provided within the Study Area.

BICYCLE AND TRANSIT FACILITIES

Bicycle Facilities

There are no existing bicycle facilities adjacent to the Project Site. However, there are several bicycle facilities in the Project vicinity, including Class I, Class II, and Class III bikeways, as described below.[1]

Class III bicycle routes are shared facilities to provide continuity to other bicycle facilities (typically Class II bikeways) or to designate preferred routes through high-demand corridors. Normally, bicycle routes are shared with motor vehicles, which may be indicated by placing bike route signs along roadways. The Class III bicycle routes in the Project vicinity include the following:

- Orchard Village Road
- Wiley Canyon Road between Orchard Village Road and Newhall Avenue
- Newhall Avenue between Railroad Avenue and Sierra Highway

Class II bicycle lanes are delineated by pavement striping and signage used to allocate a portion of a roadway for exclusive or preferential bicycle travel. Bike lanes are one-way facilities on either side of a roadway. Whenever possible, bike lanes should be enhanced with treatments that improve safety and connectivity by addressing site-specific issues, such as additional warning or wayfinding signage. The Class II bicycle lanes in the Project vicinity include the following:

- Wiley Canyon Road, west of Orchard Village Road
- Dockweiler Drive, east of Valle Del Oro to Sierra Highway
- 16th Street between Orchard Village Road and Newhall Avenue

Class I bicycle paths, also referred to as shared-use or multiuse paths, are facilities for the exclusive use by bicyclists and pedestrians. They are physically separated from vehicular traffic either in the roadway right-of-way or exclusive right-of-way. Bike paths provide critical connections

[1] California Department of Transportation, *Highway Design Manual*, Chapter 1000 – Bicycle Transportation Design, July 1, 2020.

in the City where roadways are absent or are not conducive to bicycle travel. The Class I bicycle paths in the Project vicinity include the following:

- Adjacent to Wiley Canyon Road/Via Princessa that starts east of Orchard Village Road
- Along the Santa Clara River South Fork River Trail
- Adjacent to Newhall Station connecting to Placerita Canyon Road

Public Transit Facilities

The Project Site is located less than 0.5 miles north of the Jan Heidt Newhall Metrolink Station. This station is an intermodal hub that is served by (1) Santa Clarita Transit local lines, which connect the Newhall community to other parts of the City, including Bouquet Canyon, Plum Canyon, and Canyon Country, as well as to the McBean Regional Transit Center and the Santa Clarita (Soledad) Metrolink Station; (2) Santa Clarita Transit commuter express lines, which connect Santa Clarita to North Hollywood and the Metro B and G Lines; Woodland Hills, Canoga Park, and Chatsworth; UCLA, Westwood, and Century City; and Union Station and Downtown Los Angeles; (3) Amtrak Thruway buses, which offer a connection between the Jan Heidt Newhall Metrolink Station and the Amtrak Bakersfield Station, a transfer point to and from the San Joaquins trains to Oakland and Sacramento; and (4) the Antelope Valley Transit Authority North County TRANSporter, which travels between the Palmdale Transportation Center and the Jan Heidt Newhall Metrolink Station, connecting Antelope Valley residents to Santa Clarita Valley. For additional information regarding these transit services, please see Table 4 of the TA in **Appendix L**.

4.14.2 REGULATORY AND PLANNING FRAMEWORK

FEDERAL

Americans with Disabilities Act of 1990

Titles I, II, III, and V of the Americans with Disabilities Act (ADA) have been codified in Title 42 of the United States Code, beginning at Section 12101. Title III prohibits discrimination based on disability in “places of public accommodation” (businesses and nonprofit agencies that serve the public) and “commercial facilities” (other businesses). The regulation includes Appendix A through Part 36 (Standards for Accessible Design), establishing minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility. Examples of key guidelines include detectable warnings for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travel way, and a vibration-free zone for pedestrians.

STATE

Complete Streets Act (Assembly Bill 1358)

Assembly Bill 1358, the Complete Streets Act (Government Code Sections 65040.2 and 65302), was enacted in September 2008. As of January 1, 2011, the law requires cities and counties to ensure that plans account for the needs of all roadway users when updating the part of a local general plan that addresses roadways and traffic flows. Specifically, the legislation requires cities and counties to ensure that local roads and streets adequately accommodate the needs of bicyclists, pedestrians, transit riders, and motorists.

At the same time, the California Department of Transportation (Caltrans), which administers transportation programming for the State, unveiled a revised version of Deputy Directive 64 (DD-64-R1 October 2008), an internal policy document that now explicitly embraces Complete Streets as the policy covering all phases of State highway projects, from planning to construction to maintenance and repair.

Senate Bill (SB) 743

On September 27, 2013, Governor Jerry Brown signed SB 743, which went into effect in January 2014. SB 743 added Section 21099 to the Public Resources Code (PRC), which directed the Office of Planning and Research (OPR) to prepare guidelines establishing criteria for determining the significance of transportation impacts that promote the reduction of greenhouse gas (GHG) emissions, the development of multimodal transportation networks, and a diversity of land uses. SB 743 and PRC Section 21099 further require that, upon certification of such guidelines, "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment" pursuant to CEQA.

CEQA Guidelines Section 15064.3

Recent changes to the CEQA Guidelines include the adoption of Section 15064.3, *Determining the Significance of Transportation Impacts*. CEQA Guidelines Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 miles of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less-than-significant transportation impact.[2] Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less-than-significant transportation impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household, or in any other measure. A lead agency may also use models to estimate VMT and may revise those estimates to reflect professional judgment based on substantial evidence.

REGIONAL

Southern California Association of Governments

The City of Santa Clarita is located within the jurisdiction of the Southern California Association of Governments (SCAG). In September 2020, the SCAG Regional Council adopted the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), a long-range visioning plan that incorporates land use and transportation strategies to increase mobility options and achieve a more sustainable growth pattern while meeting GHG reduction targets set by the California Air Resources Board.

The 2020-2045 RTP/SCS's "Core Vision" prioritizes the maintenance and management of the region's transportation network, expanding mobility choices by co-locating housing, jobs, and

[2] "Major transit stop" is defined in PRC Section 21064.3 as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. "High-quality transit corridors" are defined in PRC Section 21155 as a corridor with fixed-route bus service with service intervals no longer than 15 minutes during peak commute hours.

transit and increasing investment in transit and complete streets. Strategies to achieve the "Core Vision" include, but are not limited to, Smart Cities and Job Centers, Housing Supportive Infrastructure, Go Zones, and Shared Mobility. The 2020-2045 RTP/SCS intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the region's overall quality of life. These benefits include, but are not limited to, a 5 percent reduction in VMT per capita, a 9 percent reduction in vehicle hours traveled, and a 2 percent increase in work-related transit trips.

LOCAL

Transportation Analysis Guidelines

In response to SB 743 and in compliance with CEQA Guidelines Section 15064.3 discussed above, the City adopted new transportation impact thresholds and guidance for preparing transportation assessments in the City (i.e., *Transportation Analysis Updates in Santa Clarita* [TAU]). This guidance includes a set of VMT screening criteria for projects in the City. These VMT screening criteria are consistent with those identified in OPR's Technical Advisory, which was developed specifically to help aid lead agencies with SB 743 implementation. The City's methodology and thresholds are further discussed in Subsection 4.14.4, Methodology, below.

City of Santa Clarita General Plan Circulation Element

The Circulation Element plans for the continued development of transportation systems that are consistent with regional plans, local needs, and the community's character. The Circulation Element identifies and promotes a variety of techniques for improving mobility, including development of alternative travel modes and support facilities; increased efficiency and capacity of existing systems through management strategies; and coordination of land use planning with transportation planning by promoting concentrated, mixed-use development near transit facilities. The Circulation Element identifies the following seven areas with specific goals, objectives, and policies that define the City's transportation priorities:

1. Multi-Modal Circulation Network
2. Street and Highway System
3. Vehicle Trip Reduction
4. Rail Service
5. Bus Transit
6. Bikeways
7. Pedestrian Circulation

The Circulation Element further enumerates a number of objectives, goals, and policies in support of each area. The policies and programs that are applicable to the Project, along with a detailed discussion of the Project's consistency with each, have been identified in **Table 4.14-1** in Subsection 4.14.6, Analysis of Project Impacts, below.

Non-Motorized Transportation Plan

The Non-Motorized Transportation Plan guides future pedestrian and bicycle infrastructure, policy, and planning in the City. The policies that are applicable to the Project, along with a

detailed discussion of the Project's consistency with each, have been identified in **Table 4.14-2** in Subsection 4.14.6, Analysis of Project Impacts, below.

City of Santa Clarita Community Character Design Guidelines

The City of Santa Clarita Community Character and Design Guidelines identifies urban design principles to guide architects and developers in designing high-quality projects that meet the City's functional, aesthetic, and policy objectives and help foster a sense of community. The Design Guidelines are organized around four design goals: Sense of Timelessness, Sense of Ownership, Sense of Place and Identity, and Sense of Community. The policies that are applicable to the transportation assessment for the Project are those under the Industrial and Business Park Chapter and include the following design principles:

- Controlled site access
- Service areas located at the sides and rear of buildings
- Convenient access, visitor parking, and on-site circulation
- Screening of outdoor storage, work areas, and equipment
- Emphasis on the main building entry and landscaping
- Landscaped open space

The goals and objectives established in the Design Guidelines that are applicable to the Project, along with a detailed discussion of the Project's consistency with each, have been identified in **Table 4.14-3** in Subsection 4.14.6, Analysis of Project Impacts, below.

4.14.3 THRESHOLDS OF SIGNIFICANCE

The significance thresholds used to evaluate the impacts of the Project related to transportation are based on Appendix G of the CEQA Guidelines and the City's Initial Study Checklist.

CEQA GUIDELINES APPENDIX G

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to transportation and traffic if it would:

Threshold 4.14(a): ***Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities; or***

Threshold 4.14(b): ***Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b);***

Threshold 4.14(c): ***Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or***

Threshold 4.14(d): ***Result in inadequate emergency access.***

CITY'S INITIAL STUDY CHECKLIST

In addition, in accordance with the City's Initial Study Checklist, a project would have a significant impact related to transportation if it would:

Threshold 4.14(e): ***Conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.***

VMT IMPACT THRESHOLDS

The TAU identifies significance thresholds to apply to development projects when evaluating potential VMT impacts. Consistent with OPR's Technical Advisory, the TAU states that an employment project would result in a significant VMT impact if it would generate home-based work VMT per employee more than 15 percent below the existing Citywide average.

4.14.4 METHODOLOGY

The analysis of impacts related to Transportation considered the improvements on the Project Site, as well as the Project's improvements off-site, including a Class I multi-purpose path along the frontage of the Project on 13th, Arch, and 12th Streets; widening of 13th Street, Arch Street, and 12th Street; installation of public hydrants along the frontage of the Project on 13th, Arch, and 12th Streets; and railroad crossing improvements at 13th Street, including the installation of a bike path/trail on the north side of the crossing, widening of the crossing at 13th Street and Railroad Avenue to accommodate the wider turning radii, installation of drainage on Railroad Avenue and 13th Street, new gates, modifications on Railroad Avenue at 13th Street to accommodate the revised intersection geometry and provide increased efficiency, implementation of ADA requirements for pedestrians, and implementation of line-of-sight requirements at the grade crossing. The analysis also considered the modifications to the Dockweiler Drive Extension Project in the immediate vicinity of the Project Site, including roadway improvements to 13th Street, Arch Street, 12th Street and Placerita Canyon Road that differ from previous approved plans, including accommodating the additional lane geometry at the Arch Street/13th Street intersection to widen the railroad crossing; construction of a pedestrian and bike bridge from the Jan Heidt Newhall Metrolink Station on Railroad Avenue to the future extension of Dockweiler Drive; and implementation of temporary storm drain improvements to accommodate surface water runoff from Dockweiler Drive prior to the completion of the Project.

CONSISTENCY WITH PLANS, PROGRAMS, ORDINANCES, OR POLICIES

The impact analysis below evaluates the Project's potential to conflict with the applicable plans, programs, ordinances, and policies established in the City's Circulation Element, Non-Motorized Transportation Plan, and Design Guidelines. According to the TAU, the Circulation Element includes goals, objectives, and policies related to vehicle trip reduction and promoting alternative modes of travel. These goals, objectives, and policies align with the anticipated outcomes of SB 743, including reducing GHG emissions, promoting infill development, and improving active transportation, through limiting VMT growth.

According to CEQA, a project does not need to be in perfect conformity with each and every policy. A project is considered consistent with an applicable plan if it is consistent with the overall intent of the plan and would not preclude the attainment of its primary goals. Therefore, any inconsistency with an applicable policy, plan, or regulation is only a significant impact under CEQA if the inconsistency itself would result in a direct physical impact on the environment.

VMT SCREENING

The TAU identified four VMT screening criteria for land use projects and specified that a project only needs to meet one of the screening criteria to be exempt from requiring further VMT analysis. The four screening criteria and whether the Project meets a criterion are identified as follows:

- **Project Size:** Projects that generate fewer than 110 daily trips may be screened from conducting a VMT analysis. Local-serving retail projects less than 50,000 square feet may be presumed to have a less-than-significant VMT impact, absent substantial evidence to the contrary. The Project would exceed the 110 daily trip threshold and comprise more than 50,000 square feet of non-retail use; therefore, the Project does not meet this VMT screening criterion.
- **Project Located in a Low VMT Area:** Residential and office projects located in areas that are already 15 percent below the City's baseline VMT may be presumed to have a less-than-significant VMT impact as long as the new development in the traffic analysis zone (TAZ) is similar to the development already in the TAZ and absent substantial evidence to the contrary. The Project Site lies within TAZs that have a greater daily home-based work VMT per employee than the City baseline; therefore, the Project does not meet this VMT screening criterion.
- **Transit Proximity:** Projects located within transit priority areas may be exempt from VMT analysis and shall have all of the following characteristics:
  - Floor area ratio (FAR) 0.75 or greater
  - Are consistent with the applicable SCAG SCS (as determined by the City)
  - Do not provide more parking than required by City
  - Do not replace affordable residential units with a smaller number of moderate- or high-income residential units.

  The Project is located within a transit priority area; however, the Project has a FAR of less than 0.75 and would provide more parking than required by the City. Therefore, the Project does not meet this VMT screening criterion.
- **Affordable Housing:** Projects that provide affordable housing units may be presumed to have a less-than-significant impact on VMT, absent substantial evidence to the contrary. The Project does not include any affordable housing units; therefore, the Project does not meet this VMT screening criterion.

VMT ANALYSIS

The SCAG 2016 RTP/SCS Regional Travel Demand Model was utilized to generate the VMT statistics pursuant to the City's TAU. The SCAG model covers the entire SCAG region and,

therefore, captures a more complete assessment of trip length and VMT as compared to the City's traffic model. VMT is an area-wide performance measure, which helps compare the overall performance of a project or project alternatives, and is also used as a metric to ultimately assess the transportation environmental impacts of a project. For the purposes of this analysis, the 2012 base year scenario is utilized. Based on the understanding of the City's TAU, future year analysis is not conducted because the project is not a large planning effort that may result in changes to regional travel patterns. For the purposes of this study, only the 2012 base year with project scenario was executed in the model. For a more detailed discussion of the VMT analysis methodology, please refer to Appendix C of the TA (**Appendix L** of this Draft EIR).

GEOMETRIC DESIGN AND LAND USE HAZARDS ANALYSIS

The purpose of the geometric design and land use hazards analysis is to identify potential safety conflicts between vehicles, pedestrians, and bicycles, as well as operational delays or capacity reductions resulting from the design or placement of a project's access points.

The determination of significance is typically based on commonly accepted traffic engineering design standards, while considering the amount of pedestrian and bicycle activity crossing vehicular access points, sight distance, and physical conditions like curves or grade changes, and a project's proximity to streets identified in the Safe Routes to School program. The following are generally accepted traffic engineering design standards and guidelines regarding driveway placement, width, and type. The general recommendations that would apply to the Project's access points are as follows:

- The driveway location should be planned to minimize conflicts between the parking facility and users of the adjacent street, including pedestrians, bicyclists, and drivers.
- Driveways should be located on streets with the least traffic volume when feasible and not along arterial streets.
- All commercial loading facilities should be located on local streets when feasible.
- The number of driveways should be minimized.
- Driveways should be spaced at least 50 feet apart when feasible.
- Driveway design should address all issues that could affect safety of driveway operation, including pedestrian traffic, sight distance, lane widths and turn radii, traffic volumes and speeds on the street, and driveway traffic volume.
- All vehicle maneuvering (such as commercial vehicles turning around) should occur on private property or an alley.

FREEWAY SAFETY ANALYSIS

Caltrans developed the Interim Land Development and Intergovernmental Review Safety Review Practitioners Guidance (Caltrans Safety Guidance) to identify potential safety impacts at freeway off-ramps as a result of increased traffic from development projects. It provides a methodology and significance criteria for assessing whether additional vehicle queueing at off-ramps could result in a safety impact due to speed differentials between the mainline freeway lanes and the queued vehicles at the off-ramp.

Based on the Caltrans Safety Guidance, a transportation assessment for a development project must include analysis of any freeway off-ramp where the project adds 25 or more peak hour trips. A project would result in a significant impact at such a ramp if each of the following three criteria were met:

1. Under a scenario analyzing future conditions upon project buildout, with project traffic included, the off-ramp queue would extend to the mainline freeway lanes based on the 95th percentile queue length using Synchro or a comparable Highway Capacity Manual (HCM) analysis methodology.
2. The project would contribute at least two vehicle lengths (50 feet, assuming 25 feet per vehicle) to the queue.
3. The average speed of mainline freeway traffic adjacent to the off-ramp during the analyzed peak hour(s) is greater than 30 miles per hour.

The analysis of future conditions includes Project scenarios without and with the implementation of the Dockweiler Drive Extension Project, which involves an alignment that would connect Dockweiler Drive to Arch Street and continue along Arch Street and 13th Street to link to Railroad Avenue.

4.14.5 PROJECT DESIGN FEATURES

The following Project Design Feature is proposed to further reduce VMT and vehicle trips generated by the Project:

PDF-TA-1: The Project will incorporate several Transportation Demand Measures (TDM) features to contribute to the reduction in VMT and vehicle trips to and from the Project Site. These actions are consistent with City and State of California transportation and GHG policies and objectives. The following measures will be incorporated into the Project to reduce VMT and vehicle trips:

- Flexible work schedules and telecommuting programs
- Bicycle amenities (bicycle racks, lockers, showers, etc.)
- Carpool programs and support
- Tenant-based guaranteed ride home (GRH) program
- Flex car support
- Preferential parking locations for high-occupancy vehicles
- TDM promotions and marketing
- Pedestrian network improvements
- On-street bicycle facilities
- Bicycle parking per Santa Clarita Unified Development Code

4.14.6 ANALYSIS OF PROJECT IMPACTS

Threshold 4.14(a): Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Threshold 4.14(e): Would the Project conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Impact Analysis

The City has adopted programs, plans, ordinances, and policies that establish the transportation planning regulatory framework for development in the City. Each of the documents discussed in Subsection 4.14.2, Regulatory and Planning Framework, above, including the Circulation Element, Non-Motorized Transportation Plan, and the Design Guidelines, was reviewed for applicability to the Project.

Consistency with the General Plan Circulation Element

The objectives that are applicable to the Project, along with a detailed discussion of the Project's consistency with each, are provided in **Table 4.14-1**. As shown in the table, the Project would be consistent with the applicable objectives of the Circulation Element because the Project would help improve the vehicular and bicycle network, provide end-of-trip facilities, and encourage alternative travel modes, as well as supporting and encouraging the use of electric vehicles. A more detailed analysis of the Project's consistency with the Circulation Element policies is provided in **Table 4.10-2** in Section 4.10, Land Use and Planning, of this Draft EIR.

Table 4.14-1
CIRCULATION ELEMENT CONSISTENCY ANALYSIS

Objective	Project Consistency Analysis
Area 1 – Multi-Modal Circulation Network	
Objective C 1.1: Provide multi-modal circulation systems that move people and goods efficiently while protecting environmental resources and quality of life.	**Consistent.** The Project proposes to include a bicycle path on 13th Street, as well as upgrades to the intersection of 13th Street and Arch Street to provide and enhance the multimodal circulation in the Project area.
Objective C 1.2: Coordinate land use and circulation planning to achieve greater accessibility and mobility for users of all travel modes.	**Consistent.** The Project would provide a commercial infill development near residential neighborhoods that would allow for reduced commuter trips and opportunities for alternative modes of transportation. In addition, the Project would provide employment within walking distance of the Jan Heidt Newhall Metrolink Station, further encouraging alternate travel modes.
Objective C 1.3: Ensure conformance of the Circulation Plan with regional transportation plans.	**Not Applicable.** This objective is not applicable to the Project because it is not the Project's responsibility to ensure conformance of the Circulation Plan with regional transportation plans. However, the Project would not

Table 4.14-1
CIRCULATION ELEMENT CONSISTENCY ANALYSIS

Objective	Project Consistency Analysis
	preclude the implementation of the current Circulation Plan or any regional transportation plans.
Area 2 – Street and Highway System	
Objective C 2.1: Implement the Circulation Plan (as shown on Exhibit C-2 of the Circulation Element) for streets and highways to meet existing and future travel demands for mobility, access, connectivity, and capacity.	**Not Applicable.** This objective is not applicable to the Project because it is not the Project's responsibility to ensure implementation of the Circulation Plan. However, the Project would not preclude the implementation of the current Circulation Plan and would contribute to the improvement of the Dockweiler Drive corridor as envisioned in the Circulation Element.
Objective C 2.2: Adopt and apply consistent standards throughout the Santa Clarita Valley for street design and service levels, which promote safety, convenience, and efficiency of travel.	**Not Applicable.** This objective is not applicable to the Project because it is not the Project's responsibility to plan the street system. However, the Project would not preclude the adoption and application of consistent standards throughout the Santa Clarita Valley for street design and service levels.
Objective C 2.3: Balance the needs of congestion relief with community values for aesthetics and quality of life.	**Consistent.** The Project would support congestion relief by providing dedications along the Project Site for street enhancements along 12th Street, 13th Street, and Arch Street. These dedications would help improve traffic flow and provide for active transportation options, such as walking and biking. These improvements would have appropriate landscaping to enhance and reinforce the local community aesthetics and quality of life.
Objective C 2.4: Allow trucks to utilize only major and secondary highways as through routes, to minimize impacts of truck traffic on surface streets and residential neighborhoods.	**Consistent.** The Project Site is adjacent to several streets that are part of the regional transportation network, including Railroad Avenue and the future Dockweiler Extension. These connect to other major streets, such as Lyons Avenue and Newhall Avenue. Project trucks would be able to utilize these streets to access I-5 and SR-14 to minimize impacts of truck traffic on surface streets and residential neighborhoods.
Objective C 2.5: Consider the needs for emergency access in transportation planning.	**Consistent.** The Project would comply with all emergency access needs and standards, including the provision of fire lanes and adequate turning radii and Project driveways and internal intersections.
Objective C 2.6: Ensure that funding and phasing of new transportation improvements is coordinated with growth.	**Not Applicable.** This objective is not applicable to the Project because it is not the Project's responsibility for funding of all transportation improvements to accommodate traffic growth. However, the Project would not preclude the City from securing funding and phasing new transportation improvements to accommodate growth.
Objective C 2.7: Pursue the safety, efficiency and tranquility of existing and future residential streets by properly planning for local, collector and arterial roadways and limiting residential driveway access onto collector or arterial roadways.	**Not Applicable.** This objective is not applicable to the Project because it is not the Project's responsibility to plan the street system. However, the Project would not preclude the City's pursuit of the safety, efficiency, and tranquility of existing and future residential streets.
Area 3 – Vehicle Trip Reduction	
Objective C 3.1: Promote the use of travel demand management strategies to reduce vehicle trips.	**Consistent.** The Project would provide a TDM plan aimed at reducing single-occupant commuting, as well as bike parking and end-of-trip facilities.

Table 4.14-1
CIRCULATION ELEMENT CONSISTENCY ANALYSIS

Objective	Project Consistency Analysis
Objective C 3.2: Encourage reduction in airborne emissions from vehicles through use of clean vehicles and transportation system management.	**Consistent.** In addition to the TDM plan mentioned above, the Project would include electric vehicle charging stations to encourage the use of clean vehicles and carpool incentives to encourage reduced VMT.
Objective C 3.3: Make more efficient use of parking and maximize economic use of land, while decreasing impervious surfaces in urban areas, through parking management strategies.	**Consistent.** The Project Site includes up to 95.2 acres of undeveloped land, which currently includes pervious surfaces. To make more efficient use of parking and maximizing economic use of the land while decreasing impervious surfaces in urban areas, approximately half of the parking would be provided in a parking structure.
Area 4 – Rail Service	
Objective C 4.1: Maximize the effectiveness of Metrolink's commuter rail service through provision of support facilities and land planning.	**Consistent.** The Project would provide numerous employment opportunities within walking distance of the Jan Heidt Newhall Metrolink Station.
Objective C 4.2: Access to a high speed rail system connecting the Santa Clarita Valley with other regions, and other regional rail service connections.	**Not Applicable.** This objective is not applicable to the Project because it is not the Project's responsibility to plan the transportation system. However, the Project would not preclude access to a high speed rail system connecting the Santa Clarita Valley with other regions and other regional rail service connections.
Area 5 – Bus Transit	
Objective C 5.1: Ensure that street patterns and design standards accommodate transit needs.	**Consistent.** The Project would improve public transit efficiency and convenience through provision of land dedications to allow for the improvement of the 13th Street railroad crossing.
Objective C 5.2: Maximize the accessibility, safety, convenience, and appeal of transit stops.	**Not Applicable.** This objective is not applicable to the Project because it is not the Project's responsibility to improve transit stops. However, the Project would not preclude maximization of accessibility, safety, convenience, and appeal of transit stops.
Objective C 5.3: Explore opportunities to improve and expand bus transit service.	**Not Applicable.** This objective is not applicable to the Project because it is not the Project's responsibility to optimize the transportation system. However, the Project would not preclude the exploration of opportunities to improve and expand bus transit service.
Objective C 5.4: Provide adequate funding to expand transit services to meet the needs of new development in the Valley.	**Not Applicable.** This objective is not applicable to the Project because the Project is not responsible for transit funding. However, the Project would not preclude the City's provision of adequate funding to expand transit service to meet the needs of new development.
Area 6 – Bikeways	
Objective C 6.1: Adopt and implement a coordinated master plan for bikeways for the Valley, including both City and County areas, to make bicycling an attractive and feasible mode of transportation.	**Not Applicable.** This objective is not applicable to the Project because the Project is not responsible for bikeway planning. However, the Project would not preclude the adoption and implementation of a coordinated master plan for bikeways for the Valley.
Objective C 6.2: Encourage provision of equipment and facilities to support the use of bicycles as an alternative means of travel.	**Consistent.** The Project would provide a bike lane on 13th Street, bike parking, and end-of-trip facilities for bike commuters.
Area 7 – Pedestrian Circulation	

Table 4.14-1
CIRCULATION ELEMENT CONSISTENCY ANALYSIS

Objective	Project Consistency Analysis
Objective C 7.1: A continuous, integrated system of safe and attractive pedestrian walkways, paseos and trails linking residents to parks, open space, schools, services, and transit.	**Consistent.** The Project would provide sidewalks along the Project frontage, as well as upgraded crosswalks and ADA-compliant facilities at the intersection of 13th Street and Arch Street. The Project would also provide a Class I multiuse path adjacent to the Project Site along 13th Street, Arch Street, and 12th Street, which would connect to Railroad Avenue to the west and the future Dockweiler Drive extension to the south.
Sources: City of Santa Clarita, General Plan, Circulation Element, 2011; Gibson Transportation Consulting, Inc., Transportation Assessment for Shadowbox Studios, January 2023.	

Consistency with the Non-Motorized Transportation Plan

The goals and objectives that are applicable to the Project, along with a detailed discussion of the Project's consistency with each, are provided in **Table 4.14-2**. As shown in the table, the Project would be consistent with the applicable goals and objectives of the City's Non-Motorized Transportation Plan because the Project would promote walking and biking to work. For bicyclists, the Project would provide a multiuse path on 13th Street along the Project frontage, bicycle parking, and end-of-trip facilities, including lockers and showers. In regard to pedestrians, the Project would provide employment opportunities for the residents of numerous nearby residential developments, as well as access to the Jan Heidt Newhall Metrolink Station, located less than 0.5 mile south of the Project Site.

Table 4.14-2
NON-MOTORIZED TRANSPORTATION PLAN CONSISTENCY ANALYSIS

Goal and Objectives	Project Consistency Analysis
Goal 1. Safety & Health: This NMTP will empower residents to live a more active lifestyle by providing a network of safe and comfortable walking routes and bikeways for everyone to enjoy. **Objective A:** Reduce bicycle and pedestrian collisions through safe and comfortable facilities **Objective B:** Promote an active lifestyle that includes biking and walking **Objective C:** Reduce air pollution, asthma rates, and greenhouse gas emissions	**Consistent.** The Project would develop an on-street bike lane along the Project frontage on 13th Street, as well as providing and maintaining bike parking and end-of-trip facilities. These facilities would be designed to improve safety for all road users and help promote active transportation within the City. Providing this mode of access to the Project Site would help reduce vehicular trips, thus improving air quality and health outcomes.
Goal 2. Access & Comfort: This NMTP will support increased access to neighborhood destinations such as parks, shopping and employment centers, libraries, schools, recreation centers, and transit stops. Pedestrian and bicycle facilities will be accessible and comfortable for people of all ages and abilities to use. **Objective A:** Increase access to jobs, education, retail, parks and libraries, schools, recreational centers, transit, and other neighborhood destinations **Objective B:** Address barriers so that disadvantaged populations can take part in improvements	**Consistent.** The Project would develop an on-street bike lane along the Project frontage on 13th Street, as well as providing and maintaining bike parking and end-of-trip facilities. This would improve access to local and regional destinations, such as jobs, transit, retail, and other activities. The Project would also improve mobility for disadvantaged households by providing safe alternatives to vehicular travel and reducing existing travel times adjacent to the Project Site with various pedestrian and bike improvements. All improvements would be compliant with ADA requirements.

Table 4.14-2
NON-MOTORIZED TRANSPORTATION PLAN CONSISTENCY ANALYSIS

Goal and Objectives	Project Consistency Analysis
Objective C: Reduce air pollution, asthma rates, and greenhouse gas emissions **Objective D:** Reduce travel times for disadvantaged households **Objective E:** Prioritize the needs and trip patterns of disadvantaged populations **Objective F:** Serve people with disabilities.	
Goal 3. Maintain & Expand the Network: This NMTP will help out community identify, develop, and maintain a complete and convenient bicycle and pedestrian network. **Objective A:** Integrate bicycle and pedestrian network and facility needs into all city planning documents and capital improvement projects **Objective B:** Leverage existing funding to maximize project delivery **Objective C:** Maintain designated facilities to be comfortable and free of hazards to biking and walking **Objective D:** Reduce long-term transportation costs by reducing the need for vehicle ownership or for parking in new developments.	**Not Applicable.** This goal is not applicable to the Project because the Project is not responsible for planning and maintaining the transportation network. However, the Project would not preclude the identification, development, and maintenance of a complete and convenient bicycle and pedestrian network.
Sources: City of Santa Clarita, 2020 Non-Motorized Transportation Plan, September 2020; Gibson Transportation Consulting, Inc., Transportation Assessment for Shadowbox Studios, January 2023.	

Consistency with the Santa Clarita Community Character and Design Guidelines

The attributes that were identified in the Design Guidelines that are applicable to the Project, along with a detailed discussion of the Project's consistency with each, are provided in **Table 4.14-3**. As shown in the table, the Project would be consistent with the Design Guidelines because the Project's design would incorporate each of the attributes of the Design Guidelines for industrial and business park uses.

Table 4.14-3
COMMUNITY CHARACTER AND DESIGN GUIDELINES CONSISTENCY ANALYSIS

Attributes	Project Consistency Analysis
Controlled Site Access	**Consistent.** The Project would install a traffic signal at the main entrance at the intersection of 13th Street and Arch Street, and provide guard booths at all entrances and exits.
Service Areas Located at the Sides and Rear of Buildings	**Consistent.** The Project would locate all loading and receiving areas toward the rear of the property.
Convenient Access, Visitor Parking, and On-Site Circulation	**Consistent.** The Project would provide adequate internal access lanes and driveways, ample visitor parking, and a network of internal circulation roads capable of handling all Project traffic and circulation.
Screening of Outdoor Storage, Work Areas, and Equipment	**Consistent.** The Project would screen all mechanical equipment to the extent feasible. Some outdoor work

Table 4.14-3
COMMUNITY CHARACTER AND DESIGN GUIDELINES CONSISTENCY ANALYSIS

Attributes	Project Consistency Analysis
	areas are vital to the studio operations but would be located away from any public rights-of-way.
Emphasis on the Main Building Entry and Landscaping	**Consistent.** The Project has designed the main entrance at the intersection of 13th Street and Arch Street with a full landscaping plan.
Landscaped Open Space	**Consistent.** The Project would provide both landscaped spaces, including picnic areas, and undeveloped space.
Sources: City of Santa Clarita, Santa Clarita Community Character and Design Guidelines, March 24, 2009; Gibson Transportation Consulting, Inc., Transportation Assessment for Shadowbox Studios, January 2023.	

Based on the Project consistency analyses above, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, taking into account all modes of transportation, including mass transit; nonmotorized travel, such as bicycle and pedestrian facilities; and roadways, including but not limited to intersections, streets, highways and freeways. As such, impacts would be less than significant.

Mitigation Measures

Impacts with regard to Thresholds 4.14(a) and 4.14(e) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Thresholds 4.14(a) and 4.14(e) were determined to be less than significant without mitigation.

Threshold 4.14(b): Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Impact Analysis

The VMT analysis conducted for the Project is consistent with the guidelines established in the City's TAU. The analysis used the SCAG Regional Transportation Plan Model. Since the Project includes only office or employment-generating uses, the VMT in this analysis is reported as home-based work VMT per employee. Based on the City's TAU, employment/commercial/industrial projects that exceed 15 percent below the Citywide baseline VMT for home-based work VMT per employee are identified as resulting in a significant transportation impact. The City's threshold of significance is 15.7 VMT per employee based on the 2012 Citywide home-based work VMT per employee of 21.0.

To provide for a conservative analysis, **Project Design Feature PDF-TA-1** was not included in the VMT analysis despite the Project's commitment to prepare and implement a TDM plan. Even without this Project Design Feature, the findings of the VMT analysis show that the Project would generate an average home-based work VMT per employee of 14.0, which is less than the City's threshold of significance of 15.7. Therefore, the Project would result in a less-than-significant VMT impact and, as such, would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b).

Mitigation Measures

Impacts with regard to Threshold 4.14(b) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.14(b) were determined to be less than significant without mitigation.

Threshold 4.14(c): Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Impact Analysis

Direct Impacts Related to the Project's Geometric Design Features

As shown in Figure 2-3, in Section 2.0, Project Description, of this Draft EIR, the Project would provide primary vehicular access via a new four-way signalized intersection at Arch Street (south leg), 13th Street (west leg), Gate 1 Driveway (north leg), and Gate 2 Driveway (east leg). In addition, the pedestrian and bicycle traffic at this intersection would be protected by the traffic signal phases, and an off-street multiuse path and new pedestrian sidewalks have been provided to facilitate the safe movement of pedestrians and bicycles in and out of the Project Site and beyond. These amenities would serve to reduce hazardous conflicts between vehicles and pedestrians.

A secondary access point would be provided via a new driveway (i.e., Gate 3 Driveway) on 12th Street, approximately 400 feet east of Arch Street. The security control points at all three driveways would be set back well into the Project Site with a sufficient number of inbound and outbound lanes to avoid backups and prevent any queues from extending into the adjacent public streets.

Driveway design would comply with all City requirements, including width, curb return radii, and access control locations. No unusual obstacles are presented in the design of the driveways that would be considered hazardous to motorized vehicles, nonmotorized vehicles, or pedestrians. All roads are straight and flat, and driveways meet the roadways at right angles or include turn restrictions to prevent any visual obstructions.

