

KIA Dealership Calabasas Project

City of Calabasas, California

Environmental Case Number: SPR-2023-004; OTP-2023-006; LLA-2023-001; SCP-2023-002



PREPARED FOR:

City of Calabasas
Community Development Department
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**KIA DEALERSHIP CALABASAS
PROJECT**

**INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION**

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April 2025

<u>SECTION</u>	<u>PAGE NUMBER</u>
1.0 INTRODUCTION	1
2.0 FINDINGS OF THIS INITIAL STUDY	2
3.0 PROJECT DESCRIPTION	3
4.0 INITIAL STUDY / MITIGATED NEGATIVE DECLARATION	10
I. Aesthetics	13
II. Agriculture and Forestry Resources	17
III. Air Quality	19
IV. Biological Resources	27
V. Cultural Resources	34
VI. Energy	38
VII. Geology and Soils	41
VIII. Greenhouse Gas Emissions	46
IX. Hazards and Hazardous Materials	50
X. Hydrology and Water Quality	54
XI. Land Use and Planning	58
XII. Mineral Resources	61
XIII. Noise	62
XIV. Population and Housing	69
XV. Public Services	71
XVI. Recreation	74
XVII. Transportation	75
XVIII. Tribal Cultural Resources	80
XIX. Utilities and Service Systems	84
XX. Wildfire	89
XXI. Mandatory Findings of Significance	93
5.0 REFERENCES	95
6.0 ACRONYMS	98
7.0 PREPARERS	100
8.0 RESPONSE TO COMMENTS	101
9.0 CORRECTIONS	126
 <u>TABLES</u>	
Table 3-1 Proposed Building Area	6
Table 3-2 Automobile and Bicycle Parking	8
Table 3-3 Construction Assumptions	9

Table III-1	Project Area Air Quality Monitoring Summary 2017-2021	20
Table III-2	South Coast Air Basin Emissions Forecasts	21
Table III-3	SCAQMD Daily Emissions Thresholds	22
Table III-4	Maximum Daily Construction Emissions	23
Table III-5	Maximum Daily Operational Emissions	23
Table III-6	Local Significance Thresholds and Peak Daily Onsite Emissions	25
Table VI-1	Fuel Consumption During Construction	39
Table VIII-1	Annual Greenhouse Gas Emissions	48
Table XI-1	Consistency Analysis with General Plan Land Use Element	59
Table XIII-1	Existing Freeway Traffic Noise Contours	63
Table XIII-2	Construction Equipment Noise Level at Sensitive Receptors	64
Table XIII-3	Calabasas Exterior Noise Standards	65
Table XIII-4	Project-Related Traffic Noise Increase	66
Table XIII-5	Car Wash Dryer Noise Levels at Receptors	67
Table XIII-6	Vibration Damage Levels at Nearby Sensitive Receptors	67
Table XIV-1	Population and Employment Growth Forecast	69
Table XVII-1	Potential Circulation Enhancements on Calabasas Road	76
Table XIX-1	Project Water Demand	85
Table XIX-2	Project Wastewater Generation	86
Table XIX-3	Demolition and Construction Solid Waste Generation	87
Table XIX-4	Operational Solid Waste Generation	87
Table XXI-1	Related Projects	94

FIGURES

Figure 1	Location Map	4
Figure 2	Vicinity Map	5
Figure 3	Site Plan	7

APPENDICES

Appendix A	Project Plans
Appendix B	Air Quality and GHG Impact Analysis
Appendix C	Biological Assessment
Appendix D	Oak Tree Report
Appendix E	Phase I Cultural Resource Assessment
Appendix F	Energy Calculations
Appendix G	Geotechnical Report
Appendix H	Phase I ESA
Appendix I	Limited Phase II Site Investigation Report
Appendix J	Hydrology Study
Appendix K	Noise and Vibration Technical Study
Appendix L	Transportation Analysis
Appendix M	Tribal Consultation
Appendix N	Wildfire Memo

1.0 INTRODUCTION

The purpose of this Initial Study is to disclose and evaluate the environmental impacts of the Kia Dealership Project proposed by Hello Auto Group, to be located at 24460 Calabasas Road Calabasas, California.

PROJECT SUMMARY

The Kia Dealership Project consists of the demolition of remnant paved areas, foundations, retaining walls, and graded pads associated with a former plant nursery on the currently vacant site and the proposed construction, use, and maintenance of a new automobile dealership (inclusive of auto display and auto service), comprised of a two-story, 35-foot tall commercial building and associated improvements totaling up to 47,897 SF of floor area. The majority (78 percent) of the 10.94-acre site will be left undisturbed, as shown on the site plan. In addition to the proposed dealership building, the project proposes a detached auto wash/detail facility, employee surface parking, rooftop parking, a rooftop solar array, landscaping, signage, and exterior display/security lighting within the City of Calabasas.

LEGAL AUTHORITY

As lead agency, the City of Calabasas has prepared this Initial Study in accordance with the California Environmental Quality Act (CEQA) of 1970 (Public Resources Code 21000–21189) and relevant provisions of the *CEQA Guidelines* (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000–15387), as amended.

Initial Study. Section 15063(c) of the CEQA Guidelines defines an Initial Study as the proper preliminary method of analyzing the potential environmental consequences of a project. To paraphrase from this Section, the relevant purposes of an Initial Study are:

- (1) To provide the Lead Agency with the necessary information to decide whether to prepare an Environmental Impact Report (EIR) or a Negative Declaration (ND) or Mitigated Negative Declaration (MND);
- (2) To enable the Lead Agency to modify a project, mitigating adverse impacts, thus avoiding the need to prepare an EIR; and
- (3) To provide sufficient technical analysis of the environmental effects of a project to permit a judgment based on the record as a whole, that the environmental effects of a project have been adequately mitigated.

Negative Declaration or Mitigated Negative Declaration. CEQA Guidelines Section 15070 States a public agency shall prepare a ND or MND for a project subject to CEQA when:

- (a) The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment; or
- (b) The initial study identifies potentially significant effects, but:
 1. Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed MND and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and
 2. There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

An MND may be used to satisfy the requirements of CEQA when a project would have no significant unmitigable effects on the environment.

2.0 FINDINGS OF THIS INITIAL STUDY

The impact analysis in this Initial Study demonstrates that with the incorporation of mitigation measures, the proposed project would have a less than significant impact on the environment with regard to all CEQA Environmental Checklist topics, and therefore an MND is the appropriate CEQA document. For each topic addressed in Section 4.0, the impacts associated with development of this project have been determined to be “Significant Unless Mitigation Incorporated,” “Less than Significant,” or “No Impact.” For topics determined to be “Significant Unless Mitigation Incorporated,” mitigation measures have been identified that would reduce impacts to below a level of significance.

3.0 PROJECT DESCRIPTION

Hello Auto Group (“Applicant”) proposes the Kia Dealership Calabasas Project (“project”) consisting of the demolition of remnant paved areas, foundations, retaining walls, and graded pads associated with a former plant nursery on the currently vacant site and the proposed construction, use, and maintenance of a new automobile dealership (inclusive of auto display and auto service), comprised of a two-story, 35-foot tall commercial building and associated improvements totaling up to 47,897 SF of floor area. The majority of the site will be left undeveloped. In addition to the proposed dealership building, the project proposes a detached auto wash/detail facility, employee surface parking, rooftop parking, rooftop solar array, landscaping, signage, and exterior display/security lighting within the City of Calabasas.

PROJECT LOCATION, ZONING, AND EXISTING USES

The project is located in the City of Calabasas as shown in **Figure 1, Location Map**. The project site is located along the south side of Calabasas Road between Mureau Road and Parkway Calabasas as shown in **Figure 2, Vicinity Map**. The subject property is zoned Commercial Limited (CL) with a Commercial Auto Retail (CAR) overlay and a Scenic Corridor (SC) overlay. The subject property is within the Ventura Freeway Scenic Corridor. The street address associated with the subject property is 24460 Calabasas Road.

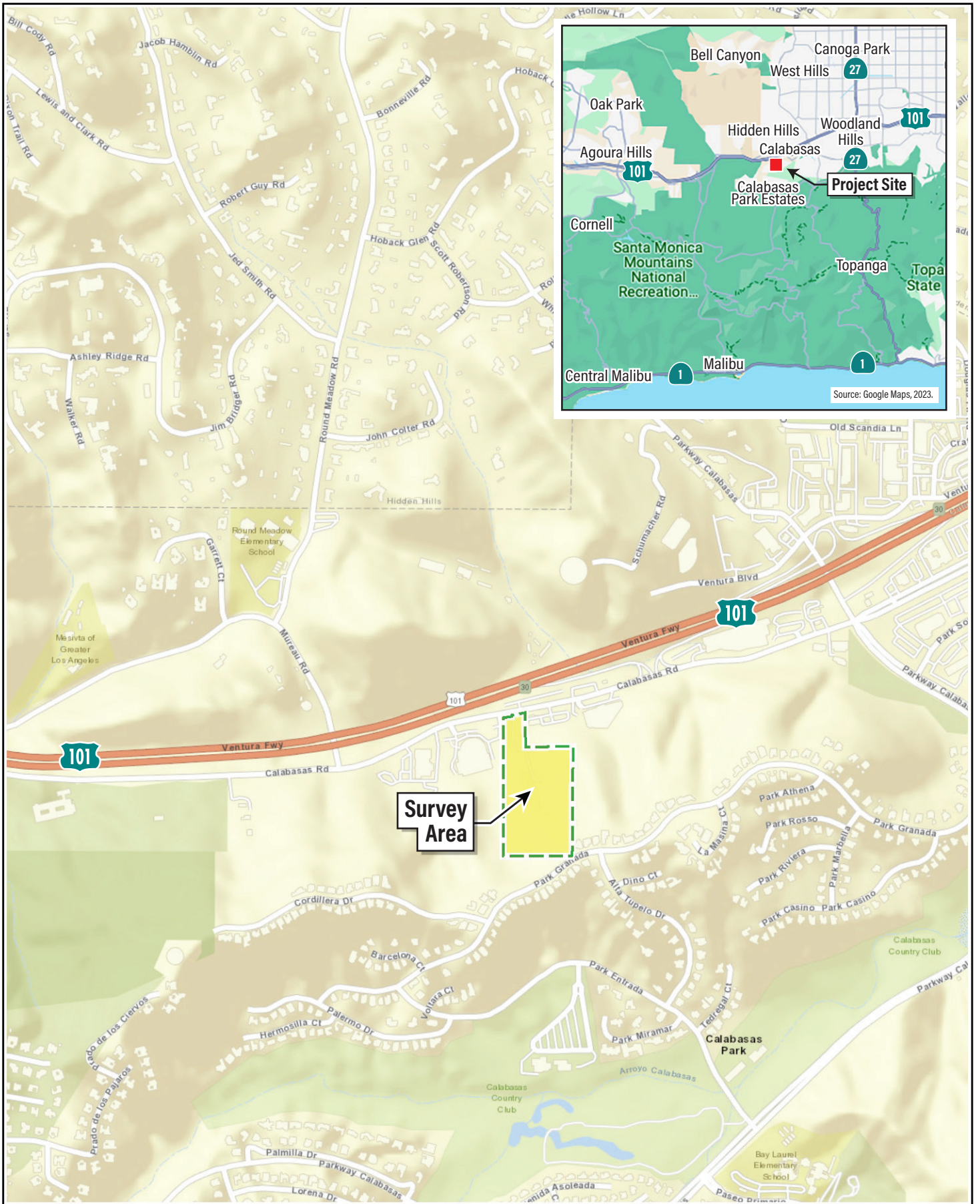
The project site is comprised of two parcels, identified with Assessor’s Parcel Numbers 2069-009-008 and 2069-009-020 (“Subject Property”). The Subject Property encompasses 10.94 gross acres (476,553 SF) in an irregular shape, as shown in Figure 2. The project site is located on the northern portion of the subject property. The project would disturb approximately 22 percent of the Subject Property, and thus most of the Subject Property (78 percent) would remain undeveloped. There is an elevation change of approximately 160 feet from the lower northwest corner to the higher southeast corner of the project site. The undisturbed portion of the Subject Property continues to rise further in elevation.

The project site contains 50 oak trees located on the subject property and four off-site oak trees located adjacent to the subject property. Oak trees are protected by the city oak tree regulations. A site-specific Oak Tree Report found that 21 trees would have their protected zones encroached upon by development, but only two would be encroached to the extent that the trees may be damaged.¹ The project also includes removal of three oak trees in order to facilitate excavation/construction of the building and associated retaining walls. The remainder of the on-site oak trees are proposed to be maintained and protected during construction using standard tree protection practices, as discussed in the Oak Tree Report. In addition, the project would include planting 17 coast live oaks (*Quercus agrifolia*) as mitigation trees.

The project site is currently improved with existing remnant paved areas, foundations, retaining walls, and graded pads associated with the former plant nursery use. The following summarizes the existing land uses surrounding the subject property.

- The property north of the Subject Property, across Calabasas Road, is zoned Commercial Business Park (CB) and developed with a vehicle storage lot. US Route 101 (US 101) is further to the north.
- The properties to the west are zoned OS-DR, CL, and Commercial, retail (CR) and the northern part of the adjacent property is improved with an existing automobile dealership, while the southern part of the property is undeveloped. Properties further to the west are developed with an existing automobile dealership, an associated vehicle inventory storage lot, or contain undeveloped open space.

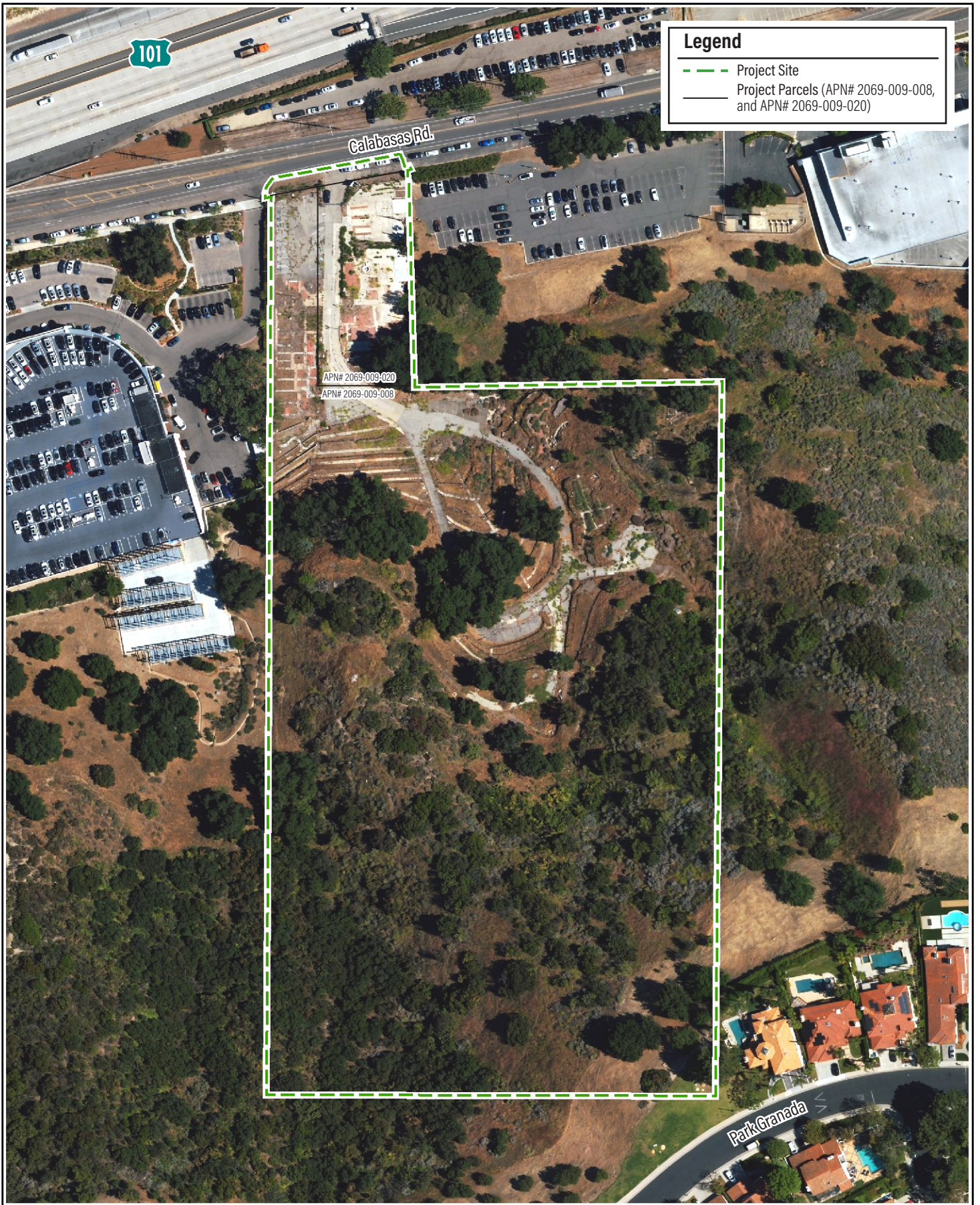
¹ Tree Care Consulting, Oak Tree Report, March 31, 2023.



Source: ESRI World Street Maps, 2023.

Location Map





Legend

- Project Site
- Project Parcels (APN# 2069-009-008, and APN# 2069-009-020)

Source: Valtus Imagery Services: Hexagon Imagery Program (HxIP), 2022.

- The properties to the east are zoned CL, CR, PF, OS-DR, and CL OS-DR including Cadillac auto dealership, a vacant parcel, Los Angeles Consolidated Fire Protection District (LACFD) Station 68, a mixed-use property with a medical clinic and multi-family residences. To the northeast (across Calabasas Road) is improved with a vehicle storage lot, a water district pump station, interstate interchange, existing automobile dealership, and undeveloped properties.
- The properties to the south are zoned open space, development restricted (OS-DR), and residential single-family (RS), and include undeveloped open space or properties developed with single family residences which are adjacent to the southernmost portion of the project site.

PROJECT COMPONENTS

The project consists of removal of the existing remnant paved areas, foundations, retaining walls, and graded pads from the former plant nursery use, and development of a new, two-story plus roof deck, automobile dealership totaling up to 47,897 SF of floor area, as shown in **Figure 3, Site Plan**. The proposed buildings will reach a maximum height of 35 feet above the finished grade including the 3.5-foot parapet and solar panel array, and excluding the rooftop elevator tower, stair tower, and machinery. Architectural Site Plans detailing building elevations, exteriors, and renderings are provided in **Appendix A, Project Plans**. The project Landscape Plan and Civil Plan Set are also included in Appendix A. The proposed building area breakdown is provided in **Table 3-1, Proposed Building Area**.

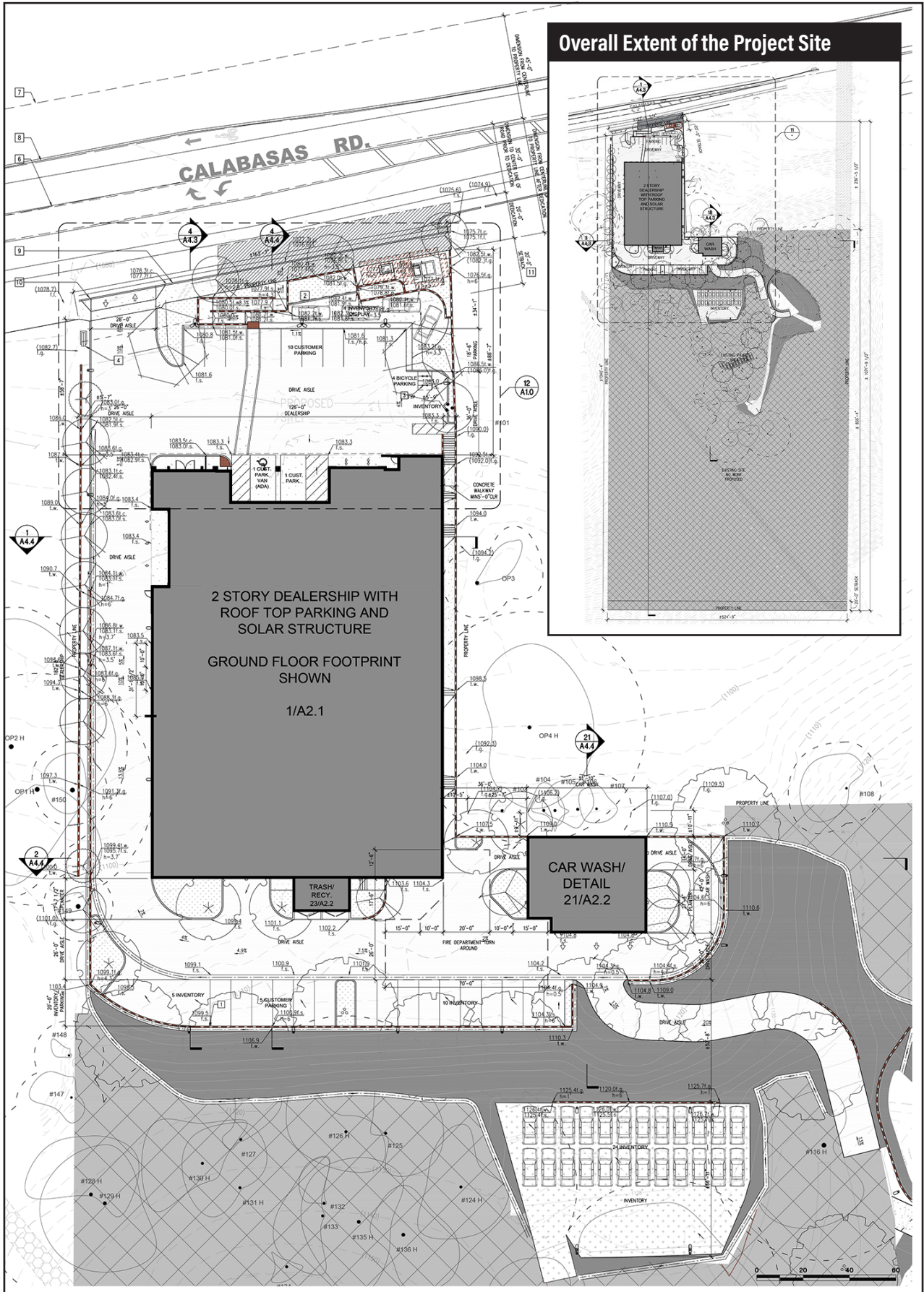
Table 3-1
Proposed Building Area

Floor	Area (SF)
Ground Floor	22,890
Second Floor	22,890
Car Wash	2,117
Total Proposed Floor Area	47,897
Source: AHT Architects, Architectural Site Plans, Sheet A0.0, June 4, 2024.	

Demolition of the existing paved areas, foundations, retaining walls, and graded pads would remove 3,500 SF of existing hardscape. The project proposes a new automobile dealership (inclusive of auto display, auto service and auto wash/detail facility) with a total floor area of up to 47,897 SF. Ground floor uses consist of a service shop, automobile service bays, a structurally separate car wash associated with the service shop in the main building, outdoor automobile inventory display and/or storage, outdoor customer automobile parking, and outdoor bicycle parking. The proposed automobile repair and service areas will be wholly contained within the building. The second-floor level contains typical uses associated with an automobile dealership, including a sales floor/showroom, offices, and a customer lounge, as well an indoor structured customer automobile parking and automobile inventory storage. The rooftop includes employee automobile parking and automobile inventory storage. The roof would also contain heating, ventilation, and air conditioning (HVAC) equipment and an open-air solar canopy above the parking and storage.

SITE PARKING, ACCESS, AND CIRCULATION

The existing western driveway would be relocated from its current location to provide vehicle access from this single driveway along Calabasas Road. Car carrier delivery trucks would unload new vehicles at the loading zone at the front property line. The new vehicles would be driven on-site or stored in off-site lots. Pedestrian access would be provided from Calabasas Road. Refer to **Table 3-2, Automobile and Bicycle Parking**, for a breakdown of required and proposed parking.



Source: AHT Architecture, Feb. 27, 2024.