Accordingly, the Project would not present any geometric design hazards related to traffic movement, mobility, or pedestrian accessibility, and, therefore, hazard impacts would be less than significant.

Indirect Impacts Related to Freeway Safety

Based on the Project trip generation estimates and the traffic distribution pattern detailed in the TA (**Appendix L**), the Project would not add 25 or more trips to any freeway off-ramps under the future condition without the Dockweiler Drive Extension Project. However, the TA determined that the Project would add 25 or more a.m. and p.m. peak hour trips to the SR-14 southbound off-ramp at Newhall Avenue under the future condition with the Dockweiler Drive Extension Project. Accordingly, based on the Caltrans Safety Guidance, a freeway safety analysis was conducted to determine if all three criteria identified in Subsection 4.14.4, Methodology, would be met.

The 95th percentile off-ramp queue length was calculated using the HCM analysis methodology for operating conditions without and with Project traffic in 2028, as well as without and with the Dockweiler Drive Extension Project. The analysis determined that, under the operating conditions with the Project and the Dockweiler Drive Extension Project, the southbound off-ramp queue at SR-14 and Newhall Avenue would not exceed the available queuing space and, thus, would not extend to the mainline freeway lanes. Therefore, because the first criterion was not met, the Project would result in a less-than-significant impact related to freeway safety.

Mitigation Measures

Impacts with regard to Threshold 4.14(c) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.14(c) were determined to be less than significant without mitigation.

Threshold 4.14(d): Would the Project result in inadequate emergency access?

Impact Analysis

Emergency vehicle access to the Project area is provided via multiple arterial roadways, including Wiley Canyon Road/Via Princessa to the north, Railroad Avenue to the west, and Lyons Avenue to the south. As discussed above, the Project would provide primary vehicular access via a new four-way signalized intersection at Arch Street, 13th Street, Gate 1 Driveway, and Gate 2 Driveway. Primary vehicle access to the Project Site would be via two internal project streets connecting to 12th Street. A secondary access point would be provided via a new driveway (i.e., Gate 3 Driveway) on 12th Street, approximately 400 feet east of Arch Street. The Project's circulation and access would be implemented in conformance with City engineering design requirements and conditions of the Los Angeles County Fire Department to ensure that adequate emergency access is provided throughout the Project Site. In addition, a traffic evacuation assessment was conducted for the Project. As discussed in greater detail in Section 4.17, Wildfire, of this Draft EIR, the off-site improvements proposed by the Project, in conjunction with the Dockweiler Drive Extension Project, would facilitate the evacuation of the Placerita Canyon area by reducing the evacuation congestion period at Arch Street and 12th Street and Dockweiler Drive; the traffic signal intersection design would provide for the most efficient traffic operations under an evacuation scenario. Therefore, the Project would not result in inadequate emergency access, and impacts would be less than significant.

Mitigation Measures

Impacts with regard to Threshold 4.14(d) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.14(d) were determined to be less than significant without mitigation.

4.14.7 CUMULATIVE IMPACTS

Impact Analysis

Consistency with a Program, Plan, Ordinance, or Policy Addressing the Circulation System

As with the Project, each of the 36 related projects would be separately reviewed and approved by the City to ensure their consistency with applicable programs, plans, ordinances, and policies, including, but not limited to, those established in the Circulation Element, Non-Motorized Transportation Plan, applicable specific plans and streetscape plans, and the City's Design Guidelines. Overall, implementation of the Project, along with the related projects, would not create inconsistencies with these plans and policies. Therefore, Project impacts related to consistency with identified plans and policies addressing the circulation system would not be cumulatively considerable, and cumulative impacts would be less than significant.

VMT Analysis

A development project would have a cumulative VMT impact if it were deemed inconsistent with the 2020-2045 RTP/SCS, the regional plan to reach State air quality and GHG reduction targets. However, based on the TAU, a project that does not result in a significant VMT impact would be in alignment with the 2020-2045 RTP/SCS and, therefore, would also have no cumulative VMT impact.

As determined under the discussion of Threshold 4.14(b) above, the Project would not result in a significant VMT impact. In addition, when considered with the related projects, many of which propose additional residential development near the Project Site, the Project would provide additional local employment options to the many existing and future residents in the Study Area to further reduce VMT. Therefore, Project impacts related to VMT would not be cumulatively considerable, and cumulative impacts would be less than significant.

Geometric Design Features

A project could contribute to a significant cumulative impact with respect to geometric design if the project, in combination with related projects with access points proposed along the same block(s), would result in significant impacts.

There are no related projects in the immediate vicinity of the Project Site; the closest related projects (Related Project No. 3, 21, and 22) are located approximately 2,000 feet from the Project Site and, as such, would not have any access points near the Project Site. Therefore, Project impacts related to hazardous geometric design features would not be cumulatively considerable, and cumulative impacts would be less than significant.

Freeway Safety

The freeway safety analysis above is based on future traffic conditions in 2028, which take into account trips generated by the related projects. Accordingly, since the Project would result in a less-than-significant impact related to freeway safety, the Project's contribution to this impact would not be cumulatively considerable, and cumulative impacts would be less than significant.

Mitigation Measures

Cumulative transportation impacts were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Cumulative transportation impacts were determined to be less than significant without mitigation.

4.15 TRIBAL CULTURAL RESOURCES

This section evaluates potential impacts to tribal cultural resources that may result from implementation of the Project. The analysis in this section is based on the results of consultation with California Native American tribes conducted by the City of Santa Clarita for the Project, pursuant to the requirements of the California Environmental Quality Act (CEQA) as amended by Assembly Bill (AB) 52. Information in this section is also derived from the *Phase 1 Paleontological and Archaeological Resources Assessment for the Shadowbox Studios Project,* dated August 2022, prepared by ArchaeoPaleo Resource Management, Inc., and provided in **Appendix E** of this Draft EIR.

4.15.1 ENVIRONMENTAL SETTING

HISTORICAL BACKGROUND

Prehistoric

As described in Section 4.4, Cultural Resources, of this Draft EIR, prehistoric human land use for the Southern California region potentially dates as far back as approximately 12,000 years ago.

Horizon I, described as the Early Man Period, began with the arrival of the first inhabitants of the region approximately 12,000 BP to 6,000 BP. This period is characterized by the presence of nomadic and semi-nomadic hunter-gatherer groups who exploited coastal and inland environments for food and shelter. Many early sites were located on the shorelines of ancient lakes and marshes as well as along stream channels and estuaries. These groups appeared to be primarily big game hunters who followed large and medium-sized animals during seasonal rounds.

Horizon II, also known as the Millingstone Period (approximately 6,000 BP–1,000 BC) is based on the presence of utilized culinary tools. The hallmarks of the Millingstone Period are (1) extensive use of millingstone implements, such as portable manos and metates suggestive of hard seed processing and (2) core tools. The Millingstone period reflects increased sedentism, long-term habitation within an established settlement, and cultural adaptation toward the coastal and water perimeters along lakes, streams, lagoons, and estuaries. Subsistence strategies are diverse, such as seasonal rounds-based residential camps, during this period; some sites evince a greater reliance upon shellfish, small mammals, and birds, as well as plant resources, and less emphasis upon hunting and fishing.

Circa 5,000–4,500 BP, new forms of subsistence procurement and technology, increasing societal changes, and growing core settlements began to emerge throughout Southern California. Many Native American settlements were located in transitional ecological zones, which provided these groups with a broad spectrum of subsistence (e.g., land and sea mammals, fish, and acorns) without extensive migration, resulting in village-style communities surrounded by peripheral settlements.[1]

[1] Claude Warren, *Archaic Prehistory in the Western United States: Cultural Tradition and Ecological Adaptation on the Southern California Coast*, 1968, pp. 1-14; William Wallace, "Suggested Chronology for Southern California Coastal Archaeology," *Southwestern Journal of Anthropology*, 1955; Joseph Chartkoff & Kerry Kona Chartkoff, *The Archaeology of California*, 1984; Michael Moratto, *California Archaeology with New Introduction*, 2004.

Horizon III is identified as the Intermediate Period, a subsistence strategy shift within the Millingstone period that lasts from approximately 1,000 BC to 750 AD. During the latter part of the Millingstone period and throughout the Intermediate period, the mortar and pestle appear extensively in the archaeological record suggesting increased reliance upon the acorn as a dietary staple and a noticeable shift away from the hard seed exploitation of the earlier Millingstone period. Additionally, projectile point and faunal remains indicate increased land and sea exploitation as well as seasonal hunting and gathering subsistence strategies. The artifact assemblages of this period are diverse and include broad leaf-shaped blades, heavy stemmed projectile points in association with terrestrial and aquatic bone, antler and bone tools, asphaltum, steatite, the bow and arrow, and arrow shaft straighteners. These artifact types are suggestive of possible Shoshonean influence and immigration, as well as possible Hokan displacement or replacement or increasing socio-cultural complexity, such as trade.

Horizon IV, considered the Late Prehistoric period, began approximately 750 AD and terminated at the time of European contact. This period is characterized by greater population density and socio-cultural complexity. Beginning approximately 1500 BP, there is an increased use of the bow and arrow, bedrock mortars, and milling slicks, indicative of the transition from the Intermediate to the Late Prehistoric period, which continued to the contact period.

Since the bow and arrow was widely used during this period, there was a greater reliance upon fishing and sea mammal hunting. The artifact assemblages of this period tend to be more diverse and elaborate and include evidence of trade goods, which is indicative of increasing intricacy with respect to trade networks and social contact with other groups. The evidence includes small bird points, mortars and pestles, steatite ornaments, cogged stones, stone discs, perforated stone discs, circular shell fish hooks (nearer the coast), bone tools, bone and shell ornaments, asphaltum, steatite and shell beads, fire affected rock, and elaborate mortuary customs.

During the Late Prehistoric era (1,000–400 BP), regional differences throughout California fully developed, resulting in the tribal groups that are currently known.[2] Populations of these culturally distinct groups continued to rise along with territorially defined, sedentary settlement patterns. Resource exploitation, including fishing, intensified while large-scale hunting and gathering operations provided varied sources of subsistence. With growth and the development of trade networks, societies became highly stratified with hierarchies based upon wealth, occupation, and/or lineage. The increased subsistence intensification, sedentism, and complexity are documented in the archaeological record of the Gabrieleño people and their linguistically distinct Chumash neighbors to the west.[3] Other Native American groups with similar advances of recorded complexity included the Gabrieleno Tongva, the Kizh people, the Kitnanemuk people, the Tataviam people, and the Vanyume people; the latter two groups, which have closer associations with the Project area, are discussed in more detail below.

Historic

European explorers made sporadic visits into the general Los Angeles area during the sixteenth century. Extensive Spanish interaction with the Gabrieleño began in 1769, when Gaspar de Portolá led an overland expedition from San Diego across Southern California. The expedition

[2] William Wallace, "Suggested Chronology for Southern California Coastal Archaeology," Southwestern Journal of Anthropology, 1955.

[3] Joseph Chartkoff & Kerry Kona Chartkoff, *The Archaeology of California*, 1984; Michael Moratto, *California Archaeology with New Introduction*, 2004.

party traveled through present-day Elysian Park to find a river that is known today as the Los Angeles River.[4] Twelve years after Portola's voyages, settlers of various ethnicities, including of Spanish, African, and Native American descent, established a pueblo on the coastal plain of the Los Angeles River. Over time, the area known as the Ciudad de Los Angeles became the "City of Angels," and on April 4, 1850, it became known as the City of Los Angeles.[5]

The goal of the Spanish colonization effort was not only to create local populations of settling peasants and merchants but also to include native peoples who already occupied the region into those populations. In order to incorporate the indigenous tribes, efforts were made to educate them and convert them to Christianity, which led to religious missions in becoming the cornerstone of colonization.[6] To support the Spanish settlements, missions did not just attempt to convert California Indians but also used them to work on the farms and ranches present on mission grounds. Many of the Gabrieleño were gradually forced to move to the San Gabriel or San Fernando Missions to provide labor, and many of the Native Americans living on the coastal plains and inland valleys at the time were also transported here, though small groups did escape this confinement.[7]

The forced interaction with the Spanish marked the beginning of the decline of the indigenous population, especially as the local population suffered from the European epidemics. By 1800, the original Gabrieleño villages were empty and the Gabrieleños and other Native Americans provided much of the labor for the European ranches, farms, and communities.[8] During this time, only fragmentary ethnographic information was recorded.

The Mexican period began when Mexico gained its independence from Spain in 1821, and, at the same time, the mission system began to break down. Around 1834, the mission system of Alta California began to undergo secularization; although the goal was to return land to the Native Americans that occupied the mission properties, in actuality, most Native Americans were put to work on ranchos or dispersed to interior lands of the state.

California experienced a period of thriving ranchos between the years of 1821 through 1848.[9] In 1939, the San Fernando Mission, which consisted of the western Santa Clarita Valley and portions of Ventura County, was granted by the governor to Lieutenant Antonio del Valle—a decision that angered the Native Americans (stated in local literature as the Tataviam) who were expecting this land to be returned to their ownership.

American military forces were present within California during the summer of 1846 as a result of the Mexican American War. Mexican resistance deteriorated, and the United States occupied Mexico City in 1848, marking the beginning of the American period (1848 to present).[10]

In 1848, the Treaty of Guadalupe Hidalgo ended the Mexican American War. Although the treaty required the U.S. to grant citizenship to the Indians of former Mexican territories, the state of

4 Blake Gumprecht, *The Los Angeles River: Its Life, Death, and Possible Rebirth*, 1999.
5 William Mason, *Los Angeles under the Spanish Flag: Spain's New World*, 2004; Dale Pitt & Leonard Pitt, *Los Angeles A to Z: An Encyclopedia of the City and County*, 1997.
6 Joseph Chartkoff and Kerry Kona Chartkoff, *The Archaeology of California*, 1984.
7 Lowell J. Bean & Charles R. Smith, *Handbook of North American Indians* Vol. 8: *California*, 1978, pp. 538-549.
8 Lowell J. Bean & Charles R. Smith, *Handbook of North American Indians* Vol. 8: *California*, 1978, pp. 538-549.
9 Kevin Starr, *California: A History*, 2005; R.J. Wlodarski, "A Phase 1 Archaeological Study for the New Studio Project Subsequent EIR," Culver City, County of Los Angeles, California, 1998.
10 U.S. Congress, The Statutes at Large, Treaties, and Proclamations, of the United States of America from December 5, 1859 to March 3, 1863, Acts of the Thirty-seventh Congress of the United States, Statute II—1861-62, 1863.

California refused to grant Indian protections, and did not declare Native Californians to be citizens until 1917.

ETHNOGRAPHIC BACKGROUND

Since physical borders did not exist between tribes and other entities, Santa Clarita Valley and the surrounding areas included many tribal groups. The tribal groups that lived, and still live, in Santa Clarita Valley and the surrounding areas are the Tataviam and the Vanyume. At the time of Spanish arrival, the Native American people, named the Tataviam, occupied various locations in the Santa Clarita Valley, which included the Santa Clara River Valley and northward to the southern Antelope Valley. However, other Native American culture groups, including the Chumash to the west and the Gabrieliño/Tongva/Kizh Nation to the south and southeast, include this area as part of their territory.

At the time of European contact, Tataviam territory may have ranged east of Piru, within the entire upper Santa Clara River region, northwards to Pastoria Creek and east to Mount Gleason. Studies show that the Tataviam lived in socially complex hunter-gatherer groups and were in close contact with their Chumash neighbors to the east and Gabrieleño/Tongva neighbors to the south.[11] As with many Californian culture groups known as hunter/gatherers, the Tataviam lived in small villages and satellite camps near water sources originating in the local mountains, foothills, and adjacent desert areas—namely, within the upper regions of the Santa Clara River, extending over the Sawmill Mountains to the north, the southwestern areas of the Antelope Valley, and where Saugus, Agua Dulce, and Lake Elizabeth are located today. More specifically, Newhall is the general location of the Tataviam village *Tochonanga*, a name linguistically associated with the Late Prehistoric era Gabrieliño territories.[12]

Hunter/gatherer subsistence consisted primarily of plants and animals found in the foothills, such as acorns, seeds, berries, deer and rabbit. Seasonal settlement and resource exploitation rounds may have included natural spring areas, as well as the foothill creeks that drain into the Santa Clara River. These groups were also prolific lithic tool manufacturers and basket makers.

The Tataviam have been described as a remnant Takic language group, and the group in the Antelope Valley has been identified as a Serrano division of the Shoshonean. Originally, the anthropological literature referenced these groups as using the name that the Hokan-speaking Chumash people used: *Alliklik* or *I'alliklik*. Early twentieth century ethnographer Alfred Kroeber (1925) states that at some later point in their history, the name *Alliklik* was changed to the name Tataviam.[13]

EXISTING CONDITIONS

Existing Project Site Conditions

A field reconnaissance survey was conducted on July 27 and July 28, 2021, as well as March 2, 2022, to evaluate the presence of any cultural resources, including tribal cultural resources. Observations made during the field surveys noted the Project Site to be abundant in California scrub oak, chaparral yucca plants, and various fauna with a source of running water from Placerita Creek. The California scrub oak trees were considered a valuable resource to local Native

[11] Harrick Eugene Hanks, *The Archaeology of the Vasquez Rocks: A Site Locality in the Upper Santa Clara River Valley, Los Angeles County, California*, 1971; Thomas Blackburn & John Bean Lowell, *Handbook of North American Indians, Vol. 8: California, Kitanemuk*, 1978; Michael Moratto, *California Archaeology,* 1984.

[12] Bernice Eastman Johnston, *California's Gabrielino Indians*, 1962.

[13] Alfred Kroeber, *A Handbook of the Indians of California,* 1925, republished 1976.

Americans for its acorns, which were an essential food source and raw materials to make bows, baskets, medicine and to build fires for warmth, cooking, and making pottery. The presence of California scrub oak within the Project Site suggests that local Native Americans may have traveled through these areas in search of this highly valuable resource. This presence is confirmed by a prehistoric-aged grinding stone (quern stone), a hammerstone, and an arrow-point sharpening tool found during the field reconnaissance surveys.

Background Research

As identified in Section 4.4, Cultural Resources, of this Draft EIR, a records search from the California Historical Resources Information System – South Central Coastal Information Center (SCCIC) was completed in September 2021. SCCIC results identified an isolated andesite core in 1984 that was considered prehistoric in age, but its origins were outside of the current Project Site boundaries. Further data on prehistoric and/or Native American presence was provided by the positive results of the Native American Heritage Commission (NAHC) records check of the Sacred Lands File (SLF).

Assembly Bill 52 Consultation

Pursuant to the requirements of Assembly Bill (AB) 52, as further described below, in May 2022, the City of Santa Clarita notified the Fernandeño Tataviam Band of Mission Indians (FTBMI) of the Project. The FTBMI responded with a request for further consultation, which occurred starting in November 2022 and concluded in February 2023. During consultation, information pertaining to the FTBMI were provided by the tribe's representative, and appropriate mitigation measures were identified to avoid significant impacts to tribal cultural resources.

According to the tribe's representative, the Project Site is situated (1) in the center of a triangle created by three FTBMI villages, namely the *Tochononga*, *Chaguayanga*, and *Tobimonga*; (2) between two creeks; and (3) on a site with several oak trees, which are sacred to the FTBMI. FTBMI ancestors from all three villages frequented the Project area for its resources, which included acorns from the oak trees and water from Placerita Creek and Newhall Creek. In addition, a burial site was discovered less than two miles from the Project Site.[14] Based on this information and the data collected for and presented in the Phase 1 Assessment, the Project Site has been determined to be potentially sensitive for tribal cultural resources.

4.15.2 REGULATORY AND PLANNING FRAMEWORK

FEDERAL

National Register of Historic Places

In federal law, historic property means any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places (NRHP) maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. In addition, the term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization,

[14] Sarah Brunzell, Cultural Resources Management Division Manager of the Tribal Historic and Cultural Preservation Department of the Fernandeño Tataviam Band of Mission Indians, Project Correspondence: Shadowbox Studios Consultation Follow up, November 30, 2022.

and that meet the National Register criteria (Code of Federal Regulations, Title 36 Section 800.16(l)(1)). A NRHP eligible resource is a historic resource that meets the criteria of a historical resource but is not listed on the NRHP.

Native American Graves Protection and Repatriation Act

The discovery of human remains is always a possibility during construction-related disturbances. The Native American Graves Protection and Repatriation Act (NAGPRA) was enacted November 16, 1990. It states that the "ownership or control of Native American cultural items," which include human remains, funerary objects, sacred objects, and objects of cultural patrimony, that are "excavated or discovered on Federal or tribal lands" after the law went into effect is held by the lineal descendants of the Native American (or Hawaiian) to whom the objects originally belonged. If the lineal descendants cannot be found, then their ownership is conferred to the "Indian" tribe or Native Hawaiian organization on whose land the objects or remains were discovered or that has the closest cultural affiliation.

STATE

California Register of Historical Resources

The California Register of Historical Resources (CRHR), similar in nature to the NRHP, is "an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change."[15] The CRHR was enacted in 1992 and its regulations are administered by the California Office of Historic Preservation (OHP). The criteria for eligibility for the CRHR are based upon NRHP criteria but are specific to California's history and cultural heritage. Certain resources are determined to be automatically included in the CRHR, including California properties formally determined eligible for listing, or already listed in, the NRHP.

A resource eligible for the CRHR must meet one of the four criteria and retain enough of its historic character or appearance (integrity) to be recognized as a historical resource and convey the reason for its significance. These four criteria, which are similar to those of the NRHP for considering a resource to be significant, are as follows:

1) If the resource is associated with events which have made a significant contribution to the broad patterns of California's history and historical heritage;

2) If the resource is associated with the lives of persons significant in California's past;

3) If the resource embodies the distinctive characteristics of a type, period, or method of construction, or represent the work of a master, or possess high artistic value; or

4) If the resource yields, or is likely to yield, information important in prehistory or history.

A historic resource that may not retain sufficient integrity to meet the criteria for listing in the NRHP may still be eligible for listing in the CRHR. Additionally, the CRHR consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The CRHR automatically includes the following:

[15] California Public Resources Code, Section 5024.1(a).

- California properties listed on the NRHP and those formally determined eligible for the NRHP;
- California Registered Historical Landmarks from No. 770 onward; and
- California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Resources Commission for inclusion on the CRHR.

Assembly Bill 52

Approved on September 25, 2014, AB 52 amended California Public Resources Code (PRC) Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. The primary intent of AB 52 is to involve California Native American tribes early on in the environmental review process and to establish a category of resources related to Native Americans, known as tribal cultural resources, that require consideration under CEQA. AB 52 requires the lead agency to notify any California Native American tribes, who have requested notification and are traditionally or culturally affiliated with the project site's geographic area, of the project.

California Public Resources Code

Section 21074

PRC Sections 21074(a)(1) and (2) define tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" that are either included or determined to be eligible for inclusion in the CRHR or included in a local register of historical resources, or a resource that is determined to be a tribal cultural resource by a lead agency, in its discretion and supported by substantial evidence. A tribal cultural resource is further defined by PRC Section 20174(b) as a cultural landscape that meets the criteria of PRC Section 20174(a) to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. PRC Section 20174(c) provides that a historical resource described in PRC Section 21084.1, a unique archaeological resource as defined in PRC Section 21083.2(g), or a "nonunique archaeological resource" as defined in PRV Section 21083.2(h) may also be a tribal cultural resource if it conforms with the criteria of PRC Section 20174(a).

Section 21080

PRC Section 21080.3.1 requires that, within 14 days of a lead agency determining that an application for a project is complete, or a decision by a public agency to undertake a project, the lead agency provide formal notification to the designated contact, or a tribal representative, of California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project (as defined in PRC Section 21073) and who have requested in writing to be informed by the lead agency of projects within their geographic area of concern.[16] Tribes interested in consultation must respond in writing within 30 days from receipt of the lead agency's formal notification and the lead agency must begin consultation within 30 days of receiving the tribe's request for consultation.[17]

[16] Public Resources Code, Section 21080.3.1(b) and (c).
[17] Public Resources Code, Sections 21080.3.1(d) and 21080.3.1(e).

PRC Section 21080.3.2(a) identifies the following as potential consultation discussion topics: the type of environmental review necessary; the significance of tribal cultural resources; the significance of the project's impacts on the tribal cultural resources; project alternatives or appropriate measures for preservation; and mitigation measures. Consultation is considered concluded when either (1) the parties agree to measures to mitigate or avoid a significant effect on a tribal cultural resource if a significant effect exists; or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.[18]

In addition to other CEQA provisions, the lead agency may certify an EIR for a project with a significant impact on an identified tribal cultural resource, only if a California Native American tribe has requested consultation pursuant to PRC Section 21080.3.1 and has failed to provide comments to the lead agency, or requested a consultation but failed to engage in the consultation process, or the consultation process occurred and was concluded as described above, or if the California Native American tribe did not request consultation within 30 days.[19]

PRC Section 21082.3(c)(1) states that any information, including, but not limited to, the location, description, and use of the tribal cultural resources, that is submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public without the prior consent of the tribe that provided the information. If the lead agency publishes any information submitted by a California Native American tribe during the consultation or environmental review process, that information shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.

Confidentiality does not apply to data or information that are, or become publicly available, already in lawful possession of the project applicant before the provision of the information by the California Native American tribe, are independently developed by the applicant or the applicant's agents, or are lawfully obtained by the project applicant from a third party that is not the lead agency, a California Native American tribe, or another public agency.[20]

Section 5097

PRC 5097.98 provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. PRC Section 5097.98 further requires the Native American Heritage Commission (NAHC), upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods. In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the land owner rejects the recommendation of the descendant, the landowner

[18] Public Resources Code, Section 21080.3.2(b).
[19] Public Resources Code, Section 21082.3(d)(2) and (3).
[20] Public Resources Code, Section 21082.3(c)(2)(B).

may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

California Health and Safety Code

California Health and Safety Code (HSC) HSC Sections 8010 and 8011 establish a state repatriation policy that is consistent with and facilitates implementation of NAGPRA. NAGPRA requires that museums and federal agencies document all Native American human remains within their collections, or uncovered on projects, as well as their cultural ties. These agencies must then notify any tribe that may be affiliated with the remains and provide the opportunity for their repatriation along with any associated cultural items (grave goods). The state version of the law, California NAGPRA (Cal NAGPRA), mandates publicly funded agencies and museums to repatriate human remains and associated cultural items to California Native American Tribes, not just federally recognized tribes within California, and establishes penalties for noncompliance.

LOCAL

City of Santa Clarita General Plan

The Conservation and Open Space Element[21] of the Santa Clarita General Plan includes the following goals, objectives, and policies related to tribal cultural resources that would be applicable to the Proposed Project:

- Goal CO 5: Protection of historically and culturally significant resources that contribute to community identity and a sense of history.
    - Objective CO 5.3: Encourage conservation and preservation of Native American cultural places, including prehistoric, archaeological, cultural, spiritual, and ceremonial sites on both public and private lands, throughout all stages of the planning and development process.
        - Policy CO 5.3.1: For any proposed general plan amendment, specific plan, or specific plan amendment, notify and consult with any California Native American tribes on the contact list maintained by the California Native American Heritage Commission that have traditional lands located within the City's jurisdiction, regarding any potential impacts to Native American resources from the proposed action, pursuant to State guidelines.
        - Policy CO 5.3.2: For any proposed development project that may have a potential impact on Native American cultural resources, provide notification to California Native American tribes on the contact list maintained by the Native American Heritage Commission that have traditional lands within the City's jurisdiction, and consider the input received prior to a discretionary decision.
        - Policy CO 5.3.3: Review and consider a cultural resources study for any new grading or development in areas identified as having a high potential for Native American resources and incorporate recommendations into the project approval as appropriate to mitigate impacts to cultural resources.

[21] City of Santa Clarita, General Plan, Conservation and Open Space Element, June 2011.

4.15.3 THRESHOLDS OF SIGNIFICANCE

The significance thresholds used to evaluate the impacts of the Proposed Project related to tribal cultural resources are based on Appendix G of the CEQA Guidelines. Based on Appendix G, a project would have a significant impact related to tribal cultural resources if it would:

Threshold 4.13(a): ***Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:***

(i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or

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

4.15.4 METHODOLOGY

The analysis of impacts related to tribal cultural resources considered the improvements on the Project Site, as well as the Project's improvements off-site, including a Class I multi-purpose path along the frontage of the Project on 13th, Arch, and 12th Streets; widening of 13th Street, Arch Street, and 12th Street; installation of public hydrants along the frontage of the Project on 13th, Arch, and 12th Streets; and railroad crossing improvements at 13th Street, including the installation of a bike path/trail on the north side of the crossing, widening of the crossing at 13th Street and Railroad Avenue to accommodate the wider turning radii, installation of drainage on Railroad Avenue and 13th Street, new gates, modifications on Railroad Avenue at 13th Street to accommodate the revised intersection geometry and provide increased efficiency, implementation of ADA requirements for pedestrians, and implementation of line-of-sight requirements at the grade crossing. The analysis also considered the modifications to the Dockweiler Drive Extension Project in the immediate vicinity of the Project Site, including roadway improvements to 13th Street, Arch Street, 12th Street and Placerita Canyon Road that differ from previous approved plans, including accommodating the additional lane geometry at the Arch Street/13th Street intersection to widen the railroad crossing; construction of a pedestrian and bike bridge from the Jan Heidt Newhall Metrolink Station on Railroad Avenue to the future extension of Dockweiler Drive; and implementation of temporary storm drain improvements to accommodate surface water runoff from Dockweiler Drive prior to the completion of the Project.

Evaluation of the Project's potential to result in a significant impact on tribal cultural resources is based, in part, on the resource identification efforts presented in the Phase 1 Assessment provided in **Appendix E** of this Draft EIR. The Phase 1 Assessment included a cultural resource records search conducted at the South Central Coastal Information Center (SCCIC) to review

recorded cultural resources, including tribal cultural resources, within a one-mile radius of the Project Site, historic topographic maps on file, historic aerial photographs, and previous cultural reports and studies conducted within a one-mile radius of the Project Site; a Sacred Lands File search; and a field survey of the Project Site.

As discussed in Subsection 4.15.1 above, tribal consultation between the City and the FTBMI occurred between November 2022 and February 2023. During consultation, appropriate mitigation measures were identified to avoid significant impacts to tribal cultural resources. These mitigation measures are presented below.

4.15.5 PROJECT DESIGN FEATURES

No Project Design Features are proposed with respect to tribal cultural resources.

4.15.6 ANALYSIS OF PROJECT IMPACTS

Threshold 4.13(a.i): Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

Threshold 4.13(a.ii): Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Impact Analysis

As described in Subsection 4.15.1, Environmental Setting, above, the presence of California scrub oak within the Project Site suggests that local Native Americans may have traveled through these areas in search of this highly valuable resource. This presence is confirmed by a prehistoric-aged grinding stone (quern stone), a hammerstone, and an arrow-point sharpening tool found during the field reconnaissance surveys. The tribe's representative also confirmed the Project Site's sensitivity for tribal cultural resources based on the Project Site's location (1) in the center of three FTBMI villages, (2) between Placerita Creek and Newhall Creek, (3) on a site with several oak trees, and (4) less than two miles from a burial site.

Consequently, there is a potential for additional tribal cultural resources to be uncovered from ground-disturbing activities during Project construction and implementation of off-site improvements. Therefore, these ground-disturbing activities may result in significant impacts to tribal cultural resources.

Mitigation Measures

To reduce potential significant impacts to tribal cultural resources, the following mitigation measures are proposed for the Project:

MM-TCR-1 In conjunction with **Mitigation Measure MM-CR-1**, prior to the start of construction, a qualified representative of the Fernandeño Tataviam Band of Mission Indians shall be retained to conduct a Tribal Cultural Resources Worker Environmental Awareness Program (WEAP) training for construction personnel regarding the aspects of Tribal Cultural Resources and the procedures for notifying the Fernandeño Tataviam Band of Mission Indians should Tribal Cultural Resources be discovered.

MM-TCR-2 The Project applicant shall retain a professional Native American monitor procured by the Fernandeño Tataviam Band of Mission Indians to observe all soil disturbing activities, such as site clearance and grubbing, grading, and excavation. The Fernandeño Tataviam Band of Mission Indians shall assign a Native American monitor to each grading or other earthwork machine engaged in ground disturbing activity that is active more than 100 feet from any other grading or other earthwork machine. If tribal cultural resources are encountered, the Native American monitor shall have the authority to request that ground-disturbing activities cease within 60 feet of discovery to assess and document potential finds in real time.

MM-TCR-3 In the event that tribal cultural resources are discovered during Project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease, and a cultural resources principal investigator, who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology, shall assess the find. The principal investigator and tribal monitor shall have the authority to request ground-disturbing activities cease within the area of a discovery. Work on the other portions of the Project outside of the buffered area may continue during this assessment period. Consultation between the Fernandeño Tataviam Band of Mission Indians tribal monitor and lead agency shall occur to determine further action required for any inadvertent discoveries of tribal cultural resources. Depending on the nature of the find, the determination of significance may require additional excavation, potentially including the preparation and execution of a Phase II Archaeological Testing Plan. The City of Santa Clarita, acting with the advice of the consulting principal investigator and the Fernandeño Tataviam Band of Mission Indians, shall determine the significance and treatment of the discovered resources.

MM-TCR-4 Prior to the disposition of any inadvertent discovery of tribal cultural resources, the Fernandeño Tataviam Band of Mission Indians shall be consulted on the treatment and reburial location of the tribal cultural resources. The Fernandeño

Tataviam Band of Mission Indians shall be given first right of refusal for the treatment, disposition, and possible collection/caretaking of tribal cultural resources. The Fernandeño Tataviam Band of Mission Indians consider collection as a last resort and prefer tribal cultural resources either remain in-situ, or if required, be reburied.

MM-TCR-5 Prior to the disposition of any materials suspected to be indicative of a midden, a cultural resources principal investigator, who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology, and the Fernandeño Tataviam Band of Mission Indians archaeologist shall assess the find and confirm whether it is funerary in nature. Once confirmed it is not suspected to be funerary-associated, the midden shall be left in-situ whenever possible. If it is not possible to leave the midden in-situ, the Fernandeño Tataviam Band of Mission Indians shall be consulted for a treatment plan.

MM-TCR-6 If human remains or funerary objects are encountered during any activities associated with the Project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code Section 7050.5, which shall be enforced for the duration of the Project. Should the find be determined as Native American in origin, the Most Likely Descendant (MLD), as determined by the Native American Heritage Commission (NAHC), shall be notified and consulted to provide recommendations to the landowner for the treatment of the human remains. However, pursuant to PRC Section 5097, the ultimate decision regarding the subsequent disposition of those discoveries shall be made by the landowner and the City of Santa Clarita.

MM-TCR-7 A copy of any and all archaeological documents created as a part of the project (isolate records, site records, survey reports, testing reports, and monitoring reports) shall be provided to the Fernandeño Tataviam Band of Mission Indians.

Level of Impact Significance Following Mitigation

Implementation of **Mitigation Measure MM-TCR-1** through **MM-TCR-7** would avoid significant impacts to tribal cultural resources during construction.

4.15.7 CUMULATIVE IMPACTS

Impact Analysis

Impacts to tribal cultural resources are typically site-specific and do not combine with the impacts of other projects to result in cumulative impacts unless there is a substantial resource that extends beyond the Project Site to adjoining land. The nearest project to the Project Site identified in **Table 3-1** in Section 3.0, Environmental Setting, of this Draft EIR, is the Laemmle Theater located approximately 945 feet from the Project Site near the intersection of Lyons Avenue and Railroad Avenue, which has been constructed and currently in operation. All other projects are at longer distances away from the Project Site. Given this spatial separation, it is unlikely that the any tribal cultural resource materials that might be found at other development sites would be composed of

identical materials that may be found within the Project Site although there is a chance that the materials could be associated with the same tribal ancestry.

As determined above, the Project would not have a significant impact on tribal cultural resources with implementation of **Mitigation Measures MM-TCR-1** through **MM-TCR-7**. These mitigation measures reflect the City's required compliance with AB 52 and the culmination of tribal consultation with the Fernandeño Tataviam Band of Mission Indians. These mitigation measures provide for monitoring of ground-disturbing activities by a qualified tribal representative, who would have responsibility to identify potential tribal cultural resources, divert construction work while resources are being evaluated, and determine appropriate methods for recovery and disposition of any tribal cultural resources that may be found during Project construction. As such, the Project would not contribute to any significant cumulative impacts on tribal cultural resources, and cumulative impacts would be less than significant.

Mitigation Measures

Cumulative impacts with regard to tribal cultural resources were determined to be less than significant. Therefore, no additional mitigation measures beyond those identified specifically for the Project are required.

Level of Significance After Mitigation

Cumulative impacts with regard to tribal cultural resources were determined to be less than significant without additional mitigation measures beyond those identified specifically for the Project.

4.16 UTILITIES AND SERVICES SYSTEMS

This section of the Draft EIR describes the existing conditions and capacities for utilities and service systems related to water, wastewater, stormwater, dry utilities (electric, gas, and telecommunications), and solid waste. This section also analyzes the adequacy of existing supplies and infrastructure to meet Project demand and describes relevant plans and regulations.

Information and analyses presented in this section are based, in part, on the *Water Supply Assessment,* prepared for the Project by the Santa Clarita Valley Water Agency, dated October 5, 2022; and the *Preliminary Water Analysis for the Shadowbox Studios Project in the City of Santa Clarita,* prepared by Dexter Wilson Engineering, Inc. and dated December 2021; these reports are included in **Appendix M** of this Draft EIR.

4.16.1 ENVIRONMENTAL SETTING

WATER

Water Supply

Water service to the Project Site would be provided by the Santa Clarita Valley Water Agency (SCV Water), which was formed in January 2018, through the merger of the Castaic Lake Water Agency and its Santa Clarita Water Division (SCWD), Newhall County Water District, and the Valencia Water Company. Prior to the merger, the Castaic Lake Water Agency served as a wholesale water agency to acquire, treat, and deliver State Water Project (SWP) water supply throughout the Santa Clarita Valley, while SCWD, Newhall County Water District, and Valencia Water Company were the retail water purveyors. Following the merger, SCV Water now comprises three divisions, namely SCWD, the Newhall Water Division (NWD), and the Valencia Water Division, which have separate but interconnected distribution systems. These three divisions encompasses nearly the entire City of Santa Clarita and unincorporated portions of Los Angeles County; SCV Water also serves as a wholesale water provider to Los Angeles County Waterworks District (LACWWD) No. 36, which includes the unincorporated communities of Hasley Canyon and Val Verde. SCV Water's current service area includes a mix of residential and commercial, and light industrial land uses, mostly comprised of single-family homes, apartments, condominiums, and several local shopping centers and neighborhood commercial developments. SCV Water serves approximately 73,542 service connections.[1]

SCV Water's existing water resources include imported supplies, local groundwater, recycled water, and water from existing groundwater banking programs. Planned supplies include new groundwater production and additional banking programs. Imported water supplies consist primarily of SWP supplies and the Sacramento-San Joaquin Delta. The sole source of local groundwater in the Santa Clarita Valley is the Santa Clara River Valley Groundwater Basin's East Subbasin, which is composed of two aquifer systems, the Alluvium and the Saugus Formation.[2] **Table 4.16-1** summarizes the existing and planned supplies and projected demand in the service area (including agricultural, manufacturing, and industrial uses) during average/normal years, **Table 4.16-2** during single-dry years, and **Table 4.16-3** during multiple-dry years.[3]

1 SCV Water, Water Supply Assessment for Shadowbox Studios Development, October 5, 2022, pages 1-3 and 1-4.
2 SCV Water, 2020 Urban Water Management Plan, June 2021.
3 SCV Water, Water Supply Assessment for Shadowbox Studios Development, October 5, 2022, page 5-2.

Table 4.16-1
EXISTING AND PLANNED SUPPLIES AND DEMANDS WITHIN SERVICE AREA IN AVERAGE/NORMAL YEARS (ACRE-FEET)[a]

	2025	2030	2035	2040	2045	2050
Existing Supplies						
Groundwater	21,840	15,290	14,410	14,410	14,410	14,410
Recycled Water	450	450	450	450	450	450
Imported Water	64,360	62,410	63,067	62,107	62,107	62,107
Banking/Exchange Programs	0	0	0	0	0	0
Total Existing Supply	*86,650*	*78,150*	*77,927*	*76,967*	*76,967*	*76,967*
Planned Supplies						
Groundwater	12,845	22,660	26,280	26,280	26,280	26,280
Recycled	1,849	3,696	5,091	6,498	7,499	8,511
Banking Programs	0	0	0	0	0	0
Total Planned Supply	*14,694*	*26,356*	*31,371*	*32,778*	*33,779*	*34,791*
Total Existing and Planned Supplies	**101,334**	**104,506**	**109,298**	**109,745**	**110,746**	**111,758**
Total Projected Demand[b,c]	**76,400**	**81,700**	**88,700**	**93,600**	**97,500**	**101,000**

Notes:
[a] LACWWD #36 is included for purposes of providing regional completeness.
[b] Demands include savings from plumbing code/standards and active conservation. Demands account for estimated increase from climate change.
[c] Future demands include that of the Shadowbox Studios Development Project.
Source: SCV Water, Water Supply Assessment for Shadowbox Studios Development, Table 2-3 and Table 5-2, October 5, 2022.

Table 4.16-2
EXISTING AND PLANNED SUPPLIES AND DEMANDS WITHIN SERVICE AREA IN SINGLE-DRY YEARS (ACRE-FEET)[a]

	2025	2030	2035	2040	2045	2050
Existing Supplies						
Groundwater	24,450	24,210	23,470	23,470	23,470	23,470
Recycled Water	450	450	450	450	450	450
Imported Water	25,678	18,060	19,429	19,191	19,191	19,191
Banking/Exchange Programs	15,000	15,000	19,950	19,950	19,950	19,950
Total Existing Supply	*65,578*	*57,720*	*63,299*	*63,061*	*63,061*	*63,061*
Planned Supplies						
Groundwater	19,120	32,940	36,420	36,420	36,420	36,420
Recycled	1,849	3,696	5,091	6,498	7,499	8,511
Banking Programs	0	10,000	10,000	10,000	10,000	10,000
Total Planned Supply	20,969	46,636	51,511	52,918	53,919	54,931
Total Existing and Planned Supplies	**86,547**	**104,356**	**114,810**	**115,979**	**116,980**	**117,992**
Total Projected Demand[b,c,d]	**81,000**	**86,600**	**94,000**	**99,200**	**103,400**	**107,100**

Notes:
Values are rounded to the nearest hundred.
[a] LACWWD #36 is included for purposes of providing regional completeness.
[b] Demands include savings from plumbing code/standards and active conservation. Demands account for estimated increase from climate change.
[c] Demands assume a 6 percent increase above normal demand during dry years.
[d] Future demands include that of the Shadowbox Studios Development Project.
Source: SCV Water, Water Supply Assessment for Shadowbox Studios Development, Table 2-4 and Table 5-3, October 5, 2022.

Table 4.16-3
PROJECTED WATER DEMAND WITHIN SERVICE AREA IN MULTIPLE-DRY YEARS (ACRE-FEET)[a]

	2025	2030	2035	2040	2045	2050
Existing Supplies						
Groundwater	23,770	24,330	23,500	23,200	23,200	23,200
Recycled Water	450	450	450	450	450	450
Imported Water	45,380	39,480	40,440	41,090	41,090	40,970
Banking/Exchange Programs	16,550	15,550	17,970	19,950	19,879	16,809
Total Existing Supply	*86,150*	*79,810*	*82,360*	*84,690*	*84,619*	*81,429*
Planned Supplies						
Groundwater	17,430	24,330	27,820	28,521	28,521	28,521
Recycled	1,823	3,603	5,045	6,498	7,499	8,389
Banking Programs	0	6,000	10,000	10,000	10,000	10,000
Total Planned Supply	19,253	33,933	42,865	45,019	46,020	46,910
Total Existing and Planned Supplies	**105,403**	**113,743**	**125,225**	**129,709**	**130,640**	**128,340**
Total Projected Demand[b,c,d]	**77,830**	**83,620**	**90,570**	**95,780**	**99,670**	**102,870**

Imported Water Supplies

SCV Water's imported water supplies consist primarily of SWP supplies, which were first delivered to SCV Water (CLWA at the time) in 1980. From the SWP, SCV Water also has access to water from Flexible Storage Accounts in Castaic Lake, which are planned for dry-year use but are not strictly limited as such. In addition to its SWP supplies, SCV Water has an imported supply from the Buena Vista Water Storage District (BVWSD) and Rosedale Rio-Bravo Water Storage District (RRBWSD) in Kern County. Moreover, Newhall Land and Farming Company (also referred to as Five Point) has a water transfer supply from a source in Kern County that, for planning purposes, is anticipated to be available beginning in 2035.[4]

State Water Project Supplies

The SWP is the largest State-built, multi-purpose water project in the country. It was authorized by the California State Legislature in 1959, with the construction of most of the initial facilities completed by 1973. Today, the SWP includes 28 dams and reservoirs, 26 pumping and generating plants and approximately 660 miles of aqueducts. The primary water source for the SWP is the Feather River, a tributary of the Sacramento River. Storage released from Oroville Dam on the Feather River flows down natural river channels to the Sacramento-San Joaquin River Delta (Delta). While some SWP supplies are pumped from the northern Delta into the North Bay Aqueduct, the vast majority of SWP supplies are pumped from the southern Delta into the 444-mile-long California Aqueduct, which conveys water along the west side of the San Joaquin Valley to Edmonston Pumping Plant, where water is pumped over the Tehachapi Mountains, and the aqueduct then divides into the East and West Branches. SCV Water takes delivery of its SWP water at Castaic Lake, a terminal reservoir of the West Branch. From Castaic Lake, SCV Water delivers its SWP supplies to its customers through an extensive transmission pipeline system.[5]

The total planned annual delivery capability of the SWP was originally 4.23 million acre-feet (MAF). The initial SWP storage facilities were designed to meet SWP contractors' water demands

[4] SCV Water, Water Supply Assessment for Shadowbox Studios Development, October 5, 2022, page 3-1.
[5] SCV Water, Water Supply Assessment for Shadowbox Studios Development, October 5, 2022, page 3-2.

in the early years of the SWP, with the construction of additional storage facilities planned as demands increased. However, essentially no additional SWP storage facilities have been constructed since the early 1970s. SWP conveyance facilities were generally designed and have been constructed to deliver maximum amounts to all contractors. Today, the maximum SWP contractors' demands total approximately 4.17 MAF, with 9,200 AF being SCV Water's amount.[6]

Groundwater

The sole source of local groundwater for urban water supply in the Santa Clarita Valley is the Santa Clara River Valley Groundwater Basin, East Subbasin (Basin). The un-adjudicated Basin is comprised of two aquifer systems—the Alluvium and the Saugus Formation. The Alluvium generally underlies the Santa Clara River and adjacent areas, including its several tributaries, to maximum depths of about 200 feet; and the Saugus Formation underlies practically the entire Upper Santa Clara River area, to depths of at least 2,000 feet. There are also some scattered outcrops of Terrace deposits in the Basin that likely contain limited amounts of groundwater. However, since these deposits are located in limited areas situated at elevations above the regional water table and are also of limited thickness, they are of no practical significance as aquifers for municipal water supply; consequently, they have not been developed for any significant water supply in the Basin and are not included as part of the existing or planned groundwater supplies. The Basin is bordered on the north by the Piru Mountains, on the west by impervious rocks of the Modelo and Saugus Formations and a constriction in the alluvium, on the south by the Santa Susana Mountains, and on the south and east by the San Gabriel Mountains. The extent of the basin generally coincides with the outer extent of the Alluvium and Saugus Formation.[7]

Transfers and Exchanges

An opportunity available to SCV Water to increase water supplies is to participate in voluntary Water transfer programs. Since the drought of 1987-1992, the concept of water transfer has evolved into a viable supplemental source to improve supply reliability. Up to 27 million AF of water are delivered for agricultural use every year. Over half of this water use is in the Central Valley, and much of it is delivered by, or adjacent to, SWP and Central Valley Project conveyance facilities. This proximity to existing water conveyance facilities could allow for the voluntary transfer of water to many urban areas, including SCV Water, via the SWP. Such water transfers can involve water sales, conjunctive use, groundwater substitution, and water sharing.[8]

Water System

SCV Water also provides and maintains the water system throughout its service area. SCV Water Zone 1 water pressure zone system currently serves the Project area. A 24-inch pipeline is located in Placerita Canyon Road, Arch Street, and 13th Street, which then continues north in Railroad Avenue on the west side of the railroad right-of-way. Parallel to this pipeline in Arch Street and 13th Street is a 12-inch pipeline. In addition, an existing 6-inch pipeline crosses the northern portion of the Project Site, extending from Railroad Avenue east to Alderbrook Drive.[9]

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6 SCV Water, Water Supply Assessment for Shadowbox Studios Development, October 5, 2022, page 3-4.
7 SCV Water, Water Supply Assessment for Shadowbox Studios Development, October 5, 2022, page 3-17.
8 SCV Water, Water Supply Assessment for Shadowbox Studios Development, October 5, 2022, page 3-48.
9 Dexter Wilson Engineering, Inc., Preliminary Water Analysis for the Blackhall Studios Project in the City of Santa Clarita, December 21, 2021.

WASTEWATER

The City's Public Works Department manages the sanitary sewer collection system, which serves a population of approximately 213,000 residents and consists of about 450 miles of gravity sewer lines and a total of 3 pump stations.[10] The City contracts with the Consolidated Sewer Maintenance District (CSMD), managed by the County of Los Angeles Department of Public Works (LACDPW), for the maintenance of its sanitary sewer system and field operations. The CSMD provides sewage collection services to over 2 million customers in unincorporated County areas, 37 member cities, and 2 contracted cities. The CSMD system includes over 4,600 miles of sanitary sewers, 155 pump stations, and 4 wastewater treatment plants.[11]

The City's local sewers discharge into the Los Angeles County Sanitation Districts (LACSD) facilities for conveyance, treatment, and disposal. The LACSD consists of 24 independent special districts serving about 5.5 million people in Los Angeles County. The LACSD's service areas cover approximately 850 square miles, containing 78 cities and unincorporated areas in the County. The LACSD operates and maintains the regional wastewater collection system, which includes approximately 1,400 miles of sewers, 49 pumping plants, and 11 wastewater treatment plants that transport and treat about half the wastewater in Los Angeles County.[12]

The City's sewer system conveys wastewater and wastewater solids from the local sewer lines, which are either owned by the City of Santa Clarita or Los Angeles County, to the Saugus and Valencia Water Reclamation Plants (WRPs).[13] The Saugus WRP is located at 26200 Springbrook Avenue in the City of Santa Clarita and provides primary, secondary, and tertiary treatment for 6.5 million gallons per day (mgd) of wastewater. The Valencia WRP is located at 28185 The Old Road in the community of Valencia, in Los Angeles County unincorporated area, and provides primary, secondary, and tertiary treatment for 21.6 mgd of wastewater. The Valencia WRP also has solids processing facilities and processes all wastewater solids generated in the Santa Clarita Valley Sanitation District.[14]

The Project Site contains an existing 18-inch sewer line that extends along the eastern boundary of the Project Site from 12th Street to just south of the Placerita Creek at the north, then cuts east-west to adjacent to the railroad right-of-way, then extends north-south to the northwestern boundary of the Project Site.[15] However, the Project Site is vacant and undeveloped and does not currently generate any wastewater.

STORMWATER FACILITIES

The Project Site is currently undeveloped land, bordered by 12th Street, Arch Street, and 13th Street on the south; a railroad right-of-way and Railroad Avenue on the west; Metropolitan Water District right-of-way on the east; and slopes maintained by the adjacent residential uses to the

[10] City of Santa Clarita, Sewer System Management Plan, 2020.
[11] Los Angeles County Department of Public Works, About Us, https://pw.lacounty.gov/SMD/SMD/Page_08.cfm, accessed March 30. 2023.
[12] LACSD, Our Agency, https://www.lacsd.org/about-us/who-we-are/our-agency, accessed March 30, 2023.
[13] LACSD, Wastewater Collection Systems, https://www.lacsd.org/services/wastewater-sewage/facilities/wastewater-collection-systems, accessed March 30, 2023.
[14] LACSD, Saugus Water Reclamation Plant, https://www.lacsd.org/services/wastewater-sewage/facilities/saugus-water-reclamation-plant, accessed March 30, 2023; Valencia Water Reclamation Plant, https://www.lacsd.org/services/wastewater-sewage/facilities/valencia-water-reclamation-plant, accessed March 30, 2023.
[15] City of Santa Clarita, Mapping Your City, https://maps.santa-clarita.com/portal/apps/webappviewer/index.html?id=4b3cfb271314475db6518999b4747876, accessed March 29, 2023.

north. Placerita Creek, which traverses the northern portion of the Project Site, flows into the northwest-flowing Newhall Creek, creating the South Fork of the Santa Clara River.

The Project Site is located within flatland terrane with the exception of the north-northeastern portion of the Project Site, which has moderate to steep south-southwestern facing hillside terrain.[16] This portion of the Project Site slopes downward to a detention basin.

Surface drainage currently flows to the west-northwest and southwest at the Project Site's northernmost portion to either Placerita Creek or Newhall Creek and ultimately to the Santa Clara River and the Pacific Ocean. Stormwater is conveyed through surface runoff. The existing drainage area extends east and upstream, then flows over land where it crosses under 12th Street via an existing 48-inch publicly maintained pipe for small or medium storms. The drainage area flows over land and across 12th Street via the same pipe for large storms. Stormwater discharges from the Project Site are not considered direct discharges, as defined by the State Water Resources Control Board. Section 303(d) of the federal Clean Water Act (CWA) requires states to identify water bodies that are "impaired" or those that do not meet water quality standards and are not supporting their beneficial uses. The Project Site discharges to the Santa Clara River Reach 6, which is not listed for water quality impairment on the most recent CWA Section 303(d) List of Impaired Waters for sediment and pH.[17]

SOLID WASTE

The City of Santa Clarita's commercial franchised waste hauler is Burrtec Waste Industries. Burrtec provides waste collection services, including organics recycling, mixed recycling, and organic waste collection to all commercial and industrial locations within the City.[18] Beginning July 1, 2023, Burrtec will be the new waste services provider for all residential and commercial waste services in the City.[19] Burrtec also operates several material recovery facilities and transfer stations throughout Southern California and the Salton City Landfill.

The City of Santa Clarita is served primarily by three landfills:[20]

- Chiquita Canyon Landfill: A 639-acre landfill located at 29201 Henry Mayo Drive in the unincorporated community of Castaic. The Chiquita Canyon Landfill has a maximum permitted throughput of 12,000 tons per day, with a remaining capacity of 60,408,000 cubic yards as of August 24, 2018.[21]
- Antelope Valley Landfill: A 185-acre landfill located at 1200 West City Ranch Road in the City of Palmdale. The Antelope Valley Landfill has a maximum permitted throughput of 5,548 tons per day, with a remaining capacity of 17,911,225 cubic yards as of October 31, 2017.[22]

16 Flatland terrane: A fault-bounded area or region with a distinctive stratigraphy, structure, and geological history.
17 Storm Water Resources, Inc, Stormwater Pollution Prevention Plan for Shadowbox Studios-Santa Clara, April 2022.
18 City of Santa Clarita, Commercial Waste Services, https://greensantaclarita.com/trash-and-recycling/commercial-trash-and-recycling/commercial-waste-services/, accessed January 12, 2023.
19 City of Santa Clarita, Upcoming Hauler Transition and Organics Recycling, https://greensantaclarita.com/upcoming-hauler-transition-and-organics-recycling/, accessed January 12, 2023.
20 City of Santa Clarita, One Valley One Vision General Plan EIR, 2010.
21 CalRecycle, Chiquita Canyon Sanitary Landfill, https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3574?siteID=1037, accessed January 12, 2023.
22 CalRecycle, Antelope Valley Public Landfill, https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3458?siteID=1364, accessed January 12, 2023.

- Sunshine Canyon Landfill: A 1,036-acre landfill located at 14747 San Fernando Road in the City of Los Angeles. The Sunshine Canyon Landfill has a maximum permitted throughput of 12,100 tons per day, with a remaining capacity of 77,900,000 cubic yards as of May 31, 2018.[23]

In addition, the Burrtec-operated Salton City Landfill, located at 935 West Highway 86 in Salton City, has a maximum permitted throughput of 6,000 tons per day, with a remaining capacity of 1,264,170 cubic yards as of September 30, 2018.[24]

The Project Site is vacant and undeveloped and does not currently generate any solid waste.

DRY UTILITIES

Electric Power

Southern California Edison (SCE) provides electric service to the City of Santa Clarita. SCE provides electric power to 15 million people in 50,000 square miles across Central, coastal, and Southern California, including 180 incorporated cities and 15 counties. SCE monitors and maintains a vast electricity system that contains 12,635 miles of transmission lines, 91,375 miles of distribution lines, 720,800 distribution transformers, and 2,959 substation transformers.[25]

SCE operates seven substations in the City. The nearest substation to the Project Site is the Newhall substation, located 1.7 miles southwest at the corner of Lyons Avenue and Wiley Canyon Road. The nearest major electrical infrastructure contains two transmission lines and two electrical transmission lines that run south along the west side of Railroad Avenue and continue south along Orchard Village Road.[26] Currently, the Project Site is vacant and undeveloped and is not currently served by any electricity infrastructure.

Natural Gas

Southern California Gas Company (SoCalGas) provides natural gas services to the City of Santa Clarita. SoCalGas provides natural gas to 21.8 million consumers with a service area of approximately 24,000 square miles throughout Central and Southern California.[27]

SoCalGas manages the Honor Rancho Natural Gas Storage Facility, located at 28300 Brady Parkway, located in the northwestern corner of the City, north of Newhall Ranch Road and east of I-5. Honor Rancho, which is composed of naturally occurring underground storage reservoirs, provides natural gas all year, especially during peak periods. SoCalGas operates numerous wells, natural gas compressors, a dehydration system, pipelines and various buildings, and ancillary equipment at the facility.[28] Within the City, SoCalGas service lines range in size from 2- to 34-

[23] CalRecycle, Sunshine Canyon City/County Landfill, https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/259?siteID=4702, accessed January 12, 2023.
[24] CalRecycle, Salton City Solid Waste Site, https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/4186?siteID=598, accessed January 12, 2023.
[25] SCE, Who We Are, https://www.sce.com/about-us/who-we-are, accessed January 11, 2023.
[26] California Energy Commission, California Electric Infrastructure App, https://cecgis-caenergy.opendata.arcgis.com/apps/ad8323410d9b47c1b1a9f751d62fe495/explore, accessed January 11, 2023.
[27] SoCalGas, Company Profile, https://www.socalgas.com/about-us/company-profile, accessed January 12, 2023.
[28] SoCalGas, Honor Rancho Natural Gas Storage Facility, https://www.socalgas.com/stay-safe/pipeline-and-storage-safety/storage-facility-safety/honor-rancho, accessed January 12, 2023.

inch mains. A 30-inch gas line runs along the Santa Clara River in the eastern portion of the City, while a 34-inch and a 22-inch main cross the river in the western portion of the City.[29]

The nearest gas pipelines to the Project Site contain a high-pressure distribution line that runs along Railroad Avenue and continues south to Newhall Avenue, and a transmission line that runs along Orchard Village Road, continues east along Lyons Avenue, and continues south along Railroad Avenue to Newhall Avenue.[30] The Project Site is vacant and undeveloped and is not currently served by any natural gas infrastructure.

Telecommunication Facilities

Internet services in the City are provided by AT&T, Exede, Frontier Communications, and Spectrum. AT&T is also the local provider of telephone services although other companies offer service in the area, including HughesNet, Exede, and Spectrum.[31] The Project Site is vacant and undeveloped and is not currently served by any telecommunication facilities.

4.16.2 REGULATORY AND PLANNING FRAMEWORK

WATER SUPPLY

State

Urban Water Management Planning Act

In 1983, the California legislature enacted the Urban Water Management Planning Act. The requirements for Urban Water Management Plans (UWMPs) are found in California Water Code Sections 10610-10656 and 10608. Every urban water supplier that either provides over 3,000 acre-feet of water annually or serves more than 3,000 urban connections is required to submit a UWMP. In the UWMPs, urban water suppliers must assess the reliability of water sources over a 20-year planning time frame, describe demand management measures and water shortage contingency plans, and discuss the use and planned use of recycled water. The Urban Water Management Planning Act states that every urban water supplier should make every effort to ensure the appropriate level of reliability in its water service sufficient to meet the needs of its various categories of customers during normal, dry, and multiple dry years. It is the act's intention to permit levels of water management planning commensurate with the numbers of customers served and the volume of water supplied.

Senate Bill 610

Senate Bill (SB) 610 (Water Code Section 10910[c][2]) makes changes to the Urban Water Management Planning Act to require additional information in UWMPs if groundwater is identified as a source available to the supplier. Required information includes a copy of any groundwater management plan adopted by the supplier, a copy of the adjudication order or decree for adjudicated basins, and if non-adjudicated, whether the basin has been identified as being overdrafted or projected to be overdrafted in the most current California Department of Water

[29] City of Santa Clarita, One Valley One Vision General Plan EIR, 2010.

[30] SoCalGas, Gas Transmission Pipeline Map, https://socalgas.maps.arcgis.com/apps/webappviewer/index.html?id=c85ced1227af4c8aae9b19d677969335, accessed January 12, 2023.

[31] Santa Clarita Guide, Santa Clarita Residential Utilities, https://santaclaritaguide.com/ResidentialUtilities.html, accessed January 12, 2023.

Resources (DWR) publication on that basin. If the basin is in overdraft, the plan must include current efforts to eliminate any long-term overdraft.

A key provision of SB 610 requires that any project subject to the California Environmental Quality Act (CEQA) supplied with water from a public water system be provided a specified water supply assessment (WSA), except as specified in the law. In accordance with Water Code Section 10912, projects subject to CEQA requiring submittal of a WSA include the following:

- Residential developments of more than 500 dwelling units;
- Shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- Hotels, motels, or both, having more than 500 rooms;
- Industrial, manufacturing, or processing plant, or industrial park of more than 40 acres of land, more than 650,000 square feet of floor area, or employing more than 1,000 persons;
- Mixed-use projects that include one or more of the above-identified categories; or
- A project that would demand an amount of water equivalent to or greater than the amount of water required by a 500-dwelling unit project.

Upon full buildout of the Project, the proposed film and television studio campus on the Project Site would have an overall building area of approximately 1,285,800 square feet. As such, the provisions of SB 610 are applicable, and the Project requires a WSA.

Assembly Bill 901

Assembly Bill (AB) 901 requires UWMPs to include information relating to the quality of existing sources of water available to an urban water supplier over given time periods and the manner in which water quality affects water management strategies and supply.

Assembly Bill 1420

Effective January 1, 2009, AB 1420 amended the Urban Water Management Planning Act to require that water management grants or loans made to urban water suppliers and awarded or administered by DWR, the State Water Resources Control Board, or the California Bay-Delta Authority or its successor agency be conditioned on implementation of the water demand management measures.

Senate Bill X7-7 (Chapter 4, Statutes of 2009)

SB X7-7, the Water Conservation Act of 2009, requires the State to achieve a 20 percent reduction in urban per capita water use by December 31, 2020. The responsibility for this conservation falls to local water agencies, which must increase water use efficiency through promotion of water conservation standards that are consistent with the California Urban Water Conservation Council's best management practices (BMP). Each urban retail water supplier was also required to develop urban water use targets and an interim urban water use target by July 1, 2011, based on the

alternative methods set out in the 2009 act. The agencies must meet those targets by the 2020 deadline. Based on its 2020 UWMP, SCV Water complied with its target reduction by December 31, 2020.[32]

California Water Plan

The California Water Plan is the State's strategic plan for sustainably managing and development water resources. As required by Water Code Section 10005(a), the plan is updated every five years by the DWR and presents the status and trends of the State's water-dependent natural resources; water uses and supplies; and future agricultural, urban, and environmental water demands and supplies for a range of plausible climate and socioeconomic scenarios. The plan is intended to guide State investments in innovation and infrastructure and advance integrated watershed management. The California Water Plan was last updated in 2018 and is undergoing an update for 2023.

California Plumbing Code

Title 24, Part 5 of the California Code of Regulations establishes the California Plumbing Code, which sets efficiency standards, such as maximum flow rates, for all new federally regulated plumbing fittings and fixtures, including showerheads and lavatory faucets.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) of 2014 comprised several assembly and senate bills (AB 1739, SB 1168, and SB 1319), and requires local agencies to adopt groundwater management plans that are tailored to the resources and needs of their communities. The act requires formation of local groundwater sustainability agencies to assess local water basin conditions and adopt locally based management plans. Local Groundwater Sustainability Agencies (GSAs) were required to be formed by June 30, 2017. Over 260 GSAs in over 140 basins were formed by the SGMA's initial planning milestone. However, as the SGMA continues to be implemented and the priorities and boundaries of some basins change, new GSAs will be formed, and existing GSAs may want to reorganize, consolidate, or withdraw from managing in all or part of a basin.

Under Water Code Section 10720.7, GSAs responsible for high- and medium-priority basins that are subject to critical conditions of overdraft must adopt groundwater sustainability plans by January 31, 2020. Plans for high- and medium-priority basins that are not in critical overdraft were required to be adopted by January 31, 2022. The SGMA gives GSAs 20 years to implement plans and achieve long-term groundwater sustainability, and protect existing surface water and groundwater rights. The SGMA provides local GSAs with the authority to require registration of groundwater wells, measure and manage extractions, require reports, assess fees, and revise groundwater basin boundaries.

To meet the SGMA requirements, the Santa Clarita Valley GSA was formed in 2017 and developed a groundwater sustainability plan in 2022.[33]

[32] SCV Water, 2020 Urban Water Management Plan, June 2021.

[33] Santa Clarita Valley Groundwater Sustainability Agency, Santa Clara River Valley East Groundwater Subbasin Groundwater Sustainability Plan, January 2022.

State Model Water Efficient Landscape Ordinance

The State Model Water Efficient Landscape Ordinance (MWELO) promotes the efficient use of water in new or retrofitted landscapes by establishing irrigation system efficiency standards, which include greywater usage, on-site stormwater capture, limiting the percentage of turf planted in new landscapes, and reporting on the implementation and enforcement of the ordinance by local agencies. The MWELO is also referenced by Title 24, Part 11, Chapters 4 and 5 of the California Green Building Standards (CALGreen) Code. Local agencies are required to either adopt the MWELO or adopt a local ordinance, which must be at least as effective in conserving water as MWELO. Santa Clarita Municipal Code (SCMC) Section 17.51.030, as discussed below, implements the provisions of the MWELO at the local level.

Local

Santa Clarita Valley Water Agency 2020 Urban Water Management Plan

SCV Water adopted its 2020 Urban Water Management Plan (UWMP) in June 2021. The 2020 UWMP provides a broad perspective on a number of water supply issues and is a planning tool that generally guides water supply and resource management in the Santa Clarita Valley. The 2020 UWMP provides a detailed summary of present and future water resources and demands within the Santa Clarita Valley service area and assesses its water resource needs. The 2020 UWMP includes water supply and demand forecasts that are based on the population projections in the general plans of the jurisdictions within the SCV Water service area. Specifically, the 2020 UWMP provides water supply planning for a 30-year planning period in five-year increments and identifies water supplies needed to meet existing and future demands. In order to estimate demand through 2050, population and water use projections were made based upon existing land uses and planned land use development compiled for the service area, including the City of Santa Clarita and County of Los Angeles land use plans. The 2020 UWMP also discusses supply reliability planning, drought risk assessment, and the implementation of water conservation and recycling measures.

City of Santa Clarita Municipal Code Chapter 9.38, Water Conservation

SCMC Sections 9.38.010 through 9.38.050 establish water use guidelines and restrictions which reinforce the water use reduction goals established in the adopted Water Shortage Contingency Plan (1991). This chapter outlines both the appropriate water use restrictions in response to drought conditions and the continual water use practices that incorporate measures for efficient use of water in irrigation and indoor plumbing, including drought-tolerant landscaping and low-flow fixtures.

City of Santa Clarita Municipal Code Section 17.51.030, Development Standards – Landscaping and Irrigation Standards

SCMC Section 17.51.030 sets forth the landscaping and irrigation standards for all new development in the City and codifies the implementation of the state MWELO. Specifically, the purpose of this section is to encourage the efficient use of water through appropriate low water-using plant materials, water-conserving irrigation design, and regular maintenance of landscaped areas. Furthermore, the intent of this section is to encourage the appropriate design, installation, maintenance, and management of landscapes so that water demand can be decreased, runoff can be retained, and flooding can be reduced without a decline in the quality or quantity of landscapes. Lastly, this section is intended to promote the conservation of potable water by

maximizing the use of recycled water and other water-conserving technology for appropriate applications.

City of Santa Clarita Plumbing Code

The City has adopted, by reference, the 2019 California Plumbing Code. Specifically, Title 20 of the SCMC sets forth the City's Plumbing Code with amendments to portions of the State Code.[34]

City of Santa Clarita General Plan

The applicable goals, objectives, and policies from the City of Santa Clarita General Plan Conservation and Open Space Element and Land Use Element are listed below.[35]

Conservation and Open Space Element – Water Resources

- Goal CO 4: An adequate supply of clean water to meet the needs of present and future residents and businesses, balanced with the needs of natural ecosystems.
    - Objective 4.1: Promote water conservation as a critical component of ensuring adequate water supply for Santa Clarita Valley residents and businesses.
        - Policy 4.1.3: Require low water use landscaping in new residential subdivisions and other private development projects, including a reduction in the amount of turf-grass.
        - Policy 4.1.5: Promote the use of low-flow and/or waterless plumbing fixtures and appliances in all new non-residential development and residential development of five or more dwelling units.
        - Policy 4.1.7: Apply water conservation policies to all pending development projects, including approved tentative subdivision maps to the extent permitted by law. Where precluded from adding requirements by vested entitlements, encourage water conservation in construction and landscape design.
    - Objective CO 4.2: Work with water providers and other agencies to identify and implement programs to increase water supplies to meet the needs of future growth.
        - Policy 4.2.2: Require new development to provide the infrastructure needed for delivery of recycled water to the property for use in irrigation, even if the recycled water main delivery lines have not yet reached the site, where deemed appropriate by the reviewing authority.
        - Policy 4.2.6: Require that all new development proposals demonstrate a sufficient and sustainable water supply prior to approval.

Land Use Element – Environmentally Responsible Development

- Goal LU 7: Environmentally responsible development through site planning, building design, waste reduction, and responsible stewardship of resources.
    - Objective LU 7.2: Ensure an adequate water supply to meet the demands of growth.

[34] The 2022 California Plumbing Code (California Code of Regulations, Title 24, Part 5) is effective January 1, 2023.
[35] City of Santa Clarita, General Plan, Land Use Element, 2011; Conservation and Open Space Element, 2011.

- Policy 7.2.3: Require that all new development proposals demonstrate a sufficient and sustainable water supply prior to approval.

- Objective LU 7.4: Promote water conservation through building and site design.
  - Policy 7.4.1: Require the use of drought tolerant landscaping, native California plant materials, and evapotranspiration (smart) irrigation systems.
  - Policy 7.4.2: Require the use of low-flow fixtures in all non-residential development and residential development with five or more dwelling units, which may include but are not limited to water conserving shower heads, toilets, waterless urinals and motion-sensor faucets, and encourage use of such fixtures in building retrofits as appropriate.

Land Use Element – Public Facilities

- Goal LU 9: Adequate public facilities and services, provided in a timely manner and in appropriate locations to serve existing and future residents and businesses.
  - Objective LU 9.1: Coordinate land use planning with provision of adequate public services and facilities to support development.
    - Policy 9.1.1: Ensure construction of adequate infrastructure to meet the needs of new development prior to occupancy.
    - Policy 9.1.2: Coordinate review of development projects with other agencies and special districts providing utilities and other services.