Table 3-2
Automobile and Bicycle Parking

Type	Land Use	Square Footage ¹	Required Ratio	Number of Spaces
Automobile Parking	Showroom/Office	12,375 SF	1 space/450 SF	28 spaces
	Service	20,386 SF	1 space/500 SF	41 spaces
	Parts Department	1,805 SF	1 space/300 SF	7 spaces
	Outdoor Display	969 SF	1 space/2,000 SF	1 space
Total Automobile Parking Required				77 spaces
Total Automobile Parking Proposed				77 spaces
Bicycle Parking	Commercial	Not Applicable	1 bicycle space / 20 automobile spaces (i.e., 5 percent)	4 spaces
Total Bicycle Parking Required				4 spaces
Total Bicycle Parking Proposed				4 spaces
Source: AHT Architects, Inc., Architectural Plans, June 4, 2024.				
¹ The square footages provided in this table include outdoor space and therefore will differ from building square footage provided elsewhere in this document.				

As shown in Table 3-2, the project requires a total of 77 automobile parking spaces for all uses on site. The project meets the required parking as follows: 13 parking spaces on the ground floor, 12 spaces behind the building, 11 parking spaces on the second floor, and 43 spaces on the roof level. In addition to the automobile parking spaces, the project provides a total of 4 bicycle parking spaces, in compliance with the City of Calabasas Zoning Ordinance. The 77 automobile parking spaces proposed include four accessible Americans with Disabilities Act parking spaces, electric vehicle charging spaces and van pool parking stalls for customers and employees.

The City's 2030 General Plan designates the Calabasas Road as an arterial roadway, within the project vicinity. Calabasas Road adjoins the subject property to the north and generally runs east and west. Calabasas Road is a two lane, undivided roadway, with a bike lane in the project vicinity. The roadway is currently improved with pavement and a concrete curb but has no sidewalk.

DEMOLITION AND CONSTRUCTION

The project would demolish and remove the existing remnant paved areas, foundations, retaining walls, and graded pads from the former plant nursery use. Demolition and construction is estimated to begin as early as winter 2024/early 2025. An estimate of the expected duration for each phase of construction, size of the on-site workforce, and off-road equipment needed is provided in **Table 3-3, Construction Assumptions**. California Emissions Estimator Model (CalEEMod 2022.1.1.23) estimated work schedule of 13 months is conservative since the project is expected to be completed and operational by spring/summer of 2026.

As shown below in Table 3-3, demolition and construction necessitates the use of off-road earth moving equipment such as, bulldozers (dozers), forklifts, and tractors equipped with front end loaders and backhoes. Construction also involves trucks for material and supplies delivery, as well as powered hand tools including concrete saws. Construction crews are expected to access the site via the Ventura Freeway and Calabasas Road, thereby avoiding residential areas. The grading phase of construction would result in export of 27,100 cubic yards (CY) of soil. The likely destination for export is the Calabasas Landfill.

**Table 3-3
Construction Assumptions**

Phase	Duration	Equipment Type	(# of pieces)
Demolition	20 days	Concrete Saw	1
		Tractor/Loader/Backhoes	2
		Rubber Tired Dozers	1
Site Preparation	2 days	Grader	1
		Tractors/Loaders/Backhoes	1
Grading	40 days	Rubber Tired Dozers	1
		Grader	1
		Tractors/Loaders/Backhoes	1
Building Construction	200 days	Cranes	1
		Forklifts	2
		Tractors/Loaders/Backhoes	2
Paving	10 days	Pavers	1
		Rollers	1
		Cement and Mortar Mixers	4
		Tractors/Loaders/Backhoes	1
Architectural Coating	10 days	Air Compressors	1

Source: Envicom Corporation, Air Quality and GHG Impact Analysis, May 2024.

REQUIRED APPROVALS

The Applicant is requesting the following entitlements and approvals from the City as Lead Agency under CEQA:

- Site Plan Review
- Oak Tree Permit
- Lot Line Adjustment
- Scenic Corridor Permit
- Sign Permit and Sign Program

4.0 INITIAL STUDY / MITIGATED NEGATIVE DECLARATION**CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY AND CHECKLIST**

- 1. Project title:**
Kia Dealership Calabasas Project
- 2. Lead agency name and address:**
City of Calabasas
Community Development Department
100 Civic Center Way
Calabasas, CA 91302
- 3. Contact person and phone number:**
Jaclyn Rackerby
Community Development Department
100 Civic Center Way
Calabasas, CA 91302
Tel: (818) 224-1705
- 4. Project location:**
24460 Calabasas Road, Calabasas, CA 91302
- 5. Project sponsor's name and address:**
Diamond West
24005 Ventura Blvd, Ste. 100,
Calabasas, CA 91302
- 6. General plan land use designation:**
Business Limited Intensity Commercial (B-LI)
- 7. Zoning:**
Commercial Limited (CL)
- 8. Description of project:**
The Kia Dealership Project consists of the demolition of remnant paved areas, foundations, retaining walls, and graded pads associated with a former plant nursery on the currently vacant site and the proposed construction, use, and maintenance of a new automobile dealership (inclusive of auto display and auto service), comprised of a two-story, 35-foot tall commercial building and associated improvements totaling up to 47,897 SF of building area. The majority (78 percent) of the 10.94-acre site will be left undeveloped. In addition to the proposed dealership building, the project proposes a detached auto wash/detail facility, employee surface parking, rooftop parking, rooftop solar array, landscaping, signage, and exterior display/security lighting within the City of Calabasas.
- 9. Surrounding land uses and setting:**
Calabasas Road is to the north of the subject property and is zoned CB and developed with a vehicle storage lot. US 101 is further north of the property. The properties to the west are zoned OS-DR, CL, and CR and the northern part of the adjacent property is improved with an existing automobile dealership and southern portion is undeveloped. The properties to the east are zoned CL, CR, PF, OS-DR, and CL OS-DR, and include an existing automobile dealership, existing open space and a single family residence (to the northeast). The properties to the south are zoned OS-DR, and RS,

and include undeveloped open space or properties developed with single family residences which are adjacent to the southernmost portion of the project site.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):

The City of Calabasas is the only approval agency at this time.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

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

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project. Therefore, an EIR Addendum will be prepared.

Name: Jaclyn Rackerby
 Title: Planner, City of Calabasas

Signature: 

Date: 4/16/25

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

The following analysis is based on the Architectural Site Plans prepared by AHT Architects Inc., provided in Appendix A.

a. Less Than Significant Impact. A significant impact may occur if a proposed project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks views of a scenic vista. There are no specific scenic elements identified for the site in the City General Plan; however, the project is located within a scenic corridor. Thus, the scenic vista would be a panoramic view of the hillsides and ridgeline as viewed from the corridor (also see the discussion below in Section I.b.).

The project site has been previously developed and contains remnant hardscaping from the prior use. The site is located within 500 feet of a designated scenic corridor associated with US 101, and is therefore located within a Scenic Corridor Overlay as shown on the City’s Zoning Map.² The project would be two stories tall and it would have a limited effect on views of the hillsides to the south from US 101 and Calabasas Road, as the visual impact analysis in the project site plan shows (see Rendering 1 and Rendering 2 in the Architectural Plan Set in Appendix A). In addition, while CEQA does not protect private views, it should be noted that the project would not substantially obstruct views from the residences to the south because they are much higher in elevation than the maximum height of the proposed development. The project would be required to comply with the City’s Scenic Corridor Development Guidelines, which would reduce aesthetic impacts. These guidelines require compliance with other applicable city polices, including the use of unobtrusive building materials and colors, building setbacks, and use of minimal of grading that blends with natural contours, among other design requirements. Therefore, the project would have a less than significant impact.

Mitigation Measures: No mitigation measures are required.

² City of Calabasas Zoning Map, map printed April 26, 2018, adopted January 27, 2010.

b. Less than Significant Impact. A significant impact would occur if scenic resources within a State scenic highway would be damaged or removed by development of the proposed project. US 101 is an eligible State scenic highway from its junction with State Route 27 (SR 27) and State Route 46 (SR 46),³ which includes the project area. In addition, the City of Calabasas General Plan designates the US 101 corridor in this location (and along its entire extent through the city) as a local scenic corridor. The project is not located in a designated historic district and does not contain scenic rock outcroppings. The project site contains protected oak trees, of which 21 would be encroached and three would be removed during project construction, including one heritage oak tree. As 47 of the 50 existing oak trees (or 94%) will remain, the impact to scenic resources from tree removals would be less than significant.

Based on the analysis that follows, the project would result in no impact to scenic resources within a city-designated scenic highway.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact. A significant impact would occur if a proposed project introduced incompatible visual elements on the site or visual elements incompatible with the character of the area surroundings. Projects in urbanized areas could have a significant impact if they conflicted with applicable zoning and other regulations governing scenic quality. The project is located in a commercial area with existing development. Views in the vicinity of the project site are constrained by similar, adjacent structures within the urban setting, including the existing automobile dealerships to the west, and the existing automobile dealership to the east, which are of similar height and massing as the proposed project, as shown in Rendering 1 and Rendering 2 in the Architectural Plan Set included in Appendix A, and discussed below. As with the surrounding projects, the hillsides and ridgelines behind the structures would remain visible from public vantage points, including the US 101 scenic corridor, due to their greater elevation. As described in the following analysis, the project would not conflict with applicable zoning and other regulations governing scenic quality, and impacts would be less than significant.

Building Height and Massing

As in-fill development, the building height and massing of the proposed automobile dealership is similar to the existing adjacent automobile dealerships. The project is zoned CL-CAR-SC, and the CL zone allows a maximum height of 35 feet. The project has a maximum building height of 35 feet above the finished grade, including the 3.5-foot parapet and solar panels, and excluding the rooftop elevator tower, stair tower, and machinery.

The project site zoning is CL-CAR-SC, which is commercial limited, with a commercial auto retailer overlay and a scenic corridor overlay. The project requests a Scenic Corridor Permit and will be required to comply with the City's Scenic Corridor Development Guidelines.

By proposing a two-story automobile dealership adjacent to existing one to two-story automobile dealerships, the proposed project would be of similar scale, mass, land use, and density as existing commercial uses within the project vicinity. In the area of Calabasas Road where the project is located, there are a total of four existing automobile dealerships. These existing buildings feature massing similar to the proposed project.

Landscape Design

Existing trees on the project site to remain would include coast live oaks (*Quercus agrifolia*), valley oaks (*Quercus lobata*), and California black walnut (*Juglans californica*). The project would plant additional

³ Caltrans, List Of Eligible And Officially Designated State Scenic Highways, August 2019.

trees, including coast live oaks (*Quercus agrifolia*), shrubs, vines, and groundcover, as shown on the project landscape plan.⁴ A native plant palette would be used, and most of the new plants would have low water usage. The final proposed landscape plan would be reviewed and approved by the Planning Division during the plan check process prior to issuance of a building permit. The landscaping would preserve aesthetics from public viewpoints along US 101, and with the hillside backdrop remaining in view, a less than significant impact would occur.

Graffiti/Vandalism

The project includes walls that could provide space for graffiti and vandalism. The project owner would employ professional staff that would identify and arrange for removal of graffiti and debris, thus, the owner would maintain the project appearance as attractive, clean, and safe for employees and customers. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact. A significant impact may occur if a project introduces new sources of light or glare from a project site that would be incompatible with the surrounding areas, or that pose a safety hazard to motorists on adjacent streets or freeways. The determination of whether the proposed project results in a significant nighttime illumination impact must consider the change in ambient illumination levels as a result of proposed project sources and the extent to which proposed project lighting would spill off the project site and affect adjacent light-sensitive areas.

Light

The project is located in a developed area with existing nighttime lighting from streetlights along Calabasas Road. Other sources of nighttime lighting include nearby commercial buildings, parking lots, and freeway traffic from US 101. The proposed project would generally include nighttime lighting limited to the amount necessary to safely illuminate building entrances, stairs and walkways for adequate night visibility and security. The project does include a small illuminated vehicle display area; however, compliance with Calabasas Municipal Code (CMC) guidelines and standards (Section 17.25.030(B)(9) [Dark Skies Ordinance] regarding maximum allowable light levels, direction of light, and glare, would limit light spillover.⁵ The project applicant's lighting consultant has provided a photometric plan (included in Appendix A) that demonstrates compliance with the ordinance. As a design feature, the proposed outdoor and parking lighting would be shielded and directed downward within the site in a manner that prevents the direct illumination of adjacent properties, natural areas, and the night sky, unless otherwise required for other safety purposes as determined by the City, thereby reducing light impacts to less than significant.

Glare

Nighttime glare can occur from car lights, streetlights and other lights on buildings, walkways, and parking areas. Daytime glare can result from buildings with glass exteriors or reflective surfaces. While solar panels primarily absorb light rather than reflect it, rooftop solar panels would have some minor potential to create glare from light approaching at certain angles, but visibility from public viewpoints would be limited. The exterior facade of the proposed building would be finished with materials including metal panels, corrugated metal panels, metal coping and paint. The project would also have glass windows on the north, west, and east facades. The City will review the material selection of the building exteriors shown on the architectural plans to ensure the exteriors are constructed of materials with high-performance and/or non-

⁴ L. Newman Design Group, Inc., Landscape Plan, February 5, 2024.

⁵ Calabasas Municipal Code, Chapter 17: Land Use Development, Article III: Site Planning and Project Design Standards, Chapter 17.27: Lighting, Section B 9: Auto Dealerships, Ord. No 2010-265 § 3. January 27, 2010.

reflective glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare.

The project would also include tree planting as part of the landscaping scheme, which would provide additional screening. Vehicle headlights from vehicles parking within the proposed parking levels and roof parking level would be concealed by the building exterior and parapet wall surrounding the roof perimeter. Therefore, glare impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Impact Analysis

a-e. No Impact. The project site is zoned CL with a CAR overlay. The subject property is located in an area identified as “Other Land”⁶ on the California Important Farmland Finder prepared by the California Department of Conservation for the Farmland Mapping and Monitoring Program.⁷ The site was previously a plant nursery, which has been closed. The project site is not enrolled in an existing Williamson Act Contract.⁸ The site is not mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance nor located within a national forest or on forest land. As such, the project would have no impact on agricultural or forestry resources.

⁶ “Other Land” is described as land not included in any other mapping category. Common examples include low density rural developments, brush, timber, wetland, and riparian areas not suitable for livestock grazing, confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than forty acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.

⁷ California Department of Conservation, Division of Land Resource Protection, California Important Farmland, Accessed May 7, 2024 at: <https://maps.conservation.ca.gov/DLRP/CIFF/>

⁸ California Department of Conservation, Division of Land Resource Protection, California Williamson Act Enrollment Finder, Accessed on May 7, 2024 at: <https://maps.conservation.ca.gov/dlrp/WilliamsonAct/>.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

The proposed project lies within the South Coast Air Basin (Air Basin), a 6,600 square mile coastal plain bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto mountains to the north and east. A number of regional factors collectively hinder the dispersion of air pollutants and contribute towards poor air quality, especially in the Air Basin’s inland valleys: low temperature inversion heights, meteorological conditions (e.g. light winds, extensive sunlight, limited turbulent mixing), adjacent mountain ranges and topographical features. The goal of the South Coast Air Quality Management District (SCAQMD) is achieving clean air standards within the Air Basin.

Project-related air quality emission data was obtained using CalEEMod, a model developed to calculate construction and operational emissions. The model calculates both the daily maximum and annual average emissions for criteria pollutants. The following analysis is based on the Air Quality and Greenhouse Gas (GHG) Impact Analysis, prepared by Envicom Corporation, provided in **Appendix B, Air Quality and GHG Impact Analysis**, which is based on the previous site plan that proposed more building square-footage, so it is a conservative analysis.⁹

Existing levels of ambient air quality and historical trends and projections in the proposed project area are documented from measurements made by the SCAQMD, which is the agency that is responsible for regulating stationary sources of emissions in the air basin. The project site is nearest to the Reseda Monitoring Station (Station 074), therefore, monitoring data recorded at Station 074 for regional air pollutants, such as O₃, carbon monoxide (CO), nitrogen oxides (NO_x), and 10-micron diameter or less particulate matter (PM-10 and PM-2.5) are used to represent the air quality in the proposed project area.¹⁰

⁹ Envicom Corporation, Air Quality and Greenhouse Gas Impact Analysis, May 2024.

¹⁰ California Air Resources Board, Air Monitoring Sites – Interactive Map, accessed on August 11, 2023 at: <https://ww2.arb.ca.gov/applications/air-monitoring-sites-interactive-map>

Table III-1, Project Area Air Quality Monitoring Summary 2017-2021 provides data from this monitoring station which this data is available from the SCAQMD website.¹¹

**Table III-1
Project Area Air Quality Monitoring Summary 2017-2021**

Pollutant/Standard	2017	2018	2019	2020	2021
Ozone (O₃)					
<i>Number of Days Standards Exceeded</i>					
1-Hour > 0.09 ppm (S)	26	14	1	14	4
8-Hour > 0.07 ppm (S, F)	64	49	6	49	33
<i>Maximum Observed Concentration</i>					
Max. 1-Hour Conc. (ppm)	0.140	0.120	0.101	0.142	0.110
Max. 8-Hour Conc. (ppm)	0.114	0.101	0.087	0.115	0.083
Carbon Monoxide (CO)					
<i>Number of Days Standards Exceeded</i>					
8-Hour > 9.0 ppm (S, F)	0	0	0	0	0
<i>Maximum Observed Concentration</i>					
Max 8-Hour Conc. (ppm)	3.0	2.1	2.2	1.7	1.9
Nitrogen Dioxide (NO₂)					
<i>Number of Days Standards Exceeded</i>					
1-Hour > 0.18 ppm (S)	0	0	0	0	0
<i>Maximum Observed Concentration</i>					
Max. 1-Hour Conc. (ppm)	0.062	0.057	0.064	0.057	0.054
Inhalable Particulates (PM-10)*					
<i>Number of Days Standards Exceeded/Days Monitored</i>					
24-Hour > 50 µg/m ³ (S)	2/54	0/54	1/60	0/36	0/60
24-Hour > 150 µg/m ³ (F)	0/54	0/54	0/60	0/36	0/60
<i>Maximum Observed Concentration</i>					
Max. 24-Hr. Conc. (µg/m ³)	66	49	63	48	47
Ultra-Fine Particulates (PM-2.5)					
24-Hour > 35 µg/m ³ (F)	0/109	0/106	0/118	0/116	3/120
Max. 24-Hr. Conc. (µg/m ³)	35.2	31.0	30.0	27.6	55.5
Source: SCAQMD, Historical Data by Year, Air Quality Data Tables downloaded from: https://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year .					
* The Reseda monitoring station does not provide data for Inhalable Particulates (PM-10). These figures are from the Santa Clarita Valley monitoring station, No. 90.					
Notes: S = State; F = Federal; µg/m ³ = micrograms per cubic meter of air					

The air quality data and trends in the proposed project vicinity, as documented in Table III-1, are summarized below:

1. From 2017-2021, O₃ levels exceeded the 1-hour State standard 26 days, the 8-hour State standard 26 days, and the Federal 8-hour standard 64 days.
2. PM-10 levels exceeded the State 24-hour standard 1.1 percent of all days monitored from 2017-2021. The National 24-hour PM-10 standard was not exceeded in the same period.
3. PM-2.5 levels exceeded the current National 24-hour standard 0.5 percent of all days monitored from 2017-2021.

¹¹ South Coast Air Quality Management District, Historical Data by Year, 2021, 2020, 2019, 2018, and 2017 Air Quality Data Tables.

4. CO and NO_x levels have not exceeded National or State standards in the previous five years of monitoring data (2017-2021).

In the Air Basin, the agencies designated to develop the regional Air Quality Management Plan (AQMP) are the SCAQMD and the Southern California Association of Governments (SCAG). The 2022 AQMP is a regional blueprint for achieving air quality standards and healthful air, and it represents a comprehensive analysis of emissions, meteorology, atmospheric chemistry, regional growth projections, and the impact of existing control measures. According to the AQMP, the principal contributors to air quality challenges in the Air Basin are mobile source emissions.

Primary Pollutants

Primary pollutants are those that are emitted in their existing unhealthful form. CO is an example of such a pollutant, which can have effects at a very localized level, near an individual source of emissions or a collection of sources, such as a crowded intersection or parking lot. Many particulates, especially fugitive dust emissions, are also primary pollutants. Because of the non-attainment status of the Air Basin for PM-10, SCAQMD Rule 403 requires construction projects to implement an aggressive dust control program.

Secondary Pollutants

Secondary pollutants are those that transform or combine with other pollutants over time from more benign components directly emitted from a source(s) to a more unhealthful contaminant. O₃ is an example of a secondary pollutant, which is created through chemical reactions involving primary precursors reactive organic gases (ROG), NO_x, and sunlight.

The SCAQMD emissions forecast¹² for O₃ precursors (ROG and NO_x) and for CO and PM are shown in **Table III-2, South Coast Air Basin Emissions Forecasts** (emissions in tons/day). Substantial reductions in emissions of ROG, NO_x and CO are forecast to continue throughout the next several decades. Emissions of PM-10 and PM-2.5 are forecast to slightly increase unless new particulate control programs are implemented.

Table III-2
South Coast Air Basin Emissions Forecasts

Pollutant	(tons/day)		
	2025	2030	2035
Nitrogen Oxide (NO _x)	289	266	257
Volatile Organic Compounds (VOCs)*	393	393	391
PM-10	165	170	172
PM-2.5	68	70	71

Source: California Air Resources Board, Almanac 2013, Chapter 4: Regional Trends and Forecasts, Table 4-1
* For purposes of this analysis, VOC and ROG (Reactive Organic Gas) are used interchangeably since ROG represents approximately 99.9 percent of VOC.

¹² California Air Resources Board, Almanac 2013, Chapter 4: Regional Trends and Forecasts, Table 4-1.

a. Less than Significant Impact. A significant air quality impact could occur if a project is not consistent with the applicable AQMP or would represent a substantial hindrance to implementing the policies or obtaining the goals of that plan. The governing board of the SCAQMD adopted the most recent version of the 2022 AQMP in December 2022. Planning strategies for reducing emissions and achieving ambient air quality standards are developed using demographic growth projections (regional population, housing, and employment) generated by the SCAG.

The project would develop a two-story, 35-foot-tall structure for the Kia Dealership and associated surface and rooftop parking. The project would be consistent with the City General Plan land use designations for the site and would not generate housing or otherwise lead to substantial population growth in the vicinity. The project would align with the employment growth estimates of the 2024-2050 RTP/SCS. In addition, the 2024-2050 RTP/SCS list several supporting strategies that represent best practices and identify how the SCAG region can implement the plan and achieve related GHG reductions. These strategies are directed at responsible agencies and not applicable to private development, so they are not detailed here. However, the project would comply with the latest California Green Building Standards Code (known as CALGreen) in efforts to meet the goals of AB 32. The project would be designed to CALGreen standards and would not conflict with the 2024-2050 RTP/SCS or 2022 Scoping Plan. As required by CMC Chapter 17.34, non-residential developmental is required to meet the equivalent of a Leadership in Energy and Environmental Design (LEED) Silver Rating utilizing the LEED Reference Guide Version 2.0, which requires construction activity pollution prevention, including preventing fugitive dust and particulate matter. Beyond land use consistency, an analysis of project-related air quality emissions is also required. The SCAQMD has designated significant emissions levels for evaluating regional air quality impacts considered significant under CEQA, shown in **Table III-3, SCAQMD Daily Emissions Thresholds**.

Table III-3
SCAQMD Daily Emissions Thresholds

Pollutant	Construction	Operations
ROG	75	55
NO _x	100	55
CO	550	550
PM-10	150	150
PM-2.5	55	55
SO _x	150	150

Source: SCAQMD CEQA Air Quality Significance Thresholds, Revision March 2023.

Projects with maximum daily emissions that exceed the thresholds for construction or operations shown in Table III-3 are considered to have a potentially significant air quality impact under CEQA.

Construction Emissions

The proposed project would remove the paved areas, foundations, retaining walls, and graded pads, which totals approximately 3,500 SF of area to be demolished. The project would construct an up to 47,897 SF two-story, 35-foot-tall structure for the Kia Dealership with associated parking. The total demolition weight of the hardscape to be removed will be approximately 850 tons. Development of the project site will require the export of up to 28,000 CY of soil and import of 900 CY of soil.

A detailed list of the construction equipment and duration of each construction phase is provided in Section 3.0 Project Description. **Table III-4, Maximum Daily Construction Emissions**, provides the calculated peak daily construction emissions for the project.

Table III-4
Maximum Daily Construction Emissions

Emissions	Construction Emissions ^(a) (lbs/day)					
	ROG	NO _x	CO	SO ₂	PM-10	PM-2.5
Maximum Daily Emissions	32.1	12.9	11.9	<0.1	2.9	1.6
SCAQMD Thresholds	75	100	550	150	150	55
Significant Impact? Yes/No	No	No	No	No	No	No
Source: Envicom Corporation, Air Quality and GHG Impact Analysis, May 2024. Maximum emissions reported for summer or winter season, whichever is greater. (a) Construction emissions reflect required compliance with SCAQMD Rule 403 for applying water during grading to reduce dust.						

All construction grading projects must comply with the requirements of SCAQMD Rule 403, Fugitive Dust, which requires the implementation of Best Available Control Measures for all fugitive dust sources. SCAQMD Rule 403, Control Measure 08-2 States that during earth moving activities, projects are required to “Re-apply water as necessary to maintain soils in a damp condition and to ensure that visible emissions do not exceed 100 feet in any direction.” Therefore, pursuant to SCAQMD Rule 403, the project would be required to implement adequate watering of exposed surfaces during grading.

As shown in Table III-4, peak daily construction activity emissions would be well below SCAQMD thresholds. Given the results of the analysis and compliance with regulatory requirements, the air quality impact during construction would be less than significant.

Operational Emissions

During operations, the proposed land uses would result in air quality emissions of criteria pollutants from area sources, energy sources, and mobile sources. The SCAQMD thresholds for air quality impacts from operations are shown above in Table III-3. Operations of the proposed development would not exceed SCAQMD significance thresholds for criteria pollutants as shown in **Table III-5, Maximum Daily Operational Emissions**.

Table III-5
Maximum Daily Operational Emissions

Emissions Sources	Emissions (lbs/day)					
	ROG	NO _x	CO	SO ₂	PM-10	PM-2.5
Winter						
Area	0.81	0.00	0.00	0.00	0.00	0.00
Energy	0.02	0.34	0.28	<0.01	0.03	0.03
Mobile	4.23	4.31	42.26	0.11	11.00	2.84
Total	5.07	4.65	42.54	0.11	11.03	2.87
Summer						
Area	1.28	0.02	2.81	<0.01	<0.01	<0.01
Energy	0.02	0.34	0.28	<0.01	0.03	0.03
Mobile	4.29	3.94	46.87	0.12	11.00	2.84
Total	5.58	4.30	50.00	0.12	11.03	2.87
SCAQMD Thresholds	55	55	550	150	150	55
Significant Impact? Y/N	No	No	No	No	No	No
Source: Envicom Corporation, Air Quality and GHG Impact Analysis, May 2024. Totals may not add due to rounding.						

As shown in Table III-5, operational peak daily emissions would be well below SCAQMD thresholds. Therefore, the project would not substantially affect conformance with the AQMP or obstruct its implementation, and the project's operational air quality impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A significant impact may occur if a project adds a considerable cumulative contribution to Federal or State nonattainment pollutants. As the Air Basin is currently in nonattainment for O₃ and PM_{2.5},¹³ development could exceed an air quality standard or contribute to a deterioration in existing or projected air quality. To determine the significance of the proposed project's incremental contribution to cumulative air quality emissions, the SCAQMD recommends assessment of a project's potential contribution to cumulative impacts using the same significance criteria used for project-specific impacts. If an individual project's construction or operational emissions would be less than significant, then the project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Air Basin is in nonattainment. Based on the project emissions reported in Tables III-4 and III-5, the individual project's construction and operational emissions would be below SCAQMD thresholds. Therefore, the project would not generate a cumulatively considerable increase in emissions for those pollutants for which Air Basin is in nonattainment, and the project impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact. A significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors. Sensitive receptors are populations more susceptible to the effects of air pollution than the population at large. Land uses considered sensitive receptors include residences, long-term care facilities, schools, playgrounds, parks, hospitals, and outdoor athletic facilities. The closest sensitive receptors in the project vicinity are single-family residential uses to the north, approximately 460 feet from the project construction limit.

Local Significance Thresholds Impacts

Localized Significance Thresholds (LST) were developed in response to the Governing Board's Environmental Justice Enhancement Initiative I-4 and are only applicable for certain criteria pollutants: NO_x, CO, PM-10 and PM-2.5. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable Federal or State ambient air quality standard, and they are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor.

Based on SCAQMD guidance, use of an LST analysis for the project is optional. For the proposed project, the primary source of possible LST impact would be construction activity, based on the maximum onsite daily emissions estimated by CalEEMod. LSTs are applicable for assessing impacts to a sensitive receptor, where it is possible that an individual could remain for 24 hours, such as a residence, hospital, or convalescent facility.

SCAQMD's LST screening tables provide thresholds for 25, 50, 100, 200 and 500-meter source-receptor distances. The nearest sensitive receptors to the project site are single-family residences to the north, located approximately 140 meters from the project construction boundary. As the project construction boundary is located approximately 140 meters to the nearest sensitive receptor, per SCAQMD guidance,¹⁴ the LST

¹³ South Coast AQMD, National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) Attainment Status for South Coast Air Basin, February 2016.

¹⁴ South Coast Air Quality Management District, Final Localized Significance Threshold Methodology, Revised July 2008.

screening levels for receptors located at 100 meters are conservatively used for the evaluation. Additionally, per SCAQMD guidance for applying CalEEMod to LSTs,¹⁵ the maximum number of acres disturbed during an 8-hour day based on the equipment list shown in Table III-6 would be 2-acres,¹⁶ which would occur during grading. Thus, the LST screening levels and thresholds for a 2-acre site was used, consistent with SCAQMD guidance.

Table III-6, Local Significance Thresholds and Peak Daily Onsite Emissions (pounds/day) shows the relevant thresholds and the estimated peak daily onsite emissions during the construction phases that would generate the highest level of onsite emissions for each pollutant evaluated for LST impacts.¹⁷ As previously described, the project would be required to implement adequate watering of exposed surfaces during grading to reduce dust emissions to comply with SCAQMD Rule 403, Fugitive Dust.

**Table III-6
Local Significance Thresholds and Peak Daily Onsite Emissions**

LST 2.0 acre/100 meters West San Fernando Valley	Emissions (lbs/day)			
	NO _x	CO	PM-10	PM-2.5
Peak Onsite Daily Emissions ^(a)	11.4	10.7	2.6	1.5
LST Threshold	156	1,497	33	9
Significant Impact? Yes/No	No	No	No	No
Source: Envicom Corporation, Air Quality and GHG Impact Analysis, May 2024, Appendix B. Maximum emissions reported for any construction phase in summer or winter season, whichever is greater. (a) Construction emissions reflect required compliance with SCAQMD Rule 403 for applying water during grading to reduce dust.				

As shown in Table III-6, the peak onsite emissions during construction would not exceed the applicable SCAQMD LSTs, and as such, potential LST impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact. A significant impact may occur if the project would result in other emissions, such as those leading to odors, adversely affecting a substantial number of people. Objectionable odors are typically associated with manufacturing, industrial, or sewage treatment processes, while the project is development of a car dealership. Nevertheless, the SCAQMD’s rules for odor compliance are mandated under the California Health and Safety Code, Section 41700, and they are also addressed in SCAQMD Rule 402. This rule on Public Nuisance States:

“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. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.”

During construction, trash receptacles would be provided and covered and properly maintained in order to control odors, as required by law. The project would be connected to municipal waste treatment utility infrastructure and does not propose any onsite wastewater treatment facilities. During operations, separate

¹⁵ South Coast Air Quality Management District, Fact Sheet for Applying CalEEMod to Localized Significance Thresholds, accessed on August 31, 2023.

¹⁶ (1 rubber tired dozer x 0.5 ac) + (1 grader x 0.5 ac) + (2 tractors/backhoes/loaders x 0.5 ac) = 2 ac

¹⁷ Offsite construction emissions, such as export hauling, are not evaluated for local significance at receptors adjacent to the site.

trash and recycling bins would be required and provided, which would be emptied regularly for disposal. Therefore, the potential for the project to generate odors adversely affecting a substantial number of people during construction and operation would be less than significant.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES.				
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or State habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The following analysis is based on the Biological Assessment prepared by Envicom Corporation in June 2024 (included as **Appendix C, Biological Assessment**) and the Oak Tree Report prepared by Tree Care Consulting dated March 31, 2023 (included as **Appendix D, Oak Tree Report**). The Biological Assessment provides an inventory of the biological resources at the project site and analysis of impacts based on standard CEQA thresholds of significance. The biological survey area encompasses the entire site, comprised of APNs 2069-009-020 and 2069-009-008.

Impact Analysis

a. Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if the project would result in a substantial adverse effect on any species identified as a candidate, sensitive or

special-status species in local or regional plans. The project site currently is vacant, but includes remnants of a prior nursery use which includes existing pavement, foundations, and other disturbed areas, and is also situated between two existing car dealerships. There are no standing structures within the project site; however, the evidence of the previous development is located within the northern portion of the project site and includes concrete foundations, wooden retaining walls, hardscaping, parking lots, remnants of previous landscaping, and a driveway.

Plant Species

An evaluation of the potential for occurrence at the site of special-status plant species known to occur in the region was undertaken through a search of the California Native Plant Society (CNPS) Online Inventory of Rare and Endangered Plants, 8th edition and California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDDB) Rarefind 5 application for sensitive “elements” reported within the Calabasas 7.5’ United States Geological Survey (USGS) topographical quadrangle, and eight adjacent quadrangles including Santa Susana, Oat Mountain, Simi, Thousand Oaks, Malibu Beach, Point Dume, and Topanga. Additional special-status species not reported by the CNDDDB that are anticipated to occur in the region were also considered. The CNDDDB/CNPS derived lists are provided in Appendix B.

Most special-status plant species known to occur in the region are precluded from occurring at the site due to lack of suitable habitat or because the site is outside of the known range of the species. Other species, particularly perennial shrubs and many of the perennial herbs, are presumed absent as they were not found during the survey.

Biological Assessment reviewed the habitat requirements, range, and distribution of the special-status plants that have been reported within the Calabasas quadrangle and eight surrounding quadrangles, four (4) rare, threatened, or endangered plant species have low potential to occur within the Survey Area. These species include:

- Ojai navaretia (*Navarretia ojaiensis*)
- Nuttall’s scrub oak (*Quercus dumosa*)
- chaparral ragwort (*Senecio aphanactis*)
- slender mariposa lily (*Calochortus clavatus* var. *gracilis*)

The spring botanical survey of the site was conducted during the appropriate blooming period that did not detect any of these special-status species within the survey area.

Wildlife Species

As for special-status plants, the potential for occurrence for special-status wildlife was undertaken through research of the CNDDDB using the Rarefind 5 application for special-status “elements” on the USGS 7.5’ Calabasas topographical quadrangle and eight adjacent quadrangles. Additional special-status species were also considered which are known to occur in the region based on the author’s research and experience. The potential for occurrence analysis considers the potential for special-status wildlife to occur within the biological Survey Area. According to the CDFW’s CNDDDB Rarefind 5 application, no special-status wildlife species are known to occur on-site.

The special-status species that could be directly impacted include potentially occurring land dwelling and tree roosting animals, including the coast horned lizard (*Phrynosoma blainvillii*) a Species of Special Concern (SSC), coastal whiptail (*Aspidoscelis tigris stejnegeri*) (SSC), California glossy snake (*Arizona elegans occidentalis*) (SSC), California legless lizard/Southern California legless lizard (*Anniella spp./Anniella stebbinsi*) (SSC), San Diego desert woodrat (*Neotoma lepida*) (SSC), pallid bat (*Antrozous*

pallidus) (SSC), western red bat (*Lasiurus blossevillii*), big free-tailed bat (*Nyctinomops macrotis*) (SSC), American badger (*Taxidea taxus*) (SSC), and Crotch bumblebee (*Bombus crotchii*) a State Candidate Endangered/Threatened species. Habitat loss associated with the project is not expected to significantly impact a population of a potentially occurring special-status wildlife species, given the relatively low acreage of habitat that would be affected and the amount of remaining suitable habitat in the surrounding area. Direct loss or injury to a special-status wildlife species would be a significant impact. Implementation of **BIO-1** below would reduce potentially significant impacts to special-status wildlife to a less than significant level

Nesting Birds

Ground and vegetation disturbing activities if conducted during the nesting bird season (February 1 to August 31) would potentially result in removal or disturbance to trees and/or shrubs that could contain active bird nests. In addition, these activities would also affect herbaceous vegetation that could support and conceal ground-nesting species. Project activities that result in the loss of bird nests, eggs, and young, would be in violation of one or more of California Fish and Game Code sections 3503 (any bird nest), 3503.5 (birds-of-prey), or 3511 (Fully Protected birds). In addition, removal or destruction of one or more active nests of any other birds listed by the Federal Migratory Bird Treaty Act of 1918 (MBTA), whether nest damage was due to vegetation removal or to other construction activities, would be considered a violation of the MBTA and California Fish and Game Code Section 3511. The loss of protected bird nests, eggs, or young due to project activities would be a significant impact. Implementation of **BIO-2** below would reduce potentially significant impacts to nesting birds to a less than significant level.

Mitigation Measures:

BIO-1 Pre-construction Surveys for Special-Status Wildlife Species

Prior to the commencement of ground or vegetation disturbing activities, two (2) pre-construction surveys for special status wildlife species, including the coast horned lizard (*Phrynosoma blainvillii*) [SSC], coastal whiptail (*Aspidoscelis tigris stejnegeri*) [SSC], California glossy snake (*Arizona elegans occidentalis*) [SSC], California legless lizard/Southern California legless lizard (*Anniella* spp./*Anniella stebbinsi*) [SSC], San Diego desert woodrat (*Neotoma lepida*) [SSC], pallid bat (*Antrozous pallidus*) [SSC], western red bat (*Lasiurus blossevillii*), big free-tailed bat (*Nyctinomops macrotis*) [SSC], American badger (*Taxidea taxus*) [SSC], and Crotch bumblebee (*Bombus crotchii*) [SC] shall be conducted by a qualified biologist. The first survey shall be conducted within fourteen (14) days and the second survey shall be conducted within three (3) days prior to the commencement of ground or vegetation disturbing activities. The pre-construction surveys shall incorporate appropriate methods and timing to detect these species, including individuals that could be concealed in burrows, beneath leaf litter, in loose soil, in nests (i.e., San Diego desert woodrat), or in cavities/crevices of trees. If a special-status species is found, avoidance is the preferred mitigation option. If avoidance is not feasible, the species shall be captured and transferred to appropriate habitat and location where they would not be harmed by project activities, preferably to open space habitats in the vicinity of the project site. The City of Calabasas Planning Division and California Department of Fish and Wildlife (CDFW) shall be consulted regarding the presence of a special-status species at the site. If a Federally listed species is found, the United States Fish and Wildlife Service (USFWS) shall also be notified. A letter report summarizing the methods and results of the surveys shall be submitted to the City of Calabasas Planning Division and CDFW prior to commencement of project activities.

BIO-2 Pre-construction Surveys for Impacts to Nesting Birds

Within 14 days prior to the commencement of ground or vegetation disturbing activities during the nesting/breeding season of native bird species potentially nesting on the site (typically February 1 through August 31), a City-approved qualified biologist shall perform two (2) nesting bird surveys to determine if active nests of any bird species protected by the State or Federal Endangered Species Acts, Migratory Bird Treaty Act, and/or the California Fish and Game Code Sections 3503, 3503.5, or 3511 are present in the disturbance zone or within 200 feet of the disturbance zone for songbirds or within 500 feet of the disturbance zone for raptors and special-status bird species. The second nesting bird survey shall be conducted within three days of the start of ground or vegetation disturbing activities. A letter report summarizing the methods and results of the surveys shall be submitted to the City of Calabasas Planning Division and California Department of Fish and Wildlife (CDFW), if applicable, prior to commencement of project activities. In the event that an active nest is found within the survey area, site preparation, construction, and fuel modification activities shall stop until the biologist can establish an appropriate setback buffer. If a special-status bird species is found nesting at the site then the City of Calabasas Planning Division, and CDFW and United States Fish and Wildlife Service (USFWS), when applicable, shall be consulted. The buffer shall be demarcated and project activities within the buffer shall be postponed or halted, at the discretion of the biologist, until the nest is vacated and juveniles have fledged, as determined by the biologist, and there is no evidence of a second attempt at nesting.

b. Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if the project would have a significant adverse effect on any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations or by CDFW or USFWS.

While there are no riparian habitats located at the project site, the Biological Assessment determined there are twenty-three landcover types within the survey area. Of these, ten are distinct plant communities that meet the criteria for classification using the State Vegetation Classification System. The remainder are either individual trees or shrubs, or other areas associated with previous/adjacent development and/or disturbance/associated landscaping. The plant communities within the Survey Area were correlated with plant communities included in the Vegetation Classification of the Santa Monica Mountains Natural Recreation Area and Environs in Ventura and Los Angeles Counties, California and the California Natural Communities List. In these documents each plant community is assigned a conservation status rank (also known as “rarity rank”). Plant communities with conservation status ranks of G1, G2, G3, S1, S2, or S3 are considered “rare.” The California Natural Communities List also indicates which communities are “sensitive.”

The following plant communities at the site are considered rare and/or sensitive by the CDFW:

- California Brittle Bush (*Encelia californica*) Shrubland Alliance
- California Walnut – Coast Live Oak (*Quercus agrifolia*) Woodland Association
- Sugar Bush – Purple Sage – California Sagebrush (*Rhus ovata* – *Salvia leucophylla* – *Artemisia californica*) Shrubland Association
- Foothill Needlegrass (*Stipa lepida*) Herbaceous Alliance

The following plant community at the site is protected by the City of Calabasas as “Scrub Oak Habitat”:

- Scrub Oak (*Quercus berberidifolia*) Shrubland Alliance

Within the Survey Area, there are four plant communities considered rare and/or sensitive by CDFW and of these four rare and/or sensitive plant communities, only the Sugar Bush – Purple Sage – California

Sagebrush Shrubland Alliance would be impacted by the project. No other CDFW rare and/or sensitive plant communities would be impacted by project development, fuel modification, or fence installation. Further, no City of Calabasas Scrub Oak Habitat would be impacted by the project. Proposed fuel modification would affect the understory vegetation within coast live oak woodlands, but fuel modification is not anticipated to alter the woodland canopy, except for deadwood removal.

A total of 0.019-acre of Sugar Bush – Purple Sage – California Sagebrush Shrubland Association would be permanently removed due to development of the project. Further, a total of 0.011 acres of Sugar Bush – Purple Sage – California Sagebrush would be temporarily disturbed due to installation of a proposed fence. The total impacts to this community, including permanent and temporary, would be 0.030 acres. As this community is considered rare and/or sensitive by CDFW, these impacts would be significant. However, implementation of **BIO-3** below would reduce these impacts to a less than significant level.

Mitigation Measures:

BIO-3 Mitigation for Permanent and Temporary Impacts to Sugar Bush – Purple Sage – California Sagebrush Shrubland Association

The 0.019 acres of Sugar Bush – Purple Sage – California Sagebrush Shrubland Association that would be permanently removed by the project shall be compensated for at a 2:1 ratio. To the extent feasible, this shall be accomplished by the on-site restoration of disturbed habitats (e.g., non-native grasses and forbs areas) to in-kind habitat. On-site restoration should be implemented only where suitable conditions exist to support in-kind habitat. Wherever impacts to Sugar Bush – Purple Sage – California Sagebrush Shrubland Association are not permanent, in-kind habitat that has been temporarily disturbed by installation of the proposed fence shall be fully restored by monitoring recovery of temporarily disturbed areas and installing plants as necessary at the discretion of the qualified and approved biologist, restoration ecologist, or resource specialist. If on-site restoration is not possible, compensation for the removal of Sugar Bush – Purple Sage – California Sagebrush Shrubland Association may be accomplished by off-site restoration of in-kind habitat or by a contribution to an in-lieu fee program approved by the City of Calabasas Community Development Director and the CDFW, if applicable. In-lieu fees shall be used for the restoration of in-kind habitat.

A restoration plan shall be developed by a qualified biologist, restoration ecologist or resource specialist, and approved by the Community Development Director and CDFW, if applicable, prior to issuance of the grading permit for the project. The plan shall at a minimum include:

- Description of the project/impact and mitigation sites
- Specific objectives
- Success criteria
- Plant palette
- Implementation plan
- Maintenance activities
- Monitoring plan
- Contingency measures

Success criteria shall at a minimum be evaluated based on appropriate survival rates and percent cover of planted native species according to local regulatory agency standards, as well as control of invasive plant species within the restoration area.

The restoration project shall be initiated prior to development of the project and shall be implemented over a five-year period. The restoration project shall incorporate an iterative process of annual monitoring and evaluation of progress, and allow for adjustments to the restoration plan, as necessary, to achieve desired outcomes and meet success criteria in accordance with local regulatory standards. Annual reports discussing the implementation, monitoring, and management of the restoration project shall be submitted to the Community Development Director and the CDFW, if applicable. Five years after project start, a final report shall be submitted to the Community Development Director and CDFW, if applicable, which shall at a minimum discuss the implementation, monitoring and management of the restoration project over the five-year period, and indicate whether the restoration project has, in part, or in whole, been successful based on established success criteria. The project shall be extended if success criteria have not been met at the end of the five-year period to the satisfaction of the Community Development Director and the CDFW, if applicable.

c. No Impact. A significant impact may occur if the project has a substantial adverse effect on Federally protected wetlands or waters of the US. According to the USFWS National Wetlands Mapper, no natural wetlands are located within the project site.¹⁸ As the project site is not located within any natural wetlands, streams, marshes, vernal pools, riparian habitats, or waters of the US, the project would not remove or otherwise impair such areas and would therefore result in no impact.

d. Less Than Significant Impact. A significant impact may occur if the project would substantially interfere with the movement of any native resident or migratory fish or wildlife species with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

The Biological Assessment reviewed the documents listed below and determined the project site is not within an area that has been identified as important to wildlife movement, such as a regional-scale habitat linkage or a wildlife movement corridor:

- City of Calabasas 2030 General Plan;
- Santa Monica Mountains National Recreation Area Land Protection Plan;
- South Coast Missing Linkages Project: A Linkage Design for the Santa Monica Mountains-Sierra Madre Connection; and
- California Essential Connectivity Project: A Strategy for Conserving a Connected California.

The potential importance of the project site to wildlife movement was also evaluated both in the field and by reviewing recent aerial photographs of the site and the surrounding area. Although a diversity of wildlife species could potentially move through the project site, as it contains vegetative cover and suitable habitat for many species, the site is not of particular importance to wildlife for movement. For example, the site is not situated within a bottleneck of habitat between larger areas of core suitable habitat, it does not contain an important wildlife crossing, and it is not necessary for wildlife to pass through the site to access essential resources for water, foraging, breeding, or cover. The project site is situated within an area that is surrounded to the east and west by urban commercial development, as well as Calabasas Road and US 101 to the north. The project site was also previously used for commercial purposes and development of the site would not extend far beyond the previous footprint. With development of the project, wildlife could continue to move through the undeveloped naturally vegetated southern portion of the project site. As such, there would be no impact.