WASTEWATER

Federal

The National Pollutant Discharge Elimination System (NPDES) permit system was established as part of the CWA to regulate discharges from all point sources. Through this system, point sources of pollution must obtain a discharge permit from the proper authority, often a state, federal agency (e.g., US Environmental Protection Agency [USEPA]), a tribe, or a territory. The NPDES permits cover industrial and municipal discharges, storm sewer discharges in larger cities, stormwater associated with industrial activity, runoff from construction sites disturbing more than one acre, mining operations, and animal feedlots and aquaculture facilities above certain thresholds. For point source discharges, such as municipal sewage plants and industrial uses, each NPDES permit contains limits on allowable concentrations and mass emissions of pollutants contained in the discharge. Indirect dischargers, those that send wastewater into municipal sewer systems that flow into a sewage treatment plant, are not required to obtain NPDES permits. These indirect discharges are covered by another CWA program, called pretreatment.

State

California State Water Resources Control Board

The State Water Resources Control Board (SWRCB) is responsible for ensuring the highest reasonable quality of waters of the State, while allocating those waters to achieve the optimum balance of beneficial uses. As established by Title 23, Part 26 of the California Code of Regulations, the board oversees the Wastewater Treatment Plant Classification, Operator

Certification, and Contract Operator Registration Program, which is designed to protect public health and the environment by providing for the effective operation of wastewater and water recycling treatment plants through the certification of wastewater treatment plant operators.

California Green Building Standards Code

The CALGreen Code is set forth in California Code of Regulations Title 24, Part 11, and establishes voluntary and mandatory standards pertaining to the planning and design of sustainable site development and water conservation, among other issues. Under the CALGreen Code, all flush toilets are limited to 1.28 gallons per flush, and urinals are limited to 0.5 gallons per flush. In addition, maximum flow rates for faucets are established at 2.0 gallons per minute (gpm) at 80 pounds per square inch (psi) for showerheads, 1.2 gpm at 60 psi for residential lavatory faucets, and 1.8 gpm at 60 psi for kitchen faucets.

Local

City of Santa Clarita Sewer System Management Plan

On May 2, 2006, the SWRCB adopted Statewide General Waste Discharge Requirements and Monitoring and Reporting Program (WDRs) by issuing Order No. 2006-0003. The WDRs have two requirements: owners and operators of publicly owned collection sewer systems a mile long or greater must apply for coverage under the WDRs, and these owners and operators must develop and implement a Sewer System Management Plan (SSMP). The City's SSMP seeks to minimize sanitary sewer overflows (SSO) to the greatest extent practicable throughout the City's sanitary sewer collection system. The SSMP contains specific goals and actions to address the adequate maintenance and operation of the City's sewer system and to prevent SSOs or manage SSOs if they occur. As the CSMD provides operation and maintenance services for the City's sewer facilities, the City's SSMP is similar to the CSMD's SSMP.

City of Santa Clarita General Plan

The applicable goals, objectives, and policies from the City of Santa Clarita General Land Use Element are listed below.[36]

<u>Land Use Element – Public Facilities</u>

- Goal LU 9: Adequate public facilities and services, provided in a timely manner and in appropriate locations to serve existing and future residents and businesses.
  - Objective LU 9.1: Coordinate land use planning with provision of adequate public service and facilities to support development
    - Policy LU 9.1.1: Ensure construction of adequate infrastructure to meet the needs of new development prior to occupancy.
  - Objective 9.2: Coordination of City and County sewer master planning and sewer mitigation to support future development and avoid fiscal impacts to local government or the existing community.
    - Policy 9.2.2: Require that all new development mitigates its impact on existing sewer capacity by upgrading facilities when warranted or payment of a fee to allow construction of new facilities when needed.

[36] City of Santa Clarita, General Plan, Land Use Element, June 2011.

- Policy 9.2.4: Facilitate the efficient construction of sewer infrastructure by sizing facilities to accommodate anticipated future sewer flows within the sewershed.
- Policy 9.2.5: Cooperate with the development community to allow reimbursement for the cost of constructed sewer facilities with a capacity that exceeds what would be required to mitigate a project's own sewer impact.
- Policy 9.2.6: Coordinate to ensure that new development projects have agreed to mitigate both City and County sewer impacts prior to project approval.

STORMWATER FACILITIES

Federal

The CWA, formerly known as the Water Pollution Control Act, was first introduced in 1948 with major amendments in 1961, 1966, 1970, 1972, 1977, and 1987. The CWA authorizes federal, state, and local entities to cooperatively create comprehensive programs for eliminating or reducing the pollution of state waters and tributaries. Amendments enacted in 1970 created the USEPA, while amendments enacted in 1972 established the NPDES permit program, which prohibits discharge of pollutants into the nation's waters without procurement of a NPDES permit from the USEPA. Although federally mandated, the NPDES permit program is generally administered at the state level.

Amendments enacted in 1977 mandated development of a BMP Program at the state level and renamed the Water Pollution Control Act to the CWA, which is universally used today. The CWA was amended in 1987 to require the USEPA to create specific requirements for discharges. In response to the 1987 amendments, Phase I of the USEPA NPDES Program required NPDES permits for (1) municipal separate storm sewer systems (MS4) permits generally serving, or located in, incorporated cities with 100,000 or more people (referred to as municipal permits); (2) 11 specific categories of industrial activity (including landfills); and (3) construction activity that disturbs five acres or more of land. As of March 2003, Phase II of the NPDES Program extended the requirements for NPDES permits to numerous small MS4s, construction sites of one to five acres, and industrial facilities owned or operated by small MS4s, which were previously exempted from permitting.

The USEPA delegated the responsibility of administering portions of the CWA to state and regional agencies, including the State of California. In California, the NPDES stormwater permitting program is administered by the SWRCB. The SWRCB was created by the legislature in 1967. The joint authority of water distribution and water quality protection allows the SWRCB to provide protection for the State's waters, through its nine Regional Water Quality Control Boards (RWQCBs). The RWQCBs develop and enforce water quality objectives and implement plans that will best protect California's waters, acknowledging areas of different climate, topography, geology, and hydrology. The RWQCBs develop "basin plans" for their hydrologic areas, issue WDRs, enforce action against stormwater discharge violators, and monitor water quality.

Regional

Los Angeles Regional Water Quality Control Board Basin Plan

As required by the California Water Commission, the Los Angeles RWQCB has adopted the Basin Plan, which addresses the following objectives:

- Designates beneficial uses for surface and ground waters;
- Sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's Antidegradation Policy; and
- Describes implementation programs to protect all waters in the Los Angeles region.

In addition, the Basin Plan incorporates (by reference) all applicable State and Los Angeles RWQCB plans and policies and other pertinent water quality policies and regulations. The Basin Plan is a resource for the Los Angeles RWQCB, entities who use water and/or discharge wastewater in the Los Angeles region, and other agencies and organizations involved in environmental permitting and resource management activities.

NPDES Permit Program

The NPDES permit program was first established under authority of the CWA to control the discharge of pollutants from any point source into the waters of the United States. In California, the NPDES stormwater permitting program is administered by the SWRCB through its nine RWQCBs. The joint authority of water distribution and water quality protection allows the SWRCB to provide protection for the State's waters through the RWQCBs. The Los Angeles RWQCB issues combined NPDES permits under the CWA and WDRs (under the California Water Commission) to point dischargers of waste to surface waters. To ensure protection of water quality, NPDES permits may contain effluent limitations for pollutants of concern, pollutant monitoring frequencies, reporting requirements, schedules of compliance when appropriate, operating conditions, BMPs, and administrative requirements. NPDES permits apply to publicly owned treatment works discharges, industrial wastewater discharges, and municipal, industrial, and construction site stormwater discharges.

Los Angeles County Low Impact Development Standards Manual

The LACDPW's Low Impact Development (LID) Standards Manual outlines stormwater quality and quantity control design standards. These design standards are also outlined in SCMC Section 17.95 and require certain projects to retain stormwater on-site through infiltration, evapotranspiration, and stormwater harvest, as feasible. Pursuant to SCMC Section 17.95, development projects must retain stormwater quality design volume on-site, which is defined as the volume of runoff produced from a 0.75-inch, 24-hour rain event, or the 85th percentile 24-hour runoff event, as determined by the Los Angeles County 85th percentile precipitation isohyetal map, whichever is greater.

Los Angeles County Hydrology Manual

The LACDPW's Hydrology Manual provides a basis of design for storm drainage facilities. The manual requires that a storm drain conveyance system be designed for a 25-year storm event and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. Areas with sump conditions are required to have a storm drain conveyance system capable of conveying flow from a 50-year storm event.[37] Los Angeles County also limits the allowable discharge into existing storm drain facilities based on its MS4 permit, which is enforced on all new developments that discharge directly into the MS4 system.

[37] Sump condition: A condition where water is restricted to an inlet area because the inlet is located at a low point.

As required by the LACDPW, all public storm facilities must be designed in conformity with the standards set forth by Los Angeles County. The LACDPW reviews and approves MS4 plans prior to construction. Any proposed increases in discharge directly into Los Angeles County facilities, or proposed improvements of Los Angeles County-owned MS4 facilities, such as catch basins and drainage lines, require approval from the Los Angeles County Flood Control District to ensure compliance with the municipal NPDES permit requirements.

Local

City of Santa Clarita Stormwater and Urban Runoff Pollution Control (SCMC Chapter 10.04)

SCMC Section 10.04.070, Construction Activity Stormwater Measures, identifies specific requirements related to water runoff and discharges during construction in the City. These requirements include, but are not limited to, the implementation of a grading and construction activity runoff control program adequate to accomplish the following:

- Retain on-site the sediments generated on or brought to the project site, using treatment control or structural BMPs;
- Retain construction-related materials and wastes, spills, and residues at the project site and prevent discharges to streets, drainage facilities, the MS4, receiving waters, or adjacent properties;
- Contain non-stormwater runoff from equipment and vehicle washing at the project site; and
- Control erosion from slopes and channels through use of effective BMPs, such as limitation of grading during the wet season; inspection of graded areas during rain events; planting and maintenance of vegetation on slopes, if any; and covering any slopes susceptible to erosion.

City of Santa Clarita Stormwater Mitigation Plan Implementation (SCMC Chapter 17.95)

SCMC Chapter 17.95 identifies certain requirements for post-construction stormwater activities for development projects to comply with the NPDES and MS4 permits. This chapter requires that each project develop and implement a mitigation plan to lessen the water quality impacts of development by using smart growth practices, BMPs, and to integrate LID design principles to mimic pre-development hydrology conditions through infiltration, evapotranspiration, rainfall harvest, and use.

City of Santa Clarita General Plan

The applicable goals, objectives, and policies from the City of Santa Clarita General Plan Land Use Element and Conservation and Open Space Element are listed below.[38]

<u>Land Use Element – Environmentally Responsible Development</u>

- Goal LU 7: Environmentally responsible development through site planning, building design, waste reduction, and responsible stewardship of resource.
    - Objective LU 7.3: Protect surface and ground water quality through design of development sites and drainage improvements.

[38] City of Santa Clarita, General Plan, Land Use Element, 2011; Conservation and Open Space Element, 2011.

- Policy LU 7.3.2: Maintain stormwater runoff onsite by directing drainage into rain gardens, natural landscaped swales, rain barrels, permeable areas, and use of drainage areas as design elements, where feasible and reasonable.
- Policy LU 7.3.3: Seek methods to decrease impermeable site area where reasonable and feasible, in order to reduce stormwater runoff and increase groundwater infiltration, including use of shared parking and other means as appropriate.

Conservation and Open Space Element – Water Resources

- Goal CO 4: An adequate supply of clean water to meet the needs of present and future residents and businesses, balanced with the needs of natural ecosystems.
  - Objective CO 4.3: Limit disruption of natural hydrology by reducing impervious cover, increasing on-site infiltration, and managing stormwater runoff at the source.
    - Policy CO 4.3.1: On undeveloped sites proposed for development, promote onsite stormwater infiltration through design techniques such as pervious paving, draining runoff into bioswales or properly designed landscaped areas, preservation of natural soils and vegetation, and limiting impervious surfaces.

SOLID WASTE

State

Assembly Bill 939

The California Integrated Waste Management Act of 1989 (AB 939), as amended, was enacted to reduce, recycle, and reuse solid waste generated in the State. AB 939 requires city and county jurisdictions to divert 50 percent of the total waste stream from landfill disposal. AB 939 also requires each city and county to promote source reduction, recycling, and safe disposal or transformation. AB 939 further requires each city and county to conduct a Solid Waste Generation Study and to prepare a Source Reduction and Recycling Element to describe how it would reach these goals. The Source Reduction and Recycling Element contains programs and policies for fulfillment of the goals of AB 939, including the above-noted diversion goals, and must be updated annually to account for changing market and infrastructure conditions. As projects and programs are implemented, the characteristics of the waste stream, the capacities of the current solid waste disposal facilities, and the operational status of those facilities are upgraded, as appropriate. California cities and counties are required to submit annual reports to the California Department of Resources Recycling and Recovery (CalRecycle) to update their progress toward the AB 939 goals.[39] CalRecycle is a department in the California Environmental Protection Agency (CalEPA) that administers and provides oversight for all of California's State-managed non-hazardous waste handling and recycling programs.

Assembly Bill 1826

AB 1826 requires jurisdictions to implement an organic waste recycling program for businesses, including outreach, education, and monitoring of affected businesses. Additionally, each jurisdiction is to identify a multitude of information, including barriers to siting organic waste recycling facilities, as well as closed or abandoned sites that might be available for new organic waste recycling

[39] California Public Resources Code Section 41821.

facilities. AB 1826 defines "organic waste" as food waste, green waste, landscape and pruning waste, non-hazardous wood waste, and food-soiled paper waste that is mixed in with food waste. It also defines a "business" as a commercial or public entity, including but not limited to a firm, partnership, proprietorship, joint stock company, corporation, or association that is organized as a for-profit or nonprofit entity, or a multifamily residential dwelling consisting of five or more units. As of January 1, 2017, businesses that generate 4 cubic yards or more of organic waste per week are subject to this requirement. Commencing January 1, 2019, businesses that generate 4 cubic yards or more of commercial solid waste per week also were required to arrange for organic waste recycling services. In September 2020, CalRecycle reduced this threshold to 2 cubic yards of solid waste (i.e., total of trash, recycling, and organics) per week generated by covered businesses.

California Green Building Standards Code

The CALGreen Code sets standards for new structures to minimize the State's carbon output. California requires that new buildings reduce water consumption, increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. Each local jurisdiction retains the administrative authority to exceed the new CALGreen Code. The 2022 CALGreen Code went into effect January 1, 2023.

Regional

Countywide Integrated Waste Management Plan

Pursuant to AB 939, each county is required to prepare and administer a Countywide Integrated Waste Management Plan (CoIWMP), including preparation of an Annual Report. The CoIWMP is to include the various counties' and cities' solid waste reduction planning documents, plus an Integrated Waste Management Summary Plan and a Countywide Siting Element. The summary plan describes the steps to be taken by local agencies to achieve the mandated State diversion rate by integrating strategies aimed toward reducing, reusing, recycling, diverting, and marketing solid waste generated within the County. The LACDPW is responsible for preparing and administering the summary plan and the Countywide Siting Element.

The County continually evaluates landfill disposal needs and capacity as part of the preparation of the CoIWMP Annual Report. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed in part by determining the available landfill capacity. The most recent annual report, the CoIWMP 2020 Annual Report, published in October 2021, provides disposal analysis and facility capacities for 2020, as well as projections to the CoIWMP's horizon year of 2035. As stated in the CoIWMP 2020 Annual Report, the County is not anticipating a solid waste disposal capacity shortfall within the next 15 years under current conditions.[40] A variety of strategies, including mandatory commercial recycling, diversion of organic waste, and alternative technologies (e.g., engineered municipal solid waste conversion facilities or anaerobic digestion), would be implemented to ensure that the County would be able to accommodate the solid waste generated through the horizon year of 2035.

[40] LACDPW, Countywide Integrated Waste Management Plan: 2020 Annual Report, October 2021.

Local

Construction and Demolition Recycling Ordinance

The City of Santa Clarita has a Construction and Demolition Ordinance that requires all demolition projects, all commercial projects valued over $200,000, all new commercial projects over 1,000 square feet, all new residential construction projects, and all residential additions and improvements that increase building area, volume, or size to recycle a minimum of 65 percent of all inert materials and 65 percent of all other materials.

City of Santa Clarita General Plan

The applicable goals, objectives, and policies from the City of Santa Clarita General Plan Conservation and Open Space Element are listed below.[41]

Conservation and Open Space Element – Greenhouse Gas Reduction

- Goal CO 8: Development designed to improve energy efficiency, reduce energy and natural resource consumption, and reduce emissions of greenhouse gases.
    - Objective CO 8.4: Reduce energy consumption for processing raw materials by promoting recycling and materials recovery by all residents and businesses throughout the community.
        - Policy CO 8.4.4: Promote commercial and industrial recycling, including recycling of construction and demolition debris.
        - Policy CO 8.4.5: Develop and implement standards for refuse and recycling receptacles and enclosures to accommodate recycling in all development.

DRY UTILITIES

State

California Public Utilities Commission (CPUC)

The CPUC establishes policies and rules for electricity and natural gas rates provided by private utilities in California, such as SCE and SoCalGas. Publicly owned utilities do not fall under the CPUC's jurisdiction. The Digital Infrastructure and Video Competition Act of 2006, which took effect January 1, 2007, established the CPUC as the sole cable/video TV franchising authority in the State of California.

The CPUC is overseen by five commissioners appointed by the governor and confirmed by the State Senate. The CPUC's responsibilities include regulating electric power procurement and generation, infrastructure oversight for electric transmission lines and natural gas pipelines, and permitting of electrical transmission and substation facilities.

California Energy Commission (CEC)

The CEC is a planning agency which provides guidance on setting the State's energy policy. Responsibilities include forecasting electricity and natural gas demand, promoting and setting energy efficiency standards throughout the State, developing renewable energy resources and permitting thermal power plants 50 megawatts and larger. The CEC also has specific regulatory

[41] City of Santa Clarita, General Plan, Conservation and Open Space Element, 2011.

authority over publicly owned utilities to certify, monitor, and verify eligible renewable energy resources procured.

California Code of Regulations, California Building Standards Code (Title 24)

The California Energy Efficiency Standards for residential and nonresidential development are included as Title 24, Parts 6 and 11 of the California Code of Regulations. These standards mandate certain energy efficiency measures and include standards for utilities such as lighting and water heating.

Local

Santa Clarita Municipal Code Section 17.51.070

SCMC Section 17.51.070, Road Dedication, Improvements, and Other Requirements, states that "a building or structure shall not be used on any lot or parcel of land any portion of which abuts upon an alley, street or highway unless the one-half (1/2) of the alley, street or highway … has been dedicated and improved" with curbs, gutters, sidewalks, base pavement, streetlights, street trees, and drainage structures. This section also specifies that all new and existing utilities shall be located underground, including along project street frontage. When locating utilities underground is not possible, they shall be screened from view to the satisfaction of the City Engineer.

City of Santa Clarita General Plan

The applicable goals, objectives, and policies from the City of Santa Clarita General Plan Land Use Element are listed below.[42]

Land Use Element – Appearance

- Goal LU 6: A scenic and beautiful urban environment that builds on the community's history and natural setting.
    - Objective LU 6.3: Beautify streetscapes and gateways to the community.
        - Policy LU 6.3.4: Require undergrounding of utilities lines for new development where feasible and plan for undergrounding of existing utility lines in conjunction with street improvement projects where economically feasible.

Land Use Element – Public Facilities

- Goal LU 9: Adequate public facilities and services, provided in a timely manner and in appropriate locations to serve existing and future residents and businesses.
    - Objective LU 9.1: Coordinate land use planning with provision of adequate public services and facilities to support development.
        - Policy LU 9.1.1: Ensure construction of adequate infrastructure to meet the needs of new development prior to occupancy.

[42] City of Santa Clarita, General Plan, Land Use Element, June 2011.

4.16.3 THRESHOLDS OF SIGNIFICANCE

The significance thresholds used to evaluate the impacts of the Project related to utilities and service systems are based on Appendix G of the CEQA Guidelines and the City's Initial Study Checklist.

CEQA GUIDELINES APPENDIX G

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact on utilities and service systems if it would:

Threshold 4.16(a): ***Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effect.***

Threshold 4.16(b): ***[Not] Have sufficient water supplies available to serve the Project from existing entitlements and resources, or are new or expanded entitlements needed.***

Threshold 4.16(c): ***Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.***

Threshold 4.16(d): ***Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction; or***

Threshold 4.16(e): ***[Not] Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.***

CITY'S INITIAL STUDY CHECKLIST

In addition, in accordance with the City's Initial Study Checklist, a project would have a significant impact related to wastewater and solid waste if it would:

Threshold 4.16(f): ***Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.***

Threshold 4.16(g): ***[Not] Be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs.***

4.16.4 METHODOLOGY

The analysis of impacts related to utilities and service systems considered the improvements on the Project Site, as well as the Project's improvements off-site, including a Class I multi-purpose path along the frontage of the Project on 13th, Arch, and 12th Streets; widening of 13th Street, Arch Street, and 12th Street; and railroad crossing improvements at 13th Street, including the installation of a bike path/trail on the north side of the crossing, widening of the crossing at 13th Street and Railroad Avenue to accommodate the wider turning radii, installation of drainage on Railroad Avenue and 13th Street, new gates, modifications on Railroad Avenue at 13th Street to accommodate the revised intersection geometry and provide increased efficiency, implementation of requirements compliant with the Americans with Disabilities Act for pedestrians, and implementation of line-of-sight requirements at the grade crossing. The analysis also

considered the modifications to the Dockweiler Drive Extension Project in the immediate vicinity of the Project Site, including roadway improvements to 13th Street, Arch Street, 12th Street and Placerita Canyon Road that differ from previous approved plans, including accommodating the additional lane geometry at the Arch Street/13th Street intersection to widen the railroad crossing; construction of a pedestrian and bike bridge from the Jan Heidt Newhall Metrolink Station on Railroad Avenue to the future extension of Dockweiler Drive; and implementation of temporary storm drain improvements to accommodate surface water runoff from Dockweiler Drive prior to the completion of the Project.

WATER SUPPLY

The analysis of the Project's impacts relative to water supply is based on the WSA prepared for Shadowbox Studios Development by SCV Water (**Appendix M** of this Draft EIR). The WSA includes an estimate of the Project's anticipated water demand by applying water generation rates to the Project's proposed land uses. In accordance with SB 610, the resulting demand for water associated with the Project is then analyzed relative to SCV Water's existing and planned future water supplies to determine if SCV Water would be able to accommodate the Project's water demands during average, single-dry, and multiple-dry years hydrologic conditions.

The analysis of the Project's impacts relative to water infrastructure is based on the preliminary water analysis prepared for the Project.

WASTEWATER

The analysis of impacts related to wastewater treatment is based on a review of planning documents, applicable codes, and consultation with appropriate public service providers. The letter in response to the Project's Notice of Preparation can be found in **Appendix A**.

STORMWATER FACILITIES

The analysis of potential impacts involving construction of new stormwater drainage facilities is based on information included in the *Hydrology Report, City of Santa Clarita, Shadowbox Studios (Offsite),* dated August 2022; the *Hydrology Report, City of Santa Clarita, Shadowbox Studios,* dated September 2022; and the *Low Impact Development Report*, dated September 2022, all prepared by Alliance Land Planning & Engineering. The analysis also uses information from the *Stormwater Pollution Prevention Plan*, dated April 2022, prepared by Storm Water Resources, Inc.; and the *Hydraulic and Sediment Transport Analyses for Blackhall Studios*, dated January 19, 2022, prepared by Chang Consultants. These reports are included in **Appendix I** of this Draft EIR.

SOLID WASTE

Analysis of potential project impacts was based on estimated generations of solid waste and the potential for generation greater than landfill capacities, or potential for additional impacts of other kinds to those landfills during Project construction. Solid waste generation rates for specific land uses were examined to help determine if there could be potential impacts involving solid waste services.

DRY UTILITIES

Analysis of potential project impacts was based on locations and extent of proposed connections to existing off-site utility infrastructure and the potential for disruptions to traffic flow or utility services, or potential for additional impacts of other kinds to those connections during Project construction of those connections. Regional demand forecasts for electricity and natural gas services were examined to help determine if there could be potential impacts involving expanding the supplies of these energy sources.

4.16.5 PROJECT DESIGN FEATURES

No Project Design Features are proposed with respect to water supply, wastewater, stormwater facilities, solid waste, and dry utilities.

4.16.6 ANALYSIS OF PROJECT IMPACTS

WATER SUPPLY

Threshold 4.16(a): Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effect?

Impact Analysis

Water service to the Project would be provided through the SCV Water Zone 1 water pressure zone system. The Project would connect to the existing 12-inch water line in 12th Street and 13th Street and proposes four water connections to provide domestic and fire protection service to the Project. Two connections, comprising 4-inch laterals, would serve the Project's domestic water system, and two connections, comprising 8-inch fire service laterals, would serve the Project's fire protection system.

In addition, the Project would install 8-inch water meters (rated for 3,500 gpm continuous flow and 4,700 gpm as the maximum intermittent flow) in order to meet the fire-flow requirements for the Project, which is set at 2,500 gpm for 2 hours at 20 psi. With regard to public fire flow, the Los Angeles County Fire Department's Fire Prevention Division has stipulated a requirement of 4,000 gpm at 20 psi for a duration of 4 hours. If multiple hydrants are used to meet this requirement, each hydrant would be required to have a flow of 1,250 gpm minimum for 2 hours at 20 psi. Accordingly, the Project would install eight public hydrants, including three on 12th Street, two on Arch Street, two on 13th Street, and one at the intersection of 13th Street and Railroad Avenue. These water system improvements would be designed and implemented in accordance with SCV Water's guidelines, standards, and approved materials. The Project would not require or result in the relocation or construction of new or expanded water facilities that would cause significant environmental effects, and, as such, impacts to water infrastructure would be less than significant.

Mitigation Measures

Impacts with regard to Threshold 4.16(a) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.16(a) were determined to be less than significant without mitigation.

Threshold 4.16(b): Would the Project have sufficient water supplies available to serve the Project from existing entitlements and resources, or are new or expanded entitlements needed?

Impact Analysis

During the Project's construction activities, water would be required primarily for dust control, cleaning of equipment, and other related activities; however, such water demand would be temporary and intermittent. Water for construction-related purposes could be provided by water trucks and/or through connections to nearby water distribution lines. The amount of water required during this construction phase would be below the total water demand of the fully developed Project.

The Project is subject to the requirements for SB 610 for preparation of a WSA, as described above in Subsection 4.16.2. Accordingly, a WSA was prepared for the Project by SCV Water and is provided in **Appendix M** of this Draft EIR. As analyzed in the Project's WSA and presented in **Table 4.16-4**, the Project at buildout would generate a water demand of 196 acre-feet per year (AFY) in an average/normal year, 207 AFY in a single dry year, and 200 AFY in multiple dry years, consistent with the projections presented in SCV Water's 2020 UWMP. The WSA accounted for the Project's water demand in overall service area projections during normal, dry, and multiple-dry years over the 30-year planning period, which are shown in **Tables 4.16-1** through **4.16-3** in Subsection 4.16.1, above.[43] Therefore, the WSA confirms that that existing and planned supplies are able to meet projected demands (including agricultural, manufacturing, and industrial uses) and the Project's demand during average/normal years, single-dry years, and multiple-dry years.[44]

Therefore, the Project would have sufficient water supplies available to serve the Project from existing water resources and entitlements. As such, Project impacts related to water supply would be less than significant.

Mitigation Measures

Impacts with regard to Threshold 4.16(b) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.16(b) were determined to be less than significant without mitigation.

[43] SCV Water, Water Supply Assessment prepared for the Shadowbox Studios Development, October 5, 2022, page 2-7.

[44] Please note that while Section 2.0, Project Description, of the Draft EIR, states that the Project proposes 1,285,800 square feet of development, the WSA provided water demand calculations based 1,293,000 square feet of development. As such, the water demand provided herein and analyzed in the WSA is more conservative.

Table 4.16-4
PROJECT WATER DEMAND IN ACRE-FEET PER YEAR (AFY)

Proposed Land Use	Size	Demand Factor[a]	Demand[b]
Landscape Irrigation	17.1 acres	—	55.7 AFY
Commercial/Office	258.5 TSF	90,000 gal/TSF/year	74.1 AFY
Industrial	1,034.5 TSF	20,000 gal/TSF/year	65.9 AGY
Project Total Demand for Normal/Average Year			**196 AFY**
Project Total Demand for Single-Dry Year[c]			**207 AFY**
Project Total Demand for Multiple-Dry Year[d]			**200 AFY**

AFY = acre-feet per year
gal = gallons
TSF = thousand square feet

[a] Demand factors for commercial/office and industrial land uses are derived from SCV Water 2020 UWMP. SCV Water calculated the landscape irrigation demand from the agency's Maddaus Technical Memorandum, which serves as the land-use demand forecast for SCV Water and its service area.

[b] Please note that while Section 2.0, Project Description, of this Draft EIR, states that the Project proposes 1,285,800 square feet of development, the WSA provided water demand calculations based 1,293,000 square feet of development. As such, the water demand provided herein and analyzed in the WSA is more conservative.

[c] Water demand for the Project at buildout may increase by approximately 6 percent in a single dry year, consistent with projections from SCV Water's 2020 UWMP.

[d] Water demand for the Project at buildout may increase by approximately 2 percent in multiple dry years, consistent with projections from SCV Water's 2020 UWMP.

Source: SCV Water, Water Supply Assessment for Shadowbox Studios Development, Tables 2-6 and 2-7, October 5, 2022.

WASTEWATER

Threshold 4.16(a): Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effect?

Threshold 4.16(c): Would the Project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Threshold 4.16(f): Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Impact Analysis

The Project would connect new sewer pipelines from proposed buildings to an existing 18-inch sewer line that extends along the eastern boundary of the Project Site. Wastewater from the Project Site would be conveyed and treated at the Saugus and Valencia WRPs. According to the LACSD, these WRPs (combined) currently treat 19.6 mgd of wastewater;[45] however, these facilities have the combined capacity to treat 28.1 mgd of wastewater at the primary, secondary, and tertiary level. As such, the remaining capacity of the WRPs to treat wastewater is 8.5 mgd. The amount of wastewater generated by the Project is based on its water demand of 207 AFY

[45] LACSD, NOP Response to Blackhall Studios, dated April 22, 2022. See **Appendix A** of this Draft EIR.

(refer to **Table 4.16-4**), which is equal to 0.19 mgd (i.e., 207 AFY = 68 million gallons per year = 0.19 mgd). The Project's wastewater generation would account for approximately 2 percent of the WRPs remaining capacity to treat wastewater. Based on the Project's projected wastewater generation, the LACSD has remaining capacity between the two WRPs to treat the Project's wastewater generation. As such, the WRPs have adequate capacity to serve the Project in addition to existing commitments.

In addition, the Project would be subject to a development impact fee, payment of which would be considered the Project's fair-share contribution to any needed improvement and/or expansion of wastewater utility infrastructure. Accordingly, the Project would not require the relocation or construction of a new or expanded wastewater treatment as the LACSD has adequate capacity to process and treat wastewater generated by the Project. Therefore, impacts would be less than significant.

Mitigation Measures

Impacts with regard to Threshold 4.16(a), Threshold 4.16(c), and Threshold 4.16(f) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.16(a), Threshold 4.16(c), and Threshold 4.16(f) were determined to be less than significant without mitigation.

STORMWATER FACILITIES

Threshold 4.16(a): Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effect?

Impact Analysis

As the Project Site is currently undeveloped, the Project would require new stormwater drainage facilities to manage the increase of stormwater generated by the Project and to manage off-site stormwater currently conveyed by the existing drainage features of the Project Site. The stormwater drainage facilities and their environmental impacts are described in further detail in Sections 4.3, Biological Resources, 4.6, Geology and Soils, and 4.9, Hydrology and Water Quality, of this Draft EIR.

As discussed in Section 4.9, Hydrology and Water Quality, the Project Site, in its undeveloped condition, has a flow rate of approximately 125 cubic feet per second (cfs). With Project implementation, the flow rate generated by the Project would be approximately 183 cfs. To bring the total Project outlet flow rate down to or below the existing tributary flow rate and in compliance with the City's and County's standards to manage stormwater runoff, at least 100 cfs of stormwater would be conveyed to the proposed underground infiltration chambers or infiltration/drainage basin. The Project would implement hydromodifications to collect and treat on-site runoff and provide enhanced flood control protection along Placerita Creek.

Additionally, a portion of the off-site stormwater, during peak storm events, would be routed to the infiltration/drainage basin. A 50-year storm event was also modeled for off-site subareas. The total

existing flow rate generated by the off-site drainage area is approximately 375 cfs, and the flow rate generated by the Project would be approximately 197 cfs. To bring the total on-site Project flow rate down to the existing flow rate, approximately 178 cfs (during storms greater than or equal to the 10-year storm) would be split from the total off-site flow and diverted to a desilting inlet, conveyed through the Project, and sent to the drainage basin in the northern portion of the Project Site. A splitter manhole would allow up to 40 cfs from a storm event to pass through to Placerita Creek. An outlet from a splitter manhole would divert additional flow from larger storms, before passing through a weir that would continue through the manhole and outlet to Placerita Creek.[46]

The proposed stormwater drainage facilities would allow for stormwater to be contained and treated on-site through the use of an infiltration/detention basin and underground infiltration chambers, then released to Placerita Creek, ensuring that the new facilities would not result in significant environmental effects, such as exceeding existing stormwater runoff rates and volumes; providing additional sources of polluted runoff; or changing the currents, course, or direction of surface water that would affect Placerita Creek and/or groundwater as a result of Project implementation. Only treated runoff and at quantities equal to or less than the existing volume would be released. Therefore, Project implementation would not require or result in the relocation or construction of new or expanded stormwater drainage facilities that would cause significant environmental effects. As such, impacts would be less than significant.

Mitigation Measures

Impacts with regard to Threshold 4.16(a) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.16(a) were determined to be less than significant without mitigation.

SOLID WASTE

Threshold 4.16(d): Would the Project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction?

Threshold 4.16(g): Would the Project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Impact Analysis

Construction

Construction activities associated with the Project would generate waste (e.g., concrete rubble, asphalt rubble, wood, drywall) that would result in an increased demand for solid waste collection and disposal capacity. SCMC Section 15.46.300 requires completion and submittal of a Construction and Demolition Materials Management Plan (C&DMMP) to the City for approval prior to issuance of building permits for the Project. The C&DMMP would identify the type of materials that would be used and estimate the weight of materials to be recycled during construction, as well as indicate the vendor or facility that has been commissioned to collect, divert, reuse, or

[46] Weir: A dam in a stream or river to raise the water level or divert its flow over a certain elevation.

receive the construction and demolition materials. With implementation of a Project-specific C&DMMP, the Project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction; as such, Project impacts on solid waste would be less than significant.

Operations

The Project would generate solid waste associated with operation of a full-service film and television studio campus. The campus would consist of approximately 1,285,800 square feet of sound stages, workshops, warehouses, support uses, production and administrative offices, catering and other specialty services. CalRecycle does not have disposal rates identified for film and television studios. However, since sound stages are not expected to generate solid waste as would an industrial, manufacturing, or warehousing use, it was assumed that Project employees would function similar to being in an office, in which their jobs would result in a comparable amount of solid waste generated per employee (i.e., comparable amounts of paper, cardboard, food, bio/hazardous wastes, and green waste). Accordingly, the estimated solid waste generation for the Project was calculated using the office generation rate of 1.24 pounds per employee.[47] With approximately 2,333 direct employees, as identified in Section 4.12, Population and Housing, of this Draft EIR, it is estimated that the Project would generate approximately 2,900 pounds of solid waste per day or 1.45 tons per day.

The closest landfill to the Project Site is the Sunshine Canyon Landfill, which has a maximum permitted throughput of 12,100 tons per day. The Project's solid waste generation of 1.45 tons per day would represent approximately 0.01 percent of the landfill's daily permitted capacity. In the unlikely event that the Sunshine Canyon Landfill closed or reached capacity, the Chiquita Canyon Landfill, located northwest of the Project Site, has a maximum permitted throughput of 12,000 tons per day and would have adequate capacity to accommodate the Project.

All non-hazardous solid waste generated from the Project Site (e.g., plastic and glass bottles and jars, paper, newspaper, metal containers, cardboard) would be recycled per local and State regulations previously mentioned, with a diversion goal of 75 percent, in compliance with the Integrated Waste Management Act. Remaining non-hazardous solid waste would be disposed of at one of the nearby landfills (hazardous waste is managed and disposed of in compliance with all applicable federal, State, and local laws and is discussed in greater detail in Section 4.8, Hazards and Hazardous Materials, of this EIR). The City would review building plans and ensure that adequate space is set aside to allow for the collection and storage of recyclable materials on the Project Site prior to issuance of building permits. Therefore, since the Project would be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs, the Project would have a less-than-significant impact related to solid waste.

Mitigation Measures

Impacts with regard to Thresholds 4.16(d) and 4.16(g) were determined to be less than significant. Therefore, no mitigation measures are required.

[47] CalRecycle, Estimated Solid Waste Generation Rates, https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates#Service, accessed March 31, 2023.

Level of Significance After Mitigation

Impacts with regard to Thresholds 4.16(d) and 4.16(g) were determined to be less than significant without mitigation.

Threshold 4.16(e): Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Impact Analysis

Although the increase in solid waste generated would be minimal compared to the daily permitted capacity at Sunshine Canyon Landfill, buildout of the Project would contribute to the volume of solid waste generated in the City that is diverted to existing landfills. As such, the Project would contribute to the acceleration of landfill closures. However, compliance with City, county, and State waste reduction programs and policies would reduce the amount of solid waste being transferred to landfills. The Project would be required to comply with applicable State and local regulations associated with the reduction of solid waste entering landfills, including the California Integrated Waste Management Act along with City of Santa Clarita's plans, policies, and programs related to the recycling/diversion and the disposal of solid waste.

As previously noted, during construction, all waste will be recycled to the maximum extent possible in accordance with the City's requirements. Additionally, the Project would be required to prepare a C&DMMP, which would identify the type of project, estimate the weight of materials to be recycled during construction, and indicate the vendor or facility commissioned to collect, divert, reuse, or receive the Project-specific construction and demolition materials.

All non-hazardous solid waste generated from the Project Site once operational (e.g., plastic, glass bottles, paper, newspaper, metal containers, cardboard) would be recycled, with a goal of 75 percent, in compliance with the Integrated Waste Management Act. With compliance of the Project with State and local statutes and regulations related to solid waste during construction and operation, the Project would have a less than significant impact.

Mitigation Measures

Impacts with regard to Threshold 4.16(e) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.16(e) were determined to be less than significant without mitigation.

DRY UTILITIES

Threshold 4.16(a): Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Impact Analysis

Electricity

The Project would include connections to the existing electrical energy infrastructure maintained by SCE located along Railroad Avenue, Arch Street, 12th Street, and 13th Street. The Project would be required to coordinate with SCE regarding the extension of its electrical infrastructure to the Project Site and comply with site-specific requirements set forth by SCE. Project contractors would notify and coordinate with SCE to identify the locations and depth of power lines and avoid disruption of electric service to other properties. Furthermore, the Project would implement any necessary connections and upgrades required by SCE to ensure that SCE would be able to adequately serve the Project. As such, operation of the Project is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity and would not result in the construction of new energy facilities or expansion of existing facilities, and impacts would be less than significant.

Natural Gas

The Project would include connections to the existing natural gas infrastructure maintained by SoCalGas located in Railroad Avenue. It is not anticipated that the Project would require any major reconstruction or relocation of off-site natural gas infrastructure. The Project would implement any necessary connections and upgrades required by SoCalGas to ensure that SoCalGas would be able to adequately serve the Project. Thus, operation of the Project would not result in an increase in demand for natural gas that would affect available supply or distribution infrastructure capabilities and would not result in the construction of new energy facilities or expansion of existing facilities, and impacts would be less than significant.

Telecommunications

The Project would install underground cables to enable connections to telecommunications services from one of the local providers listed above. The expansion of existing internet, telephone, or cable service infrastructure is not anticipated as a result of the Project, other than to construct connection points to serve the Project. Thus, operation of the Project would not require the construction of new telecommunications infrastructure or expansion of existing facilities, and impacts would be less than significant.

Mitigation Measures

Impacts with regard to Threshold 4.16(a) were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Impacts with regard to Threshold 4.16(a) were determined to be less than significant without mitigation.

4.16.7 CUMULATIVE IMPACTS

As detailed in Section 3.0, Environmental Setting, of this Draft EIR, there would be a total of 36 related projects that propose varying levels of development, redevelopment, or modifications to existing land uses or structures in the Project vicinity. These related projects would comprise a variety of uses, including residential, commercial, offices, gas station, hotels, and industrial.

WATER SUPPLY

Impact Analysis

The geographic scope considered for cumulative impacts related to water and infrastructure is the vicinity of the Project Site (i.e., the water infrastructure that would serve both the Project and related projects). As with the Project, other new development projects would be subject to SCV Water review to ensure that the existing public infrastructure would be adequate to meet the domestic and fire water demands of each project, and individual projects would be subject to SCV Water and City requirements regarding infrastructure improvements needed to meet respective water demands, flow, and pressure requirements, etc. As detailed above, Project impacts related to water infrastructure would be less than significant. Furthermore, in accordance with City requirements, prior to ground disturbance, the related projects would be required to coordinate with SCV Water to identify the locations and depths of all lines, and SCV Water would be notified in advance of proposed ground disturbance activities to avoid disruption of water services associated with the related projects. SCV Water would also review and approve appropriate connection requirements, pipe depths, and locations associated with the related projects. Therefore, Project impacts related to water infrastructure would not be cumulatively considerable, and cumulative impacts would be less than significant.

Mitigation Measures

Cumulative impacts with regard to water supply and infrastructure were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts with regard to water supply and infrastructure were determined to be less than significant without mitigation.

WASTEWATER

Impact Analysis

The geographic scope considered for cumulative impacts related to wastewater treatment is the Saugus and Valencia WRPs service area. Similar to the Project, related projects in the City and greater Los Angeles County would be required to ensure that WRPs within the LACSD have capacity to treat wastewater generated by a Project. Furthermore, the LACSD and/or the City would review each future development project on a case-by-case basis to ensure sufficient sewer infrastructure is available to accommodate wastewater generation.

With adherence to applicable regulations, the Project's potential impacts to wastewater treatment during construction and operation would be less than significant. Therefore, the Project's contribution to wastewater treatment impacts would not be cumulatively considerable during construction and operation, and as such, cumulative impacts would be less than significant.

Mitigation Measures

Cumulative impacts with regard to wastewater treatment were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts with regard to wastewater treatment were determined to be less than significant without mitigation.

STORMWATER FACILITIES

Impact Analysis

The geographic scope considered for cumulative impacts to stormwater is the Santa Clara River Watershed. Similar to the Project, related projects in the City and greater Los Angeles County would be required to comply with the Los Angeles County LID Standards Manual and Los Angeles County Hydrology Manual. In addition, all projects within the Santa Clara River Watershed would be required to comply with NPDES permit requirements. Furthermore, the LACDPW and/or the City would review each future development project on a case-by-case basis to ensure sufficient local and regional stormwater drainage infrastructure is available to accommodate stormwater runoff.

With adherence to applicable regulations, the Project's potential impacts to stormwater facilities during construction and operation would be less than significant. Therefore, the Project's contribution to stormwater facility impacts would not be cumulatively considerable during construction and operation, and as such, cumulative impacts would be less than significant.

Mitigation Measures

Cumulative impacts with regard to stormwater were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts with regard to stormwater were determined to be less than significant without mitigation.

SOLID WASTE

Impact Analysis

The geographic scope considered for cumulative impacts to solid waste is the Burrtec service area and the landfills that accept solid waste from the Project area. Similar to the Project, related projects in the City and greater Los Angeles County would be required to ensure Burrtec and landfills have sufficient capabilities to serve a project's needs. Furthermore, the City would review each future development project on a case-by-case basis to ensure sufficient solid waste services are available to accommodate demand.

With adherence to applicable regulations, the Project's potential impacts to solid waste during construction and operation would be less than significant. Therefore, the Project's contribution to solid waste impacts would not be cumulatively considerable during construction and operation, and as such, cumulative impacts would be less than significant.

Mitigation Measures

Cumulative impacts with regard to solid waste were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts with regard to solid waste were determined to be less than significant without mitigation.

DRY UTILITIES

Impact Analysis

The geographic scope considered for cumulative impacts to dry utilities is the service areas of the individual utility provider. Similar to the Project, related projects in the City and greater Los Angeles County would be required to ensure SCE, SoCalGas, and telecommunication providers have sufficient capabilities to serve a project's needs. Furthermore, the City and/or SCE, SoCalGas, and telecommunication providers would review each future development project on a case-by-case basis to ensure sufficient dry utility infrastructure is available to accommodate demand.

With adherence to applicable regulations, the Project's potential impacts to dry utilities and infrastructure during construction and operation would be less than significant. Therefore, the Project's contribution to dry utilities and infrastructure impacts would not be cumulatively considerable during construction and operation, and as such, cumulative impacts would be less than significant.

Mitigation Measures

Cumulative impacts with regard to dry utilities and infrastructure were determined to be less than significant. Therefore, no mitigation measures are required.

Level of Significance After Mitigation

Cumulative impacts with regard to dry utilities and infrastructure were determined to be less than significant without mitigation.

4.17 WILDFIRE

This section analyzes the Project's potential impacts related to wildfires. This section relies on information included in the *Fire Protection Plan: Blackhall Studios-Santa Clarita*, prepared by Dudek and dated September 2022, and the *Traffic Evacuation Assessment for Shadowbox Studios Evacuation Shed - Santa Clarita, California* memorandum prepared by Gibson Transportation Consulting, Inc. and dated January 24, 2022, and revised January 20, 2024. Both of these documents are provided in **Appendix N** of this Draft EIR.

4.17.1 ENVIRONMENTAL SETTING

WILDFIRE FUNDAMENTALS

Wildfire is any uncontrolled fire spreading through vegetative fuels that threatens to destroy life, property, or resources, as defined in Title 24 of the California Code of Regulations (CCR) Chapter 49, Section 4902. Wildland fires are a common natural hazard in most of Southern California due to native landscapes that become highly flammable each fall and the high winds during autumn after a long drought period each year. Periodic wildfires are a substantial and recurring risk in the region based on the region's fire history and the anticipated development into wildland urban interface (WUI) areas where structures would intermingle with wildland vegetation. In WUI areas, wildfires may transition to urban fire if structures are receptive to ignition. Structure ignition depends on a variety of factors and can be prevented through a layered system of protective features, including fire-resistive landscapes directly adjacent to the structure(s), application of known ignition-resistive materials and methods, and suitable infrastructure for firefighting purposes. Understanding the existing wildland vegetation and urban fuel conditions on and adjacent to a site is necessary to understand the potential for fire in an area. The three major components of the fire environment are topography, vegetation (fuels), and climate. The state of each of these components and their interactions with each other determine the potential characteristics and behavior of a fire at any given moment.

Topography

Topography influences fire risk by affecting fire spread rates. Typically, steep terrain results in faster fire spread up-slope and slower spread down-slope. Terrain that forms a funneling effect, such as chimneys, chutes, or saddles on the landscape, can result in especially intense fire behavior. Conversely, flat terrain tends to have little effect on fire spread, resulting in fires that are driven by vegetation and wind.

Vegetation

Areas of naturally vegetated open space typically have conditions that may be favorable to wildfire spread. Variations in vegetative cover type and species composition have a direct effect on fire behavior. Some plant communities and their associated plant species have increased flammability based on plant physiology (resin content), biological function (flowering, retention of dead plant material), physical structure (bark thickness, leaf size, branching patterns), and overall fuel loading. For example, non-native grass-dominated plant communities become seasonally prone to ignition and produce lower intensity, higher spread rate fires. In comparison, sage scrub can produce higher heat intensity and higher flame lengths under strong, dry wind patterns, but does not typically ignite or spread as quickly as light, flashy grass fuels.

Climate

Typically, the highest fire danger in Southern California coincides with Santa Ana winds. The Santa Ana winds are dry, warm winds that flow from the higher desert elevations in the east through the mountain passes and canyons. As they converge through the canyons, their velocities increase. Localized wind patterns are strongly affected by both regional and local topography.

PROJECT SITE CONDITIONS

The central and southern portions of the Project Site have been disturbed by past uses, are relatively flat, and are characterized by low, ruderal plants and gravel driveways. The northern portion of the Project Site includes a prominent ridgeline with slopes up to 30 percent and Placerita Creek, a natural creek and creek wash area. The Placerita Creek wash area has been primarily undisturbed by past development activity on the Project Site and includes native vegetation communities, such as sage and buckwheat scrub habitats. The northern portion of the Project Site north of Placerita Creek is designated as a Very High Fire Hazard Severity Zone (VHFHSZ) within a Local Responsibility Area, as designated by Los Angeles County Fire Department (LACoFD) and California Department of Forestry and Fire Protection (CAL FIRE).[1] The northern portion of the Project Site is also within a Fire Zone as designated on the City of Santa Clarita Fire Zone Map.[2]

The Project area, as with all of Southern California and Los Angeles County, is subject to seasonal weather conditions that can heighten the likelihood of fire ignition and spread. The Project Site does not include topography that would create unusual weather conditions; however, the region is subject to periodic extreme fire weather conditions that occur throughout foothill portions of Los Angeles County. From a regional perspective, topographic features that may facilitate fire spread are the slope of dominant ridges and tributary canyon alignments, which are conducive to funneling or channeling winds, thus increasing their velocity and potential for influencing more extreme wildfire behavior in the region. Vegetative fuels on-site and in adjacent areas are primarily grasslands and coastal sage scrub habitats that occur along and adjacent to the Placerita Creek stream channel. Thus, the most common type of fire anticipated in the vicinity of the Project area is a wind-driven fire from the northwest/northeast, moving through the sage scrub on the adjacent lands.

Fire History

According to available data from CAL FIRE, 207 fires have burned within 5 miles of the Project Site since the beginning of the historical fire data record (generally the late 1800s). Recorded wildfires within 5 miles range from less than 0.1 acres to 115,537 acres and the average fire size is approximately 2,807.3 acres. When considering only fires greater than 10 acres and less than 100,000 acres, the average fire size is approximately 1,913.9 acres. The 2020 Elsmere Fire (approximately 159.2 acres), 2020 Calgrove Fire (approximately 4.2 acres), and 2019 Saddle Ridge Fire (approximately 8,799.3 acres) are the most recent fires. One fire, the 1962 Newhall Fire that burned approximately 8,582.8 acres, occurred on the Project Site north of the Placerita Creek stream channel.

[1] Dudek, Fire Protection Plan: Blackhall Studios-Santa Clarita, Figure 2, September 2022.

[2] City of Santa Clarita, Geographic Information System, Mapping Your City, https://www.santa-clarita.com/city-hall/departments/administrative-services/technology-services/geographic-information-systems-gis, accessed March 31, 2023.

Based on fire history, wildfire risk for the Project Site is associated primarily with a Santa Ana wind-driven wildfire burning or spotting on-site from the north or east, although a fire approaching from the south during more typical on-shore weather patterns is possible. The proximity of the Project to large expanses of open space to the east (Quigley Canyon Open Space) and southeast (Placerita Canyon) opens up the potential to funnel Santa Ana winds, thereby increasing local wind speeds and increasing wildfire hazard in the Project vicinity.

Emergency Response Fire Facilities

The Project is located within the LACoFD jurisdictional response area. The LACoFD provides fire, emergency medical, and rescue services from 173 stations and serves over four million residents throughout 60 incorporated cities and all unincorporated portions of Los Angeles County.[3] The Project site lies within the Northern Operations Bureau, Division 3. The closest existing fire station to the Project Site is Fire Station 73, located immediately across the street from the Project at 24875 Railroad Avenue. Fire Station 73 has a three-person engine company and a two-person paramedic squad truck operating 24 hours per day, seven days a week. Additionally, Fire Station 126, located at 26320 Citrus Street in Santa Clarita, and Station 124, located at 25870 Hemingway Avenue in Stevenson Ranch, could provide additional response to the Project. The LACoFD's response time are five minutes or less for urban areas, eight minutes or less for suburban areas, and 12 minutes or less for rural areas.

4.17.2 REGULATORY AND PLANNING FRAMEWORK

FEDERAL

National Cohesive Wildland Fire Management Strategy

The National Cohesive Wildland Fire Management Strategy (The National Strategy) is a collaborative effort by federal, tribal, state, and local partners/agencies to establish a national vision for wildland fire management. The National Strategy defines three national goals, describes the wildland fire challenges, identifies opportunities to reduce wildfire risks, and establishes national priorities focused on achieving the national goals. The primary goals identified to achieve the vision are: (1) restore and maintain resilient landscapes, (2) promote fire-adapted communities, and (3) prioritize safe and effective wildfire response.[4] The National Strategy provides various actions and activities that can be implemented at the national, regional, and local levels to reduce wildfire threats to landscapes, communities, the public, and emergency responders.

National Fire Protection Association Codes, Standards, Practices, and Guides

The National Fire Protection Association (NFPA) develops codes, standards, recommended practices, and guides through a consensus standards development process approved by the American National Standards Institute. The consensus standards development process brings together various professionals to achieve consensus on fire and other safety issues. NFPA standards are recommended guidelines and nationally accepted good practices in fire protection but are not law or codes, unless adopted or referenced as such by the California Fire Code or local fire agency. Typical standards would include Standard for Portable Fire Extinguishers (NFPA

[3] LACoFD, 2021 County of Los Angeles Fire Department Annual Report, 2021.

[4] US Department of the Interior, US Department of Agriculture, The National Strategy: The Final Phase in the Development of the *National Cohesive Wildland Fire Management Strategy*, April 2014.

10), Standard for the Installation of Sprinkler Systems (NFPA 13), National Electrical Code (NFPA 70), National Fire Alarm and Signaling Code (NFPA 72), Standard for Fire Doors and Other Opening Protectives (NFPA 80), and Life Safety Code (NFPA 101), as well as a number of other standards and codes specific to a building's use and/or occupancy.

STATE

California Code of Regulations Title 14, Section 1270, et seq.

CAL FIRE is responsible for protecting natural resources from fire on approximately 31 million acres of land designated by the State Board of Forestry as State Responsibility Areas (SRA). Title 14 CCR, Section 1270, et seq., known as the State Minimum Fire Safe Regulations, establishes minimum wildfire protection standards that are applicable in all SRAs where CAL FIRE is responsible for wildfire protection. These minimum standards include standards for emergency access; signing and building numbering; private water supply reserves for emergency fire use; and vegetation modification, fuel breaks, greenbelts, and measures to preserve undeveloped ridgelines.

Public Resources Code Sections 4201-4204

Public Resources Code (PRC) Sections 4201-4204 direct CAL FIRE to map fire hazard within SRAs based on fuel loading, slope, fire weather, and other relevant factors present, including areas where winds have been identified by the department as a major cause of wildfire spread. These zones, referred to as Fire Hazard Severity Zones (FHSZ), classify a wildland zone as moderate, high, or very high fire hazard based on the average hazard across the area included in the zone.

Public Resources Code Sections 4290 and 4291

PRC Section 4290 requires the California State Board of Forestry and Fire Protection to adopt regulations for minimum fire safety standards related to defensible space, road standards for fire equipment access, standards for signs identifying streets, roads, and buildings, minimum private water supply reserves for emergency fire use, fuel breaks and greenbelts, and measures to preserve undeveloped ridgelines to reduce fire risk and improve fire protection. PRC Section 4291 requires property owners in mountainous area, forest-covered lands, shrub-covered lands, grass-covered lands, or land that is covered with flammable material to develop defensible space by removing fuels within the first 100 feet of a structure, or to the property line.

California Government Code Sections 51175–51189

California Government Code Sections 51175–51189 acknowledge the threat of wildfires and the necessity for federal, state, and local agencies to work together to develop preventative measures. CAL FIRE is directed to map areas in the State as moderate, high, and very high FHSZ based on fuels, terrain, weather, and other relevant factors. The identified zones are transmitted to local agencies, who are then required to designate the zones in a Local Responsibility Area by ordinance within 120 days of receiving the information. Local Responsibility Areas are areas designated by local agencies upon the recommendation of CAL FIRE where a local agency is responsible for fire protection. Properties designated within a VHFHSZ are required to maintain a defensible space of 100 feet from each side of a structure.

2018 Strategic Fire Plan for California[5]

The 2018 Strategic Fire Plan is a collaborative effort between the California State Board of Forestry and Fire Protection and CAL FIRE and is the current iteration of the statewide fire plan that has been periodically adopted since the 1930s. The 2018 Fire Plan reflects CAL FIRE's focus on (1) fire prevention and suppression activities to protect lives, property, and ecosystem services, and (2) natural resource management to maintain the State's forests as a resilient carbon sink to meet California's climate change goals and to serve as important habitat for adaptation and mitigation. CAL FIRE provides annual updates to the California State Board of Forestry and Fire Protection on the progress of achieving the goals and objectives in the 2018 Fire Plan through the implementation of Unit Fire Plans for its field units and contract counties.

California Health and Safety Code Sections 13000 et seq.

Fire regulations for California are established in Sections 13000 et seq. of the California Health and Safety Code and include regulations for structural standards (similar to those identified in the California Building Code); fire protection and public notification systems; fire protection devices such as extinguishers and smoke alarms; standards for high-rise structures and childcare facilities; and fire suppression training.

California Fire Code (Title 24 CCR Part 9)

The California Fire Code was created by the California Building Standards Commission based on the International Fire Code and is updated every three years. The overall purpose of the California Fire Code is to establish the minimum requirements to safeguard public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. Chapter 49 of the California Fire Code contains minimum standards for development in the WUI and fire hazard areas. The California Fire Code also provides regulations and guidance for local agencies in the development and enforcement of fire safety standards. The 2022 California Fire Code, the most recent update, is effective as of January 1, 2023.

California Building Code (Title 24 CCR Part 2)

Chapter 7A of the California Building Code regulates building materials, systems, and/or assemblies used in the exterior design and construction of new buildings located within a WUI fire area. This chapter establishes minimum standards for the protection of life and property by increasing the ability of a building located in any FHSZ within SRAs or a WUI fire area to resist the intrusion of flames or burning embers projected by a vegetation fire and contributes to a systematic reduction in conflagration losses. New buildings located in such areas are required to comply with the ignition-resistant construction standards outlined in Chapter 7A.

Senate Bill 1241

In 2012, Senate Bill 1241 added Section 66474.02 to Title 7 Division 2 of the California Government Code, commonly known as the Subdivision Map Act. The statute prohibits subdivision of parcels designated in a VHFHSZ, or that are in an SRA, unless certain findings are made prior to approval of the tentative map. The statute requires that a city or county planning

[5] California State Board of Forestry and Fire Protection and CAL FIRE, 2018 Strategic Fire Plan for California, August 22, 2018.

commission make three new findings regarding fire hazard safety before approving a subdivision proposal. The three findings are:

- The design and location of the subdivision and its lots are consistent with defensible space regulations found in PRC Sections 4290-4291;
- Structural fire protection services will be available for the subdivision through a publicly funded entity; and
- Ingress and egress road standards for fire equipment are met per any applicable local ordinance and PRC Section 4290.

REGIONAL

Los Angeles County Fire Department 2022 Strategic Fire Plan[6]

The LACoFD is one of six contract counties (Los Angeles, Kern, Ventura, Orange, Santa Barbara, and Marin) that has executed a contract with the State of California to provide wildland fire protection on SRAs. The LACoFD has the responsibility as a contract county to implement the State's 2018 Fire Plan in Los Angeles County. As such, the LACoFD functionally operates as a CAL FIRE unit and is responsible for all Strategic Fire Plan activities within the County. The LACoFD's current strategic plan focuses on three primary goals: emergency operations, public service, and organizational effectiveness. These goals support and align with the State's 2018 Fire Plan.

Los Angeles County Code

Chapter 7A of the California Building Code is adopted by reference in Title 26 of the Los Angeles County Code and establishes Materials and Construction Methods for Exterior Wildfire Exposure. These standards apply to building materials, systems, and/or assemblies used in the exterior design and construction of new buildings, and to additions, alterations, or repairs made to existing buildings erected, constructed, or moved with a WUI area. Compliance procedures for new development projects involve submittal and approval of a Fire Protection Plan (FPP) that describes ways to minimize and mitigate potential for loss from wildfire exposure. Key elements of an FPP include structural design measures to prevent or resist ignition from embers or other sources, which are applicable to roofing, vents, exterior wall materials, open roof eaves, enclosed roof eaves and roof eaves soffits, exterior windows and doors, exterior porch ceilings, decking, floor projections/underfloor protection/underside of appendages, and accessory structures.

Title 32 of the County Code adopts the California Fire Code by reference. Section 328.10 of the County Code requires land development plan check reviews located within a VHFHSZ to be performed in accordance with County Code Section 4908, which requires a fuel modification plan be submitted and have preliminary approval before the issuance of a permit for any permanent structure used for habitation. Fuel modification plans are reviewed by the Los Angeles County Forestry Division of the Fire Department on the basis of defensible space, fire safety, and compliance with the County Code, Fire Department fuel modification guidelines, and California Code of Regulations.

[6] LACoFD, Los Angeles County Fire Department 2022 Strategic Fire Plan, June 3, 2022.

LOCAL

City of Santa Clarita General Plan

Land Use Element

The Land Use Element of the Santa Clarita General Plan includes the following goals, objectives, and policies related to wildfire that would be applicable to the Project:

Land Use Element: Health and safe neighborhoods for all residents.

- Goal LU 3: Protection of public safety infrastructure and property from fires
    - Objective LU 3.3: Ensure that the design of residential neighborhoods considers and includes measures to reduce impacts from natural or man-made hazards.
        - Policy LU 3.3.2: In areas subject to wildland fire danger, ensure that land uses have adequate setbacks, fuel modification areas, and emergency access routes.
        - Policy LU 3.3.5: Through the development review process, ensure that all new residential development is provided with adequate emergency access and that subdivision and site designs permit ready access by public safety personnel.

Safety Element

The Safety Element of the Santa Clarita General Plan includes the following goals, objectives, and policies related to wildfire that would be applicable to the Project:

Safety Element: Fire Hazards

- Goal S 3: Protection of public safety infrastructure and property from fires
    - Objective S 3.2: Provide for the specialized needs of fire protection services in both urban and wildland interface areas.
        - Policy S 3.2.1: Identify areas of the Santa Clarita Valley that are prone to wildland fire hazards; adopt current CAL FIRE Fire Hazard Severity Zone maps and address these areas in fire safety plans.
        - Policy S 3.2.2: Enforce standards for maintaining defensible space around structures, roadside fuel reductions, and consider establishing community fire breaks through clearing of dry brush and vegetation.
        - Policy S 3.2.3: Establish landscape guidelines for fire-prone areas with recommended plant materials and provide this information to builders and members of the public.
        - Policy S 3.2.4: Require sprinkler systems, fire resistant roofs and building materials, and other construction measures deemed necessary to prevent loss of life and property from wildland fires.
        - Policy S 3.2.5: Ensure adequate secondary and emergency access for fire apparatus, which includes minimum requirements for road width, surface material, grade, and staging areas.
        - Policy S 3.2.6: Continue to provide information and training to the public on fire safety in wildland interface areas.

- Objective S 3.3: Maintain acceptable emergency response times throughout the planning area.
  - Policy S 3.3.1: Plan for fire response times of no more than five minutes in urban areas, eight minutes in suburban areas, and 12 minutes in rural areas.
  - Policy S 3.3.2: Require the installation and maintenance of street name signs on all new development and the posting of address numbers on all homes and businesses that are clearly visible from adjacent streets.
- Objective S 3.5: Work cooperatively with relevant organizations and agencies for fire prevention, protection, and response.
  - Policy S 3.5.3: For areas adjacent to the National Forest, cooperate with the United States Forest Service regarding land use and development issues.

City of Santa Clarita 2021 Local Hazard Mitigation Plan[7]

The City of Santa Clarita 2021 Local Hazard Mitigation Plan (HMP) serves the purposes of documenting known hazards and identifying community actions that can be implemented over the short and long term to reduce future risk and loss in the City. The HMP was prepared in response to the Disaster Mitigation Act of 2000, and the 2021 HMP is a federally mandated update that ensures continuing eligibility for the Hazard Mitigation Grant Program funding. The HMP addresses several key topics, including the following:

- Planning Process: Provides a record of public process and involvement from committee members and stakeholders;
- Community Profile: Presents the history, geography, demographics, and socioeconomics of the City to provide historical context of hazards;
- Hazard Identification and Risk Assessment: Provides information on hazard identification, vulnerability, and risk associated with hazards in the City; and
- Mitigation Strategy: Describes existing mitigation and the mitigation process.

In addition, the HMP addresses the process of plan review, evaluation, implementation, and adoption. The HMP provides context and planning for hazard identification, risk, and mitigation strategies for wildfires, earthquakes, energy disruption, drought, severe weather events, pandemics, man-made hazards such as cyber-attacks and terrorism, the release of hazardous materials, landslides, and flooding.

Santa Clarita Municipal Code Section 22.01.010

The City of Santa Clarita has adopted by reference the 2022 California Fire Code as part of its building regulations and implements these standards through its building permit process. The adoption also includes amendments to the 2022 California Fire Code by the County of Los Angeles in Title 32 of the Los Angeles County Code.

[7] Interwest Consulting Group, 2021 Santa Clarita Local Hazard Mitigation Plan, October 2, 2021.

4.17.3 THRESHOLDS OF SIGNIFICANCE

The significance thresholds used to evaluate the impacts of the Project on wildfire are based on Appendix G of the CEQA Guidelines. In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to wildfire if it would:

Threshold 4.17(a): ***Substantially impair an adopted emergency response plan or emergency evacuation plan;***

Threshold 4.17(b): ***Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;***

Threshold 4.17(c): ***Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or***

Threshold 4.12(d): ***Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.***

4.17.4 METHODOLOGY

The analysis of impacts related to wildfire considered the improvements on the Project Site, as well as the Project's improvements off-site, including a Class I multi-purpose path along the frontage of the Project on 13th, Arch, and 12th Streets; widening of 13th Street, Arch Street, and 12th Street; and railroad crossing improvements at 13th Street, including the installation of a bike path/trail on the north side of the crossing, widening of the crossing at 13th Street and Railroad Avenue to accommodate the wider turning radii, installation of drainage on Railroad Avenue and 13th Street, new gates, modifications on Railroad Avenue at 13th Street to accommodate the revised intersection geometry and provide increased efficiency, implementation of ADA requirements for pedestrians, and implementation of line-of-sight requirements at the grade crossing. The analysis also considered the modifications to the Dockweiler Drive Extension Project in the immediate vicinity of the Project Site, including roadway improvements to 13th Street, Arch Street, 12th Street and Placerita Canyon Road that differ from previous approved plans, including accommodating the additional lane geometry at the Arch Street/13th Street intersection to widen the railroad crossing; construction of a pedestrian and bike bridge from the Jan Heidt Newhall Metrolink Station on Railroad Avenue to the future extension of Dockweiler Drive; and implementation of temporary storm drain improvements to accommodate surface water runoff from Dockweiler Drive prior to the completion of the Project.

An FPP was prepared by Dudek to evaluate the potential impacts related to wildfire hazards. As part of the assessment, the FPP considered the fire risk presented by the Project Site due to the location and topography, geology, surrounding combustible vegetation (fuel types), climatic conditions, fire history, and the proposed land use. Dudek also conducted a site visit on March 22, 2022, to confirm/acquire Project Site information, document existing Project Site conditions, and determine potential actions for addressing the protection of the Project's structures. Following field data collection efforts and available data analysis, Dudek conducted fire behavior modeling to document the type and intensity of the fire that would be expected adjacent to the Project Site. The

FPP also evaluated the capabilities of the existing LACoFD fire stations to adequately serve the Project Site.

In addition, Gibson Transportation Consulting, Inc. conducted an assessment of the anticipated performance of Dockweiler Drive, Arch Street, and 13th Street in the event of an emergency evacuation. The evacuation assessment assumes a worst-case scenario of an emergency occurring to the east and south of the evacuation shed, which is defined as the area south of Parvin Drive on the north, Quigley Canyon Road and Melody Movie Ranch on the east, the Master's University campus and Placerita Canyon Road on the south, and Railroad Avenue on the west.

4.17.5 PROJECT DESIGN FEATURES

The following Project Design Features are proposed with respect to wildfire risk and hazards:

PDF-WF-1: Prior to commencement of construction activities, a Construction Fire Prevention Plan will be prepared for the Project to specify the construction phase restrictions and fire safety requirements that would be implemented to reduce risk of ignitions and pre-plans for responding to an unlikely ignition.

PDF-WF-2: Prior to bringing lumber or combustible materials onto the Project Site, improvements within the active development area shall be in place, including utilities, operable fire hydrants, an approved, temporary roadway surface, and fuel modification zones (FMZs) established.

PDF-WF-3: The property owner and/or property management agency will implement a Wildfire Education Program on-site and formally adopt, practice, and implement a "Ready, Set, Go!" approach to evacuation. Project occupants will be provided with ongoing education regarding wildfires and the Project Site's FPP requirements. The educational information must include maintaining the landscape and structural components according to the appropriate standards designed for the Project. Educational materials can include but are not limited to informational handouts, website page, mailers, fire-safe council participation, inspections, and seasonal reminders to disseminate wildfire and relocation awareness information. The LACoFD will review and approve all wildfire educational material/programs before printing and distribution.

PDF-WF-4: Fuel modification area vegetation management within the FMZs will be completed annually by May 1 of each year and more often as needed for fire safety, as determined by the LACoFD. Maintenance and inspections of the FMZs would be managed by the property owner and/or property management agency and occur as needed. The property owner and/or property management agency will hire a LACoFD-approved FMZ inspector to provide annual certification that it meets the requirements of the Project Site's FPP.

4.17.6 ANALYSIS OF PROJECT IMPACTS

Threshold 4.17(a): Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

IMPACT ANALYSIS

As discussed above in Subsection 4.17.2, Regulatory and Planning Framework, the City's HMP provides a framework for communications, decisions, and actions by emergency response personnel during emergencies. During an emergency evacuation, the Santa Clarita Valley has freeway access along three routes—Interstate 5 and State Route 14 going north and south and State Route 126 going east and west. Detour routes can be established through the Santa Clarita Valley if the local freeways are closed. The City's General Plan also contains policies that support the City's HMP, including Policy LU 3.3.2, Policy LU 3.3.5, and Policy S.3.2.5, which would ensure that all land uses and new development have adequate emergency access routes. The City's existing emergency response system would be sufficient to address emergency evacuation scenarios in the event of natural or man-made incidents in the Project area that result in a need to evacuate some or all existing residents of the adjacent communities and future Project employees. Additionally, the Project would implement a Wildfire Education Program, which would include an evacuation plan for the Project Site pursuant to Project Design Feature PDF-WF-3.

The Project would utilize several exits in the event of evacuation, including the main entrance and two other access-controlled gates, one located immediately east of the main entrance at the eastern leg of the intersection of Arch Street and 13th Street, and one along 12th Street immediately east of the proposed catering buildings. Project driveways would comply with all City requirements, including width, curb return radii, and access control locations.

As stated above in Subsection 4.17.1, Environmental Setting, the LACoFD provides fire, emergency, medical, and rescue services for the Project area. The Project Site's circulation and access would conform with City LACoFD requirements to ensure that adequate emergency access is provided throughout the Project Site. As part of the FPP, an emergency response time analysis was conducted from the three LACoFD fire stations to the Project Site. The results of the analysis demonstrated that the Project would meet or substantially conform with the LACoFD's response time standards.

Additionally, as described in Section 2.0, Project Description, in conjunction with the Project, off-site improvements would be made to 13th Street, Arch Street, 12th Street and Placerita Canyon Road, including accommodating the additional lane geometry at the Arch Street/13th Street intersection to widen the railroad crossing. A traffic evacuation assessment analyzed the performance of Dockweiler Drive, Arch Street, and 13th Street in the event of an emergency evacuation under Existing Conditions and Future with Project Conditions. The results of the analysis showed that the proposed roadway modifications would reduce the existing average travel time through the Dockweiler Corridor from 27 minutes to under 16 minutes under Future with Project Conditions. Moreover, the evacuation congestion period for travel through the Dockweiler Corridor would be reduced from 2.6 hours under Existing Conditions to 1.5 hours under Future with Project Conditions.