¹⁸ USFWS, National Wetlands Inventory, Surface Water and Wetlands, Accessed on May 9, 2024 at: <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>

Mitigation Measures: No mitigation measures are required.

e. Potentially Significant Unless Mitigation Incorporated. A significant adverse effect could occur if a project were to cause an impact that is inconsistent with local regulations pertaining to biological resources, such as the oak tree regulations.¹⁹ The oak tree regulations establish tree protections, removal and protected zone encroachment permitting, and replacements as applicable. The City's Oak Tree regulations also establish a mandatory mitigation ratio of one inch diameter of new oak tree planted for every one inch removed. Furthermore, any person or entity that owns, controls, or has possession of property within the City must maintain all oak trees and scrub oak habitat pursuant to the city's oak tree regulations. Based on the Biological Assessment, the project site contains approximately 1.45 acres of oak woodland. The project would temporarily impact 0.55 acres of oak woodland and permanently impact 0.21 acres of oak woodland.

Based on the Oak Tree Report, development of the project would remove three oak trees (totaling 64 inches in diameter) and encroach on 21 oak trees. The Oak Tree Report provides recommendations to preserve and protect the oak trees that would remain during construction. The applicant shall notify the tree consultant 48 hours prior to the commencement of any work with the protected zone of any protected trees for monitoring. The Oak Tree Report provides recommendations which the project would implement as **BIO-4** for tree protection, including construction monitoring, protective fencing and other protective measures during construction. The project would provide replacement trees for the three oak trees as **BIO-5**. Following implementation of BIO-4 from the Oak Tree Report and BIO-5, the project would have a less than significant impact after mitigation.

Mitigation Measures:

BIO-4 Oak Tree Report Recommendations

The project and its construction contractor shall implement the recommendations of the project Oak Tree Report prepared by Tree Care Consulting during project construction, including construction monitoring and protective fencing.

BIO-5 Oak Tree Replacement

One inch of oak tree diameter shall be planted for each inch of oak tree diameter removed. A Mitigation and Monitoring Plan (MMP) shall be prepared and will be submitted to the City to be reviewed and approved. The MMP shall include a planting plan that identifies the size, type, and location of mitigation trees, and a five-year monitoring period per the City's Oak Tree Preservation and Protection Guidelines.

f. No Impact. A significant impact would occur if the project would be inconsistent with mapping or policies of an adopted or approved conservation plan. The site is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or State habitat conservation plan; therefore, the project would have no impact.

Mitigation Measures: No mitigation measures are required.

¹⁹ City of Calabasas, Oak Tree Regulations, Calabasas Municipal Code, Chapter 17.32.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
V. CULTURAL RESOURCES:				
Would the project:				
a. Cause a substantial adverse change in significance of a historical resource pursuant in CEQA Section 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to CEQA Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

This analysis is based on a Phase I Cultural Resource Assessment of the project site prepared by Envicom Corporation that included a record search from the South Central Coastal Information Center (SCCIC) and California Native American Heritage Commission (NAHC), a review of historic maps and aerial images, and a pedestrian survey of the subject property. The Phase I Cultural Resource Assessment was prepared by Envicom Corporation, dated March 19, 2024, and is provided in **Appendix E, Phase I Cultural Resource Assessment**.

a. No Impact. A project would have a significant impact if it would cause a substantial adverse change in the significance of a historical resource as defined in CEQA Section 15064.5, which defines criteria for historical resources. The Phase I Cultural Resources Assessment involved a SCCIC record search of the subject property plus a 0.25-mile radius surrounding the subject property (study area). The results of the SCCIC record search found no previously identified cultural resources within the boundaries of the subject property. The SCCIC identified three cultural resource reports that involved all or part of the subject property. None of these reports found cultural resources within or adjacent to the subject property. The SCCIC identified 12 cultural resource reports outside the project site, within the study area. These reports did not indicate cultural resources relevant to the project.

The results of the SCCIC record search, received on February 1, 2023, were negative for cultural resources within the study area. The pedestrian survey of the property on August 27, 2019, was also negative for historic resources. Examination of the land use history, historic USGS maps, and historic photo databases indicates the property was undeveloped. The adjacent property was developed with a school in 1890 and several additional buildings located along the path indicating the property was located on a major road. Therefore, the property is located within one of the earliest developed areas in the City. The school was demolished and replaced with a smaller school in 1926. A restaurant was later operated from the 1926 school building. Due to the historic elements of the restaurant/school, the City of Calabasas evaluated the structure separately and determined that it did not have original integrity as a historical built environment cultural resource due to several structural modifications over the years, and the building was later demolished due to safety concerns.

There was no construction on the property until the plant nursery was built in 1973, and all the foundations on the site are from the plant nursery. The records search and survey findings for historic resources on the project property are negative. The site is not listed in a local register of historical resources as defined in

Public Resources Code section 5020.1(k). The project site is not located within, or designated as, a historic cultural monument, a historic district, or other historic overlay zone. Therefore, the project would result in no impact on a historical resource as defined in CEQA Section 15064.5.

Mitigation Measures: No mitigation measures are required.

b. Potentially Significant Unless Mitigation Incorporated. A significant impact would occur if a known or unknown archaeological resource would be removed, altered, or destroyed as a result of the proposed development. A significant impact may occur if grading or excavation activities associated with a project would disturb archaeological resources that presently exist within the project site. Section 15064.5 of the CEQA Guidelines defines criteria for determining the significance of cultural resources.

A pedestrian survey of the project site was conducted on September 9, 2019, which was negative for archaeological resources on the ground surface. Envicom received the records search results from the SCCIC which determined that no previously identified cultural resources were reported within the project property. The results from the NAHC record search were received on January 13, 2023, with positive findings for one or more previously recorded Native American tribal cultural resource located within the project property or study area, which is discussed in Section XVIII., Tribal Cultural Resources. The Phase I Cultural Resource Assessment Stated that it is unlikely that non-impacted native soils will be impacted by the project; however, churned native soils are probable to be found throughout the site, especially within the raised beds. If archaeological resources were once located on the property, then artifacts from such sites could have been integrated into this re-purposed bedding fill. Additionally, large portions of the two parcels were covered with pavement or paving tiles and could not be assessed and they may contain covered older cultural resources. No older historical or prehistoric artifacts or features were observed on either parcel surface, and all of the existing remnant site features could be dated to the late-20th Century nursery with no older features being visible. The pedestrian survey findings were, therefore, negative for cultural resources within the project property. However, the survey area assessed was limited to those areas without pavement and the site pavement and/or bedding features may be masking cultural resource information.

The result of the SCCIC database record search was also negative for cultural resources within the project development site; however, the property is located within a region that should be considered as being sensitive for older cultural resources. Although the field survey was negative for cultural artifacts or features, the extensive pavement found across the project development footprint associated with the past nursery limited the ability to examine the ground surface. Finally, there is also the chance that any cultural site material present was churned into the extensive nursery landscaping features and is not observable on the surface. Therefore, the project would implement mitigation measure **CUL-1** for archaeological monitoring and **CUL-2** which establishes a discovery protocol if cultural resources are encountered. As such, the project would have a less than significant impact after mitigation.

Mitigation Measures:

CUL-1 Archaeological Monitor

An archaeological monitor that meets the Secretary of Interior qualifications will be on site during grading of the project site from surface to bedrock and during utility excavation. The purpose of having an archaeologist on site is to assess if any significant cultural resources are encountered during grading. Archaeological monitoring will start with full-time monitoring, however, if the monitoring team determines that native soils have been disturbed, removed, or heavily impacted during previous earth moving activities on the site, then monitoring can be reduced to spot-check or contingency monitoring only.

The archaeological monitor will collect any diagnostic prehistoric or older historical material uncovered through project excavation and can halt construction within 30-feet of a potentially significant cultural resource if necessary. Artifacts collected from a disturbed context or that do not warrant additional assessment can be collected without the need to halt grading. Discovery situations that do not lead to further assessment, survey, evaluation, or data recovery can be described in the monitor's daily monitoring log. However, if prehistoric features or older historical features are encountered, the Project "discovery" protocol should be followed (see below). A final Monitoring Report will be produced that discusses all monitoring activities and all artifacts recovered and features identified through monitoring of the Project site. Discovery situations that do not lead to further assessment, survey, evaluation, or data recovery can be described in the final Monitoring Report.

All artifacts recovered that are determined to have historical information value, with diagnostic or location information that may be important to California history, will be cleaned, analyzed, and described within the Monitoring Report. All materials determined important will be curated at an appropriate depository or returned to the landowner for public display if possible. If important materials are found during monitoring, a Curation Plan may be needed that is reviewed by the Lead Agency prior to the publication of the Monitoring Report. The costs of the Monitoring Report, the Curation Plan, and the processing, analysis, and curation of all artifacts will be the responsibility of the applicant.

CUL-2 Archaeological and Fossil Resource Discovery Protocol

If potentially significant intact archaeological or fossil deposits are encountered within an undisturbed context, then a cultural resource "discovery" protocol will be followed. If older historical or prehistoric features, artifact concentrations, prehistoric material, or sensitive fossil material is encountered during project grading and subsurface excavation within native soils or original context, then all work in that area shall be halted or diverted away from the discovery to a distance of 30-feet until a qualified senior archaeologist or paleontologist can evaluate the nature and/or significance of the find(s). If a senior archaeologist or paleontologist confirms that the discovery is potentially significant, then the Lead/Permitting Agency will be contacted and informed of the discovery.

Construction will not resume in the locality of the discovery until consultation between the senior archaeologist or paleontologist, the owner's Project manager, the Lead/Permitting Agency, and any other concerned parties (such as Native American Tribal Groups), takes place and reaches a conclusion approved by the Lead/Permitting Agency. If a significant cultural or fossil resource is discovered during earth-moving, complete avoidance of the find is preferred. However, if the discovery cannot be avoided, further survey work, evaluation tasks, or data recovery of the significant resource may be required by the Lead/Permitting Agency. All individual reports will be submitted to the SCCIC or to the NHMLAC at the conclusion of the Project.

- c. **Potentially Significant Unless Mitigation Incorporated.** A significant impact would occur if previously interred human remains would be disturbed during excavation of the project site. The result of the SCCIC search was negative, but NAHC record search were positive for tribal cultural resources within the project property and within the study area. While no formal cemeteries, other places of human internment, or burial grounds or sites are known to occur within the project site area, there is a possibility that human remains can be unexpectedly encountered during ground disturbing activities. If human remains are encountered unexpectedly during ground disturbing activities, regulatory requirements specified in State Health and Safety Code Section 7050.5 require

that no further disturbance occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If human remains of Native American origin are discovered during construction, compliance with State laws, which fall within the jurisdiction of the NAHC (PRC Section 5097) relating to the disposition of Native American burials must be adhered to. Mitigation measure **CUL-3** establishes a discovery protocol for inadvertent discovery of human remains. Therefore, implementation of mitigation measure CUL-3 would reduce impacts to the inadvertent discovery of human remains to a less than significant level.

Mitigation Measures:

CUL-3 Inadvertent Discovery of Human Remains

State of California Health and Safety Code Section 7050.5 addresses the inadvertent discovery of human remains, which is always a possibility during ground disturbance. The County Coroner must be notified of the discovery immediately, together with the Lead Agency, and the property owner. This code section also states that in the event human remains are uncovered, no further disturbance shall occur until the County Coroner has made a determination as to the origin and disposition of the remains pursuant to California Public Resources Code Section 5097.98. Envicom recommends that a minimum buffer area of 30 feet should be placed around the location of the discovery during this process.

If the human remains are determined to be prehistoric, the Coroner will notify the NAHC, which will then provide a Native American Most Likely Descendant (MLD) for the project area to be contacted. The MLD shall complete the inspection of the site within 48 hours of notification and may recommend the scientific removal and nondestructive analysis of human remains and items associated with Native American burials and recommend an appropriate re-internment site. The Lead Agency and a principal archaeologist shall also establish additional appropriate actions for the discovery and for further site development, which may include archaeological survey, evaluation, data recovery, changes to site monitoring, or other forms of archaeological testing and recordation. Additionally, all tribal group representatives listed on the City AB-52 consultation list will be contacted and notified of the discovery and invited to participate in the discovery response discussion, including the location of re-internment, site survey, evaluation or data recovery, and discovery recordation parameters. This process will include the FBTMI as a designated AB-52 consultation respondent.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VI. ENERGY				
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

The following analysis is primarily based on Energy Consumption Worksheets, provided in **Appendix F**.

a. Less than Significant Impact. A significant impact would occur if the project would result in wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.

Construction

During construction, the project would use heavy-duty equipment associated with demolition, site preparation, grading, paving, architectural coating and building. Construction equipment used on the site would include graders, dozers, air compressors, cranes, forklifts, welders, rollers, pavers, and tractors equipped with front end loaders and backhoes. Construction also involves trucks for material and supplies delivery, as well as powered hand tools including concrete saws. The majority of the equipment would likely be diesel-fueled. However, smaller equipment such as welders and pumps may be electric-, gasoline- or natural gas-fueled, and tower cranes would likely be electric. For the purposes of this analysis, a majority of construction activities were considered to be diesel-fueled, and activities associated with worker trips were assumed to be gasoline-fueled.

The California Code of Regulations (CCR) requires drivers of diesel-fueled commercial motor vehicles with gross vehicle weight ratings greater than 10,000 pounds not to idle the vehicle’s primary diesel engine longer than five minutes at any location.²⁰ Compliance with this regulation would also result in efficient use of construction-related energy and prevent unnecessary consumption of energy from diesel fuel.

According to the CARB on-road vehicle emissions factor model EMFAC2021(v1.0.2), Emissions Inventory,²¹ the average fuel economy for light duty vehicles operating in Los Angeles (SC) Sub-Area for the year 2025 (construction year) is approximately 24.98 miles per gallon for gasoline-fueled vehicles and approximately 8.64 miles per gallon for all categories of diesel-fueled vehicles. Based on these modeled emissions factors; worker, vendor, and hauling trips; and off-road construction equipment generated by CalEEMod, the project consumption of diesel and petroleum-based gasoline during construction was

²⁰ California Code of Regulations, Section 2485, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling.

²¹ California Air Resources Board, EMFAC, Emissions Inventory, Accessed on April 17, 2024 at: <https://arb.ca.gov/emfac/emissions-inventory/6e2a513cf8ce2127434092f65c4b46f87c3d1ec0>

calculated and is shown in **Table VI-1, Fuel Consumption During Construction**. The calculations are provided in the Energy Consumption Worksheet of **Appendix F, Energy Calculations**.

**Table VI-1
Fuel Consumption During Construction**

Energy Source	Quantity Demanded during Construction
Transportation fuels^a	
<i>Gasoline</i>	
On-road Worker Trips	4,063 gallons
Gasoline Total	4,063 gallons
<i>Diesel</i>	
On-Road Haul Trucks ^b	1,624 gallons
On-road Vendor Trucks ^b	2,504 gallons
Off-road Construction Equipment ^c	15,305 gallons
Diesel Total	19,433 gallons
Source: Energy Consumption Worksheet, Appendix F.	
^a On-road mobile source fuel use based on vehicle miles traveled from CalEEMod and fleet-average fuel consumption in gallons per mile from EMFAC2021 web-based data for 2025 (construction year) for Los Angeles (SC) Sub-Area.	
^b Vendor and haul trucks are assumed to be diesel.	
^c All emissions from off-road construction equipment were assumed to be diesel. Off-road mobile source fuel usage based on a fuel usage rate of 0.05 gallons of diesel per horsepower (HP)-hour, based on the South Coast Air Quality Management District (SCAQMD) CEQA Air Quality Handbook, Table A9-3E.	

As shown in Table VI-1, based on the CARB on-road vehicle emissions factor model EMFAC2021(v.1.0.2) and Energy Consumption Worksheet, project construction would consume a total of 19,433 gallons of diesel fuel and 4,063 gallons of gasoline. In 2023, 13.5 billion gallons of gasoline and 3.0 billion gallons of diesel, including off-road diesel, was sold in California.²² Construction-related fuel use for the project would result in approximately 0.0001 percent of the annual fuel consumption in California. As such, the use of construction equipment and the transportation of materials and workers necessary during the temporary construction period would not represent a substantial proportion of annual gasoline or diesel fuel use in California.

Adherence to CCR Section 2485 and California Air Resources Board anti-idling regulations for off-road diesel-fueled fleets would reduce the potential for wasteful use of energy by construction equipment. Due to the temporary duration of construction and the necessity of fuel consumption inherent in construction projects, fuel consumption would not be excessive or substantial with respect to fuel supplies. The energy demands associated with fuel consumption during construction would be typical of projects of this size and would not necessitate additional energy facilities or distribution infrastructure or cause wasteful, inefficient or unnecessary consumption of energy. Therefore, project construction would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, and impacts would be less than significant.

Operations – Electricity

The proposed project would generate additional demand for electricity from Southern California Edison (SCE). As estimated by CalEEMod, the proposed project's total electricity demand would be approximately 520,644 kilowatt-hours (kWh)/year. SCE supplies approximately 85,870 million kWh/year of electricity.²³

²² California Department of Tax and Fee Administration, Diesel Fuel Data, Facts, and Statistics, available at: <https://www.cdtfa.ca.gov/taxes-and-fees/spftrpts.htm>.

²³ California Energy Commission, Electricity Consumption by Entity, available at: <http://www.ecdms.energy.ca.gov/elecbyutil.aspx>

The project would represent approximately 0.0006 percent of the yearly SCE electricity demand. Therefore, the project would not result in substantial increase in electricity demand.

In addition, the project would be required to comply with the applicable portions of the California Energy Code and California Green Building Standards Code, which establishes planning and design standards for sustainable site development, energy efficiency, water conservation, and material conservation. The project is also required to meet the equivalent of LEED Silver, which requires minimum energy performance for all non-residential buildings, per CMC Chapter 17.34. By required compliance with applicable regulations, the project would not result in wasteful or inefficient use of electricity energy supplies, and impacts would be less than significant.

Operations - Natural Gas

The project would generate additional demand for natural gas from the Southern California Gas Company (SoCalGas). Total project demand for natural gas would be approximately 1,262,137 kilo-British thermal units (kBTU)/year, as estimated by CalEEMod. According to the California Energy Commission, SoCalGas supplied approximately 5,026 million therms or 520,600,000,000 kBTU/year of natural gas in 2022. The project would represent approximately 0.0002 percent of the natural gas demand for SoCalGas.

In addition, the project is required to comply with applicable portions of the California Energy Code and California Green Building Standards Code, which establishes planning and design standards for sustainable site development, energy efficiency, water conservation, and material conservation. The project is also required to meet the equivalent of LEED Silver, which requires minimum energy performance for all non-residential buildings, per CMC Chapter 17.34. By requiring compliance with applicable regulations, the project would not result in wasteful or inefficient use of natural gas energy supplies, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A significant impact may occur if the project would conflict with or obstruct a State or local plan for renewable energy or energy efficiency.

The City Department of Building and Safety reviews project site plans to verify compliance with the Building and Energy Efficiency Standards in the California Energy Code prior to issuing a building permit. As a regulatory requirement, the City would review the project during plan check for consistency with applicable State and local requirements for renewable energy and efficiency. The City incorporates the California Green Building Standards Code (CALGreen Code) Title 24 standards. CALGreen Code standards require projects to provide energy saving features, establish minimum standards for energy efficient construction practices, and require increased energy efficiency. The project is also required to meet the equivalent of LEED Silver, which requires minimum energy performance for all non-residential buildings, per CMC Chapter 17.34. In addition, the project incorporates design features including bicycle parking spaces, EV parking spaces, and rooftop solar panels. As the project would comply with regulatory requirements and consist of energy efficient project design features, 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: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VII. GEOLOGY AND SOILS.				
Would the project:				
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geological features?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

The following analysis is based on the Geotechnical Investigation (Geotechnical Report) of the project site conducted by Geotechnical Professionals Inc., dated December 16, 2022, provided in **Appendix G, Geotechnical Report**.

a. i. Less than Significant Impact. A significant impact may occur if the project would directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving 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.

According to the Geotechnical Report, the subject property is not located in a State-designated Alquist-Priolo Earthquake Fault Zone or a City-designated Preliminary Fault Rupture Study Area for surface fault rupture hazards.²⁴ Therefore, the potential for surface rupture due to faulting is low. However, the project site is within the seismically active southern California region and could experience ground shaking in the event of a nearby earthquake. As regulatory compliance, the seismic design of the proposed project would be constructed in accordance with California Building Code (CBC) 2022 Site Class C. As the potential for surface rupture of a known earthquake fault is low, the project would have a less than significant impact.

Mitigation Measures: No mitigation measures are required.

a. ii. Less than Significant Impact. A significant impact may occur if the project would directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving strong seismic ground shaking. As with all of southern California, the site is in a seismically active area and has experienced historic earthquakes from various regional faults. While there are no faults within the City, there are 25 active and potentially active faults located within 25 miles of City.²⁵ As Stated above, the site is not located within an Alquist-Priolo Earthquake Zone and the potential for fault rupture throughout the site is considered very low; however the site may be subject to strong ground shaking during potential seismic activity. To this end, hazards associated with ground-shaking will be reduced because the proposed structures are required to be designed and constructed in conformance with current building codes and engineering practices. Compliance with the 2022 CBC would reduce potential seismic ground shaking impacts to less than significant.

Mitigation Measures: No mitigation measures are required.

a. iii. Less than Significant Impact. A significant impact may occur if the project would directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving seismic-related ground failure, including liquefaction.

Liquefaction is a phenomenon in which loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Liquefaction factors include intensity and duration of ground motion, gradation characteristics of the subsurface soils, in-situ stress conditions, and the depth to groundwater. Liquefaction is typified by a loss of shear strength in the liquefied soil layers due to rapid increases in pore water pressure generated by earthquake accelerations. As shown in the Geotechnical Report, the project site is not mapped by the State of California as having potential for soil liquefaction. The Geotechnical Report encountered groundwater seepage in dense sandstone at depths of 31 to 46 feet. Historical information is limited as the bedrock material underlying the site is not considered to be water bearing. The Geotechnical Report concluded that the potential for liquefaction to adversely impact the project is very low. As such, potential substantial adverse effects including the risk of loss, injury or death involving seismic-related ground failure would be less than significant.

Mitigation Measures: No mitigation measures are required.

²⁴ City of Calabasas, 2030 General Plan Safety Element, 2018.

²⁵ Ibid.

a. iv. No Impact. A significant impact may occur if the project would directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving landslides.

Geotechnical Report States the project site is designated as a hillside area by the County of Los Angeles and there are areas of potential earthquake-induced landslides in the vicinity of the project site; however, the project site is not within such a zone. There are no known landslides near the site, nor is the site in the path of any known or potential landslides. Therefore, the project would have no impact related to landslides.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A significant impact may occur if the project would result in substantial soil erosion or the loss of topsoil.

Construction

The project would be required to implement erosion and sediment control Best Management Practices (BMPs) to prevent erosion and sediment loss and the discharge of construction wastes to prevent erosion and sedimentation problems during the construction phase of the development. The BMPs for all construction sites will include erosion and sediment controls such as scheduling, silt fencing, sandbags and straw wattles to eliminate the water quality problems associated with stormwater sedimentation runoff. Compliance with regulatory requirements would reduce impacts during construction to a less than significant level.

Operations

The project site is currently improved with existing remnant paved areas, foundations, retaining walls, and graded pads associated with the former plant nursery use. During operations, the project would comply with LID requirements for stormwater to be captured. Stormwater treatment BMP may be considered and can be provided in various ways, varying from catch basin filters, proprietary treatment devices placed in the main storm drain infrastructure, and grass swale filters. Additionally, all graded areas will be landscaped, which would reduce potential impacts of soil erosion. Through project design features and compliance with existing LID Ordinance requirements, erosion impacts during operations would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact. A significant impact may occur if the project is built 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.

Based on site reconnaissance and review of available data conducted by the Geotechnical Report, there are no known landslides at the site or immediately adjacent sites. The geological investigation determined the lower portions of the site consist of Upper Topanga sandstones and siltstones that were found to be predominantly massive to thinly bedded. Where measured, bedding in these deposits was generally to the northwest and northeast, which is generally adverse, but also predominantly at relatively flat inclinations (12 to 18 degrees to the horizontal). Steeper inclinations were encountered in the Geotechnical Report's downhole logging of one boring, but these inclinations were encountered in a siltstone layer within the upper 12 feet, which was underlain by a massive sandstone deposit. Based on the Geotechnical Report findings, the natural slopes at the site are considered to be grossly stable, with the potential for slope instability to adversely affect the planned development to be low. As such, a less than significant impact would occur.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact. A significant impact may occur if the project is located on expansive soil, creating substantial direct or indirect risks to life or property. Expansive soils contain high amounts of clay particles that swell when wet and shrink when dry. Foundations constructed on these soils are subject to uplifting forces caused by the swelling. The Geotechnical Report encountered fill soils in some of their borings and test pits to depths of 1 to 10.5 feet. The fill soils have a medium expansion potential and are anticipated to shrink and swell with moisture change. The natural materials encountered also have a medium expansion potential and will shrink and swell with change to moisture content.

As a recommendation, the Geotechnical report States clay soils should not be placed as compacted fill within two feet of pedestrian concrete subgrade. Building floor slabs will not be impacted because of the plans for a mat foundation. The soils placed to support pedestrian hardscape should consist of granular, non-expansive (E.I. of 20 or less) on-site or imported soils. Such materials were encountered within geotechnical explorations (sandstone and silty sands) but selective grading will be required to identify and stockpile these soils for use in capping these areas. Implementation of the Geotechnical Report's recommendations would reduce potential impacts of expansive soils and the project would have a less than significant impact.

Mitigation Measures: No mitigation measures are required.

e. No Impact. A significant impact may occur if the project site contains soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. The site is located in a developed area of the City that is served by an existing wastewater collection, conveyance, and treatment system operated by Las Virgenes Municipal Water District (LVMWD). No septic tanks or alternative onsite wastewater disposal systems are proposed for the project. Therefore, the project would have no impact regarding this issue.

Mitigation Measures: No mitigation measures are required.

f. Potentially Significant Unless Mitigation Incorporated. Paleontological resources are fossilized remains of organisms from the geologic past and the accompanying geologic strata. The potential for fossils depends on the rock type exposed at the surface. Sedimentary rocks contain the bulk of fossils in the City, although metamorphic rocks may also contain fossils. The 1992 Thomas W. Dibblee Jr. geological map that uses the Calabasas quadrangle as a base identified that the northern part of the Project development footprint consists of recent alluvial material. Recent alluvial material is not considered to be sensitive for paleontological fossil resources. The middle of the site is a mix of recent alluvial soils, the Monterey Formation, and the Upper Topanga Formation. The Monterey Formation from the Late Miocene (11.3 to 5.5 million years ago) is one of the more sensitive fossil rock units in California, with numerous examples of fossil marine mammals, fish, turtles, and invertebrates being recovered. The older Topanga Formation from the Middle Miocene (16 to 11.5 million years ago) is also sensitive for marine fossils, but less frequently than are found within the Monterey bedrock material.

The Project would keep the site at the existing grade in the northern part of the project development footprint, but excavate up to 18-feet below current grade in some parts of the southern development footprint. Geotech borings indicated that the northern part of the development footprint will be entirely within recent alluvial material, however, sensitive bedrock formations began at between six and 10 feet below surface in the southern part of the footprint. Encountered bedrock consists of siltstone and sandstone bedrock material. The project would implement CUL-2, which includes a fossil discovery protocol that would reduce impacts to paleontological resources, as well as **GEO-1** which shall require a qualified paleontologist to provide monitoring services. The preliminary Project geotechnical work has provided a site bedrock sensitivity map that can be used to direct future paleontological monitoring. As such, the mitigation would reduce impacts to potential paleontological resources to less than significant.

Mitigation Measures:

The project would also implement CUL-2, which includes a fossil discovery protocol that would reduce impacts to paleontological resources.

GEO-1 Paleontological Monitoring

Prior to construction, a company qualified to provide paleontological monitoring will be engaged by the applicant to provide monitoring services. The paleontological monitoring team will examine the project geotechnical report, the final project plan, and the site schedule to determine what subsurface activities may require paleontological monitoring of project site grading or excavation. Spot-check monitoring may be used within fill or disturbed deposits; however, if intact bedrock is encountered, then full-time paleontological monitoring will take place.

The paleontological monitor will collect any fossil material that is uncovered through grading or excavating that is found within a disturbed or intact context and can halt construction within 30-feet of a potentially significant fossil resource that cannot readily be removed if necessary. Fossils collected from a disturbed context or that do not warrant additional assessment can be collected, without the need to halt grading. If fossils are not present within bedrock material, and the project conditions warrant reduced monitoring, then a daily or weekly spot-check system of monitoring can be arranged by the compliance team with the construction manager. However, if fossils are encountered that cannot be removed during grading and that the monitor believes will need further assessment, then the project “discovery” protocol will be followed. Discovery situations that do not lead to further assessment, survey, evaluation, or data recovery can be described in the monitor’s daily logs.

All fossils recovered that may be of importance to California paleontology will be cleaned, analyzed, and described within a final project Monitoring Report. All collected materials will be offered to the Natural History Museum of Los Angeles County (NHMLAC) to be curated at the end of the project. If the NHMLAC decides that recovered fossils are worthy of curation, then a Curation Plan will be needed that is reviewed by the Lead/Permitting Agency prior to the publication of the final Monitoring Report and prior to curation of the fossil materials. The costs of the paleontological Monitoring Report, the Curation Plan, and the processing, analysis, and curation of all fossils will be the responsibility of the applicant.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Potentially Significant Less than Significant Impact	No Impact
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VIII. GREENHOUSE GAS EMISSIONS.

Would the project:

- | | | | | |
|----------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Impact Analysis

GHGs emitted by human activity are implicated in global climate change. These GHGs contribute to an increase in the temperature of the earth’s atmosphere by preventing long wavelength heat radiation in some parts of the infrared spectrum from leaving the atmosphere. For purposes of planning and regulation, Section 15364.5 of the CCR defines GHGs as including CO₂, CO, NO_x, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Carbon dioxide is the primary GHG emitted in California, accounting for 83 percent of total GHG emissions in 2019.²⁶ Because the warming potential of the identified GHGs differ, GHG emissions are typically expressed in terms of CO₂ equivalents (CO₂e), providing a common expression for the combined volume and warming potential of the GHGs generated by a particular emitter. The total GHG emissions from individual sources are generally reported in metric tons (MT) and are expressed as MT of CO₂ (MTCO₂e).

Fossil fuel combustion in the transportation sector (on-road motor vehicles, off-highway mobile sources, and aircraft) is the single largest source of GHG emissions, accounting for approximately half of GHG emissions globally. The transportation sector, primarily on-road travel, is the single largest source of CO₂ emissions in California. Additionally, about 50 percent of the industrial source emissions of CO₂ are from the refinery and oil and gas sectors. When the industrial source emissions from the oil and gas sectors are attributed to the transportation sector, the emissions associated with transportation amount to approximately half of Statewide GHG emissions.²⁷

Executive order S-3-05 issued by Governor Arnold Schwarzenegger in 2005 created GHG emissions target for the State and required the California EPA to report progress every two years. Executive Order B-30-15 signed by Governor Jerry Brown in 2015 replaced the 2005 targets with a new target of GHG emissions 40 percent below 1990 levels by 2030. Governor Brown followed this in 2018 with Executive Order B-55-18 which established a State goal to achieve carbon neutrality no later than 2045.

California Assembly Bill 32 (AB 32), the California Global Warming Solutions Act of 2006, provided authorization to CARB to develop regulations and market mechanisms to reach the GHG emissions goals established in 2005. Subsequently the first Climate Change Scoping Plan produced by CARB was adopted in December 2008. Senate Bill (SB 32), the California Global Warming Solutions Act of 2006: emissions limit, was passed in 2016 as a follow-up to AB 32 authorizing CARB to create regulations in pursuit of the GHG emissions target set in the 2015 executive order. The most recent update is the 2022 Scoping Plan to keep California on track to meet SB 32 GHG reduction goal of at least 40 percent below 1990 emissions

²⁶ California Air Resources Board, California’s 2022 Climate Change Scoping Plan, December 2022.

²⁷ Ibid.

by 2030. The 2022 Scoping Plan was finalized in December 2022 and is focused on the goal of obtaining carbon neutrality by 2045 or earlier. This is the first updated Scoping Plan that has added carbon neutrality as a science-based guide where it identifies technologically feasible, cost effective and equity-focused path to carbon net zero. The 2022 Scoping Plan specifically:²⁸

- Identifies a path to reduce GHG emissions by 85 percent below 1990 emissions no later than 2045.
- Identifies technologically feasible, cost-effective means to achieve carbon neutrality by 2045.
- 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 a driving principle throughout the document.
- Incorporates the contribution of natural and working lands to the State’s GHG emissions, as well as its 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 a direct air capture.

GHG emission targets set in the Scoping Plan are attained in part through regional SCS’s developed by metropolitan planning organizations (MPOs).

SB 375, the Sustainable Communities and Climate Protection Act, passed in 2008, requires CARB to develop and set regional targets for GHG emission reductions from passenger vehicles. MPOs must prepare a SCS that will reduce GHG emissions to achieve these regional targets, if feasible to do so. The SCAG is the MPO for the County of Los Angeles (along with the Counties of Imperial, San Bernardino, Ventura, Orange, and Riverside). The 2024-2050 Regional Transportation Plan/SCS (2020-2045 RTP/SCS [or Connect SoCal]) is the most recent RTP/SCS adopted by SCAG. The 2024-2050 RTP/SCS is a long-range visioning plan that examines existing land use and transportation conditions throughout the SCAG region and forecasts how the plan will meet the region’s transportation needs between 2024 and 2050, as well as achieve CARB’s GHG emissions reduction targets. In April 2024, SCAG’s Regional Council adopted the 2024-2050 RTP/SCS. The previously adopted 2020-2045 RTP/SCS was determined by CARB to achieve CARB’s 2035 GHG emissions reduction target of 19 percent below 2005 per capita emissions levels, consistent with SB 375. The 2024-2050 RTP/SCS has not yet been certified by CARB as it was only recently adopted, but as it builds upon the prior RTP/SCS and the GHG reduction target has not changed, it can be reasonably presumed that it will be certified by CARB as well.

CEQA Guidelines Section 15064.4 does not establish a threshold of significance for GHG emissions. Lead agencies have 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 (see CEQA Guidelines Section 15064.7(c)). Pursuant to CEQA Guidelines Section 15064.7(b), “Thresholds of significance to be adopted for general use as part of the lead agency’s environmental review process must be adopted by ordinance, resolution, rule, or regulation, and developed through a public review process and be supported by substantial evidence.” To date the only proposed quantitative threshold of significance that could be applied to the project is 3,000 MT CO₂e/year, proposed by the SCAQMD in 2008.²⁹ This threshold, however, has not been adopted. The City, as lead agency, has not established a quantitative threshold for evaluating the significance of GHG emissions for general use as part of the City’s environmental review process. As such, for this analysis, the potential

²⁸ California Air Resources Board, 2022 Scoping Plan for Achieving Carbon Neutrality, November 16, 2022.

²⁹ SCAQMD, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008.

significance of the project’s GHG emissions will be qualitatively evaluated based on the “extent to which the project complies with regulations or requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of GHG emissions”.

The project would be required by the City to comply with applicable regulations or requirements adopted to implement Statewide, regional, or local plans for the reduction or mitigation of GHG emissions. The project’s consistency with such plans is discussed in the Plan Consistency evaluation provided below.

a. Less than Significant Impact. A significant impact would occur if the project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

Pursuant to CEQA Guidelines Section 15064.4(a), which States that “A lead agency shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of GHG emissions resulting from a project,” the project’s estimated annual GHG emissions were calculated using CalEEMod 2022.1.1.23, which are presented for discussion purposes. The CalEEMod output data for the proposed project, which also reports input data of project details that were used in the model, is provided in Appendix B. Project-specific details and design features used in CalEEMod to calculate GHG emissions are the same as those used in the analysis of air quality criteria pollutants discussed above.

Construction

As shown in the Air Quality and GHG Impact Analysis project in Appendix B, during project construction, the CalEEMod computer model estimates that the construction activities would generate a total of 182.85 MTCO₂e emissions. The SCAQMD’s GHG emissions evaluation guidance is to amortize construction emissions over a 30-year lifetime, which results in a project amortized annual emissions of approximately 6.1 MTCO₂e emissions.

Operations

Based on the CalEEMod output files provided in Appendix B, the project’s annual operational GHG emissions from a combination of area sources, energy use, mobile, water use, and waste disposal would be 2,363 MTCO₂e, as shown in **Table VIII-1, Annual Greenhouse Gas Emissions**. With the addition of the amortized construction GHG emissions discussed above, the project would result in annual emissions of approximately 2,369.1 MTCO₂e. Table VIII-3 shows that project GHG emissions would be under the suggested reference threshold, but since there is no established threshold to compare GHG emissions with, the project’s consistency with such plans is discussed in the Plan Consistency evaluated provided below.

**Table VIII-1
Annual Greenhouse Gas Emissions**

Generation Source	MTCO ₂ e/year
Project Emissions	
Area Sources	1.3
Energy Utilization	149.4
Mobile Source	1,378.3
Solid Waste Generation	30.8
Refrigerants	792.9
Water Supply	10.3
Construction (Amortized)	6.1
Total Project Emissions	2,369.1
Reference Suggested Threshold	3,000.0

Source: Envicom Corporation, Air Quality and GHG Impact Analysis, May 2024.

Plan Consistency

As discussed above, SCAG is the applicable Metropolitan Planning Organization for Los Angeles County, and the SCAG 2024-2050 RTP/SCS is the document that outlines the land use and transportation strategies necessary for the SCAG region to meet the GHG emission reduction targets set by CARB in the Scoping Plan. As discussed above, the 2024-2050 RTP/SCS has yet to be certified by CARB, but CARB determined that the 2020-2045 RTP/SCS would achieve CARB's 2035 GHG emission reduction target of 19 percent below 2005 per capita emissions levels, and consistency with the RTP/SCS demonstrates consistency with the Scoping Plan.

The proposed project would construct the Kia Dealership creating more business and employment opportunities within the City of Calabasas. The project would align with the employment growth estimates of the 2024-2050 RTP/SCS. In addition, the 2024-2050 RTP/SCS list several supporting strategies that represent best practices and identify how the SCAG region can implement the plan and achieve related GHG reductions. These strategies are directed at responsible agencies and not applicable to private development, so they are not detailed here. However, the project would comply with the latest California Green Building Standards Code (known as CALGreen) in efforts to meet the goals of AB 32. The project would be designed to CALGreen standards and would not conflict with the 2024-2050 RTP/SCS or 2022 Scoping Plan. The project is also required to meet the equivalent of LEED Silver, which requires minimum energy performance for all non-residential buildings, per CMC Chapter 17.34. The City of Calabasas General Plan uses the SQAMD AQMP policies to implement the regional plan at local levels. The City's General Plan aims to achieve and maintain air quality levels that meet or exceed Federal and State standards and maintain consistency with the previously mentioned SCAG RPT/SCS, which the project is consistent with, as discussed above.

As there are no applicable local plans adopted to reduce GHG emissions, the project is demonstrated to result in less than significant impacts regarding any potential conflict with applicable plans, policies, or regulations adopted to reduce GHG emissions.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A significant impact would occur if the project conflicted with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions for GHGs. In addition to analyzing quantified GHG emissions, project GHG emissions were evaluated for consistency with applicable regulations to reduce GHG emissions above. As there are no applicable local plans adopted to reduce GHG emissions and the project would not conflict with implementation of the 2024-2050 RTP/SCS, the project is demonstrated to result in less than significant impacts regarding any potential conflict with applicable plans, policies, or regulations adopted to reduce GHG emissions.

Mitigation Measures: No mitigation measures are required.

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

The following analysis is based on a Phase I Environmental Site Assessment Report (Phase I ESA) dated July 9, 2024,³⁰ provided as **Appendix H, Phase I ESA**, and a Limited Phase II Site Investigation Report (Phase II ESA) dated October 2, 2024, provided as **Appendix I, Limited Phase II Site Investigation Report**.³¹

Impact Analysis

a. Less than Significant Impact. A significant impact may occur if the project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of types of hazardous materials or quantities. The service department of the proposed project would involve the

³⁰ Citadel EHS, Phase I Environmental Site Assessment Report, June 25, 2024.

³¹ Citadel EHS, Limited Phase II Site Investigation Report, October 2, 2024.

routine transport, use, or disposal of hazardous materials. These hazardous materials include chemicals commonly used in automotive repair and servicing, including, but not limited to, ethylene glycol coolant, petroleum lubricants, other petroleum-based products (e.g., brake fluid), petroleum-distillate solvent, admixed acetone, isopropyl alcohol, and methyl alcohol. Chemicals routinely used for automobile maintenance, and the transport, use, and storage of these materials would occur in compliance with regulatory requirements. As stated in the CMC Section 17.20.130.A.1 and 17.20.130.A.2, the use, handling, storage and transportation of hazardous substances shall comply with all applicable state laws (Government Code Section 65850.2 and State Health and Safety Code Sections 25505, et seq.), and the Los Angeles County Hazardous Waste Management Plan, and the project will be reviewed by the City for compliance with the CAR overlay development standards. With regulatory compliance, the project would not represent a significant hazard to the public. The project would result in a less than significant impact related to creating a significant hazard through the routine transport, storage, production, use or disposal of hazardous materials.

Mitigation Measures: No mitigation measures are required.

b. Potentially Significant Unless Mitigation Incorporated. A project may have a significant impact if the project would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

The project was previously utilized as a plant nursery from the 1973 to 2015, when the property became vacant. Given the use, prior pesticide or herbicide use is a possibility and residual amounts may remain. The Phase I ESA concluded the potential long-term use of pesticides and/or herbicides from the former plant nursery use constitutes a recognized environmental condition. For the Phase II ESA, Citadel EHS conducted investigative tests of soil samples taken from ten borings at various locations within the project site shown in Appendix I, Figure 2. Borings were advanced to a depth of two feet. Soil was visually evaluated and described using the Unified Soil Classification System and field screened for VOC using a handheld photo-ionization detector. At each of the ten locations samples were taken at 0.5 feet and 2 feet, resulting in a total of twenty samples. Soil samples were stored on ice transported under chain-of-custody procedures to Enthalpy Analytical, of Orange, California, a State-certified laboratory. The soil samples collected from 0.5 feet were analyzed for Title 22 metals by United States Environmental Protection Agency (US EPA) Methods 6010B/7471, organochlorine pesticide (OCP) by US EPA Method 8081A, and chlorinated herbicides by US EPA Method 8151A. The samples collected from 2 feet were initially placed on hold at the laboratory pending results of the 0.5-foot soil samples. Based on results of the 0.5-foot samples, additional samples were analyzed.

Multiple heavy metals were detected above reporting limits, but below their respective commercial Environmental Screening Levels (ESLs) or background levels, except for at one location. At boring B8, located in the eastern portion of the project site, arsenic was detected at 14 milligrams/kg (mg/kg) in both the 0.5-foot and 2-foot samples, which is slightly above the background level of 12 mg/kg. Chromium was detected above the concentration to require additional analysis at four locations (B1, B4, B7, and B8) in the northern and eastern portions of the project site. Results of the analysis for each sample indicated the soil will be classified as non-hazardous. At least one OCP compound was detected above reporting limits in the 0.5-foot sample collected at three locations (B1, B4, and B10) in the central portion of the project site. The 2-foot samples collected and analyzed from each of these locations reported lower concentrations of OCP when compared to the 0.5-foot samples. OCP concentrations were below commercial ESLs in each of the analyzed samples. Chlorinated herbicides were not detected above reporting levels in the 0.5-foot samples collected, except for at one location. At boring B10, located in the southern portion of the investigation area, pentachlorophenol was detected at 0.0146 mg/kg, which is well below the commercial ESL of 4.0 mg/kg. Detailed results are provided in the tables of Appendix I.

Based on the results of the investigation, it was established that the soil disturbed during grading for the site redevelopment should be classified as non-hazardous, as the soil concentrations were below the commercial ESLs and/or Background Levels, except for arsenic at one location on the eastern portion of the site (boring B8 of the Phase II Site Investigation Report). The Phase II ESA recommends a soil management plan for the eastern portion of the project site, which if implemented, would result in the need for no further investigation. This recommendation is incorporated as Mitigation Measure **HAZ-1**, which requires preparation of a soil management plan, as soil grading is proposed on the eastern portion of the project site, near boring B8, which is depicted in Appendix I, Figure 2. Based on the Phase II ESA's determination, with mitigation, the project would result in a less than significant impact related to creating 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.

Construction would involve the temporary use of paints, solvents, and equipment fuel common to construction sites. Crew members would be responsible for using these materials in compliance with safety procedures, manufacturer specifications, and Occupational Safety and Health Administration (OSHA) regulations. The operation of automotive service facilities would not cause a significant hazard to the public or environment.

Mitigation Measures:

HAZ-1 Soil Management Plan

Prior to grading in the eastern portion of the site, to remediate soils with above background arsenic levels, a soil management plan shall be prepared to safely remove and correctly dispose of contaminated soil.

c. Less than Significant Impact. A significant impact may occur if the project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The nearest schools to the project site are Bay Laurel Elementary School, approximately 0.34 miles to the south, Round Meadow Elementary, approximately 0.36 miles to the northwest and the Mesivta of Greater Los Angeles religious school approximately 0.61 miles to the west. Therefore, the project is not located within one-quarter mile of a school. In addition, the proposed project would not use, store, or dispose of the types of hazardous materials, or hazardous materials in sufficient quantities to result in a release of toxic emissions posing a public health hazard. Construction would involve the temporary use of paints, solvents, and equipment fuel, but construction crew members would be responsible for the safe handling of these materials in compliance with safety procedures, manufacturer specifications, and OSHA regulations. Operation as an automotive service facility is typical of this particular use and would not cause a significant hazard to the public or environment. Therefore, potential impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. No Impact. A significant impact may occur if the project is located on materials sites compiled pursuant to Government Code Section 65962.5 and as a result would create a significant hazard to the public or the environment. For the Phase I ESA, a search of records was conducted, including the California Environmental Protection Agency's (CalEPA's) Cortese List Data Resources databases,³² showing that the Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The search involved the following records:

³² California Environmental Protection Agency, Cortese List Data Resources, Accessed on July 11, 2024 at: <https://calepa.ca.gov/sitecleanup/corteselist/>.

- Department of Toxic Substances Control's (DTSC's) EnviroStor Hazardous Waste and Substances Site List;
- State Water Resources Control Board's (SWRCB's) GeoTracker database for Leaking Underground Storage Tank sites, Department of Defense sites, and Cleanup Program sites, as well as GeoTracker irrigated lands, oil and gas production, operating permitted USTs, and Land Disposal sites;
- CalEPA's list of solid waste disposal sites;
- SWRCB's list of Cease and Desist Orders and Cleanup and Abatement Orders; and
- Other information required from the DTSC under Government Code Section 65962.5(a).

Therefore, the project would not result in the creation of a significant hazard to the public or the environment as a result of previous uses being included in lists of hazardous materials sites compiled pursuant to Government Code Section 65962.5. No impact would occur.

Mitigation Measures: No mitigation measures are required.

e. No Impact. The project site is located approximately 10 linear miles west of the Van Nuys Airport, which is the nearest airport, and is not located within its Planning Boundary, Airport Influence Area, or Runway Protection Zone.³³ The project conforms to building height restrictions on the site, would not place structures within a designated flight path, and would not result in a safety hazard to people working or residing within the project area regarding aircraft operations in the vicinity. No impact would occur.

Mitigation Measures: No mitigation measures are required.

f. Less than Significant Impact. A project would normally have a significant impact if the project would interfere with an emergency response plan or emergency evacuation plan. The project site is located near US 101, which would function as an evacuation route in emergencies. The project would construct and operate a car dealership on a site planned by Calabasas for use as a commercial auto retailer and would not impede vehicular circulation routes or impede public access or travel upon public rights-of-way. Therefore, neither the project construction or operations would physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

g. Less than Significant Impact. A significant impact may occur if a project is located in proximity to wildland areas and would pose a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The project site is located within land classified as a Very High Fire Hazard Severity Zone (VHFHSZ), thereby requiring brush clearance and fire protection measures at the time of Building Permit issuance to protect the proposed structures against fire risks, as discussed in response to Section XX., Wildfire. Project design features and compliance with regulatory requirements, such as a sprinkler system and the design of drive aisle widths and turning radii, would reduce impacts to less than significant.