Based on the above, Project development, including the off-site improvements, would not adversely affect or physically interfere with the emergency response protocols established by the City's HMP or current best practices. Therefore, the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

MITIGATION MEASURES

Impacts related to Threshold 4.17(a) were determined to be less than significant. Therefore, no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to Threshold 4.17(a) were determined to be less than significant without mitigation.

Threshold 4.17(b): Would the Project due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Threshold 4.17(c): Would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

IMPACT ANALYSIS

As described above, the majority of the Project Site is relatively flat with slopes ranging from level to 30 percent north of Placerita Creek near the ridgeline. The northern portion of the Project Site is within a VHFHSZ and the City of Santa Clarita Fire Zone. However, the VHFHSZ designation does not indicate that the Project Site is not safe for development. As determined by the analysis in the FPP, the existing conditions of the Project Site could have the potential to facilitate fire spread. Four fire modeling scenarios were studied to determine fire behavior on the Project Site under existing conditions. Based on the modeling results, under existing conditions, the worst-case fire behavior is expected in the untreated, surface shrub and chaparral fuels northeast of the Project Site during peak weather conditions. The fire is anticipated to be a wind-driven fire from the northeast during the fall.

Post-development conditions were also modeled for the Project Site, which included implementation of ignition-resistant landscapes (drought-tolerant and low-fuel-volume plants), ignition-resistant structures, specified fire safety measures, and the Los Angeles County standard of 100-foot-wide FMZs. The modeling results show that fire potential on the Project Site would be lower than existing conditions due to fire safety requirements that would be implemented. The Project would be required to comply with the 2022 California Fire Code, which has been adopted by reference in the Los Angeles Fire Code and the Santa Clarita Municipal Code. The proposed structures on the Project Site would also be constructed pursuant to the 2022 California Building Code. Code-required fire features that would be implemented include ignition-resistant construction materials; interior fire sprinklers; fire apparatus access that would provide unobstructed travel lanes, lengths, turnouts, turnarounds, and clearances; fire staging and temporary refuge areas throughout the developed Project area and along roadways and open space; reliable water source for operations and during emergencies requiring extended fire flow; and the establishment of FMZ pursuant to PRC Section 4291. The FMZ proposed for the Project includes a 5-foot ember resistant zone (Zone A) and a minimum 95-foot wide paved/irrigated landscaping zone (Zone B). The proposed FMZ would provide sufficient fire protection given that the types of structures proposed are highly ignition-resistant and that structures would not be

constructed within a designated FHSZ. Moreover, the Project would implement Project Design Feature PDF-WF-1, which requires the preparation of a Construction Fire Prevention Plan prior to the commencement of construction activities; Project Design Feature PDF-WF-2, which requires utilities, operable fire hydrants, roadway surfaces and other improvements to be in place and FMZs to be established prior to bringing combustible materials onto the Project Site; Project Design Feature PDF-WF-3, which requires the implementation of a Wildfire Education Program for the Project; and Project Design Feature PDF-WF-4, which requires management, maintenance, inspection, and annual certification of the FMZs.

As discussed in Section 4.6, Geology and Soils, of this Draft EIR, construction of the Project would involve grading a portion of the base of the ridgeline north of Placerita Creek to improve the parking layout north of the creek and to eliminate the need for soil import. However, the Project would require a Ridgeline Alteration Permit, which would be reviewed by the City of Santa Clarita to ensure that grading impacts would be minimal and to preserve the ridgeline character. Project compliance with regulatory requirements discussed above and implementation of Project Design Features would ensure that the minimal alteration to the slope of the ridgeline would not exacerbate wildfire risk.

Pursuant to County Code Section 20.16.060, the Project Site would meet a 2-hour on-site fire flow requirement of 2,500 gallons per minute (gpm) with a residual pressure of 20 pounds per square inch (psi). As discussed in Section 4.16, Utilities and Service Systems, of this Draft EIR, the Project would install 8-inch water meters (rated for 3,500 gpm continuous flow and 4,700 gpm as the maximum intermittent flow) in order to provide adequate fire flow support on-site. Furthermore, as required by the Santa Clarita Valley Water Agency (SCV Water), the Project's service connections and metering would be sized for dual service for domestic and fire water needs. The LACoFD's Fire Prevention Division has also stipulated a public fire flow requirement of 4,000 gpm at 20 psi for a duration of 4 hours. If multiple hydrants are used to reach this requirement, each hydrant used would be required to have a flow of 1,250 gpm minimum for 2 hours at 20 psi, which would require the Project to install 8 public fire hydrants and 36 on-site fire hydrants to accommodate the proposed development. In addition, the Project would connect to existing electrical and telecommunications infrastructure surrounding the Project Site. The required water meters and fire hydrants would comply with SCV Water and LACoFD standards.

Based on the above, although potential fires on the Project Site are expected to be wind-driven and wildfire risk would remain, compliance with regulatory requirements contained in the applicable building and fire codes and implementation of Project Design Features would reduce the likelihood of wildfire ignition and spread on the Project Site and in the surrounding area. Therefore, the Project would not exacerbate wildfire risks due to slope, prevailing winds, and other factors and expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Moreover, the required water meters and fire hydrants would reduce wildfire risks on the Project Site and surrounding area. As such, the Project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Impacts related to the exacerbation of wildfire risks would be less than significant.

MITIGATION MEASURES

Impacts related to Thresholds 4.17(b) and 4.17(c) were determined to be less than significant. Therefore, no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to Thresholds 4.17(b) and 4.17(c) were determined to be less than significant without mitigation.

Threshold 4.17(d): Would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

IMPACT ANALYSIS

As described above, the majority of the Project Site is relatively flat with slopes ranging from level to 30 percent north of Placerita Creek near the ridgeline. Construction activities for the Project would include grading a portion of the base of the ridgeline north of Placerita Creek to improve the parking layout north of the creek and to eliminate the need for soil import. This northeastern portion of the Project Site is susceptible to landslides. However, as discussed in Section 4.6, Geology and Soils, of this Draft EIR, grading performed in accordance with the slope stability study of the Geotechnical Investigation Report will ensure adequate levels of slope stability. In addition, removal of any unstable soil materials and placement of engineered materials beneath building foundations would ensure that potential effects caused by unstable soils are reduced to below a level of significance.

As discussed in Section 4.9, Hydrology and Water Quality, of this Draft EIR, Project grading may alter existing on-site drainage patterns during construction and temporarily increase the potential for on-site erosion or sedimentation to occur. However, the Project would be subject to requirements of the National Pollutant Discharge Elimination System Construction General Permit and the Project-specific Stormwater Pollution Prevention Plan, which would include construction best management practices (BMPs) for erosion and sediment control. With implementation of these BMPs, Project construction would not cause substantial drainage changes or runoff. During Project operation, site improvements would eliminate the potential for erosion to occur in areas covered by impervious surfaces. In addition, the Project would plant vegetation in the graded area to provide soil stabilization and incorporate BMPs such as an infiltration and drainage basin, multiple catch basins, covered trash storage areas, and landscape designed to minimize or eliminate runoff and ensure that on- and off-site flooding and substantial changes to drainage patterns would not occur.

Based on the above, the Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. As such, impacts would be less than significant.

MITIGATION MEASURES

Impacts related to Threshold 4.17(d) were determined to be less than significant. Therefore, no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to Threshold 4.17(d) were determined to be less than significant without mitigation.

4.17.7 CUMULATIVE IMPACTS

IMPACT ANALYSIS

As detailed in Section 3.0, Environmental Setting, of this Draft EIR, there are a total of 36 related projects in the Project area that propose varying levels of development, redevelopment, or modifications to existing land uses or structures in the Project vicinity. Of the 36 related projects, nearly half the related projects are located within or adjacent to a VHFHSZ and City of Santa Clarita Fire Zone.

With regard to the impairment of an adopted emergency response plan or emergency evacuation plan, as with the Project, the related projects would be required to provide adequate emergency access in accordance with the requirements of the SCMC and in compliance with the City's General Plan policies related to emergency access. The required provision of adequate emergency access would ensure that development of related projects would not interfere with the emergency response protocols established by the City's HMP.

Similar to the Project, each related project would be individually subject to LACoFD review and would be required to comply with all applicable County Code fire safety requirements, including ignition-resistant construction, fire protection systems, defensible space and vegetation management (i.e., FMZs), and hydrant and vehicular access improvements, if necessary, to adequately reduce impacts related to wildfires. Similarly, each related project would be required to comply with applicable stormwater regulations, including implementation of applicable BMPs and retention features on-site, such that significant adverse effects including flooding, landslides, or other drainage changes to downstream areas would be minimized. Related projects are also subject to the requirements of the most current updates to the California Fire Code and California Building Code, which are adopted by reference in the County Code and Santa Clarita Municipal Code, as well as brush clearance requirements for sites located in a VHFHSZ pursuant to PRC Section 4291. As with the Project, each related project would be required to consult with the LACoFD and SCV Water establish fire-flow requirements for the proposed land uses and to determine the adequacy of existing fire-flow infrastructure serving their respective project sites. Any required upgrades to the water infrastructure serving the related projects would be addressed for each individual project in conjunction with their project approvals.

Moreover, as discussed above, development of the Project Site with code-required fire safety measures, ignition-resistant structures, and a 100-foot-wide FMZ would reduce the likelihood of ignition on the Project Site and slow wildfire spread compared to existing conditions. Thus, the Project's contribution to cumulative impacts is not cumulatively considerable. As such, with full compliance with all applicable local and state rules and regulations, as well as implementation of site-specific recommendations for the related projects, cumulative impacts related to wildfires would be less than significant.

MITIGATION MEASURES

Cumulative impacts related to wildfire were determined to be less than significant. Therefore, no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Cumulative impacts related to wildfire were determined to be less than significant without mitigation.

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5.1 PURPOSE AND SCOPE

California Environmental Quality Act (CEQA) Guidelines Section 15126.6 (a) states that "an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible." In addition, CEQA Guidelines Section 15126.6(b) states that because "an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."

Environmental impacts that could occur as a result of the Project have been identified in Sections 4.1 through 4.17 of this Draft EIR. The analyses presented in these sections determined that the Project would have adverse or significant impacts related to biological resources, cultural resources, paleontological resources, and tribal cultural resources. It should be noted that, in all cases, the potentially significant impacts would be avoided, reduced, or offset to less-than-significant levels through incorporation of the mitigation measures identified for each of these effects.

In accordance with CEQA Guidelines Section 15126.6, this Draft EIR contains a comparative impact assessment of alternatives, including the No Project Alternative, as required by CEQA Guidelines Section 15126.6(e), that would lessen the significant impacts of the Project while attaining most of the basic objectives of the Project. This section also briefly discusses alternatives that were considered by the lead agency but rejected from further analysis in this Draft EIR.

As identified in Section 2.0, Project Description, of this Draft EIR, the objectives of the Project are as follows:

- Design and construct economically-viable and technologically-advanced sound stages, creative office, and production support spaces with the infrastructure, parking, and technology to attract high-profile film, television, and streaming projects that require facilities designed to meet the specifications and demands of the movie, television, and entertainment industry and to allow flexibility to incorporate future technology advances.
- Promote economic growth in Santa Clarita, particularly in the Newhall community, by encouraging the support for the entertainment industry by creating a secure campus environment, where media and entertainment-related uses are consolidated with pre-production, post-production, story development, and administrative offices in order to maximize creativity and productivity.
- Maximize the use of the entire property to create a studio campus environment that creates a range of new media-related employment opportunities that cater to movie, television, and entertainment industries, as well as construction jobs, providing opportunities for local growth and improving the City's jobs to housing balance.

- Develop a studio campus along a transit corridor that is easily accessible by public transportation, where media and entertainment-related uses are consolidated with pre-production, production, story development, and administrative offices within a single site to promote sustainability and reduce vehicle miles traveled (VMT), resulting in corresponding reductions in air pollutant and greenhouse gas (GHG) emissions.
- Enhance the identity of the Newhall community as a movie, television, and entertainment industry area.
- Enhance the visual appearance of the Project Site by providing architecturally distinct development, while maintaining consistency with the design standards of the immediately adjacent Old Town Newhall Specific Plan area.
- Design a campus that would commemorate the filmmaking heritage of Santa Clarita.
- Provide off-site improvements to enhance and/or provide pedestrian and bike connections to adjacent communities and the Jan Heidt Newhall Metrolink Station for the benefit of the existing residents of the adjacent communities and future employees of the Project.

5.2 ALTERNATIVES CONSIDERED BUT REJECTED

CEQA Guidelines Section 15126.6(c) states that an EIR should identify any alternatives that were considered by the lead agency but were rejected as infeasible and briefly explain the reasons underlying the lead agency's determination; factors that may be used to eliminate alternatives from consideration include the alternative's (a) failure to meet most of the project objectives, (b) infeasibility, or (c) inability to avoid significant environmental impacts. In addition, according to CEQA Guidelines Section 15126.6(f), alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. The alternatives that were considered but rejected are discussed below.

5.2.1 REDUCED GRADING ALTERNATIVE

The Reduced Grading Alternative would reduce the amount of grading north of Placerita Creek on the Metropolitan Water District (MWD) property and lower the back-cut on the Project Site north of the creek. As with the Project, this alternative would involve the Placerita Creek excavation and planted bank stabilization to mitigate existing peak flow deficiencies. Similarly, the creek would be widened to the same extent as the Project. The bridge across Placerita Creek would also be constructed to connect to the employee parking lot north of the creek. Accordingly, this alternative would not result in any reduction to the permanent jurisdictional impacts identified for the Project.

Approximately 120,000 cubic yards of dirt would be required as earthen fill to raise the main studio property elevation approximately one to two feet above the 100-year floodplain south of the Placerita Creek. The 100-year flood surface on the Project Site and the surrounding area would be eliminated through the addition of compacted earthen fill and the construction of storm drain systems originating at 12th and 13th Streets and conveying water to Placerita Creek.

However, the Reduced Grading Alternative would no longer use the graded dirt from the north side of Placerita Creek as fill to elevate the Project Site south of the creek. As a result, an off-site replacement source of earthen fill material would be required to raise the Project Site. The impacts of trucking in 120,000 cubic yards of dirt across the City of Santa Clarita and over the 13th Street

rail crossing would result in approximately 8,000 truck trips over a 16- to 20-week period. Impacts to local traffic, noise, and air quality caused by the earth import trucking process would result in significant impacts to the Newhall community.

Additionally, the Reduced Grading Alternative would reduce the available parking at the employee surface parking lot north of Placerita Creek by a minimum of 100 spaces. Replacement parking would have to be met through the construction of a two-level parking structure, instead of a surface parking lot, north of the creek. Accordingly, the addition of a second-level parking deck to the employee surface parking lot would extend development north of the creek, which may have a greater visual impact when compared to the Project due to the addition of mass and the reduction in open space. Therefore, in accordance with CEQA Guidelines Section 15126.6(f), this alternative was rejected from further consideration.

5.2.2 ALTERNATIVE SITES

WHITTAKER BERMITE PROPERTY

The Whittaker-Bermite property is an undeveloped 996-acre site located in the center of the City of Santa Clarita and roughly bounded by Soledad Canyon Road on the north, Golden Valley Road on the east, Railroad Avenue on the west, and Circle J Ranch on the south. This former munitions testing and manufacturing site has contamination issues, which include perchlorate, volatile organic compounds, and both soil and groundwater contamination.[1] The property has undulating terrain, consisting of ridges and canyons. Accordingly, the City has identified many more ridgelines on the property when compared to the Project Site.[2] In addition, the California Geological Survey maps the northern portion of the property within an Alquist-Priolo fault zone (associated with the San Gabriel fault zone).[3] Furthermore, due to the undeveloped nature of the property, public infrastructure, including roads, sewer lines, water lines, and storm drain system, does not exist. As a result, development of the Project on this property would require extensive grading and excavation due to the existing topography and would be subject to more geological issues and hazards. Because public infrastructure is not currently available, major off-site public improvements would be required to serve the Project. Accordingly, this alternative would result in greater impacts related to air quality, energy, GHG emissions, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, public services, and utilities. This alternative would also potentially have greater impacts related to biological resources, cultural resources, and tribal cultural resources due to the undeveloped nature of the property. Therefore, in accordance with CEQA Guidelines Section 15126.6(f), this alternative was rejected from further consideration.

SAUGUS SPEEDWAY PROPERTY

The Saugus Speedway property is a 40-acre site located immediately adjacent to the Santa Clarita Metrolink Station to the east and the Whittaker Bermite property to the southeast. The Saugus Speedway was first used as an auto racetrack and currently hosts the Saugus Swap Meet. The property has a history dating back to the early 1920s when Edmund Richard “Hoot”

1 City of Santa Clarita, Whittaker Bermite Information: Background and Information, https://whittakerbermite.com/, accessed March 29, 2023.

2 City of Santa Clarita, Geographic Information System, Mapping Your City, https://www.santa-clarita.com/city-hall/departments/administrative-services/technology-services/geographic-information-systems-gis, accessed March 29, 2023.

3 California Geological Survey, Earthquake Zones of Required Investigation, https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed March 29, 2023.

Gibson, a western film star and rodeo champion, built a ranch and rodeo grounds, where he hosted many shows and which were used as a movie set.[4] In 1937, William and Mary Bonelli purchased the ranch, where they held rodeos and eventually built a quarter-mile dirt track. Bonelli Ranch Stadium was home to numerous car events. Later, the track was expanded to one-third mile, paved, and its name changed to Saugus Speedway. The paved track enabled the transition to stockcars, which was the primary race event through 1995, until the races stopped due to the decaying grandstands.[5]

Similar to the Project Site, the property is relatively flat. However, the majority of the property is within an Alquist-Priolo fault zone (associated with the San Gabriel fault zone).[6] Accordingly, development of the Project on this property would require additional geotechnical investigation. Since the property is already limited in size with less than half the area of the 93.5-acre Project Site, it would not be able to accommodate the Project as proposed by the Applicant or provide as many employment opportunities as the Project to further the City's goal to provide more jobs in the City. In addition, this property is included on the City's inventory of sites suitable for housing development[7]; development of the Project on this site would affect the City's ability to meet the State's Regional Housing Needs Allocation requirement and may have a potentially significant impact on population and housing. Therefore, in accordance with CEQA Guidelines Section 15126.6(f), this alternative was rejected from further consideration.

BLUE CLOUD MOVIE RANCH

The Blue Cloud Movie Ranch property is a 250-acre site located in the northeastern portion of the Saugus community. The property already supports a working movie set and film and entertainment production facility and is located away from sensitive receptors. However, it is not within a transit priority area (TPA) or high quality transit area (HQTA) designated by the Southern California Association of Governments (SCAG) or in proximity to multiple transit options.[8] Santa Clarita Transit Routes 4 and 14 provide transit service along Bouquet Canyon Road with a one-hour headway. Although development of the Project on this property would generate the same employment opportunities, which would contribute to improving the jobs/housing balance in the City, this alternative may potentially result in greater impacts to air quality, energy, GHG emissions, and transportation due to the lack of transit opportunities that encourage the use of alternative modes of transportation, which are afforded the Project Site. Therefore, in accordance with CEQA Guidelines Section 15126.6(f), this alternative was rejected from further consideration.

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4 U.S. Department of Defense, Sports Heroes Who Served: Rodeo Star Served in WWI, Became Movie Star, https://www.defense.gov/News/Feature-Stories/Story/Article/2708797/sports-heroes-who-served-rodeo-star-served-in-wwi-became-movie-star/, accessed March 29, 2023.

5 Santa Clarita Swap Meet, Our History, http://www.saugusspeedway.com/contents/about-saugus-speedway.aspx, accessed March 29, 2023.

6 California Geological Survey, Earthquake Zones of Required Investigation, https://maps.conservation.ca.gov/cgs/EQZApp/app/, accessed March 29, 2023.

7 City of Santa Clarita, City of Santa Clarita General Plan Housing Element, October 2013. The property is identified as Site No. 22 in Exhibit H-5.1.

8 Southern California Association of Governments, 2045 Transit Priority Areas (TPAs) – SCAG Region, https://hub.scag.ca.gov/datasets/c6b4717526c247528d868c2fc046894d_3/explore?location=34.453836%2C-118.486001%2C13.54; High Quality Transit Areas (HQTA) 2045 – SCAG Region, https://gisdata-scag.opendata.arcgis.com/datasets/43e6fef395d041c09deaeb369a513ca1_1/explore?location=34.460866%2C-118.495082%2C12.35, accessed March 29, 2023.

5.3 ALTERNATIVES SELECTED FOR EVALUATION

As indicated above, the intent of the alternatives is to avoid or substantially lessen any of the significant effects of a project while still feasibly obtaining most of the basic project objectives. Based on the analyses provided in Section 4.0, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would not result in significant impacts that cannot be feasibly mitigated. However, the Project would result in significant impacts to the following areas unless mitigated: biological resources, cultural resources, geology and soils (related to paleontological resources), and tribal cultural resources.

Based on the significant environmental impacts identified for the Project, the basic objectives established for the Project (see above as well as Section 2.0, Project Description, of this Draft EIR), and the feasibility of the alternatives considered, the alternatives to the Project described below were selected for evaluation.

5.3.1 ALTERNATIVE 1: NO PROJECT ALTERNATIVE

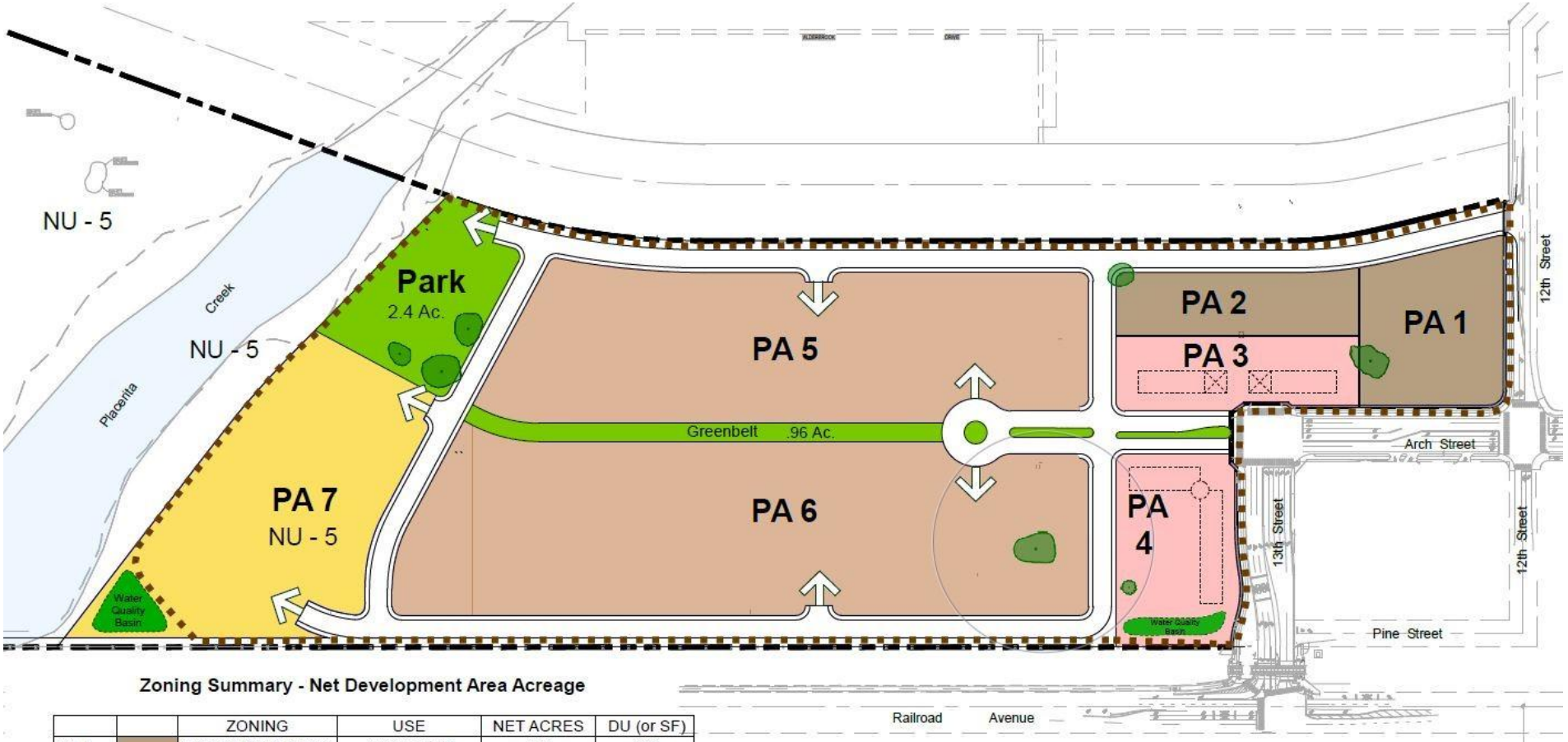
In accordance with the CEQA Guidelines, the No Project Alternative for a project on an identifiable property consists of the circumstance under which the project does not proceed. CEQA Guidelines Section 15126.6(e)(3)(B) states that, "in certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, Alternative 1, No Project Alternative, assumes that no development would occur on the Project Site. The Project Site would continue to be vacant and occasionally used for special events.

5.3.2 ALTERNATIVE 2: EXISTING ZONING ALTERNATIVE

Alternative 2, Existing Zoning Alternative, would allow the development of uses that are consistent with the Project Site's existing zoning designations, which are MXN (Mixed Use Neighborhood) for the 40.6-acre portion of the Project Site south of Placerita Creek and NU5 (Non-Urban 5, one dwelling unit per acre) for the 51.1-acre balance of the Project Site that extends north of Placerita Creek. Approximately 1.8 acres would be dedicated for public right-of-way improvements on 12th, 13th, and Arch Streets.

The MXN designation provides for a base density of up to 18 dwelling units per acre plus inclusion of commercial uses. The Existing Zoning Alternative proposes to develop the Project Site at the 18-unit-per-acre level, for a total of 725 units. An additional 27.5 percent density bonus (199 units) is proposed on the MXN portion of the Project Site in accordance with State and Local Density Bonus Law based on the provision of 15 percent of the units as low-income apartments within the MXN area. The total unit count within the MXN area would be 924 units, comprising a mix of rental apartments and for-sale attached dwelling units (averaging approximately 23 units per acre overall). This density can be accomplished within the MXN height limits and all other City of Santa Clarita zoning regulations applicable to the Project Site. To meet the MXN criteria for commercial uses, approximately 50,000 square feet of commercial/mixed-use buildings, which would retain a similar massing and perimeter landscaping as the Project, are proposed along the 13th Street and Arch Street frontages. This alternative would provide transit-adjacent housing and various income-level housing opportunities.

Construction of this alternative is anticipated to be completed between 3.5 and 4 years.



Zoning Summary - Net Development Area Acreage

		ZONING	USE	NET ACRES	DU (or SF)
PA 1		MX-N (City Housing)	Residential*	2.5	100
PA 2		MX-N (Residential)	Residential	1.7	50
PA 3-4		MX-N (Comm/Res)	Residential*	4.2	99
PA 3-4		MX-N (Comm/Res)	Commercial	N/A	50,000 SF
PA 5		MX-N (Residential)	Residential	9.5	245
PA 6		MX-N (Residential)	Residential	12.9	430
PA 7		MX-N (Res Cluster)	Residential	6.2	50
			TOTAL	37.0	974 DU

*Low Income Apartments 50,000 SF Commercial

OVERALL ACREAGE SUMMARY

Gross Area	93.5 Acres
Public Roads	1.8 Acres
Net Area	91.7 Acres
MX-N Zone Area	40.6 Acres
NU-5 Zone Area	51.1 Acres

LAND USE SUMMARY

MX-N (18U/Ac) = 725 Units Zoning Capacity
Density Bonus* (27.5%) = 199 Units
NU-5 Cluster (1U/gross Ac) = 50 Units
Total Residential 974 Units
MX-N Comm/Office 50,000 Sq. Ft.
*Bonus based on 15% Low Income Apartments

Michael Baker INTERNATIONAL

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Alternative 2: Existing Zoning Alternative

Figure 5-1

Alternative 2 proposes to provide the same Placerita Creek stabilization as the Project. However, this alternative would not construct a bridge across Placerita Creek, include any development of the area north of Placerita Creek, or propose the use of the MWD property, except as may be required at 12th Street to install stormwater collection pipelines to eliminate existing drainage deficiencies on 12th Street. The NU5 allowed density would be requested as a Clustered Density planning area in order to develop the area south of the creek as an NU5 overall density cluster site. A total of 50 units of detached residential housing would be included in the NU5 area south of the creek. The NU5 area would also include a 2.4-acre park and incorporate trails along the creek and throughout the development area. The area north of Placerita Creek would remain as natural open space and could be dedicated to the City of Santa Clarita for open space use.

The initial roadway circulation plan for Alternative 2 anticipates a three-legged intersection at 13th and Arch Streets as compared to the four-legged intersection under the Project.

5.3.3 ALTERNATIVE 3: REDUCED STUDIO ALTERNATIVE

Alternative 3, Reduced Studio Alternative, would include the same type of uses (i.e., sound stages, workshops and warehouses, production offices and other support facilities), design, architecture, and layout as proposed by the Project while reducing the square footage by approximately 24 percent. Accordingly, development of the 93.5-acre Project Site under Alternative 3 would total approximately 980,000 square feet, comprising 400,000 square feet of sound stages; 396,000 square feet of workshops, warehouses, and support uses; 140,000 square feet of production and administrative offices; and 44,000 square feet of flex/catering and other specialty services. Alternative 3 would provide 2,102 parking spaces; additional spaces would be included to accommodate delivery vans, loading areas, and trailer parking as proposed for the Project.

Overall building massing for Alternative 3 would remain similar to, or only slightly reduced from, the Project. The production support buildings along the railroad corridor would remain at the same height to provide both an attractive perimeter façade and sound attenuation to the sound stages on the interior of the Project Site. The production support buildings would remain unchanged or potentially extended farther to the south, toward the parking structure and office building. The office building massing would remain similar to the Project, with some reduction in total building square footage and potentially only two stories of offices over a ground-level parking area. All other structures would retain similar footprints and massing as the Project.

Although this alternative would reduce the development's square footage, Alternative 3 would require the same amount of grading as the Project, including the portion of the Project Site within MWD property for use as an excess parking field. As with the Project, Alternative 3 would construct a bridge over Placerita Creek and develop the north parking lot. Because this alternative would disturb the same footprint as the Project, 13 oak trees would be removed with the same number of replacement trees as the Project. Perimeter walls, fencing, and perimeter landscaping, as well as all off-site improvements, would remain the same as the Project. The duration of construction of this alternative is anticipated to be the same as the Project.

Employment would be reduced by approximately 10 to 15 percent but would still meet the economic impact objectives of the studio activities. As with the Project, Alternative 3 would involve a zone change to modify the boundaries of the Jobs Creation Overlay Zone to incorporate the portion of the Project zoned MXN south of Placerita Creek, and change the zoning of the northern portion of the Project Site from NU5 to MXN.

5.4 COMPARATIVE ASSESSMENT OF IMPACTS

The following assessment compares the impacts of the Project as identified in Sections 4.1 through 4.17 of this Draft EIR with the impacts of the two alternatives defined above. This provides a comprehensive comparative assessment and recognizes that there can be benefits or disadvantages concerning certain environmental issue areas even if the impact topics do not involve a significant impact.

5.4.1 AESTHETICS

ALTERNATIVE 1

Under Alternative 1, there would be no changes to the existing topography and landscape and, thus, no changes in the aesthetic character of the Project Site. This alternative would eliminate the less-than-significant impacts of the Project related to the changes in views and the visual character of the Project Site and surroundings. As such, impacts related to aesthetics under this alternative would be less when compared to the less-than-significant impacts of the Project.

ALTERNATIVE 2

Under Alternative 2, the portion of the Project Site north of Placerita Creek would not be developed and would remain as open space; this area could also be dedicated to the City for open space use. Accordingly, the three oak trees that would be removed by the Project in this portion of the Project Site would be preserved. Since the Project proposes an employee surface parking lot in this portion of the Project Site, views would not significantly change beyond the trees that would be planted by the Project to screen the surface parking lot from Railroad Avenue. Immediately south of the creek, Alternative 2 proposes 50 single-family residential units with heights not exceeding 35 feet. Multi-family residential buildings with heights up to 50 feet are proposed along the balance of the length of the western boundary of the Project Site, as shown in **Figure 5-1**. Accordingly, views along Railroad Avenue would not change significantly when compared to those of the Project as the heights of the majority of the proposed residential buildings under Alternative 2 would be similar to the height of the proposed support building. Views along 12th Street would be more intense as this alternative would replace the proposed catering buildings, which would be 18 feet in height, with residential buildings up to 50 feet in height. In addition, since Alternative 2 does not involve the development of a nursery in the MWD property, views along the eastern boundary of the Project Site would be more intense as the residences fronting on Alderbrook Drive would have direct views of the residential buildings without the screening afforded by the nursery. However, no scenic or significant views from these residences would be obstructed by the residential buildings proposed under this alternative. As with the Project, lighting would be required to comply with the lighting standards identified in the Santa Clarita Municipal Code (SCMC). Therefore, impacts related to aesthetics under this alternative would be similar to those of the Project and would be less than significant.

ALTERNATIVE 3

Under Alternative 3, the buildings' footprints, which would be slightly reduced, would be the primary difference between this alternative and the Project. Overall building massing and architectural design, landscaping, and gateway portal would be the same as those of the Project.

Accordingly, this alternative would have similar impacts related to views, visual character, and lighting as those identified for the Project, and, as such, impacts would be less than significant.

5.4.2 AIR QUALITY

ALTERNATIVE 1

Under Alternative 1, no development would occur, and the Project Site would remain vacant and undeveloped. Accordingly, this alternative would not generate construction or operational emissions. This alternative would eliminate the less-than-significant impacts of the Project related to air quality. As such, impacts related to air quality under this alternative would be less when compared to the less-than-significant impacts of the Project.

ALTERNATIVE 2

As with the Project, construction activities under Alternative 2 would generate criteria pollutant emissions. As shown in **Table 5-1**, emissions from construction activities under this alternative would not exceed the South Coast AQMD regional thresholds. Furthermore, as with the Project, this alternative would be required to comply with South Coast AQMD rules and regulations to control fugitive dust emissions. Because the construction emissions under this alternative are below applicable South Coast AQMD significance thresholds, this alternative would not result in a cumulatively considerable net increase of any criteria pollutant for which the South Coast Air Basin is non-attainment, and regional construction impacts under this alternative would be less than significant. However, as shown in **Table 5-1**, construction criteria pollutant emissions would be slightly less than those from the Project; as such, impacts related to construction criteria pollutant emissions would be less when compared to the less-than-significant impacts of the Project.

Table 5-1
ALTERNATIVE 2 CONSTRUCTION CRITERIA POLLUTANT EMISSIONS

Emissions Source	Maximum Emissions (pounds/day)[a]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer Emissions						
Alternative 2 Maximum Summer Emissions	25	33	69	<1	13	5
Project Maximum Summer Emissions	42	52	104	<1	26	7
Winter Emissions						
Alternative 2 Maximum Winter Emissions	25	34	66	<1	13	5
Project Maximum Winter Emissions	43	53	99	<1	26	7
South Coast AQMD Regional Thresholds	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded by Alternative 2?	***No***	***No***	***No***	***No***	***No***	***No***

Notes:
VOC = volatile organic compounds; NO_x = nitrogen oxide; CO = carbon monoxide; SO_2 = sulfur dioxide;
PM_{10} = particulate matter 10 micrometers in diameter or less; $PM_{2.5}$ = fine particulate matter 2.5 micrometers or less in diameter
[a] *Emissions were calculated using CalEEMod version 2020.4.0, as recommended by the South Coast AQMD. Refer to **Appendix O** for assumptions used in this analysis.*
Source: Rincon Consultants, Inc., Air Quality and Greenhouse Gas Emissions Quantifications for the Existing Zoning Project Alternative, March 3, 2023.