Mitigation Measures: No mitigation measures are required.

³³ Los Angeles County Department of Regional Planning, Airport Land Use Commission, Airport Influence Area, May 13, 2003.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial on- or offsite erosion or siltation;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offside;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

The following analysis is based on the Hydrology Study for the project prepared by Diamond West Inc., dated April 5, 2023, provided in **Appendix J, Hydrology Study**.

a. Less than Significant Impact. A significant impact may occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and discharge into stormwater drainage systems or otherwise substantially degrade surface or ground water quality.

The proposed development and paved areas will exceed 1 acre of disturbed area and add more than 10,000 SF of impervious surface area compared to the existing condition. This redevelopment is considered a "designated project," Stormwater management will be required as defined under the NPDES 2012 MS4

permit and the 2014 County of Los Angeles Department of Public Works Low Impact Development (LID) Standards Manual. Hydrology Report's soil type, rainfall, and runoff parameters are based on and conform to the Los Angeles County Department of Public Works Hydrology (LACDPW) Manual 2006.

The project's stormwater treatment infrastructure shall be based on the LACDPW LID Standards Manual to comply with County LID requirements. The Stormwater Quality Volume is based on the 85th percentile, 24-hour rain event, since it produces a larger stormwater volume than the 0.75-inch event. The LACDPW HydroCalc computer program was again utilized to evaluate these design storms. According to the Geotechnical Report, the tested infiltration rate is below the minimum 0.33 inches per hour, indicating that infiltration is not feasible. Therefore, the project will utilize underground storage chambers to capture and reuse the calculated stormwater quality volume as the stormwater quality BMP.

For the capture and reuse to be feasible in meeting LID requirements, an evaluation of the Estimated Total Water Usage (ETWU) for irrigation must be determined. The ETWU for irrigation from October 1 to April 30 must be greater than or equal to the volume of water produced by the stormwater quality storm event. The ETWU will be evaluated as the project design progresses into final engineering, and the LID design will be updated accordingly. BMPs can be provided in various ways, varying from catch basin filters, proprietary treatment devices placed in the main storm drain infrastructure, and grass swale filters. Stormwater during operation of the project would be treated adequately via capture and reuse or flow-through treatment BMPs.

Additionally, the project will require preparation and implementation of a City reviewed and approved Storm Water Pollution Prevention Plan (SWPPP) for the construction site, pursuant to regulations for construction sites greater than 1.0 acre, under part VI.D.8.e-j of the NPDES permit order No. R4-2012-0175 as amended by order WQ2015-0075. A SWPPP will be provided consistent with the State water board requirements, and construction BMPs will be implemented to reduce pollutants in storm. The development of the SWPPP and selection of the construction BMPs will be determined as the project's design progresses into final engineering. The project's proposed storm water management system, prepared in regulatory compliance, would reduce potential impacts regarding water quality standards or waste discharge requirements to less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A project would have a significant impact if it substantially decreased groundwater supplies or interfered with groundwater recharge such that the project may impede sustainable groundwater management of the basin. The LVMWD serves as the potable water purveyor to the City, and therefore, would serve as the potable water purveyor to the project site. The groundwater underlying LVMWD's service area is poor quality and is not currently used for the potable water supply system but is used to resupply recycled water systems.³⁴ Stormwater during operation of the project would be treated adequately via capture and reuse or flow-through treatment BMPs in order to comply with LID requirements. Therefore, the project would not substantially deplete groundwater supplies or substantially interfere with groundwater recharge such that the project may impede sustainable groundwater management of the basin, and groundwater quantity impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

³⁴ City of Calabasas, 2030 General Plan EIR, December 2008.

c.i. Less than Significant Impact. A project would have a significant impact on surface water hydrology if it would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces, in a manner which would result in substantial or erosion or siltation on site.

The project site is currently improved with existing remnant paved areas, foundations, retaining walls, and graded pads associated with the former plant nursery use. There are no drainages or jurisdictional areas on the site (see Section IV., Biological Resources). The LID requirements manage the quantity and quality of stormwater runoff by setting standards and practices to maintain or restore the natural hydrologic character of a development site, reduce off-site runoff, improve water quality, and provide groundwater recharge. The project will implement a SWPPP during construction which will implement BMPs to reduce runoff leaving the site and filter storm water to reduce erosion or siltation off site. During operations, the project would comply with LID requirements for stormwater to be captured. Stormwater treatment BMP may be considered and can be provided in various ways, varying from catch basin filters, proprietary treatment devices placed in the main storm drain infrastructure, and grass swale filters. Through project design features and compliance with existing LID Ordinance requirements, the project would not result in substantial on- or offsite erosion or siltation and the impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

c.ii. Less than Significant Impact. A project would have a significant impact on surface water hydrology if it would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river 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 offsite. The proposed improvements will not substantially alter existing onsite or area drainage patterns. Similar to existing conditions, the project site stormwater would ultimately be conveyed to existing stormwater infrastructure on Calabasas Road after being treated through a debris/detention basin that will remove and store all potential debris. The project site is located in an urbanized area and no streams or river courses are located on the Subject Property. The project is not located in a designated flood zone.³⁵ Through compliance with LID Ordinance requirements, the project would not result in a substantially increased potential for flooding on or offsite. Therefore, this impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

c.iii. Less than Significant Impact. A project would have a significant impact on surface water hydrology if it would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces, in a manner which would create or contribute runoff which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

As discussed above, the project site is currently improved with existing remnant paved areas, foundations, retaining walls, and graded pads associated with the former plant nursery use. The project proposes an increase of impervious area. The project would result in flow rates below pre-developed conditions for every storm event after implementation of detention basin and routing of flows. The proposed improvements will not substantially alter existing onsite or area drainage patterns. Similar to existing conditions, the project site storm water would ultimately be conveyed to existing stormwater infrastructure on Calabasas Road after being treated through a debris/detention basin. Through compliance with LID Ordinance requirements, the project would not substantially increase runoff volumes that could affect the

³⁵ FEMA, National Flood Hazard Layer FIRMette, Accessed on May 17, 2024 at <https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd>

existing capacity of the stormwater drainage system or provide substantial additional sources of polluted runoff to the existing drainage system, or otherwise substantially degrade water quality and this impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

c.iv. Less than Significant Impact. A project would have a significant impact on surface water hydrology if it would substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river through the addition of impervious surfaces, in a manner which would impede or redirect flood flows. The project is not located in a designated flood zone.³⁶ Stormwater runoff generated by the proposed development would be required to comply with the LID requirements to manage any incremental increase in runoff onsite. As such, the project would have a less than significant impact on impeding or redirecting flood flows.

Mitigation Measures: No mitigation measures are required.

d. No Impact. A significant impact would potentially occur if the project would risk the release of pollutants from project inundation due to location in a flood hazard, tsunami, or seiche zone.

The project is not located a flood hazard or tsunami zone.^{37,38} A seiche, a wave created when a body of water is shaken, is a concern at water storage facilities because inundation can occur if the wave overflows a containment wall. No major water retaining structures are located immediately upgradient from the project site. Therefore, flooding from seiche is considered unlikely. The project site is not located in a potential dam breach inundation area.³⁹ Project inundation is therefore not anticipated. As such, the project would have no impact pertaining to the risk of release of pollutants due to location in flood hazard, tsunami, or seiche zones.

Mitigation Measures: No mitigation measures are required.

e. Less than Significant Impact. A project would have a significant impact if it conflicted with or obstructed implementation of a water quality control plan or sustainable groundwater management plan. The project site was previously disturbed by the placement of impervious surfaces and does not propose groundwater extraction. Compliant with LID requirements, the project would capture and convey stormwater consistent with existing regulations. Therefore, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Mitigation Measures: No mitigation measures are required.

³⁶ Ibid.

³⁷ Ibid.

³⁸ Department of Conservation, CSG Information Warehouse: Tsunami Hazard Area Map, Accessed on May 17, 2024 at: https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/

³⁹ Department of Water Resources, Dam Breach Inundation Map Web Publisher, Accessed on May 17, 2024 at: https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
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XI. LAND USE AND PLANNING.

Would the project:

- | | | | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Impact Analysis

a. No Impact. A significant impact may occur if the proposed project would be sufficiently large or otherwise configured in such a way as to create a physical barrier within an established community. The site is located in a Calabasas General Plan CAR overlay and was previously developed as a plant nursery with related structures, surface parking, and landscaping. The project proposes to replace an existing, closed nursery with a new automobile dealership and associated structures. As the site was previously developed and the proposed use is similar to (and compatible with) surrounding auto dealership uses, the project would not physically divide an established community and the project would have no impact.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A significant impact may occur if a project causes a significant environmental impact due to inconsistency with the applicable land use plan, policy or regulation, including the zoning designations of the project site. The project site is located within the City and subject to the land use designations and zoning regulations of local land use plans and zoning ordinance.

Regional Plans

Regionally, the project is located within the SCAG planning area, the Federally-designated Metropolitan Planning Organization for the region. SCAG is responsible for reviewing regionally significant local plans, projects, and programs for consistency with SCAG's adopted regional plans. As the proposed project is 1) consistent with the General Plan land use designation for the subject property, and 2) impacts would be less than significant or less than significant with mitigation incorporated, and the project would have no regionally-significant impacts, additional analysis of SCAG Plan consistency is not warranted. The project is located within the planning area of the SCAQMD which implements the AQMP. As evaluated in Section III., Air Quality, the project is consistent with the AQMP, no additional analysis is required.

City General Plan

The General Plan is a comprehensive, long-range declaration of purposes, policies and programs to guide development of the City towards desired development goals, and is a strategy for long-term growth. The General Plan's most applicable objectives, goals and policies relevant to the project are shown **Table XI-1, Consistency Analysis with General Plan Land Use Element.**

**Table XI-1
Consistency Analysis with General Plan Land Use Element**

General Plan Policy	Consistency Analysis
Land Use Element	
<p>Community Structure Objective: Maintain Calabasas as a predominantly residential community with commercial, office, and business park uses playing a secondary, supporting role.</p>	<p>Consistent: The project would provide commercial development in an area designated for such uses, and would not directly affect residential uses. The General Plan Land use designation is B-LI, with a corresponding zone of CL within a CAR overlay.</p>
<p>Policy II-8: Emphasize retention of Calabasas’ natural environmental setting, neighborhood character, and scenic features as a priority over expansion of urban areas.</p>	<p>Consistent: The site is located within a CAR overlay and would develop a new auto dealership. The project would not expand the urban area, as the project site has been previously developed with a plant nursery (now closed), and consistent with planning and zoning, similar development exists to the east and west of the site. Furthermore, development is limited to the already disturbed portions of the property, thereby preserving the surrounding natural environment setting.</p>
<p>Policy II-15: Discretionary development projects are permitted the basic development intensity of their site as indicated on the General Plan Land Use Map (Figure II-1) and General Plan Land Use Districts table (Table II-1) if the proposed project is consistent with General Plan goals, objectives, approaches, and relevant policies and performance standards. Development intensities greater than the basic development intensity outlined in Table II-1 may be permitted, up to the maximum development intensity identified in Table II-1, only if the impacts of the proposed development are less than those identified in “Maximum Acceptable Development Impacts” table in the Municipal Code where specifically noted in Table II-1.</p>	<p>Consistent: The project would provide commercial development in an area designated for such uses. The General Plan Land use designation is B-LI with a corresponding zone of CL and the project site is also within a CAR overlay. The auto dealership is consistent with the General Plan Land Use Map and is consistent with goals, objectives, approaches, and relevant policies and performance standards, as demonstrated in this table. The B-LI General Plan Land use designation has a basic land use intensity of a floor area ratio (FAR) of less than or equal to 0.2 and a maximum land use intensity of an FAR of 0.2, as shown in the General Plan Land Use Districts table. As shown on the site plan, the project has an FAR of 0.08, which is well within the basic land use intensity of less than or equal to 0.2. Project plans must be reviewed and approved in the site plan review and plan check process, prior to construction, to assure compliance with regulations implementing the City policies and performance standards. The project is also required to obtain a scenic corridor permit, with the project design reviewed and approved by the City to assure compliance with the Scenic Corridor Development Guidelines.</p>
<p>Policy II-17: Encourage the clustering of development as a means of preserving significant environmental features. Clustered development shall meet the following criteria:</p> <ul style="list-style-type: none"> • The clustering of development shall occur pursuant to a specific plan, planned development, or equivalent mechanism; • The overall density of the project area shall not exceed the maximum specified in Table II-1, calculated as if there were no clustering; • The resulting project will not require a greater level of public services and facilities than would have an equivalent non-clustered project; 	<p>Consistent: The project would provide commercial development in an area designated for such uses and within a similar footprint to the previous commercial nursery development on the site. The majority (78 percent) of the 10.94-acre site will be left undeveloped, clustering the proposed commercial automobile dealership use to the area closest to the roadway, leaving a large portion of the hillside area of the site undeveloped. Further, the applicant is proposing an automobile dealership within the City’s CAR overlay zone, and the proposed use is similar and thus highly compatible with the automobile dealership uses to the east and west.</p> <p>The General Plan Land use designation is B-LI with a corresponding zone of CL within a CAR overlay. The development of the project would not result in greater level of</p>

General Plan Policy	Consistency Analysis
<ul style="list-style-type: none"> • The result of clustering development shall yield a more desirable and environmentally sensitive development plan, create usable open space areas for the enjoyment of project residents, and preserve significant environmental features; and • The net intensity of the developed area that results from clustering is compatible with the surrounding environment. 	<p>public services and facilities, as shown in Section XV., Public Services.</p>
<p>Source: City of Calabasas, 2030 General Plan Land Use Element, October 2021.</p>	

As shown in Table XI-1, the project would be consistent with the applicable land use policies of the General Plan Land Use Element regarding the proposed automobile dealership.

Calabasas Municipal Code and Zoning

The project site is zoned CL (Commercial Limited), and included in a Commercial Auto Retailer (CAR) overlay zone. The Calabasas Municipal Code (CMC) states the purpose of the CAR overlay zone is to protect an important economic base of the City by incentivizing the development of businesses for automotive sales and service; safeguarding and enhancing property values; protecting public and private investment, buildings and open spaces; and protecting and enhancing the public health, safety, and welfare. Since the project is an auto dealership with associated structures and is located within the CAR overlay zone, the project is consistent with the Calabasas Municipal Code.

As the project would be consistent with applicable land use policies plans and regulations, the project would result in a less than significant impact.

Mitigation Measures: No mitigation measures are required.

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

Impact Analysis

a-b. No Impact. A significant impact may occur if a project site is located in an area used or available for extraction of a regionally important mineral resource, or if the project would convert an existing or future regionally important mineral extraction use to another use or would affect access to a site used or available for regionally important mineral resource extraction.

The project proposes to construct an automobile dealership within a CAR overlay zone. According to the City’s General Plan Conservation Element, the western portion of the City is designated as Mineral Resources Zone (MRZ)-1, indicating that no significant mineral deposits are present. The rest of the City (including the project site) is designated MRZ-3, indicating that the significance of mineral resources could not be evaluated from available data.⁴⁰ Policy IV-46 of the Conservation Element prohibits mineral extraction operations that could result in significant impacts. Based on California Department of Conservation, Division of Oil, Gas, and Geothermal Resources, no oil wells are identified on site.⁴¹ Therefore, no mineral resources are known to exist on the project site and the City prohibits mineral resource extraction that would significantly impact the environment. As such, there is no impact associated with the loss of availability of known mineral resources would occur.

Mitigation Measures: No mitigation measures are required.

⁴⁰ City of Calabasas, 2030 General Plan, Conservation Element, October 2021.

⁴¹ Department of Conservation, Well Finder, Accessed on May 7, 2024 at: <https://maps.conservation.ca.gov/doggr/wellfinder/>.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XIII. NOISE. Would the project result in:				
a. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. 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, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

This analysis is based on the Noise and Vibration Technical Study prepared by Envicom Corporation dated January 2024, provided in **Appendix K, Noise and Vibration Technical Study**. This summary introduces key terms and concepts used in noise impact analysis. Noise is unwanted sound. Sound perceived by humans is vibration that spreads through an elastic medium such as air, which is also known as an acoustic wave or pressure wave. Sound pressure level, expressed in decibels (dB), is the most common descriptor to characterize the perceived “loudness” of a given sound pressure level. Sound can vary in intensity by over one million times within the range of human hearing so a logarithmic scale is used to keep sound intensity numbers manageable. The human ear is not equally sensitive to all sound frequencies within the entire spectrum, so human sensitivity to various frequencies is factored into sound descriptions in a process called A-weighting, resulting in A-weighted dB written as dBA. Subsequent references to dB written as dB should be understood as dBA. Variations in noise exposure over time are expressed in terms of a steady-State energy level equivalent to the energy content of the time period, called Leq. A Leq measurement can be conducted for any time period, but generally they are conducted for at least 15 minutes for environmental noise studies. Community receptors are more sensitive to unwanted noise intrusion during the evening and at night. Therefore, for planning purposes, State law requires the use of the Community Noise Equivalent Level (CNEL), a descriptor of 24-hour noise that uses a weighted average of noise levels over time with a five-dB penalty in the evening (7:00 p.m. - 10:00 p.m.) and 10-dB penalty at night (10:00 p.m. - 7:00 a.m.).

The primary noise source in the project vicinity is traffic noise from US 101, located approximately 160 feet south of the project site. To establish existing conditions, a version of the Federal Highway Traffic Noise Prediction Model (FHWA RD77-108) was used to model the existing US 101 traffic noise contours. Traffic model inputs, including average daily traffic (ADT) volumes and fleet mix, were sourced from Caltrans. **Table XIII-1, Existing Freeway Traffic Noise Contours** summarizes the modeled CNEL (dBA) noise level at 50 feet and the distances to the 60, 65, and 70+ CNEL noise contours. The traffic noise model indicates the project site is within the 70 dBA CNEL noise contour, meaning that existing noise levels on the site are greater than 70 dBA CNEL.

Table XIII-1
Existing Freeway Traffic Noise Contours

Roadway	ADT Volumes	dBA CNEL at 50 Feet	Distance in feet to CNEL Contours		
			70+ dBA	65 dBA	60 dBA
US 101, West of Junction with SR 27, Topanga Canyon Boulevard Interchange	213,000	86.4	621	1,339	2,884
Source: Envicom Corporation, Noise and Vibration Technical Study: Kia Dealership Project, June 2024. California Department of Transportation (Caltrans), Traffic Census Program, 2021.					

a. **Less than Significant Impact.** A project may result in a significant noise impact by generating 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. The following analysis distinguishes between short-term increases in ambient noise resulting from the use of construction equipment and long-term increases in ambient noise resulting from operation of the proposed building components and vehicular trips generated once the building is in use.

Temporary Noise - Construction

Section 17.20.160(C) of the CMC provides exemptions to the exterior noise standards, including noise associated with construction, including the idling of construction vehicles, provided such activities do not take place before 7:00 a.m. or after 6:00 p.m. on any day except Saturday in which no construction is allowed before 8:00 a.m. or after 5:00 p.m. No construction is allowed on Sundays or Federal holidays. These requirements may be modified by a conditional use permit. The City of Calabasas does not have construction noise standards; therefore, the FTA daytime construction noise criteria of 80 dBA Leq is used.

North of the project site across US 101 lies a section of unincorporated Los Angeles County with single-family residential development that is approximately 400 feet from the project site boundary. Because the property line of this receptor is within 500 feet of the project property line, applicable Los Angeles County standards are discussed and applied to this receptor. Section 12.08.440 of the LACC sets forth long-term construction noise standards of 60 dBA during the hours of 7:00 a.m. to 8:00 p.m. All mobile or stationary internal-combustion-engine powered equipment or machinery shall be equipped with suitable exhaust and air-intake silencers in proper working order.

The CalEEMod default construction equipment mix provided by Air Quality report was used to model construction noise by activity phase. The equipment mix was modeled using the Roadway Construction Noise Model (RCNM). Average construction noise levels for each activity phase were modeled using the top three loudest pieces of equipment. To calculate the noise level at sensitive receptors, the distance from the construction activity to the nearest receptor was measured from the acoustical center of the activity (e.g., paving, grading, building construction). **Table XIII-2, Construction Equipment Noise Level at Sensitive Receptors** below shows the construction noise levels per activity phase at a distance of 50 feet and at the nearest sensitive receptors. Modeling details and spreadsheets are included in Appendix K.

Calabasas Receptors

The City of Calabasas does not have construction noise standards; therefore, the FTA daytime construction noise criteria of 80 dBA Leq is used. As indicated in Table XIII-2, the nearest single-family homes in the City of Calabasas would experience construction noise levels of up to 60 dBA. Therefore, construction noise would not exceed the FTA construction noise threshold for residential uses, and it would not result in a substantial noise increase at these noise-sensitive receptors. Additionally, as mentioned above, noise levels would be further reduced by at least 6 dBA with the use of proper exhaust mufflers.

Table XIII-2
Construction Equipment Noise Level at Sensitive Receptors

Modeled Equipment per Construction Activity	Construction Noise Levels in dBA L_{eq} ¹		
	RCNM reference Noise Levels ¹	Residential Receptors to the South (Calabasas)	Residential Receptors to the North (unincorporated LA)
<i>Distance</i>	<i>50 feet</i>	<i>900 feet</i>	<i>600 feet</i>
Demolition	85	60	64
Site Preparation	85	59	63
Grading	85	59	63
Building Construction	82	57	60
Architectural Coating	74	49	52
<i>Distance in feet</i>	<i>50 feet</i>	<i>650 feet</i>	<i>460 feet</i>
Paving/Parking Lot	83	60	63
Maximum Construction Noise	85	60	64
Source: Envicom Corporation, Noise and Vibration Technical Study: Kia Dealership Project, June 2024. Calculations use RCNM and construction equipment list is from CalEEMod construction defaults. Notes: See Appendix B for distances and calculations. ¹ dBA L_{eq} is rounded to the nearest whole number.			

Los Angeles County Receptor

The closest single-family residence located in unincorporated Los Angeles County would be exposed to construction noise levels of up to 64 dBA Leq. While this exceeds the Los Angeles County construction noise standard of 60 dBA, this receptor is situated approximately 75 feet from US 101 and within the 70+ dBA CNEL freeway noise contour, as shown in Table XIII-1. For instance, a single passenger vehicle traveling at 60 miles per hour (mph) typically registers at approximately 80 dBA Leq when measured at a distance of 50 feet. Trucks, trailers, and other heavy-duty vehicles would produce even higher noise levels. When these levels are adjusted for the receptor's distance of 75 feet, they would experience traffic noise levels of at least 78 dBA Leq. Construction noise levels would be approximately 11 dB below ambient conditions and would not result in a substantial noise increase.

Furthermore, Section 12.08.440 of the Los Angeles County Code mandates that all mobile or stationary internal-combustion-engine powered equipment or machinery must be equipped with suitable exhaust mufflers and air-intake silencers in proper working order. A study conducted for the US Department of Transportation reported that applying a good muffler to equipment without one or with a poor muffler can reduce overall noise by 6 to 12 dBA.⁴² This requirement would further reduce noise levels to 58 dBA or less. Therefore, construction noise would not result in a substantial noise increase at this noise sensitive receptor.

Permanent - Operations

The proposed project would generate on-site and off-site operational noise. Off-site operational noise would arise from project trip generation, contributing to incremental increases in traffic noise along nearby roadway segments. A change of 5 dBA is readily discernible to most people in an exterior environment. People with normal or healthy hearing can typically detect a 3 dBA change in noise under normal conditions. Changes between 1 to 2 dBA are typically only perceptible under quiet, controlled conditions such as an audiometric booth, and changes less than 1 dBA are typically imperceptible. Considering these perceptibility thresholds, the Federal Aviation Administration's and Federal Interagency Committee on

⁴² Toth, William J., "Noise Abatement Techniques for Construction Equipment", Prepared for the National Highway Traffic Safety Administration, US Department of Transportation, August 1979.

Noise criterion for impact significance is applied and a significant traffic noise increase would occur if the project results in: a 1.5 dBA CNEL increase in ambient noise environments greater than 65 dBA CNEL, a 3.0 dBA CNEL increase in ambient noise environments between 60 - 65 dBA CNEL, a 5 dBA CNEL increase in ambient noise environments less than 60 dBA CNEL. **Table XIII-3, Calabasas Exterior Noise Standards** summarizes the CMC exterior noise standards for residential receptors.

**Table XIII-3
Calabasas Exterior Noise Standards**

Day of Week		Time of Day	dBa Leq
			Residential
Monday – Friday	Nighttime	10:00 p.m. to 7:00 a.m.	50
	Daytime	7:00 a.m. to 10:00 p.m.	65
Saturday and Sunday	Nighttime	10:00 p.m. to 8:00 a.m.	50
	Daytime	8:00 a.m. to 10:00 p.m.	60

Source: City of Calabasas Municipal Code §17.20.160(D).

For residences in unincorporated LA County, Section 12.08.390 of the Los Angeles County Code establishes exterior noise standards (for stationary sources) for residential uses. The daytime (7:00 a.m. to 10:00 p.m.) exterior noise standard for residential uses is 50 dB, and during nighttime (10:00 p.m. to 7:00 a.m.), it is set at 45 dB. Section 12.08.450 of the Los Angeles County Code limits noise from a forced-air blower in a tunnel car wash to 60 dBA at any receiving residential property, between the hours of 7:00 a.m. and 8:00 p.m. .

On-site operational noise sources encompass noise generated by HVAC and the blow dryers in the car wash tunnel. The proposed car wash would not be open to the public and does not include outdoor vacuum stalls. Therefore, the primary noise source from the car wash would be from the blow dryers.

Off-Site Operational Traffic Noise

Table XIII-4, Project-Related Traffic Noise Increase below displays the project and cumulative traffic noise increase along study roadway segments. The traffic noise increase attributed to the project is anticipated to be 1.1 dBA CNEL or less, and the project's contribution to cumulative traffic noise is 0.9 dBA CNEL or less. Consequently, all study roadway segments are projected to experience an increase of less than 1.5 dBA CNEL. Therefore, the project would not result in a substantial traffic noise increase.

On-Site Operational Stationary Noise

The project is anticipated to have HVAC equipment on rooftops. HVAC equipment would be installed near the center of the building's rooftop. HVAC equipment typically ranges between 60 dBA to 72 dBA at a distance of 3 feet. The nearest sensitive receptors to the rooftop mechanical equipment would be the single-family homes to the north (Los Angeles County) and south (City of Calabasas) situated approximately 600 feet and 900 feet away, respectively. At these distances, noise levels would attenuate to 26 dBA or less. Therefore, HVAC noise levels comply with the CMC noise standards for weekday daytime/nighttime of 65/50 dBA and weekend daytime/nighttime standards of 60/50 dBA. In addition, at the sensitive receptors in unincorporated Los Angeles County, HVAC noise levels comply with the Los Angeles County exterior noise standards of 45 dBA (nighttime) and 50 dBA (daytime).

The proposed project involves the construction of a car wash intended exclusively for servicing the dealership's vehicles. Site plans show the car wash to function as a drive-through car wash with blow dryers near the exit. However, the car wash would not install outdoor vacuum stalls. Consequently, this noise analysis focuses on noise impacts from the tunnel blow dryers.

**Table XIII-4
Project-Related Traffic Noise Increase**

Roadway Segment	ADT Volumes				dBA CNEL		
	Existing No Project	Existing Plus Project	Cumulative No Project	Cumulative Plus Project	Project Noise Increase	Cumulative Plus Project Increase	Project Contribution to Cumulative Increase
Mureau Road north of Calabasas Road	6,970	7,090	8,030	8,150	0.1	0.7	0.1
Calabasas Road east of Mureau Road	7,160	7,280	8,820	8,940	0.1	1.0	0.1
Calabasas Road east of US 101 on/off ramps	13,610	14,230	14,750	15,370	0.2	0.5	0.2
Calabasas Road west of US 101 on/off ramps	9,540	10,580	11,110	12,150	0.4	1.1	0.4
Parkway Calabasas north of Calabasas Road	18,230	18,730	19,770	20,270	0.1	0.5	0.1
Parkway Calabasas south of Calabasas Road	13,200	13,250	11,220	13,810	0.0	0.2	0.9
Calabasas Road east of Parkway Calabasas	12,110	12,180	13,090	13,160	0.0	0.4	0.0
Calabasas Road west of Parkway Calabasas	12,960	13,580	12,160	15,320	0.2	0.7	0.2

Source: Envicom Corporation, Noise and Vibration Technical Study: Kia Dealership Project, June 2024.
Traffic Data Source: Associate Transportation Engineers, Kia Dealership Transportation Analysis, November 2023.

The nearest residential property line within the City of Calabasas is approximately 730 feet from the car wash. As indicated in **Table XIII-5, Car Wash Dryer Noise Levels at Receptors** noise levels at this distance would attenuate to 50 dBA or less. Therefore, blow dryer noise levels would comply with the CMC noise standards for weekday daytime/nighttime of 65/50 dBA and weekend daytime/nighttime standards of 60/50 dBA.

Table XIII-5
Car Wash Dryer Noise Levels at Receptors

Receptor	Jurisdiction	Distance to Car Wash	Dryer Noise Levels at Receptors	
Single-family homes to the north	City of Calabasas	730 feet	10HP without PowerLock ¹	45 dB
			15HP without PowerLock ²	49 dB
Single-family home to the south	LA County	660 feet	10HP without PowerLock ¹	46 dB
			15HP without PowerLock ²	50 dB
Source: Envicom Corporation, Noise and Vibration Technical Study: Kia Dealership Project, June 2024. Notes: HP = Horsepower ¹ Maximum level associated with 10 HP Model ² Maximum level associated with 15 HP Model				

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A significant noise impact may occur if the proposed project would expose people to or generate excessive ground-borne vibration or ground-borne noise levels. Construction activities generate ground-borne vibration when heavy equipment travels over unpaved surfaces or engages in soil movement; however, the ground surface dampens ground-borne vibration over a short distance. Predicted vibration levels generated by construction equipment are provided in terms of Peak Particle Velocity in inches per second (in/sec PPV), a unit of measurement used by regulatory agencies including the Federal Transit Administration and California Department of Transportation, in **Table XIII-6, Vibration Damage Levels at Nearby Sensitive Receptors.**

Table XIII-6
Vibration Damage Levels at Nearby Sensitive Receptors

Equipment	Vibration Levels, PPV (in/sec)	
	FTA Reference Level at 25 feet ¹	BMW Dealership Building - 80 feet west
Vibratory Roller	0.210	0.037
Large Bulldozer	0.089	0.016
Caisson Drilling	0.089	0.016
Loaded Trucks	0.079	0.013
Jackhammer	0.035	0.006
Small Bulldozer	0.003	0.001
Source: Envicom Corporation, Noise and Vibration Technical Study: Kia Dealership Project, June 2024. ¹ Federal Transit Administration, Transit Noise and Vibration Impact Assessment, September 2018. Notes: PPV = peak particle velocity; in/sec = inches per second		

The closest structure to the project site boundary is the neighboring BMW dealership building to the west, situated approximately 80 feet from the project site boundary. As shown in Table XIII-6, vibration levels would attenuate to 0.037 in/sec PPV at 80 feet. Construction related vibration would not exceed the FTA criterion of 0.20 in/sec PPV at the nearest off-site structure. In addition, the nearest residential building is over 600 feet away from the project grading activity, and therefore, would also experience vibration levels less than 0.20 in/sec PPV.

The proposed project would not have significant sources of operational vibration, such as rail systems or railroad tracks. Therefore, the project would not generate substantial long-term vibration levels.

Mitigation Measures: No mitigation measures are required.

c. No Impact. A project located within two miles of a public airport or public use airport may result in a significant impact if a project would the project expose people residing or working in the project area to excessive noise levels. The project site is located over ten miles southwest of the nearest airport, Van Nuys Airport. The site is not within the Planning Boundary, Airport Influence Area, or Runway Protection Zone of Van Nuys Airport.⁴³ Therefore, the project would not result in the exposure of residents or those working in the project area to excessive noise levels.

Mitigation Measures: No mitigation measures are required.

⁴³ Los Angeles County Department of Regional Planning, Airport Land Use Commission, Airport Influence Area, May 13, 2003.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
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XIV. POPULATION AND HOUSING.

Would the project:

- a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
- b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Impact Analysis

a. Less than Significant Impact. A significant impact may occur if a project would induce substantial unplanned population growth in an area, either directly or indirectly. The project is an automobile dealership comprised of a new commercial building and ancillary features. The project site is currently a former plant nursery and associated surface parking. SCAG’s 2024-2050 RTP/SCS forecasts for population and employment growth from 2020 through 2050 for the City are shown in **Table XIV-1, Population and Employment Growth Forecast.**

**Table XIV-1
Population and Employment Growth Forecast**

Year	City Population	City Employment
2019	23,500	25,100
2050	24,937 ^(a)	26,200
Net Growth	1,437	1,200
Source: SCAG 2024-2050 RTP/SCS, Current Demographics & Growth Forecast Appendix, Table 12 and 13, Adopted April 4, 2024.		
^(a) Derived using Los Angeles County population to household ratio from Table 12 of the Current Demographics & Growth forecast from SCAG RTP/SCS.		

As shown in Table XIV-1, SCAG forecasts City population and employment to increase from 2019 to 2050 by 1,437 people and 1,200 jobs. As the project would replace a vacant plant nursery with a new automobile dealership within the City’s CAR overlay zone, the project would not introduce population growth, and would not develop a site planned for population growth. As the project is consistent with the existing zoning for a commercial automobile dealership, it would be consistent with SCAG projections for employment. As such, the project-related population increase would be within local and regional projections and would not cause substantial growth that could exceed projected levels for the year of occupancy. As the proposed project would not generate a residential population, cause a substantial increase in employment, or extend existing or new infrastructure that would indirectly induce population growth, the project would have less than significant impacts associated with population growth.

Mitigation Measures: No mitigation measures are required.

b. No Impact. A significant impact may occur if a project would result in the displacement of existing housing units or people, necessitating the construction of replacement housing elsewhere. The existing plant nursery is currently unoccupied and contains no residences or residents, the project would not displace persons or residential units or necessitate the construction of replacement housing elsewhere. Therefore, the project would have no impact.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
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XV. PUBLIC SERVICES.

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

a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

a. Less than Significant Impact. A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service, the construction of which could cause significant environmental impacts. The City is provided fire service through contract with the LACFD. The target response time for the LACFD in the City for fire-related emergencies is five minutes.⁴⁴

Existing LACFD stations in the vicinity would serve the proposed project. The nearest station is Station 68, located at 24130 Calabasas Road, approximately 0.5 miles northwest of the project site. Additionally, Station 125, located at 5215 Las Virgenes Road, is approximately 2.2 miles northwest of the project site.⁴⁵ Station 68 equipped with a 3-person engine company and a 2-person paramedic squad with 5 daily-on duty personnel.⁴⁶ Due to the proximity of the LACFD stations, the project site is within the five-minute target response time.

Through the City plan check process, the project would submit plans to LACFD for review and approval of fire prevention and safety features, including design features such as adequate street widths and access to the building, fire flow pressure, and fire hydrant placement. Additionally, the project would be required to pay a developer fee for the provision of protection facilities in compliance with the 2030 General Plan development. Given the availability of existing LACFD stations and developer fee, the impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

⁴⁴ City of Calabasas, 2030 General Plan EIR, December 2008.

⁴⁵ County of Los Angeles Fire Department , Fire Station Locator, Accessed on September April 23, 2024 at: <https://locator.lacounty.gov/fire/Search?find=&near=24460+Calabasas+Road%2C+Calabasas%2C+CA%2C+91302&cat=&tag=&loc=&lat=34.149922368563885&lon=-118.66009126992124>

⁴⁶ City of Calabasas, 2030 General Plan EIR, December 2008.

b. Less than Significant Impact. A project would normally have a significant impact if it requires new or expanded police station facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times or other performance objectives for police protection. The City is contracted with the Los Angeles County Sheriff's Department (LASD) for law enforcement service.

The LASD is split into three regions and the project site is located in ~~Region I~~ the North Patrol Division. The project site is Malibu/Lost Hills Sheriff Station boundary, and the station is located at 27050 Agoura Road approximately 4.1 driving miles west of the project site. ~~Target time response varies on urgency of the call~~ Standard target response times and average response times for the station vary based on the urgency of the call:⁴⁷

- Routine call: ~~23.6 minutes~~ 60 minutes standard target, 39.9 minutes station average
- Priority call: ~~10.2 minutes~~ 30 minutes standard target, 11.7 minutes station average
- Emergency: ~~4.7 minutes~~ 15 minutes standard target, 7.7 minutes station average

LAPD prioritizes emergency calls for police assistance based on the nature of the call. Unlike fire protection services, police units are most often in a mobile State; hence, the distance between a headquarters facility and the location of a particular emergency does not generally determine response times. Malibu/Lost Hills Sheriff Station has approximately ~~25 deputies on patrol at any given time~~ 14 deputies on average on patrol per shift, although the actual number varies depending on the shift. The project would construct an automobile dealership with a sales floor/showroom, offices, and service shop typical of an automobile dealership. As the project would not introduce new residents and would be located in an area within LASD patrol, the project would not result in a substantial increase in the LAPD service area or population such that new or physically altered police facilities would be needed to maintain performance objectives. Therefore, potential operational impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which could generate a demand for school facilities exceeding the capacity of the Las Virgenes Unified School District (LVUSD). Since the project would be commercial use, the project would not increase population of the City, but project employment may generate students. Pursuant to Education Code Section 17620(a)(1), the project would pay a fee for the provision of school services which would reduce potential school facility impacts. LVUSD school fee for commercial/industrial development is \$0.78 per SF.⁴⁸ With payment of the school fee, the project would have a less than significant impact pertaining to schools.

Mitigation Measures: No mitigation measures are required.

d. No Impact. A significant impact would occur if the recreation and park services available could not accommodate a project-related population increase and if the proposed project resulted in the construction of new recreation and park facilities that create significant environmental impacts. The City Community Services, Parks, and Recreation Department provides approximately 57 acres of recreation facilities in the project area. The City is also surrounded by open space and park land owned by national and State agencies that residents have access to hike, mountain bike, and other recreational activities.

⁴⁷ ~~Hid.~~ County of Los Angeles, Office of the Sherrif, Kia Dealership Calabasas Project, Notice of Intent to Adopt a Mitigated Negative Declaration: Review Comments, December 12, 2024.

⁴⁸ Las Virgenes Unified School District, Residential and Commercial/Industrial Development School Fee Justification Study, March 31, 2022.

Additionally, the City has a joint use agreement with local LVUSD facilities to use school recreation facilities for non-school recreational activities. The City targets three acres of parks per 1,000 residents and does not attribute park demand to commercial development. As the project would not introduce a new residential population, the project would not result in a substantial increase in park usage such that new or physically expanded park facilities would be needed. Since the project does not include residential development, the project would not be required to pay a recreation fee or dedicate land to offset potential impacts to park facilities pursuant to City Municipal Code Section 17.20.060(A)(3). Therefore, the project would have no impact pertaining to park and recreation facilities.

Mitigation Measures: No mitigation measures are required.

e. **Less than Significant Impact.** Other public services in the project vicinity include Calabasas Library. The Calabasas Library is located 0.8 miles east of the project site, located at 200 Civic Center Way. The library moved to the current location in 2008, which was double the size of the prior library, so the Calabasas Library will meet the needs of the City through 2030.⁴⁹ As the project would not introduce a new residential population, the project would not generate a volume of demand on existing library services that would necessitate the construction of new or physically expanded library facilities. Due to the expansion of Calabasas Library, and the fact that the project will not add population, the library facility will meet the need of the City and the project impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

⁴⁹ City of Calabasas, 2030 General Plan EIR, December 2008.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVI. RECREATION.				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact Analysis

a. No Impact. A significant impact may occur if a project includes substantial employment or population growth, which would increase the use of existing neighborhood, regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated. The City Community Services, Parks, and Recreation Department provides existing facilities in the City that provide a variety of recreation opportunities and is furthered analyzed above in Section XV.d., Public Services. As the project is a commercial development, the project would not result in a substantial increase in park usage such that substantial physical deterioration of the facility would occur or be accelerated. Therefore, the project would have no impact pertaining to park and recreation facilities.

Mitigation Measures: No mitigation measures are required.

b. No Impact. A significant impact may occur if a project includes the construction or expansion of park facilities, and such construction or expansion would have a significant adverse effect on the environment. As discussed in response Section XV.b., Public Services, the project would not be residential development and the project would not require the construction or physical expansion of existing recreational facilities; therefore, the project would have no impact.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVII. TRANSPORTATION. Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially increase hazards to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

The following analysis is based on information from the Revised Transportation Analysis for the project conducted by Associated Transportation Engineers dated April 12, 2024, provided in **Appendix L, Transportation Analysis**.

a. Less than Significant Impact. A significant impact may occur if the project would conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. The Circulation Element of the 2030 General Plan provides potential enhancements, general requirements, and prohibited actions for critical intersection/roadways corridors in the City such as Calabasas Road. In response to SB 743, the City adopted new transportation impact thresholds to provide guidance to the City.⁵⁰

The project site is served by a network of arterial roads and collector streets. The site is located along Calabasas Road, which is an east-west two lane undivided arterial roadway in the project vicinity, with a posted speed limit of 40 mph. Some portions of Calabasas Road have a painted center median or two-way left turn lane, but, due to the current roadway width, there is no existing median or turn lane on the portion of the road immediately fronting the project site. The project is proposing to construct frontage improvements and install a new left turn access and painted median. Parkway Calabasas is located east of the site and is a north-south two to four lane divided arterial roadway with a posted speed limit of 40 mph. East of Parkway Calabasas, Calabasas Road continues to the east as a four-lane divided arterial. Mureau Road is located west of the site and is an east-west two and four lane arterial roadway with a posted speed limit of 35 mph. The identified roads above are in the study-area analyzed in the Transportation Analysis.

The study-area has limited pedestrian facilities along Calabasas Road which does not have sidewalks on portions of the road, including adjacent to the project site. As part of the project frontage improvements, a sidewalk will be developed on Calabasas Road adjacent to the project site, adding to the intermittently improved Calabasas Road sidewalk that eventually will connect the project to the local transit service provided in the study-area on Parkway Calabasas. The existing bicycle facilities in the study-area consist

⁵⁰ City of Calabasas, Transportation Analysis in the City of Calabasas: SB 743 Overview & Recommendations, July 28, 2020.

of Class II bike lanes along Calabasas Road, Parkway Calabasas, and Mureau Road which connects the project to residential areas east and west of the project. The City, Los Angeles County Metro (Metro), and Los Angeles Department of Transportation (LADOT) provide local public transportation in the City. The project site is served by Line 1 Shuttle operated by the City from 6:30 AM to 6:00 PM on a fixed bus route on Calabasas Road. The nearest shuttle stop to the project site is located just west of the site adjacent to Bob Smith’s BMW dealership. The Metro #161 (Canoga Station-Thousand Oaks) operates a fixed route bus service on Parkway Calabasas. The project site is also served by LADOT Commuter Express #423 Route (Downtown Los Angeles-Thousand Oaks) which also operates a fixed route bus service on Parkway Calabasas.

Circulation Element

The Circulation Element identified seven locations as “Critical Intersections and Roadway Corridors” with specific provisions that have been formulated to enhance the roadways operations and active transportation opportunities while protecting significant environmental features and adjacent neighborhood areas. The project site is located on Calabasas Road, which is one of the seven identified “Critical Intersections and Roadway Corridors”. **Table XVII-1, Potential Circulation Enhancements on Calabasas Road**, shows general requirements, potential system enhancements, and prohibited actions for Calabasas Road.

Table XVII-1
Potential Circulation Enhancements on Calabasas Road

Critical Roadway Corridors	Potential Enhancements
Calabasas Road	<p><u>General Requirements</u></p> <p>Preserve the non-urban character of Calabasas Road west of Parkway Calabasas. In determining the feasibility of any roadway or active transportation (i.e., bicycle and/or pedestrian) enhancements, it is important to avoid degradation of significant biological habitats.</p> <p><u>Potential System Enhancements</u></p> <ul style="list-style-type: none"> • Construct a roundabout, traffic signal, or other intersection operational and safety improvement at the Calabasas Road/Mureau Road Intersection. • Construct turnaround at the western terminus of Calabasas Road. • Enhance vehicular, bicycle, and pedestrian circulation and safety. • Improve City-owned parcels along the corridor with theme setting fire-resistant landscaping, hardscaping and furniture. • Improve Calabasas Road between Parkway Calabasas and Mureau Road to two lanes in each direction with center turn lanes and bicycle and pedestrian facilities. • Improve Calabasas Road west of Mureau Road to provide at a minimum, bike lanes, one vehicle lane in each direction, and a minimum 5-foot wide sidewalk with a minimum 5-foot parkway along the south side of the street.

Critical Roadway Corridors	Potential Enhancements
	<ul style="list-style-type: none"> • Improve traffic signal operations through synchronization and system upgrades. <p><u>Prohibited Actions</u></p> <ul style="list-style-type: none"> • No street widening or re-striping shall be permitted to create additional traffic through travel lanes along the segment of Calabasas Road within the boundaries of Old Calabasas Town. • Calabasas Road shall not be extended west of a potential relocated Mureau Road bridge to connect to Agoura Road at Las Virgenes Road for general public vehicle traffic. The existing two-lane road section may be extended to provide access to private properties. • Provide active transportation-only (i.e., bicycle and/or pedestrian) connectivity to Las Virgenes Road from the end of Calabasas Road. • In order to preserve natural hillsides and biotic habitats, and to avoid geologic constraints, Parkway Calabasas shall not be completed through to Las Virgenes Road.
<p>Source: City of Calabasas, 2030 General Plan Circulation Element, Table VI-1, Updated February 22, 2022.</p>	

Potential system enhancements identified in the Circulation Element of the General Plan are implemented at a City level, but the development of the project would not conflict with potential system enhancements for Calabasas Road. The project site is located between two existing car dealerships and was previously developed with a plant nursery. The project site is located in a CAR overlay (as are the adjacent properties) and would construct a car dealership. The project use would be consistent with the project site zoning and does not propose any of the identified prohibited actions listed in Table XVII-1.

The Circulation Element also States the City analyzes traffic and transportation impacts with both LOS and Vehicle Miles Traveled (VMT). The City determined the project does not require a Transportation Environmental Impact Analysis for CEQA compliance and has been screened out of a Full VMT analysis. The project was required to provide a local transportation operational assessment which is provided separately from this CEQA document.

b. No Impact. A significant impact may occur if the project would conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b), pertaining to VMT.

SB 743 was enacted in September 2013 changing the way transportation impact analysis is conducted under CEQA. Within the State’s CEQA Guidelines, these changes include the elimination of auto delay, Level of Service (LOS), and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant traffic impacts. The Governor’s Office of Planning and Research’s 2019 revisions to the CEQA Guidelines established that as of July 1, 2020, a lead agency must rely upon VMT guidelines to assess transportation impacts, although a lead agency could begin reliance on the guidelines sooner.

However, as stated in the City General Plan, the change to VMT transportation impact thresholds in the CEQA context does not prohibit the City from requiring development projects to comply with separate, City adopted LOS to reduce local traffic impacts, as a policy measure. The project has provided a separate analysis of the project's potential impacts against the City's transportation threshold policy, but is not included in this document because any identified potential impacts are no longer required under CEQA.