As with the Project, the on-site construction emissions of NO_X, CO, PM_{10}, and $PM_{2.5}$ emissions and would not exceed the South Coast AQMD localized significance thresholds (LST) screening

levels during any phase of construction (see **Appendix O** of this Draft EIR).[9] Therefore, this alternative would not expose sensitive receptors to substantial criteria pollutant concentrations during construction activities. Impacts would be less when compared to the less-than-significant impacts of the Project due to reduced emissions during construction.

As with the Project, operational emissions under this alternative would result from normal daily activities on-site. **Table 5-2** summarizes the operational emissions generated by area sources, energy sources, and mobile sources under Alternative 2. As shown therein, the operational emissions from Alternative 2 would exceed the regional thresholds of significance established by the South Coast AQMD for VOC, NO_X, CO, PM_{10}, and $PM_{2.5}$. These exceedances are attributed predominantly to natural gas combustion from natural gas fireplaces in the proposed residences under this alternative. Because the operational emissions would exceed the regional thresholds for any of the criteria pollutants, Alternative 2 would result in a cumulatively considerable net increase in criteria pollutants for which the South Coast Air Basin is non-attainment under the National Ambient Air Quality Standards (O_3 and $PM_{2.5}$) or the California Ambient Air Quality Standards (O_3, PM_{10}, and $PM_{2.5}$), and, as such, on-site operational impacts would be significant without mitigation. However, installation of electric fireplaces only would reduce all criteria pollutant emissions below the South Coast AQMD regional thresholds.

Table 5-2
ALTERNATIVE 2 OPERATIONAL CRITERIA POLLUTANT EMISSIONS

Emission Source	Maximum Emissions (pounds per day)[a,b]					
	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Summer Emissions						
Alternative 2 Maximum Summer Emissions	709	141	6,305	20	1,044	994
Project Maximum Summer Emissions	51	49	248	<1	57	16
Winter Emissions						
Alternative 2 Maximum Winter Emissions	709	143	6,305	20	1,044	994
Project Maximum Winter Emissions	50	50	240	<1	57	16
South Coast AQMD Regional Thresholds	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded by Alternative 2?	***Yes***	***Yes***	***Yes***	***No***	***Yes***	***Yes***
Alternative 2 Mitigated Maximum Summer Emissions	50	30	331	1	69	19
Alternative 2 Mitigated Maximum Winter Emissions	49	31	323	1	69	19
South Coast AQMD Regional Thresholds	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded by Alternative 2?	***No***	***No***	***No***	***No***	***No***	***No***

Notes:
VOC = volatile organic compounds; NO_x = nitrogen oxide; CO = carbon monoxide; SO_x = sulfur dioxide;
PM_{10} = particulate matter 10 micrometers in diameter or less; $PM_{2.5}$ = fine particulate matter 2.5 micrometers or less in diameter
[a] *Emissions were calculated using CalEEMod version 2020.4.0, as recommended by South Coast AQMD. Refer to **Appendix O** for assumptions used in this analysis.*
[b] *The numbers may not add up precisely due to rounding.*
Source: Rincon Consultants, Inc., Air Quality and Greenhouse Gas Emissions Quantifications for the Existing Zoning Project Alternative, March 3, 2023.

Similarly, the operational on-site emissions of CO, PM_{10}, and $PM_{2.5}$ under Alternative 2 would exceed South Coast AQMD LST screening levels during operation and would potentially expose

[9] Rincon Consultants, Inc., Air Quality and Greenhouse Gas Emissions Quantifications for the Existing Zoning Project Alternative, March 3, 2023.

sensitive receptors to substantial criteria pollutant concentrations. Similar to the regional pollutant exceedances, the source of the exceedance is primarily from natural gas fireplaces. Installation of electric fireplaces only would reduce all on-site pollutant emissions below the South Coast AQMD screening levels.

Overall, air quality impacts under Alternative 2 would be less than significant with implementation of mitigation but would result in a greater impact when compared to the less-than-significant impacts of the Project (without mitigation).

ALTERNATIVE 3

Under Alternative 3, the size of the development would be reduced by approximately 24 percent. However, all aspects of the Project would remain the same, including the amount of grading and excavation and the types of uses and amenities proposed by the Project. This alternative would also implement all the off-site improvements proposed by the Project.

Since the intensity of air emissions and fugitive dust from site preparation and construction activities would be the same as the Project on peak construction days, maximum daily construction criteria pollutant emissions would also be the same as those of the Project. Accordingly, this alternative would have the same air quality impacts during construction as the Project, and, as such, construction impacts would be less than significant.

Due to the 24 percent reduction in the size of the development under this alternative, operational emissions would typically be reduced proportionally. Because the construction and operational emissions under this alternative are below applicable South Coast AQMD significance thresholds, this alternative would not result in a cumulatively considerable net increase of any criteria pollutant for which the South Coast Air Basin is non-attainment or the exposure of sensitive receptors to substantial criteria pollutant concentrations. Accordingly, air quality impacts under this alternative would be less than significant and would be less when compared to the less-than-significant impacts of the Project due to the reduction in operational emissions.

5.4.3 BIOLOGICAL RESOURCES

ALTERNATIVE 1

Under Alternative 1, no development would occur, and the Project Site would remain vacant and undeveloped. Accordingly, this alternative would not result in any impacts to sensitive or special-status species, vegetation, wildlife, and jurisdictional areas on the Project Site. This alternative would eliminate the Project's less-than-significant impacts with mitigation as related to biological resources. As such, impacts related to biological resources under this alternative would be less when compared to the Project's less-than-significant impacts with mitigation.

ALTERNATIVE 2

Under Alternative 2, the portion of the Project Site north of Placerita Creek would not be developed and would remain as open space. Accordingly, the three oak trees that would be removed by the Project in this portion of the Project Site would be preserved. However, construction under Alternative 2 would result in the same areas of disturbance on the portion of the Project Site south of the creek. In addition, as with the Project, Alternative 2 would include stabilization of Placerita Creek, which would result in impacts to jurisdictional areas that would require implementation of the same mitigation measures as the Project (Mitigation Measures MM-BIO 1 through MM-BIO-

5). Therefore, impacts related to biological resources under this alternative would be less than significant with mitigation. Due to the preservation of the oak trees and the northern portion of the Project Site, impacts to biological resources under this alternative would be less when compared to the Project's less-than-significant impacts with mitigation.

ALTERNATIVE 3

Under Alternative 3, the size of the development would be reduced by approximately 24 percent. However, all aspects of the Project would remain the same, including the footprint of site disturbance, amount of grading and excavation, stabilization of Placerita Creek, and construction of a bridge over the creek to access the employee surface parking lot proposed by the Project. This alternative would also implement all the off-site improvements proposed by the Project. Accordingly, similar to the Project, impacts to biological resources under this alternative would be less than significant with mitigation.

5.4.4 CULTURAL RESOURCES

ALTERNATIVE 1

Under Alternative 1, no development would occur, and the Project Site would remain vacant and undeveloped. Accordingly, this alternative would not result in potential impacts to unknown buried cultural resources on the Project Site. This alternative would eliminate the Project's less-than-significant impacts with mitigation as related to cultural resources. As such, impacts related to cultural resources under this alternative would be less when compared to the Project's less-than-significant impacts with mitigation.

ALTERNATIVE 2

Under Alternative 2, the portion of the Project Site north of Placerita Creek would not be developed and would remain as open space. However, construction under Alternative 2 would result in the same areas of disturbance on the portion of the Project Site south of the creek, resulting in the potential for unanticipated discovery of cultural resources during construction. As with the Project, Alternative 2 would require implementation of the same mitigation measures as the Project (Mitigation Measures MM-CR-1 through MM-CR-5). Therefore, impacts related to cultural resources under this alternative would be less than significant with mitigation. Due to the preservation of the northern portion of the Project Site, which would reduce the area of disturbance overall, impacts to cultural resources under this alternative would be less when compared to the Project's less-than-significant impacts with mitigation.

ALTERNATIVE 3

Under Alternative 3, the size of the development would be reduced by approximately 24 percent. However, all aspects of the Project would remain the same, including the footprint of site disturbance and the amount of grading and excavation. This alternative would also implement all the off-site improvements proposed by the Project. As with the Project, Alternative 3 would have the potential to uncover unknown buried cultural resources on the Project Site. Accordingly, Alternative 3 would require implementation of the same mitigation measures as the Project (Mitigation Measures MM-CR-1 through MM-CR-5). Therefore, similar to the Project, impacts to cultural resources under this alternative would be less than significant with mitigation.

5.4.5 ENERGY

ALTERNATIVE 1

Under Alternative 1, no development would occur, and the Project Site would remain vacant and undeveloped. Accordingly, this alternative would not generate a demand for electricity, natural gas, and transportation fuel. This alternative would eliminate the less-than-significant impacts of the Project related to energy. As such, impacts related to energy under this alternative would be less when compared to the less-than-significant impacts of the Project.

ALTERNATIVE 2

Under Alternative 2, the residential and commercial development would result in the annual consumption of approximately 4,577,140 kilowatt-hours (kWh) of electricity, 134,296 therms of natural gas, 1,371,905 gallons of gasoline, and 244,439 gallons of diesel as compared to the Project's annual consumption of 8,460,355 kWh of electricity, 37,009 therms of natural gas, 1,088,710 gallons of gasoline, and 192,858 gallons of diesel, respectively. As with the Project, Alternative 2 would develop the Project Site in accordance with State regulations, including, but not limited to, the CALGreen Code and the Energy Efficiency Standards, to reduce energy consumption. Compliance with energy conservation requirements would reduce wasteful and unnecessary energy consumption in newly constructed development. Therefore, as with the Project, Alternative 2 would not result in the inefficient, wasteful, and unnecessary use of energy would result in a less-than-significant impact related to energy, However, since Alternative 2 would result in a higher demand for natural gas and transportation fuel, impacts would be greater when compared to the less-than-significant impacts of the Project.

ALTERNATIVE 3

Under Alternative 3, the size of the development would be reduced by approximately 24 percent. However, all aspects of the Project would remain the same, including the amount of grading and excavation and the types of uses and amenities proposed by the Project. This alternative would also implement all the off-site improvements proposed by the Project.

Due to the 24-percent reduction in the size of the development under this alternative, energy consumption would typically be reduced proportionally. Accordingly, impacts related to energy under this alternative would be less than significant and would be less when compared to the less-than-significant impacts of the Project due to the reduction in energy consumption.

5.4.6 GEOLOGY AND SOILS

ALTERNATIVE 1

Under Alternative 1, no development would occur, and the Project Site would remain vacant and undeveloped. This alternative would not increase or change exposure to existing environmental conditions, such as fault rupture, seismic shaking, liquefaction, or other geologic hazards. In addition, this alternative would not result in any potential impacts to buried unknown paleontological resources on the Project Site. This alternative would eliminate the Project's less-than-significant impacts with mitigation as related to paleontological resources. As such, impacts related to geology and soils pertaining to paleontological resources under this alternative would be less when compared to the Project's less-than-significant impacts with mitigation.

ALTERNATIVE 2

Under Alternative 2, the portion of the Project Site north of Placerita Creek would not be developed and would remain as open space. Accordingly, impacts related to landslides and the grading of a portion of the base of ridgeline north of Placerita Creek would not occur. However, development of the residential and commercial uses proposed under Alternative 2 would be subject to the same underlying geologic and seismic conditions, which would require compliance with site-specific geotechnical investigations, the California Building Code, and the Santa Clarita Building Code. In addition, construction under Alternative 2 would result in the same areas of disturbance on the portion of the Project Site south of the creek, resulting in the potential for unanticipated discovery of paleontological resources during construction. As with the Project, Alternative 2 would require implementation of the same mitigation measures as the Project (Mitigation Measures MM-GEO-1 through MM-GEO-5). Therefore, impacts related to paleontological resources under this alternative would be less than significant with mitigation. Due to the preservation of the northern portion of the Project Site, which would reduce the area of disturbance overall, impacts to geology and soils under this alternative would be less when compared to the Project's less-than-significant impacts with mitigation.

ALTERNATIVE 3

Under Alternative 3, the size of the development would be reduced by approximately 24 percent. However, all aspects of the Project would remain the same, including the footprint of site disturbance and the amount of grading and excavation. This alternative would also implement all the off-site improvements proposed by the Project. As with the Project, Alternative 3 would be subject to the same underlying geologic and seismic conditions, which would require compliance with site-specific geotechnical investigations, the California Building Code, and the Santa Clarita Building Code. As with the Project, Alternative 3 would have the potential to uncover unknown buried paleontological resources on the Project Site. Accordingly, Alternative 3 would require implementation of the same mitigation measures as the Project (Mitigation Measures MM-GEO-1 through MM-GEO-5). Therefore, similar to the Project, impacts to geology and soils pertaining to paleontological resources under this alternative would be less than significant with mitigation.

5.4.7 GREENHOUSE GAS EMISSIONS

ALTERNATIVE 1

Under Alternative 1, no development would occur, and the Project Site would remain vacant and undeveloped. Accordingly, this alternative would not generate GHG emissions. This alternative would eliminate the less-than-significant impacts of the Project related to GHG emissions. As such, impacts related to GHG emissions under this alternative would be less when compared to the less-than-significant impacts of the Project.

ALTERNATIVE 2

As with the Project, Alternative 2 would generate GHG emissions from construction (the operation of construction equipment on-site, as well as from vehicles transporting construction workers to and from the Project Site and heavy trucks to transport building materials) and operation (associated with area sources, energy and water usage, vehicle trips, and wastewater and solid waste generation). Alternative 2 would generate a total of 12,292 metric tons of CO_2 equivalent ($MTCO_2e$) (see **Appendix O** of this Draft EIR) as compared to the 11,373 $MTCO_2e$ that would be

generated by the Project. Elimination of the natural gas fireplaces, as previously discussed in Subsection 5.4.2, Air, Quality, above, could reduce emissions by up to 283 $MTCO_2e$ annually. However, even with this reduction, Alternative 2 would result in 636 $MTCO_2e$ greater than the Project; as such, Alternative 2 would result in a greater impact when compared to the less-than-significant impacts of the Project (without mitigation).

ALTERNATIVE 3

Under Alternative 3, the size of the development would be reduced by approximately 24 percent. However, all aspects of the Project would remain the same, including the amount of grading and excavation and the types of uses and amenities proposed by the Project. This alternative would also implement all the off-site improvements and sustainability features proposed by the Project.

Due to the 24 percent reduction in the size of the development under this alternative, operational emissions would typically be reduced proportionally. Accordingly, impacts related to GHG emissions under this alternative would be less than significant and would be less when compared to the less-than-significant impacts of the Project due to the reduction in GHG emissions.

5.4.8 HAZARDS AND HAZARDOUS MATERIALS

ALTERNATIVE 1

Under Alternative 1, no development would occur, and the Project Site would remain vacant and undeveloped. Accordingly, this alternative would not generate any impacts related to hazards and hazardous materials, with the exception of wildfire risk identified in Section 5.4.17, Wildfire, below. Although this alternative would eliminate the less-than-significant impacts of the Project related to hazardous materials storage, use, and disposal, Alternative 1 may result in a significant impact related to wildfire if the Project Site is left undeveloped and the shrubs and chaparrals untreated. Therefore, impacts related to wildfire under this alternative would be greater when compared to the less-than-significant impacts of the Project.

ALTERNATIVE 2

As with the Project, development under Alternative 2 would involve the limited transport, storage, use, and disposal of hazardous materials related to the use of cleaning products, paints, solvents, adhesives, pesticides and herbicides, and other chemical materials used in building maintenance, which are typical of multi-family residential buildings and commercial uses. As with the Project, the level of hazardous materials usage required for the proposed development under Alternative 2 would not present a significant threat to the environment because the residential/commercial development would not include the routine transport, use, or disposal of hazardous materials at volumes or concentrations that require special provisions, permits, or approvals, such as those required for certain industrial land uses. Therefore, potential impacts related to hazards and hazardous materials, with the exception of wildfire risk identified in Section 5.4.17, Wildfire, below, would be less than significant. However, the northern portion of the Project Site north of Placerita Creek would remain vacant and undeveloped under this alternative. As discussed below, the existing conditions of the Project Site could have the potential to facilitate fire spread, particularly since this portion of the Project Site is adjacent to the areas with untreated, surface shrub and chaparral fuels. Accordingly, Alternative 2 may result in a significant impact related to wildfire if the northern portion of the Project Site is left undeveloped and the shrubs and

chaparrals untreated. Therefore, impacts related to wildfire under this alternative would be greater when compared to the less-than-significant impacts of the Project.

ALTERNATIVE 3

Under Alternative 3, the size of the development would be reduced by approximately 24 percent. However, all aspects of the Project would remain the same, including the types of uses and amenities, access, limited transport, storage, use, and disposal of hazardous materials proposed by the Project. This alternative would also implement all the off-site improvements and sustainability features proposed by the Project. Therefore, potential impacts related to hazards and hazardous materials under Alternative 3 would be similar to the less-than-significant impacts of the Project.

5.4.9 HYDROLOGY AND WATER QUALITY

ALTERNATIVE 1

Under Alternative 1, no development would occur, and the Project Site would remain vacant and undeveloped. Stormwater would continue to be conveyed through surface runoff. However, since Alternative 1 would not implement stormwater treatment controls that would be included in the Project or stabilize Placerita Creek as proposed under the Project to improve water quality and stormwater flows, impacts under this alternative would be less than significant but would be greater when compared to the less-than-significant impacts of the Project.

ALTERNATIVE 2

As with the Project, the proposed residential/commercial development under Alternative 2 would be required to comply with National Pollutant Discharge Elimination System permit requirements, such as implementation of a Stormwater Pollution Prevention Plan during both construction and operation, as well as implementation of a low-impact development plan and incorporation of associated best management practices into design of the development. In addition, the proposed development under Alternative 2 would be required to implement stormwater treatment features to satisfy the City's Urban Stormwater Mitigation Plan requirements as established in SCMC Chapter 17.95. Alternative 2 would also install storm drain collection pipelines at 12th Street to eliminate the existing drainage deficiencies on 12th Street and construct a drainage basin in the northwestern corner of the development adjacent to the proposed single-family detached homes, as well as implement the Placerita Creek stabilization proposed under the Project. With adherence to applicable regulations related to water quality and surface water hydrology, impacts to hydrology and water quality under this alternative would be similar to the Project's less-than-significant impacts.

ALTERNATIVE 3

Under Alternative 3, the size of the development would be reduced by approximately 24 percent. However, all aspects of the Project would remain the same, including, but not limited to, the sediment and erosion control, infiltration and drainage basin, catch basins, landscape plan, streambank stabilization measures, and elimination of the floodplain hazards on the Project Site as proposed by the Project. This alternative would also implement all the off-site improvements and sustainability features proposed by the Project. Therefore, potential impacts related to

hydrology and water quality under Alternative 3 would be similar to the less-than-significant impacts of the Project.

5.4.10 LAND USE AND PLANNING

ALTERNATIVE 1

Under Alternative 1, no development would occur, and the Project Site would remain vacant and undeveloped. The Project Site would retain its General Plan land use and zoning designations of MXN on the previously disturbed areas of the Project Site, encompassing the central and southeastern portions of the Project Site, and NU5 on the undulating and hilly portions of the Project Site that include portions of Placerita Creek and north of the creek. However, since this alternative would not contribute to meeting local and regional goals of developing areas within a TPA and HQTA or developing an entertainment use in one of its four targeted industry sectors as identified in the City's General Plan Economic Development Element, impacts under this alternative would be less than significant but would be greater when compared to the less-than-significant impacts of the Project.

ALTERNATIVE 2

Alternative 2 would develop the Project Site in accordance with the parameters set forth by the existing MXN and NU5 zoning of the Project Site. Alternative 2 would develop a total of 725 units consistent with the base density of up to 18 dwelling units per acre plus inclusion of commercial uses in the MXN portion of the Project Site. In accordance with State and Local Density Bonus Laws, an additional 27.5 percent density bonus (199 units) would be allowed within the MXN zone with the provision of 15 percent of the units as low-income housing. Accordingly, the total unit count within the MXN area would be 924 units, comprising a mix of rental apartments and for-sale attached dwelling units (averaging approximately 23 units per acre overall). This density can be accomplished within the MXN height limits of up to 50 feet and all other City of Santa Clarita zoning regulations applicable to the site. To meet the MXN criteria for commercial uses, 50,000 square feet of commercial/mixed-use buildings are proposed along the 13th Street and Arch Street frontages.

The NU5 portion includes approximately 9 acres of land south of Placerita Creek, Placerita Creek, and the remaining land extending to the northern property line. The NU5-allowed density would be requested as a Clustered Density planning area, in order to develop the area south of the creek as an NU5 overall density cluster site. A total of 50 units of detached residential housing with heights of up to 35 feet would be included in the NU5 area south of the creek. The NU5 area would also include a 2.4 acre park and incorporate trails along the creek and throughout the development area. The area north of Placerita Creek would remain as natural open space and could be dedicated to the City of Santa Clarita for open space use.

This alternative would provide housing less than 0.5 mile from the Jan Heidt Newhall Metrolink Station, which would encourage residents of the development to utilize transit as an alternative to driving to their places of employment, and would contribute to meeting the local and regional goals of developing areas with a TPA and an HQTA.

Based on the zoning and land use designation of the Project Site, the proposed development under this alternative are permitted on the Project site and, as such, would not conflict with other surrounding uses. In addition, as Alternative 2 would construct a development consistent with the existing zoning of the Project Site, this alternative would not conflict with the applicable plans,

policies, and regulations that were adopted for the purpose of avoiding or mitigating an environmental effect, including, but not limited to, the City's General Plan, the SCMC, and SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy. Therefore, the impacts of Alternative 2 related to potential conflicts with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect would be similar to the less-than-significant impacts of the Project.

ALTERNATIVE 3

Under Alternative 3, the size of the development would be reduced by approximately 24 percent. However, all aspects of the Project would remain the same, including the types of uses and amenities proposed by the Project. Accordingly, this alternative would have the same consistency analysis as the Project. Therefore, similar to the Project, land use impact under this alternative would be less than significant.

5.4.11 NOISE

ALTERNATIVE 1

Under Alternative 1, no development would occur, and the Project Site would remain vacant and undeveloped. Accordingly, this alternative would not add any noise to the existing ambient levels. This alternative would eliminate the less-than-significant impacts of the Project related to noise. As such, impacts related to noise under this alternative would be less when compared to the less-than-significant impacts of the Project.

ALTERNATIVE 2

Under Alternative 2, construction of the Project Site would result in the same intensity of noise from site preparation and construction activities would be the same as the Project on peak construction days. However, since the MWD property would not be developed, construction noise sources would be located at slightly greater distances than those of the Project, particularly as related to the residences fronting on Alderbrook Drive. Accordingly, temporary construction noise levels at sensitive receptor locations may be slightly lower than those of the Project. However, during operation, multi-story multi-family residential buildings would be located across from the Alderbrook Drive residences and separated only by the MWD property. This alternative would not have the buffer that would be provided by the nursery and surface parking proposed by the Project and may result in slightly higher permanent noise impacts from the proposed residences, particularly those on the upper floors, than the Project. These noise levels would not be different from the noise generated in the Project area. Accordingly, noise impacts under this alternative would be less than significant but would be greater than those of the Project.

ALTERNATIVE 3

Under Alternative 3, the size of the development would be reduced by approximately 24 percent. However, all aspects of the Project would remain the same, including the amount of grading and excavation and the types of uses and amenities, fencing, and the nursery proposed by the Project. This alternative would also implement all the off-site improvements proposed by the Project.

Since the intensity of noise from site preparation and construction activities would be the same as the Project on peak construction days, construction noise levels would be the same as those of the Project. In addition, operation under this alternative would be the same as the Project.

Accordingly, this alternative would have similar noise impacts during construction and operation as the Project, and, as such, noise impacts would be less than significant.

5.4.12 POPULATION AND HOUSING

ALTERNATIVE 1

Under Alternative 1, no development would occur, and the Project Site would remain vacant and undeveloped. Accordingly, this alternative would not add any population, housing, or employment to the Project Site and the Newhall community, and no impact on growth would occur. However, since this alternative would not contribute to meeting local and regional goals of developing areas within a TPA and HQTA, the City would continue to be housing-rich as the employment opportunities that would be provided by the Project would not occur. Land use impacts would be less than significant but would be greater when compared to the less-than-significant impacts of the Project.

ALTERNATIVE 2

Under Alternative 2, the Project Site would be developed with 924 multi-family dwelling units, including a mix of apartment rentals and for-sale single-family attached dwelling units, and 50 detached single-family residences, as well as 50,000 square feet of commercial uses. This alternative would introduce a population of approximately 2,786 persons to the Project Site. Although this alternative would be developed consistent with the zoning designations of the Project Site, this increase in population would account for 49.8 percent and 30 percent of the City's population and housing growth projections, respectively, between 2022 and 2026, and 1.3 percent and 1 percent of the County's population and housing growth projection, respectively, for the same period. The increase in housing would reduce the City's jobs/housing balance from 1.20 to 1 to 1.19 to 1. Although Alternative 2 would not contribute to meeting the City's aggressive goal of a 2 to 1 jobs/housing balance, this alternative would be consistent with the County's forecasted population and housing growth between 2022 and 2026. As such, this alternative would not induce unplanned growth in the Project area and would be less than significant but would be greater when compared to the less-than-significant impacts of the Project.

ALTERNATIVE 3

Under Alternative 3, the size of the development would be reduced by approximately 24 percent. However, all aspects of the Project would remain the same, including the types of uses and amenities proposed by the Project. This alternative would directly generate approximately 1,778 total employment opportunities based on the reduction in size of the development under this alternative (i.e., 24 percent of 2,333 employment opportunities provided by the Project). This alternative's employment growth would represent 2 percent of the County's estimated employment growth between 2022 and 2026 and 92 percent of the City's estimated employment growth for the same period. The substantial employment growth in the City by 2026 as a result of this alternative is accounted for in the City's General Plan Economic Development Element. The increase of 1,778 employment opportunities to the 2026 employment forecast of 96,028 jobs would result in 97,806 jobs in the City. This would improve the City's jobs/housing balance from 1.20 to 1 to 1.22 to 1, which would support the City's job/housing balance goal. Therefore, similar to the Project, the substantial employment increase under this alternative would have a beneficial impact.

5.4.13 PUBLIC SERVICES

ALTERNATIVE 1

Under Alternative 1, no development would occur, and the Project Site would remain vacant and undeveloped. Accordingly, this alternative would not generate any demand for public services. This alternative would eliminate the less-than-significant impacts of the Project related to fire protection services, police protection services, and public facilities (library). As such, impacts related to public services under this alternative would be less when compared to the less-than-significant impacts of the Project.

ALTERNATIVE 2

Under Alternative 2, the Project Site would be developed with 974 dwelling units, which would introduce approximately 2,786 persons to the Project Site. This alternative would generate a more permanent population (i.e., residents) than the temporary population (i.e., employees) of 2,333 employees estimated for the Project. As with the Project, this increase in population would, in turn, increase demand for services from the Los Angeles County Fire Department (LACoFD) and the Los Angeles Sheriff's Department (LASD). In addition, the residential population may result in increased demand for public facilities, including libraries. However, as with the Project, development under Alternative 2 would be designed in accordance with the California Fire Code, the County's Fire Code, and LACoFD's requirements. Similarly, development under Alternative 2 would include several design features and security measures that would reduce the opportunity for criminal activity to occur on-site. Furthermore, the City undergoes an annual review of budget and need for capital improvement projects. The Capital Improvement Program ensures that the City has adequate funding for public facility improvements, such as the public library. Therefore, as with the Project, impacts to fire and police protection and libraries under Alternative 2 would be less than significant but would be greater than the less-than-significant impacts of the Project due to the additional increase in population, including residents, on the Project Site.

ALTERNATIVE 3

Under Alternative 3, the size of the development would be reduced by approximately 24 percent. However, all aspects of the Project would remain the same, including the types of uses and amenities. As with the Project, the addition of 1,778 employees would increase demand for services from the LACoFD and the LASD. However, as with the Project, since this alternative would not add residential population to the Project Site, development under this alternative would not result in a significant demand for libraries. As with the Project, development under this alternative would be designed in accordance with the California Fire Code, the County's Fire Code, and LACoFD's requirements and implement the same Project Design Features as the Project. Therefore, as with the Project, impacts to fire and police protection and libraries under Alternative 3 would be less than significant but would be slightly less when compared to the less-than-significant impacts of the Project due to a lower increase in employee population than the Project.

5.4.14 TRANSPORTATION

ALTERNATIVE 1

Under Alternative 1, no development would occur, and the Project Site would remain vacant and undeveloped. Accordingly, this alternative would not generate any trips or VMT. This alternative

would eliminate the less-than-significant impacts of the Project related to transportation. As such, impacts related to transportation under this alternative would be less when compared to the less-than-significant impacts of the Project.

ALTERNATIVE 2

Alternative 2 would generate 8,551 daily trips as compared to the 6,993 daily trips generated by the Project.[10] According to the City's Transportation Analysis Updates, VMT for Santa Clarita residents is higher than the regional average due to longer commute distances.[11] Because Alternative 2 would primarily consist of residential uses, it is anticipated to generate a higher VMT per capita than the Project's 14.0 VMT per employee. However, this alternative would provide housing less than 0.5 mile from the Jan Heidt Newhall Metrolink Station, which would encourage residents of the development to utilize transit as an alternative to driving to their places of employment. Nonetheless, due to the greater number of daily trips generated under this alternative, impacts related to transportation would be greater when compared to the less-than-significant impacts of the Project.

ALTERNATIVE 3

Under Alternative 3, the size of the development would be reduced by approximately 24 percent. However, all aspects of the Project would remain the same, including the types of uses and amenities proposed by the Project. This alternative would also implement all the off-site improvements and sustainability features proposed by the Project. Accordingly, impacts related to transportation plan consistency, geometric hazards, freeway safety, and emergency access would be similar, if not less than those of the Project. In addition, Alternative 3 would generate 5,494 daily trips as compared to the 6,993 daily trips generated by the Project.[12] Accordingly, impacts related to VMT under this alternative would be less than significant and would be less when compared to the less-than-significant impacts of the Project due to the reduction in daily trips.

5.4.15 TRIBAL CULTURAL RESOURCES

ALTERNATIVE 1

Under Alternative 1, no development would occur, and the Project Site would remain vacant and undeveloped. Accordingly, this alternative would not result in any potential impacts to buried unknown tribal cultural resources on the Project Site. This alternative would eliminate the Project's less-than-significant impacts with mitigation as related to tribal cultural resources. As such, impacts related to tribal cultural resources under this alternative would be less when compared to the Project's less-than-significant impacts with mitigation.

ALTERNATIVE 2

Under Alternative 2, the portion of the Project Site north of Placerita Creek would not be developed and would remain as open space. However, construction under Alternative 2 would result in the same areas of disturbance on the portion of the Project Site south of the creek, resulting in the potential for unanticipated discovery of tribal cultural resources during construction. As with the

[10] Gibson Transportation Consulting, Inc., LA-1 Shadowbox Studios, Land Use Alternatives Trip Generation Comparison, 2023.
[11] City of Santa Clarita, Transportation Analysis Updates in Santa Clarita, May 19, 2020, p. 17.
[12] Gibson Transportation Consulting, Inc., Reduced Studio Project Alternative – Trip Generation Estimates, 2023.

Project, Alternative 2 would require implementation of the same mitigation measures as the Project (Mitigation Measures MM-CR-1 and MM-TCR-1 through MM-TCR-7). Therefore, impacts related to tribal cultural resources under this alternative would be less than significant with mitigation. Due to the preservation of the northern portion of the Project Site, which would reduce the area of disturbance overall, impacts to tribal cultural resources under this alternative would be less when compared to the Project's less-than-significant impacts with mitigation.

ALTERNATIVE 3

Under Alternative 3, the size of the development would be reduced by approximately 24 percent. However, all aspects of the Project would remain the same, including the footprint of site disturbance and the amount of grading and excavation. This alternative would also implement all the off-site improvements proposed by the Project. As with the Project, Alternative 3 would have the potential to uncover unknown buried tribal cultural resources on the Project Site. Alternative 3 would require implementation of the same mitigation measures as the Project (Mitigation Measures MM-CR-1 and MM-TCR-1 through MM-TCR-7). Accordingly, similar to the Project, impacts to tribal cultural resources under this alternative would be less than significant with mitigation.

5.4.16 UTILITIES AND SERVICE SYSTEMS

ALTERNATIVE 1

Under Alternative 1, no development would occur, and the Project Site would remain vacant and undeveloped. Accordingly, this alternative would not result in water consumption, wastewater and solid waste generation, or change in the demand for dry utilities. This alternative would eliminate the less-than-significant impacts of the Project related to utilities and service systems. As such, impacts related to utilities and service systems under this alternative would be less when compared to the less-than-significant impacts of the Project.

ALTERNATIVE 2

Under Alternative 2, the residential development and commercial uses are estimated to generate a water demand of 373 acre-feet per year (AFY) and 4,521 pounds of solid waste per day.[13] As with the Project, the amount of wastewater generated by Alternative 2 is based on the water demand identified above, which is equal to 0.32 million gallons per day (mgd). The water demand and the solid waste and wastewater generation are substantially greater than those identified for the Project (i.e., 207 AFY of water, 0.19 mgd of wastewater, and 2,900 pounds of solid waste). Accordingly, impacts to utilities and service systems under this alternative may be potentially significant and greater when compared to the less-than-significant impacts of the Project. However impacts to dry utilities may be similar when compared to the less-than-significant impacts of the Project.

[13] Rates were taken from the Sand Canyon Plaza Mixed-Use Project Draft EIR prepared for the City of Santa Clarita by Tebo Environmental Consulting, Inc., in March 2017. The rates used are as follows: 0.344 AFY per multi-family residential unit, 0.571 AFY per single-family residential unit, and 0.192 AFY per 1,000 square feet of commercial/retail use. (974x0.344)+(50x0.571)+(50x0.192) = 373 AFY. However, Alternative 2 would require a water supply assessment, which would more accurately estimate the water demand of the proposed residential and commercial development. CalRecycle, Estimated Solid Waste Generation Rates, https://www2.calrecycle. ca.gov/WasteCharacterization/General/Rates#Service, accessed March 31, 2023. The rates used are as follows: 4 pounds per multi-family residential unit, 10 pounds per single-family residential unit, and 2.5 pounds per 1,000 square feet of commercial/retail use. (974x4)+(50x10)+(50x2.5) = 4,321 pounds per day.

ALTERNATIVE 3

Under Alternative 3, the size of the development would be reduced by approximately 24 percent. However, all aspects of the Project would remain the same, including the amount of grading and excavation and the types of uses and amenities proposed by the Project. This alternative would also implement all the off-site improvements proposed by the Project.

Due to the 24 percent reduction in the size of the development under this alternative, water consumption, wastewater and solid waste generation, change in the demand for dry utilities would typically be reduced proportionally. Accordingly, impacts related to utilities and service systems under this alternative would be less than significant and would be less when compared to the less-than-significant impacts of the Project due to the reduction in water demand, wastewater and solid waste generation, and dry utility demand.

5.4.17 WILDFIRE

ALTERNATIVE 1

Under Alternative 1, no development would occur, and the Project Site would remain vacant and undeveloped. The northern portion of the Project Site north of Placerita Creek is designated as a Very High Fire Hazard Severity Zone (VHFHSZ) within a Local Responsibility Area, as designated by Los Angeles County Fire Department (LACoFD) and California Department of Forestry and Fire Protection (CAL FIRE). The northern portion of the Project Site is also within a Fire Zone as designated on the City of Santa Clarita Fire Zone Map. As discussed in Section 4.17, Wildfire, of this Draft EIR, the existing conditions of the Project Site could have the potential to facilitate fire spread. Under existing conditions, the worst-case fire behavior is expected in the untreated, surface shrub and chaparral fuels northeast of the Project Site during peak weather conditions. Wildfire risk for the Project Site is associated primarily with a Santa Ana wind-driven wildfire burning or spotting on-site from the north or east, although a fire approaching from the south during more typical on-shore weather patterns is possible. The proximity of the Project Site to large expanses of open space to the east (Quigley Canyon Open Space) and southeast (Placerita Canyon) opens up the potential to funnel Santa Ana winds, thereby increasing local wind speeds and increasing wildfire hazard in the Project vicinity. Accordingly, Alternative 1 may result in a potentially significant impact related to wildfire if the Project Site is left undeveloped and the shrubs and chaparrals untreated. Therefore, impacts related to wildfire under this alternative would be greater when compared to the less-than-significant impacts of the Project.

ALTERNATIVE 2

As with the Project, development under Alternative 2 would be required to comply with the 2022 California Fire Code, which has been adopted by reference in the Los Angeles Fire Code and the SCMC. The proposed structures under this alternative would also be constructed pursuant to the 2022 California Building Code. Code-required fire features that would be implemented include ignition-resistant construction materials; interior fire sprinklers; fire apparatus access that would provide unobstructed travel lanes, lengths, turnouts, turnarounds, and clearances; fire staging and temporary refuge areas throughout the developed area of the Project site and along roadways and open space; reliable water source for operations and during emergencies requiring extended fire flow; and the establishment of a fuel modification zone pursuant to Public Resources Code Section 4291. However, the northern portion of the Project Site north of Placerita Creek would remain vacant

and undeveloped under this alternative. As discussed above under the Alternative 1, the existing conditions of the Project Site could have the potential to facilitate fire spread, particularly since this portion of the Project Site is adjacent to the areas with untreated, surface shrub and chaparral fuels. Accordingly, Alternative 2 may result in a significant impact related to wildfire if the northern portion of the Project Site is left undeveloped and the shrubs and chaparrals untreated. Therefore, impacts related to wildfire under this alternative would be greater when compared to the less-than-significant impacts of the Project.

ALTERNATIVE 3

Under Alternative 3, the size of the development would be reduced by approximately 24 percent. However, all aspects of the Project would remain the same, including the implementation of the Fire Protection Plan prepared for the Project and the fuel modification zones that would be established under the Project, as well as the types of uses and amenities proposed by the Project. This alternative would also implement all the off-site improvements proposed by the Project. Therefore, impacts related to wildfire under this alternative would be similar to the less-than-significant impacts of the Project.

5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Table 5-3 summarizes the determinations concerning the comparison of impacts between the Proposed Project and the three alternatives, including the No Project Alternative.

Table 5-3
SUMMARY COMPARISON OF THE IMPACTS OF THE ALTERNATIVES

Impact Topic	Project	Alternative1 No Project	Alternative 2 Existing Zoning	Alternative 3 Reduced Density
Aesthetics	LTS	Less/NI	Similar/LTS	Similar/LTS
Air Quality	LTS	Less/NI	Greater/LTSM	Less/LTS
Biological Resources	LTSM	Less/NI	Less/LTSM	Similar/LTSM
Cultural Resources	LTSM	Less/NI	Less/LTSM	Similar/LTSM
Energy	LTS	Less/NI	Greater/LTS	Less/LTS
Geology and Soils	LTSM	Less/NI	Less/LTSM	Similar/LTSM
GHG Emissions	LTS	Less/NI	Greater/LTSM	Less/LTS
Hazards and Hazardous Materials	LTS	Greater/PSI	Greater/LTS	Similar/LTS
Hydrology and Water Quality	LTS	Greater/LTS	Similar/LTS	Similar/LTS
Land Use and Planning	LTS	Greater/LTS	Similar/LTS	Similar/LTS
Noise	LTS	Less/NI	Greater/LTS	Similar/LTS
Population and Housing	LTS	Greater/LTS	Greater/LTS	Similar/Beneficial
Public Services	LTS	Less/NI	Greater/LTS	Less/LTS
Transportation	LTS	Less/NI	Greater/PSI	Less/LTS
Tribal Cultural Resources	LTSM	Less/NI	Less/LTSM	Similar/LTSM
Utilities and Service Systems	LTS	Less/NI	Greater/PSI	Less/LTS
Wildfire	LTS	Greater/PSI	Greater/LTS	Similar/LTS

Notes:
LTS = Less Than Significant
LTSM = Less Than Significant with Mitigation
NI = No Impact
PSI = Potentially Significant Impact
Similar = Impact Similar to the Project
Greater = Impact Greater than the Project
Less = Impact Less than the Project

Based on the preceding analysis, the No Project Alternative would have the least impact as it would not alter the existing conditions. However, the No Project Alternative would result in potentially greater impacts related to wildfire, hydrology and water quality, land use and planning, population and housing and would not meet any of the Project's objectives. Section 15126.6(e)(2) of the State CEQA Guidelines requires that in those instances in which the No Project Alternative would be environmentally superior, the EIR must also identify which of the other alternatives would have the least environmental impact. Alternative 3 would be considered environmentally superior as it would generally have a slightly lesser level of impact than the Project due to the overall reduction in square footage (e.g., air quality, energy, GHG emissions, public services, transportation, and utilities), while meeting the basic objectives of the Project.

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6.1 SIGNIFICANT UNAVOIDABLE IMPACTS

CEQA Guidelines Section 15126.2(c) requires that an EIR describe any significant impacts which cannot be avoided. Specifically, Section 15126.2(c) states:

> *Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.*

As evaluated in Sections 4.1 through 4.17 of this Draft EIR, all impacts associated with the Project would be less than significant or less than significant with mitigation incorporated.

6.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

According to CEQA Guidelines Sections 15126(c) and 15126.2(d), an EIR is required to address any significant irreversible environmental changes that would occur should the Project be implemented. As stated in CEQA Guidelines Section 15126.2(d):

> *Uses of nonrenewable resources during the initial and continued phases of the Project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter likely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

6.2.1 USE OF NONRENEWABLE RESOURCES

The Project would necessarily consume limited, slowly renewable and nonrenewable resources. This consumption would occur during the construction phase of the Project and continue throughout its operational lifetime.

Project construction would require a commitment of resources that are nonreplenishable or may renew so slowly as to be considered nonrenewable. These resources would include the following construction supplies: certain types of lumber and other forest products; aggregate materials used in concrete and asphalt, such as sand, gravel and stone; metals, such as steel, copper, and lead; petrochemical construction materials, such as plastics; and water. Nonrenewable fossil fuels, such as gasoline and oil, would also be consumed in the use of construction vehicles and equipment, as well as the transportation of goods and people to and from the Project Site. However, use of such resources would not be unusual compared to other construction projects and would not substantially affect the availability of such resources. As analyzed in Section 4.5, Energy, of this Draft EIR, fuel consumption during Project construction and operation would not exceed available supplies, and the Project would encourage alternative modes of transportation to reduce transportation fuel use. Moreover, vehicles utilizing nonrenewable fuel resources would be required to comply with the most recent efficiency standards to ensure that transportation fuels would not be used in a wasteful or inefficient manner.

Water, an important natural resource, is not considered to be a nonrenewable resource. Water is regularly replenished by the natural hydrological cycle. Because the Santa Clarita Valley and most

of California is subject to recurring drought cycles, water is regarded as a limited resource that requires strong conservation measures to maintain adequate water supplies for normal and emergency applications. As evaluated in Section 4.16, Utilities and Service Systems, of this Draft EIR, Santa Clarita Valley Water Agency's existing and planned water supplies are sufficient to meet the Project's estimated construction and operational water demands during average/normal years, single-dry years, and multiple-dry years. Moreover, the Project would be required to comply with the California Green Building Standards Code, which specifies mandatory measures for water efficiency and conservation.

6.2.2 EXTENSION OF ROADS AND OTHER INFRASTRUCTURE

The Project would develop a full-service film and television studio campus on a vacant site. The Project would be conditioned to construct a Class I multipurpose path along the Project frontage on 12th, Arch, and 13th Streets and to either (1) pay an in-lieu fee to contribute toward improvements or (2) construct a connection to provide a link for pedestrians and bicyclists between the Project Site and the Jan Heidt Newhall Metrolink Station and Old Town Newhall dining and entertainment district. The Class I multipurpose path would be a completely separate right-of-way for the exclusive use of bicyclists and pedestrians with the path visibly marked and landscaped. The Project would also require connections to existing water, wastewater, stormwater, and dry utilities infrastructure. Additionally, as described in Section 2.0, Project Description, in conjunction with the Project, modifications to the Dockweiler Extension Project are proposed, which include roadway improvements to 13th Street, Arch Street, 12th Street and Placerita Canyon Road; a pedestrian bike bridge from the Jan Heidt Newhall Metrolink Station to the future extension of Dockweiler Drive; turning radius modification at the intersection of 13th Street and Railroad Avenue; and temporary storm drain improvements to accommodate surface water runoff from Dockweiler Drive. These modifications would support the previously planned extension of Dockweiler Drive but would not further extend Dockweiler Dive or any other roadways in the City to provide access to areas previously inaccessible. Furthermore, none of the required infrastructure connections would lead to new or expanded infrastructure service systems.

6.2.3 POTENTIAL ENVIRONMENTAL ACCIDENTS

The Project's use of hazardous materials is evaluated in Section 4.8, Hazards and Hazardous Materials, of this Draft EIR. As discussed therein, long-term operation of the Project would involve the limited transport, storage, use, and disposal of hazardous materials related to studio operations, such as set or stage work in the sound stages, cleaning, and landscaping maintenance, as well as operations of the parking structure, support building, office building, and catering building. These operations could use hazardous materials, including cleaning products; paints, solvents, adhesives, and other chemical materials used in building maintenance and interior improvements; automotive lubricants; small combustion engine fuels and lubricants; pesticides and herbicides; and electronic waste, all of which are typical of commercial land uses. The level of hazardous materials usage required for a commercial development would not present a significant threat to the environment because the Project would not include any industrial land uses. The storage, handling, and disposal of these materials would be regulated by the applicable regulatory authorities, including the California Department of Toxic Substances Control, U.S. Environmental Protection Agency, Occupational Safety and Health Administration, Los Angeles County Fire Department, and the Los Angeles County Department of Public Health. Additionally, the Project would implement materials management control practices, consisting of procedural

and structural best management practices for the handling, storing, and use of hazardous materials during Project construction and operation to prevent the release of those materials into the environment. These would include, but are not limited to, stockpile management, spill prevention and control, solid waste management, and hazardous waste management. Furthermore, the Phase I Environmental Site Assessment prepared for the Project determined that the Project Site does not present any recognized environmental conditions. Based on the above, the Project would not create a significant hazard to the public through the normal use of these materials or through a reasonably foreseeable upset or accident. The materials used on-site would not release hazardous emissions that would significantly impact surrounding uses. Therefore, it is not expected that the Project would cause irreversible damage from environmental accidents associated with the Project.

6.2.4 JUSTIFICATION FOR IRRETRIEVABLE COMMITMENT OF RESOURCES

Implementation of the Project would require an investment of both renewable and nonrenewable resources. The amount of resources that would be committed to the Project would be typical of similar developments of this size and scale. However, as discussed above and in Section 4.5, Energy, of this Draft EIR, the Project would not involve wasteful or inefficient energy consumption during construction or long-term operation. None of the building materials anticipated for the Project would be unique, rare, in short supply, or require creation of new resource extraction sites or new manufacturing and delivery channels. Implementation of the Project would also satisfy the achievement of the Project objectives identified in Section 2.0, Project Description, of this Draft EIR, which includes objectives that are beneficial to the growth and prosperity of the City. In particular, the Project would promote economic growth in the City by encouraging the expansion of the entertainment industry, one of the City's four targeted industry sectors, which would create more jobs and improve the City's jobs/housing balance. Based on these considerations, the irretrievable commitment of renewable and nonrenewable resources is justified.

6.3 GROWTH INDUCING IMPACTS

CEQA Guidelines Section 15126.2(e) requires an EIR to discuss the ways a proposed project could foster economic or population growth or the construction of additional housing, directly or indirectly, in the surrounding environment. Growth-inducing impacts include the removal of obstacles to population growth (e.g., the expansion of a wastewater treatment plant allowing more development in a service area) and the development and construction of new service facilities that could significantly affect the environment individually or cumulatively. In addition, pursuant to CEQA, growth must not be assumed as beneficial, detrimental, or of little significance to the environment. Growth can be induced by (1) direct growth associated with a project, and (2) indirect growth created by demand not satisfied by a project or the creation of surplus infrastructure not utilized by a project.

Project implementation would develop a full-service film and television studio campus on a vacant site. This would include 475,500 square feet of sound stages; approximately 565,400 square feet of workshops, warehouses, and support uses; approximately 209,300 square feet of production and administrative offices; and approximately 35,600 square feet of catering and other specialty services. Upon completion, the campus would have an overall building area of approximately 1,285,800 square feet. The Project would not include a housing component.

As discussed in Section 4.12, Population and Housing, of this Draft EIR, construction of the Project would create short-term employment opportunities that could indirectly increase the population and demand for housing in the Project vicinity. However, it is unlikely that workers would relocate their households as a result of the temporary employment associated with Project construction. Operation of the Project would directly generate approximately 2,333 total employment opportunities and an additional 3,500 indirect employment opportunities. However, the Project would be consistent with the County's forecasted employment growth between 2022 and 2026. Although the Project would result in substantial employment growth for the City compared to the Southern California Association of Government's forecast for the City, this growth is accounted for in the City's General Plan Economic Development Element and would support the City's goal of achieving a 2 to 1 job/housing balance. As such, the Project would not induce unplanned population growth in the Project area.

In addition, the area surrounding the Project Site is already developed with a mix of commercial and residential uses. As such, the Project would not remove impediments to growth. The Project would require installation of underground utilities, including water lines, sewer lines, storm drain lines, power lines, gas lines, and telecommunication lines. However, such improvements would be intended primarily to meet Project-related demand and would not necessitate regional utility infrastructure improvements that have not otherwise been accounted for and planned on a regional level. Moreover, as discussed above, the modifications to 13th Street, Arch Street, 12th Street and Placerita Canyon Road would support the previously planned extension of Dockweiler Drive but would not further extend Dockweiler Drive or any other roadways in the City to provide access to areas previously inaccessible. Therefore, the Project would not result in growth-inducing impacts.

6.4 POTENTIAL SECONDARY EFFECTS

CEQA Guidelines Section 15126.4(a)(1)(D) requires mitigation measures to be discussed, albeit in less detail than the significant effects of the Project, if the mitigation measure(s) would cause one or more significant effects in addition to those that would be caused by the Project as proposed. As evaluated in Sections 4.1 through 4.17 of this Draft EIR, all impacts associated with the Project would be less than significant or less than significant with mitigation incorporated.

6.4.1 BIOLOGICAL RESOURCES

The analysis of the Project's impacts related to candidate, sensitive, or special-status species, riparian habitat or sensitive natural communities, which is addressed in Section 4.3, Biological Resources, of this Draft EIR, resulted in recommended mitigation measures, as follows:

MM-BIO-1 The Project shall implement the following best management practices (BMPs) during construction:

- The contractor shall clearly delineate the construction limits and prohibit any construction-related traffic outside those boundaries;
- Project-related vehicles shall observe a 10-mile-per-hour speed limit within the unpaved limits of construction;
- All open trenches or excavations shall be fenced and/or sloped to prevent entrapment of wildlife species;

- All food-related trash items such as wrappers, cans, bottles, and food scraps generated during Project construction shall be disposed of in closed containers only and removed daily from the Project Site;
- No deliberate feeding of wildlife shall be allowed;
- No pets shall be allowed on the Project Site;
- No firearms shall be allowed on the Project Site;
- If vehicle or equipment maintenance is necessary, it shall be performed in the designated staging areas;
- If construction must occur at night (between dusk and dawn), all lighting shall be shielded and directed downward to minimize the potential for glare or spillover onto adjacent properties and to reduce impacts on local wildlife; and
- During construction, heavy equipment shall be operated in accordance with standard BMPs. All equipment used on-site shall be properly maintained to avoid leaks of oil, fuel, or residues. Provisions shall be in place to remediate any accidental spills.

MM-BIO-2 A qualified biological monitor familiar with special-status species with potential to occur on the Project Site shall be present during initial ground disturbance or vegetation removal activities. The biological monitor shall have the authority to temporarily stop work if one or more individuals of these special-status species are observed; the monitor shall then relocate these individuals to suitable undisturbed habitat, outside the areas directly and indirectly affected by ground disturbance activities.

MM-BIO-3 Construction activities should occur outside of the bird breeding season (generally February 1 to August 31) to the extent practicable. If construction must occur within the bird breeding season, then no more than three days prior to initiation of ground disturbance and/or vegetation removal, a nesting bird preconstruction survey shall be conducted by a qualified biologist within the disturbance footprint plus a 100-foot buffer (500 feet for raptors), where feasible. If the Proposed Project is phased or construction activities stop for more than one week, a subsequent preconstruction nesting bird survey shall be required prior to each phase of construction.

Preconstruction nesting bird surveys shall be conducted during the time of day when birds are active (typically early morning or late afternoon) and shall factor in sufficient time to perform this survey adequately and completely. A report of the nesting bird survey results, if applicable, shall be submitted to the property owner/developer for review and approval prior to ground and/or vegetation disturbance activities.

If nests are found, their locations shall be flagged. An appropriate avoidance buffer for passerines is generally 100 feet and up to 500 feet for raptors; however, the buffer distance may be modified by a qualified biologist depending upon the

species and the proposed work activity. The avoidance buffer shall be determined and demarcated by a qualified biologist with bright orange construction fencing or other suitable material that is clearly visible to construction personnel and heavy equipment operators. Active nests shall be monitored periodically by a qualified biologist until it has been determined that the nest is no longer being used by either the young or adults. No ground disturbance shall occur within this buffer until the qualified biologist confirms that the breeding/nesting is completed, and all the young have fledged. If no nesting birds are observed during preconstruction surveys, no further actions would be necessary.

MM-BIO-4 Impacts to sensitive vegetation communities shall be avoided to the greatest extent feasible. Compensatory mitigation for impacts to big sagebrush scrub and scale broom scrub communities, such as on-site restoration, off-site restoration, or purchase of credits through an approved Mitigation Bank or through applicant sponsored mitigation (e.g., on-site restoration), to reduce impacts to sensitive vegetation communities shall be accomplished at a minimum ratio of 1:1; however, the final ratio shall be determined and approved by the California Department of Fish and Wildlife (CDFW) prior to issuance of a grading permit. If on-site or off-site restoration is feasible, a Restoration Plan shall be prepared and submitted for approval by the CDFW prior to initiating construction or any site disturbance. At a minimum, the Restoration Plan shall include the following:

- A description of the purpose and goals of the restoration
- Identification of success criteria and performance standards
- Methods of site preparation
- Irrigation plan and schedule
- Best management practices
- Maintenance and monitoring program
- Adaptive management strategies
- Key stakeholders and responsible parties
- Funding
- Contingencies

MM-BIO-5 Compensatory mitigation for temporary and permanent impacts to land subject to the jurisdiction of U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and/or CDFW, such as purchase of credits through an approved Mitigation Bank or through applicant sponsored mitigation (e.g., on-site restoration), shall be accomplished at a minimum ratio of 1:1; however, the final ratio shall be determined and approved by the USACE, RWQCB, and/or CDFW prior to impacting state- or federally regulated waters. If on-site restoration would occur, a Restoration Plan, as identified in **Mitigation Measure MM-BIO-4**, shall be prepared and submitted for approval by CDFW, USACE, and RWQCB prior to initiating construction or any site disturbance.

Mitigation Measures MM-BIO-1 through **MM-BIO-3** are procedural actions and requirements that would be beneficial to the protection of biological resources. Implementation of these mitigation measures would not result in physical changes to the environment and, thus, would not result in adverse secondary impacts. The on-site restoration, off-site restoration, and/or compensatory mitigation as part of **Mitigation Measures MM-BIO-4** and **MM-BIO-5** would result in additional physical changes to the environment. However, these additional physical changes would be beneficial to restore and expand riparian habitat or sensitive natural communities. Accordingly, it is concluded that these mitigation measures to reduce impacts related to riparian habitat or sensitive natural communities would not result in significant secondary impacts.

6.4.2 CULTURAL RESOURCES

The analysis of the Project's impacts related to archaeological resources, which is addressed in Section 4.4, Cultural Resources, of this Draft EIR, resulted in recommended mitigation measures, as follows:

MM-CR-1 Prior to the start of construction, the Project applicant shall retain a cultural resources principal investigator, who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology. This principal investigator shall create a Worker's Environmental Awareness Program (WEAP) pamphlet that shall be provided as training to construction personnel to understand the requirements for the protection of cultural resources. This training shall include examples of archaeological cultural resources to look for and protocols to follow if discoveries are made. The principal investigator shall develop the training and supply any Project-specific supplemental materials necessary to execute the training.

MM-CR-2 Archaeological resources monitoring shall be conducted by a cultural resources principal investigator, who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology, during Project-related earth-disturbing activities pursuant to the California Office of Historic Preservation standards. Monitoring shall entail visual inspection of Project-related earth-disturbing activities (i.e., grubbing and grading, trenching, shoring, mass excavation, footings, utility installation, etc.) on a full-time basis unless the cultural resources principal investigator deems that construction monitoring can be conducted on a part-time basis or is no longer required.

MM-CR-3 If previously unidentified cultural resources are discovered, the cultural resources principal investigator, who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology, shall have the authority to divert or temporarily halt ground-disturbing activities in the area of discovery to allow for evaluation. The principal investigator shall evaluate the find and contact the City of Santa Clarita as soon as possible with recommendations as to the significance and proper treatment of the find. Depending on the nature of the find, the determination of significance may require additional excavation, potentially including the preparation and execution of a Phase II Archaeological Testing Plan. The City of Santa Clarita, acting with the advice of the consulting principal investigator, shall determine the significance and treatment of the discovered resources. If the resources are Native American in origin, then the

City of Santa Clarita shall notify consulting tribes and seek their input as to the significance and treatment of the find.

MM-CR-4 Avoidance and preservation-in-place are the preferred treatment for both archaeological sites and tribal cultural resources, but avoidance is not always feasible. For significant cultural resources meeting the definition of a historical resource per CEQA Guidelines Section 15064.5(a) or a unique archaeological resource per PRC Section 21083.2(g) as determined by the City of Santa Clarita, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the consulting archaeologist and approved by the City of Santa Clarita before being carried out using professional archaeological methods. Before construction activities are allowed to resume in the affected area, the Data Recovery Program shall be completed to the satisfaction of the City of Santa Clarita. Work may continue on other parts of the project while consultation and treatment are concluded.

If human remains are encountered, work within 50 feet of the discovery shall be suspended, and the City of Santa Clarita shall be contacted immediately. The City of Santa Clarita shall, in turn, contact the Los Angeles County coroner. If the remains are deemed Native American in origin, the coroner shall contact the Native American Heritage Commission, which shall identify a most likely descendant in compliance with PRC Section 5097.98 and CEQA Guidelines Section 15064.5. The most likely descendant shall have up to 48 hours to visit the site and make recommendations as to the treatment and final deposition of the remains. Work may be resumed at the landowner's discretion but shall only commence after consultation and treatment have been concluded to the satisfaction of the City of Santa Clarita. Work may continue on other parts of the Project Site while consultation and treatment are conducted.

MM-CR-5 All archaeological resources collected during the course of Project construction (including those collected during the Phase I Investigation and other pre-Project identification efforts) shall be taken to a properly-equipped archaeological laboratory, where they shall be cleaned, analyzed, and prepared for curation. At a minimum, and unless otherwise specified in any treatment plans prepared for the Project, all resources shall be identified, analyzed, catalogued, photographed, and labeled. At the close of the Project, the collection shall be donated to a public institution with a research interest in the materials and the capacity to care for the materials in perpetuity. Accompanying notes, maps, and photographs shall also be filed at the repository, as appropriate. The cost of curation is assessed by the repository and is the responsibility of the Project applicant.

At the conclusion of monitoring and laboratory work, a final report shall be prepared describing the results of the cultural mitigation monitoring efforts. The report shall include a summary of the field and laboratory methods, an overview of the cultural background of the Project vicinity, a catalog of cultural resources recovered, an analysis of cultural resources recovered and their scientific significance, and recommendations. A copy of the report shall also be submitted to the designated museum repository (if applicable).

Mitigation Measures MM-CR-1, MM-CR-2, and **MM-CR-5** are procedural actions and requirements that would be beneficial to the protection of archaeological resources. Implementation of these mitigation measures would not result in physical changes to the environment, and thus would not result in adverse secondary impacts. The archaeological resources monitoring as part of **Mitigation Measures MM-CR-3** and **MM-CR-4** could potentially require targeted excavations to unearth additional archaeological resources if such is the recommendation of the principal archaeologist. In addition, in the event that grading and excavation activities are temporarily halted, construction activities could be delayed and the duration of construction could be extended. However, even if the duration of construction is extended, the same construction activities evaluated throughout this Draft EIR would continue to occur. Extending the duration of construction would not result in new or increased activities not already evaluated in this Draft EIR. Accordingly, it is concluded that these mitigation measures to reduce impacts related to archaeological resources would not result in significant secondary impacts.

6.4.3 GEOLOGY AND SOILS

The analysis of the Project's impacts related to paleontological resources, which is addressed in Section 4.6, Geology and Soils, of this Draft EIR, resulted in recommended mitigation measures, as follows:

MM-GEO-1 Prior to the start of construction, the Project applicant shall retain a qualified professional paleontologist as defined by Society for Vertebrate Paleontology (SVP) (2010) standards. The paleontologist shall create a Worker's Environmental Awareness Program pamphlet that shall be provided as training to construction personnel to understand regulatory requirements for the protection of paleontological resources. The training class(es) shall include examples of paleontological resources to look for and protocols to follow if discoveries are made. The paleontologist shall develop Project-specific training and supply any supplemental materials necessary to execute the training.

MM-GEO-2 Paleontological resources monitoring shall be conducted under the guidance of the qualified professional paleontologist and by a qualified paleontological resource monitor(s) as defined by SVP (2010) standards. Monitoring shall entail the visual inspection of excavated or graded area and trench sidewalls. The monitor shall have the authority to temporarily halt or divert construction equipment in order to investigate and salvage finds. The paleontological monitor shall have the authority to take sediment samples and test for microfossils at the discretion of the qualified professional paleontologist. If no significant fossils have been exposed or the qualified professional paleontologist has otherwise found that the scientific value of the resource has been exhausted, the qualified professional paleontologist may determine that full-time monitoring is no longer necessary or, with the approval of the City, may reduce or eliminate monitoring.

MM-GEO-3 In the event that a paleontological resource is encountered when a monitor is not on-site or a potentially significant resource is encountered that requires additional investigation or cannot be quickly salvaged by the paleontological monitor, all construction shall cease within 50 feet of the discovery and the qualified professional paleontologist shall be notified immediately. If the monitor

is present at the time of discovery, then the monitor shall have the authority to temporarily divert the construction equipment around the find and notify the qualified professional paleontologist. The qualified professional paleontologist shall then visit the site and assess the resource for its scientific significance. Project excavations shall continue elsewhere, monitored by a paleontological resource monitor. The qualified professional paleontologist shall evaluate the find and contact the City as soon as possible with recommendations as to the significance and potential treatment of the find. Depending on the nature of the find, the determination of significance may require additional excavation, potentially including the preparation and execution of a Paleontological Testing Plan. If significant, depending on the nature of the resource, treatment shall require the preparation and execution of a Paleontological Treatment Plan. The City, acting with the advice of the qualified professional paleontologist, shall determine the significance and treatment of the discovered resources.

MM-GEO-4 All significant fossils collected shall be prepared in a properly-equipped paleontology laboratory to a point ready for permanent curation. Preparation shall include the careful removal of excess matrix from fossil materials and stabilizing and repairing specimens, as necessary. Any fossils encountered and recovered shall be prepared to the point of identification. Following the initial laboratory work, all fossil specimens shall be identified to the lowest taxonomic level, analyzed, photographed, and catalogued, before being delivered to an accredited local museum repository for permanent curation and storage.

MM-GEO-5 At the conclusion of laboratory work and preparation for museum curation, a final report shall be prepared describing the results of the paleontological mitigation monitoring efforts associated with the Project. The report shall be prepared for the lead agency and the Project applicant. The report shall include a summary of the field and laboratory methods, an overview of the geology and paleontology in the Project vicinity, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. If the monitoring efforts produced fossils, then a copy of the report shall also be submitted to the designated museum repository. Accompanying notes, maps, and photographs shall also be filed at the repository. The cost of curation is assessed by the repository and is the responsibility of the Project applicant.

Mitigation Measures MM-GEO-1, MM-GEO-4, and **MM-GEO-5** are procedural actions and requirements that would be beneficial to the protection of paleontological resources. Implementation of these mitigation measures would not result in physical changes to the environment, and thus would not result in adverse secondary impacts. The paleontological resources monitoring as part of **Mitigation Measures MM-GEO-2 and MM-GEO-3** could potentially require excavations to unearth additional paleontological resources, if recommended by the paleontologist. In addition, in the event that grading and excavation activities are temporarily diverted due to the discovery of a paleontological resource, construction activities could be delayed and the duration of construction could be extended. However, even if the duration of construction is extended, the same construction activities evaluated throughout this Draft EIR would continue to occur. Extending the duration of construction would not result in new or increased activities not already evaluated in this Draft EIR. Accordingly, it is concluded that

these mitigation measures to reduce impacts related to paleontological resources would not result in significant secondary impacts.

6.4.4 TRIBAL CULTURAL RESOURCES

The analysis of the Project's impacts related to tribal cultural resources, which is addressed in Section 4.15, Tribal Cultural Resources, of this Draft EIR, resulted in recommended mitigation measures, as follows:

MM TCR-1 In conjunction with **Mitigation Measure MM CR-1**, prior to the start of construction, a qualified representative of the Fernandeño Tataviam Band of Mission Indians shall be retained to conduct a Tribal Cultural Resources Worker Environmental Awareness Program (WEAP) training for construction personnel regarding the aspects of Tribal Cultural Resources and the procedures for notifying the Fernandeño Tataviam Band of Mission Indians should Tribal Cultural Resources be discovered.

MM TCR-2 The Project applicant shall retain a professional Native American monitor procured by the Fernandeño Tataviam Band of Mission Indians to observe all soil disturbing activities, such as site clearance and grubbing, grading, and excavation. The Fernandeño Tataviam Band of Mission Indians shall assign a Native American monitor to each grading or other earthwork machine engaged in ground disturbing activity that is active more than 100 feet from any other grading or other earthwork machine. If tribal cultural resources are encountered, the Native American monitor shall have the authority to request that ground-disturbing activities cease within 60 feet of discovery to assess and document potential finds in real time.

MM TCR-3 In the event that tribal cultural resources are discovered during Project activities, all work in the immediate vicinity of the find (within a 60-foot buffer) shall cease, and a cultural resources principal investigator, who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology, shall assess the find. The principal investigator and tribal monitor shall have the authority to request ground-disturbing activities cease within the area of a discovery. Work on the other portions of the Project outside of the buffered area may continue during this assessment period. Consultation between the Fernandeño Tataviam Band of Mission Indians tribal monitor and lead agency shall occur to determine further action required for any inadvertent discoveries of tribal cultural resources. Depending on the nature of the find, the determination of significance may require additional excavation, potentially including the preparation and execution of a Phase II Archaeological Testing Plan. The City of Santa Clarita, acting with the advice of the consulting principal investigator and the Fernandeño Tataviam Band of Mission Indians, shall determine the significance and treatment of the discovered resources.

MM TCR-4 Prior to the disposition of any inadvertent discovery of tribal cultural resources, the Fernandeño Tataviam Band of Mission Indians shall be consulted on the treatment and reburial location of the tribal cultural resources. The Fernandeño Tataviam Band of Mission Indians shall be given first right of refusal for the

treatment, disposition, and possible collection/caretaking of tribal cultural resources. The Fernandeño Tataviam Band of Mission Indians consider collection as a last resort and prefer tribal cultural resources either remain in-situ, or if required, be reburied.

MM TCR-5 Prior to the disposition of any materials suspected to be indicative of a midden, a cultural resources principal investigator, who meets the Secretary of the Interior's Professional Qualification Standards for Archaeology, and the Fernandeño Tataviam Band of Mission Indians archaeologist shall assess the find and confirm whether it is funerary in nature. Once confirmed it is not suspected to be funerary-associated, the midden shall be left in-situ whenever possible. If it is not possible to leave the midden in-situ, the Fernandeño Tataviam Band of Mission Indians shall be consulted for a treatment plan.

MM TCR-6 If human remains or funerary objects are encountered during any activities associated with the Project, work in the immediate vicinity (within a 100-foot buffer of the find) shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code Section 7050.5, which shall be enforced for the duration of the Project. Should the find be determined as Native American in origin, the Most Likely Descendant (MLD), as determined by the Native American Heritage Commission (NAHC), shall be notified and consulted to provide recommendations to the landowner for the treatment of the human remains. However, pursuant to PRC Section 5097, the ultimate decision regarding the subsequent disposition of those discoveries shall be made by the landowner and the City of Santa Clarita.

MM TCR-7 A copy of any and all archaeological documents created as a part of the project (isolate records, site records, survey reports, testing reports, and monitoring reports) shall be provided to the Fernandeño Tataviam Band of Mission Indians.

Mitigation Measures MM-TCR-1 and **MM-TCR-4** through **MM-TCR-7** are procedural actions and requirements that would be beneficial to the protection of tribal cultural/archaeological resources and human remains. Implementation of these mitigation measures would not result in physical changes to the environment, and thus would not result in adverse secondary impacts. The tribal cultural resources monitoring as part of **Mitigation Measures MM-TCR-2 and MM-TCR-3** could potentially require excavations to unearth additional tribal cultural resources, if recommended by the Native American monitor. In addition, in the event that grading and excavation activities are temporarily diverted due to the discovery of a tribal cultural resource, construction activities could be delayed and the duration of construction could be extended. However, even if the duration of construction is extended, the same construction activities evaluated throughout this Draft EIR would continue to occur. Extending the duration of construction would not result in new or increased activities not already evaluated in this Draft EIR. Accordingly, it is concluded that these mitigation measures to reduce impacts related to tribal cultural resources would not result in significant secondary impacts.

6.5 EFFECTS FOUND NOT TO BE SIGNIFICANT

Section 15128 of the CEQA Guidelines states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant

and not discussed in detail in the Draft EIR. Pursuant to Section 15128, such a statement may be contained in an attached copy of an Initial Study. An Initial Study was prepared for the Project and is included as **Appendix A** of this Draft EIR, which provides a detailed discussion of the issue and reasons why each topical area was found not to be significant.

The significance thresholds used to evaluate the impacts of the Project are based on Appendix G of the CEQA Guidelines and the City's Initial Study Checklist. The City of Santa Clarita determined that the Project would result in less than significant or no impacts related to:

Aesthetics

b) Substantially damage scenic resources, including, but not limited to, primary/secondary ridgelines, trees, rock outcroppings, and historic buildings within a state scenic highway?

Agriculture and Forestry Resources

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

d) Result in the loss of forestland or conversion of forestland to non-forest use?

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forestland to non-forest use?

Air Quality

e) Create objectionable odors affecting a substantial number of people?

Biological Resources

f) Conflict with the provisions of an adopted habitat conservation plans, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?

g) Affect a Significant Ecological Area (SEA) or Significant Natural Area (SNA) as identified on the City of Santa Clarita ESA Delineation Map?

Geology and Soils

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

iii) Seismic-related ground failure, including liquefaction?

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Hazards and Hazardous Materials

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

i) Expose people to existing sources of potential health hazards (e.g., electrical transmission lines, gas lines, oil pipelines)?

Hydrology and Water Quality

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?

m) Impact stormwater management in any of the following ways:

vii) Does the Proposed Project include provisions for the separation, recycling, and reuse of materials both during construction and after project occupancy?

Land Use and Planning

a) Disrupt or physically divide an established community (including a low-income or minority community)?

c) Conflict with any applicable habitat conservation plan, natural community conservation plan, and/or policies by agencies with jurisdiction over the project?

Mineral and Energy Resources

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

c) Use nonrenewable resources in a wasteful and inefficient manner?

Noise

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

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

Population and Housing

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere (especially affordable housing)?

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Public Services

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

   iii) Schools?

   iv) Parks?

Recreation

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

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