With regard to VMT, in response to SB 743, the City adopted new transportation impact thresholds to provide guidance to the City.⁵¹ The City implemented Los Angeles County's methodology, which is based on State guidelines and goals for VMT reduction. The project Transportation Study provided in Appendix L included a Local Transportation Study Checklist reviewed by the City of Calabasas which determines if projects are screened out of preparing a full VMT analysis based on (1) Project Type, (2) if it is located within a low VMT-generating area, and/or (3) if the project is located within a Transit Priority Area. The Local Transportation Study Checklist determined the project is not required to conduct a full VMT analysis because the project type would not generate an increase in regional VMT and is located in a low employee VMT area. As such, the project would not conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b).

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact. A significant impact may occur if the project would substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

During construction, worker vehicles and trucks would access the site via US 101 and Calabasas Road. They would enter and exit the site directly from Calabasas Road, thereby avoiding residential streets. As access to the project site would use an existing road, the project would not increase hazards due to a design features. During operations, vehicular access will be provided by a driveway along Calabasas Road. The driveway will be designed and constructed to the City's design standards and allow full access. The section of Calabasas Road adjacent to the project has not been fully improved with curb, gutter, sidewalk, and street lighting. The project would be required to complete these improvements along the site frontage, including left turn access and a painted median.

The Transportation Study analyzed sight distance at the proposed driveway to determine if there would be adequate visibility between a driver exiting from the driveway and a vehicle traveling on Calabasas Road. The posted speed limit on Calabasas Road adjacent to the driveway is 40 mph. The American Association of State Highway and Transportation Officials (AASHTO) minimum corner sight distance for a 40-mph design speed is 440 feet. The sight distance looking to the east and west from the driveway satisfy the AASHTO 440-foot corner sight distance requirement. The AASHTO minimum stopping sight distance for a 40-mph design speed is 300 feet. The sight distance looking for the east and west of the driveway satisfy the AASHTO 300-foot stopping sight distance requirement. Due to vehicles parking along the curb adjacent to the project site driveway, the project would install a "No Parking" zone along 50 feet of Calabasas Road to the east and west of the project driveway. Additionally, landscaping along the frontage of the project would have to be maintained at a height of 3.5 feet or lower. The "No Parking" zone and restricted-height landscaping would provide intervisibility between eastbound and westbound traffic on Calabasas Road. As such, the project would not substantially increase hazards due to geometric design features or incompatible use and the project would have a less than significant impact.

⁵¹ City of Calabasas, Transportation Analysis in the City of Calabasas: SB 743 Overview & Recommendations, July 28, 2020.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact. A significant impact may occur if the project would result in inadequate emergency access. The project site is located close to an urban area with major roadways, which would reduce evacuation complications. The project site is located less than one-quarter mile from a US 101 on-ramp. As the project site has quick and direct access to the freeway and a very short drive out of any potential danger zone, the presence of the facility would not be expected to overwhelm evacuation proceedings, particularly as the emergency responders evacuate areas in stages as opposed to all at once, while monitoring advancing emergency issues such as fires. Additionally, the project would be subject to LACFD and LASD review to ensure that access needs are met, such as adequate driveway and drive aisle design and building accessibility for fire equipment. Therefore, the project would not have a substantial impact on emergency access and the impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Potentially Significant Impact	No Impact
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XVIII. TRIBAL CULTURAL RESOURCES.

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

- | | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------------------------------------|--------------------------|-------------------------------------|
| a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Impact Analysis

The Tribal Notification Letters, dated June 19, 2024, and AB 52 Completion of Consultation letter dated September 30, 2024, are provided in **Appendix M, Tribal Consultation**.

a. No Impact. A significant impact would occur if a project would cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074 listed, or eligible for listing, in the California Register of Historical Resources, or in a local register of historical resources. As mentioned in Section V., Cultural Resources, in response to checklist question V.a., the site is improved and does not contain historical resources. The site is not listed in a local register of historical resources as defined in PRC Section 5020.1(k). The project site is not located within, or designated as, a historic cultural monument, a historic district, or other historic overlay zone. Therefore, the project would result in no impact on a tribal cultural resource as defined in PRC Section 21074 listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources.

Mitigation Measures: No mitigation measures are required.

b. Potentially Significant Unless Mitigation Incorporated. A significant impact would occur if a project would cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074 determined by the lead agency, in its discretion and supported by substantial evidence, to be significant.

The Phase I Cultural Resources Assessment found no significant cultural resources in the SCCIC and NAHC record searches, on a pedestrian walkthrough, or on historic maps and images. As the project area is not considered sensitive for cultural resources based on the Phase I Cultural Resources Assessment, it is unlikely a resource of tribal cultural value as determined by the lead agency would be found.

California AB 52 established a formal consultation process for California Native American tribes traditionally and culturally affiliated with a geographic area to identify potential significant impacts to tribal cultural resources, as defined in PRC Section 21074, as part of the CEQA process. As specified in PRC Section 21080.3.1, lead agencies must provide notice inviting consultation to California Native American tribes traditionally and culturally affiliated with the geographic area of a proposed project if a tribe has submitted a request in writing to be notified of proposed projects within 30 days of the City's AB 52 notice. Pursuant to AB 52, the City mailed a tribal notification letter, provided in Appendix M, to 18 tribes on June 19, 2024, describing the project and informing California Native American tribes that the period to request consultation would close on July 19, 2024. One tribe requested consultation within 30 calendar days from the date of the tribal notification letter.

As lead agency, the City, facilitated tribal consultation with one tribe, the Fernandeano Tataviam Band of Mission Indians (Tataviam). Initial consultation with the Tataviam tribe took place on August 22, 2024. The Tataviam did not identify tribal cultural resources on the project site; however, the Tataviam identified cultural sensitivity of the site for tribal cultural resources and recommended monitoring and a discovery protocol. Given the project proposes subsurface excavation in the eastern portion of the project site that would retain up to 12.5 feet of soil with additional over-excavation, and that fill soils were encountered at depths up to five feet, proposed ground disturbing activities would disturb native soil and could result in the inadvertent discovery of a tribal cultural resource. Implementation of mitigation measure TRI-1 and TRI-2 would reduce impacts resulting from inadvertent discovery of potential tribal cultural resources to less than significant by monitoring and established discovery protocols for inadvertently discovered resources and burials.

Mitigation Measures:

TRI-1 Native American Monitoring

The project applicant shall retain a professional Native American Tribal monitor who has a cultural affiliation to the project region to observe all ground disturbing activities of intact or potentially intact native soils. Ground disturbing activities include, but are not limited to, site clearing and grubbing, grading, excavation, and trenching. Monitoring will take place for the duration of such activities until older alluvial deposits or bedrock are encountered, which are pre-Holocene geological contexts that do not have prehistoric Native American cultural resources. Fill deposits will also not require monitoring unless the fill material can be determined to be originally from the project site.

The tribal monitor can collect any diagnostic prehistoric or ethnographic material uncovered through Project excavation and can halt construction within 50 feet of a potentially significant cultural resource, if necessary, in order to better examine project soils. Artifacts found that necessitate a halt to grading must be transferred to the site archaeological monitor for further analysis and processing, consistent with the tribal cultural resources discovery protocol. Cultural resources that are encountered by the project will be assessed by both the Native American monitor and the archaeological monitor. If one or both of the monitors determine that the discovery should be further assessed by tribal/cultural principals, then the project discovery process shall proceed with tribal participation if requested by the tribe, and consistent with the tribal cultural resources

discovery protocol. Artifacts found within a disturbed context or that do not warrant additional assessment can be collected without the need to halt grading, and will be transferred to the site archaeological monitoring for further analysis and processing. Discovery situations that do not lead to further assessment, survey, evaluation, or data recovery can be described in the tribal monitor's daily monitoring log. However, if prehistoric features or artifact concentrations are encountered, the Project "discovery" protocol should be followed (see below). The tribal monitor daily forms will be included with the final project Monitoring Report.

TRI-2 Tribal Cultural Resource Discovery Protocol.

If potentially significant intact prehistoric deposits are encountered within an undisturbed context, then a cultural resource "discovery" protocol will be followed (see below). If prehistoric or ethnographic features, artifact concentrations, or sensitive archaeological material noted by the tribal or archaeological monitor are encountered during Project grading and subsurface excavation within native soils or original context, then all work in that area shall be halted or diverted away from the discovery to a distance of 50 feet until a qualified senior archaeologist can evaluate the nature and/or significance of the find(s) with the tribal monitor. If a senior archaeologist and the tribal monitor confirm that the discovery is potentially significant as a tribal cultural resource, then the Lead/Permitting Agency will be contacted and informed of the discovery. If the senior archaeologist and the tribal monitor conclude that the discovery is not significant, then construction can resume.

Upon the discovery of a potentially significant tribal cultural resource, construction will not resume in the locality of the discovery until consultation between the senior archaeologist, the tribal monitor, the owner's Project manager, the Lead/Permitting Agency, and any other concerned agencies and parties, takes place and reaches a conclusion approved by the Lead/Permitting Agency. As part of this process, all tribal group representatives recorded on the City AB-52 list will be contacted and informed of the discovery. This process will include the FBTMI as a designated AB-52 consultation respondent.

If a significant tribal cultural resource is discovered during earth-moving, complete avoidance of the find is preferred. However, if the discovery cannot be avoided, further survey work, evaluation tasks, or data recovery of the significant resource may be required by the Lead/Permitting Agency after consultation with the tribal group monitor and representative(s). All individual reports will be submitted to the City and to the SCCIC at the conclusion of the Project.

TRI-3 Reburial of Native American Artifacts.

If discovery consultation leads to an agreement by the project archaeologist, the Native American tribal monitor, invited Native American groups, and the Lead Agency that artifacts associated with a Tribal Cultural Resource have been discovered within an undisturbed native soils context, then the Lead Agency shall consult with all invited Native American Tribal Group representatives who have a cultural affiliation with the project region, as to the disposition and treatment of any prehistoric or Native American ethnographic materials encountered during project construction. Once all invited Native American groups have been consulted with, the Lead Agency will then select a course of action for the reburial of all uncovered artifacts that best matches the tribal group representatives' views. The City will also consult with other agencies with jurisdiction as warranted. This process will include the FBTMI as a designated AB-52 consultation respondent.

TRI-4 The Inadvertent Discovery of Human Remains

State of California Health and Safety Code Section 7050.5 addresses the inadvertent discovery of human remains, which is always a possibility during ground disturbance. The County Coroner must be notified of the discovery immediately, together with the Lead Agency, and the property owner. This code section also states that in the event human remains are uncovered, no further disturbance shall occur until the County Coroner has made a determination as to the origin and disposition of the remains pursuant to California Public Resources Code Section 5097.98. Envicom recommends that a minimum buffer area of 30 feet should be placed around the location of the discovery during this process.

If the human remains are determined to be prehistoric, the Coroner will notify the NAHC, which will then provide a Native American Most Likely Descendant (MLD) for the project area to be contacted. The MLD shall complete the inspection of the site within 48 hours of notification and may recommend the scientific removal and nondestructive analysis of human remains and items associated with Native American burials and recommend an appropriate re-internment site. The Lead Agency and a principal archaeologist shall also establish additional appropriate actions for the discovery and for further site development, which may include archaeological survey, evaluation, data recovery, changes to site monitoring, or other forms of archaeological testing and recordation. Additionally, all tribal group representatives listed on the City AB-52 consultation list will be contacted and notified of the discovery and invited to participate in the discovery response discussion, including the location of re-internment, site survey, evaluation or data recovery, and discovery recordation parameters. This process will include the FBTMI as a designated AB-52 consultation respondent

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
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 effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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 goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

a. Less than Significant Impact. A significant impact may occur if a project would require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects. The project would generate water, wastewater, and stormwater typical of commercial uses in compliance with applicable federal, state, and local laws, statutes, and ordinances. As project site is located in a developed area, the project would connect to existing public utilities infrastructure, the project would not result in the relocation or substantial expansion of that infrastructure. See Section XIX.b., for an analysis of water supply and XIX.c, for an analysis of wastewater capacity. As such, the project would not require construction or relocation of utilities and would have a less than significant impact.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. A significant impact would occur if the project did not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

The LVMWD serve as the potable water purveyor to the City. The LVMWD does not source local water and obtains water supply from the Metropolitan Water District of Southern California. According to the 2020 Urban Water Management Plan (UWMP), LVMWD has sufficient water supplies available for average, single-dry, and multiple dry weather years through the Year 2045. Water supplies for 2025 for an average weather year are projected by the UWMP to be 23,185 acre-feet per year (AFY). The project would construct and operate an automobile dealership comprised of a new commercial building with up to 47,897 of floor area, including a car wash and associated facilities. Based on these characteristics, water demand is provided in **Table XIX-1, Project Water Demand**.

Table XIX-1
Project Water Demand

Type of Use	Building Area	Demand Rate ^(a)	Water Demand (gpd) ^(b)
Business – Retail	1.100 acres ^(c)	2,000 gpd/acre	2,200
Total Net Water Generation			2,200
^(a) Las Virgenes Municipal Water District, Potable Water Master Plan, Appendix L – Land Use Duty Factors, Demand Factors by Land Use, June 2014. ^(b) gpd = gallons per day ^(c) up to 47,897 SF building area = 1.100 acres			

As shown in Table XIX-1, the water demand resulting from the project would be 2,200 gallons per day (gpd), or 2.5 AFY, which is a small fraction of one percent (i.e., 0.01 percent) of LVDWD’s 23,185 AFY projected water demand for the Year 2025. The proposed project would comply with required California Green Building Code. Additionally, the LVWMD has a Water Shortage Contingency Plan that may necessitate water conservation measures the project would be required to implement if water shortages occur.⁵² Based on the availability of water supplies indicated in the UWMP, the LVWMD would have sufficient water supply to serve the project and reasonably foreseeable future development accounted for in the UWMP. The project would have a less than significant impact.

Mitigation Measures: No mitigation measures are required.

c. Less than Significant Impact. A significant impact would occur if a project would result in a determination by the wastewater treatment provider, which serves or may serve the project, that it does not have adequate capacity to serve a project’s projected demand in addition to the provider’s existing commitments.

The local collector sewer is owned by the City, and LVMWD is responsible for wastewater treatment in the Calabasas area. Through a Joint Exercise of Powers Agreement, Tapia Water Reclamation Facility (TWRP) is owned and operated jointly between Triunfo Sanitation District and LVMWD.⁵³ TWRP currently averages 9.5 million gallons of wastewater per day (mgd) with a maximum processing capacity of 16 mgd.⁵⁴ The estimated amount of wastewater the project would generate is provided in **Table XIX-2, Project Wastewater Generation**.

⁵² Las Virgenes Municipal Water District, Water Shortage Contingency Plan, June 1, 2021.

⁵³ City of Calabasas, 2030 General Plan EIR, December 2008.

⁵⁴ Las Virgenes Municipal Water District, Tapia Water Reclamation Facility, Accessed on April 24, 2024 at: <https://www.lvmwd.com/our-services/wastewater-services/tapia-water-reclamation-facility>

Table XIX-2
Project Wastewater Generation

Type of Use	Size or Units	Demand Rate ^(a)	Water Demand (gpd)
<i>Proposed</i>			
Commercial Use	up to 47,897 SF	80 gpd/1,000 SF	3,832
Total Net Wastewater Generation			3,832
^(a) L.A. CEQA Threshold Guidelines Exhibit M.2-12, Sewage Generation Factors for “Commercial Use.”			
Note: Calabasas 2030 General Plan uses L.A. CEQA Threshold Sewage Generation Factors in Section 4.14 Utilities and Service Systems.			

As shown in Table XIX-2, Project Wastewater Generation, the net increase in wastewater generation would be approximately 3,832 gpd,⁵⁵ which is a small fraction of one percent (i.e. 0.06 percent) of the excess treatment capacity at TWRF. Based on estimated wastewater generation, TWRF has sufficient capacity for the project in addition to the provider’s existing commitments, and the project demand is a small percentage of the remaining capacity. Therefore, the project impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Less than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a such a degree that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Solid waste generated within the City is recycled, reused, and transformed at waste-to-energy facilities or disposed of at landfills. The Calabasas Landfill would serve the project site and is owned and operated by County of Los Angeles. The Calabasas Landfill is permitted to accept up to 3,500 tons per day (tpd) of waste with an estimated cease operation date of January 2029. The SVLRC accepts green materials, tires, mixed municipal, industrial, and construction and demolition (C&D) waste.⁵⁶

Demolition and Construction

Estimated project-generated construction waste is provided below in **Table XIX-3, Demolition and Construction Solid Waste Generation**. The project would remove approximately 850 tons of existing hardscape and would construct an automobile dealership comprised of a two-story commercial building with up to 47,897 SF of floor area, including the commercial building and structured parking area and car wash.

Construction of the proposed project would generate approximately 168 tons of waste as shown in Table XIX-3. The project would require construction waste diversion of at least 65 percent in accordance with the California Green Building Standards Code Section 5.408, so 59 tons of C&D waste would go to Calabasas Landfill.

Disposal of demolition waste would occur over approximately 20 days and disposal of construction waste over 262 days. Total demolition and construction waste disposal from the project, 168 tons, would be disposed over 282 days total or approximately 0.60 tpd of waste, which represents less than one percent (0.02 percent) of the 3,500 tpd of permitted capacity for waste daily disposal capacity at Calabasas Landfill. Therefore, construction waste would not exceed the daily permitted capacity of the Calabasas Landfill and solid waste disposal from construction activities would be less than significant.

⁵⁵ The 3,832 gpd estimate is conservative, as a majority of the automobile dealership would be comprised of showroom space, which would not create an additional demand for wastewater infrastructure.

⁵⁶ Cal Recycle, SWIS Facility/Site Activity Details Calabasas Landfill (19-AA-0056), Accessed on April 24, 2024 at: <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/3579?siteID=1041>.

Table XIX-3
Demolition and Construction Solid Waste Generation

Type of Use	Size	Generation Rate ^(a)	Total Waste (pounds)	Total Waste (tons)
Demolition				
Hardscape	850 cubic ft ^(b)	150 lbs/cubic ft	127,500	64
Total Demolition Waste Generation				64
Construction				
Commercial Building	up to 47,897 SF	4.34 lbs/SF	207,873	104
Total Construction Waste Generation				104
Total C&D Waste				168
Diversion of 65% for Recycling ^(d)				109
Total Demolition and Construction Waste for Landfill Disposal				59
^(a) United States Environmental Protection Agency, Office of Resource Conservation and Recovery, Report No. EPA530-R-09-002, Estimating 2003 Building-Related Construction and Demolition Materials Amount, Table A-7.				
^(b) Existing project site has both concrete and asphalt pavement. Concrete is heavier, so all removal of hardscape is assumed to be concrete as conservative analysis.				
^(c) United States Environmental Protection Agency, Office of Resource Conservation and Recovery, Report No. EPA530-R-09-002, Estimating 2003 Building-Related Construction and Demolition Materials Amount, Table A-7.				
^(d) 2022 CALGreen Section 5.408				

Operations

Future employees of the proposed automotive dealership would generate solid waste typical of commercial uses. Operational non-hazardous waste is provided in **Table XIX-4, Operational Solid Waste Generation**.

Table XIX-4
Operational Solid Waste Generation

Type of Use	Size	Generation Rate (lbs/SF/day) ^a	Total Waste (lbs/day)	Total Waste (tpd)
Operations				
Commercial	up to 47,897	0.006	287	0.14
Total Operations Waste Generation			287	0.14
Diversion of 50% for Recycling ^b				0.07
Total Operational Waste for Landfill Disposal			144	0.07
^(a) City of Calabasas, 2030 General Plan EIR, December 2008.				
^(b) Required by AB 939.				

As shown in Table XIX-4, Operational Solid Waste Generation, commercial uses are estimated to generate 0.006 pounds per SF per day. Based on the project size, the project would result in a total solid waste generation of approximately 0.14 tpd prior to recycling diversion. Diversion of 50 percent of the solid waste stream for recycling would result in a total of 0.07 tpd to be disposed in landfills. This would represent approximately 0.002 percent of the permitted daily capacity of Calabasas Landfill. Therefore, operational solid waste impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

e. Less than Significant Impact. A significant impact may occur if a project would generate solid waste not disposed of in accordance with applicable regulations. The project would generate solid waste typical of commercial uses and would comply with applicable federal, state, and local laws, statutes, and

ordinances regarding the proper disposal of solid waste. As such, the project has a less than significant impact.

Mitigation Measures: No mitigation measures are required.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XX. WILDFIRE.				
If located in or near state responsibility areas or land classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Due to slope, prevailing winds, and other factor, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Require the installation 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

The project site is located within a VHFHSZ and the following analysis is based on the Memorandum for the Evaluation of Wildfire Risks to the Kia Dealership Project (Wildfire Memo) prepared by Envicom Corporation on March 12, 2024 (**Appendix N, Wildfire Memo**).⁵⁷

The project site is located in the foothills of the greater Santa Monica Mountains. At a broad scale, the Santa Monica Mountains proper rise up some distance south of the project site and to the south. Within the mountains, there is little development, and substantial vegetation that serves as fuel for wildfires. To the north, the Simi Hills divide the San Fernando, Simi, and Conejo Valleys. The roughly four-mile stretch of the freeway between the San Fernando Valley and Conejo Valley is sporadically developed, but for the most part is bordered by undeveloped hillsides. Prevailing winds in southern California come from offshore from the west, northwest, or southwest depending on location, and may reverse course in the evening during winter months. The frequency of wildfire in any location will be dependent on several factors such as topography, vegetation type and composition, fire return interval, wind and temperature.

The project site is located at the northern edge of the City of Calabasas just south of US 101, situated between three existing car dealerships approximately 0.5 mile west of Parkway Calabasas. Topographically speaking, the site is located on the south side of the narrow east-west valley that runs between the foothills of the Simi Hills to the north and the Santa Monica Mountains foothills to the south, located just outside the San Fernando Valley to the east. The hill abutting the project site on the south runs predominately east-

⁵⁷ Envicom Corporation, Memorandum, Evaluation of Wildfire Risks to the Kia Dealership Consultants, March 12, 2024.

west. The ridge and sections of the south side of the hill are developed with single-family homes. Below this subdivision further to the south is a golf course and a handful of more subdivisions located within a small valley and a nearby plateau. The north side of the hill, facing the project site, is undeveloped and bisected by drainages creating an undulating pattern along the north face. On the north side of the freeway there are two small hills adjacent to each other which rise up from the freeway and descend to the north into a moderately hilly area that is at the western edge of the San Fernando Valley. Development here continues at the western edge of the Simi Hills, defining the western edge of the valley.

The hillside behind the project site is dominated by native plant communities, with a few pockets of non-native grassland. These areas will be more susceptible to wildfire, however, fuel modification activities and new landscaping behind the proposed facility will reduce the vulnerable area significantly. Post-construction the lowest portion of the hillside will still contain non-native understory, but it will be confined between the new structures, hardscape, and irrigated landscaping to the north, and the largely intact hillside to the south. The hillside behind the site is somewhat disconnected from areas of intact open space with the presence of the freeway and surrounding development, which is a positive benefit in terms of potential exposure to wildfire.

The site has not experienced much wildfire according to state fire records, which begin in 1878. Only two wildfires have reached the property: an unnamed wildfire in 1958 and the 1970 Golf Course Fire. The 1958 wildfire reached the southwest corner of the subject property, primarily burning areas southwest of the project site. The 1970 Golf Course Fire burned the area now occupied by the subdivision to the south of the subject property, the golf course located below it, and the hillside behind the project site, from the site to Parkway Calabasas. Other wildfires have come within one mile of the project site, a total of 14, though most have been small and isolated. Two of the larger wildfires were between 3,000 and 4,300 acres. The largest two wildfires were the Dayton and Woolsey Fires at 43,097 and 89,551 acres, respectively. The majority of small wildfires have been to the north and northwest of the project site in the more denuded hillsides on the north side of the freeway. Half of the fires within a one-mile radius occurred prior to 1980.

The lack of wildfire activity at the project site is due the location and character of the site and the influencing factors described above. The site will be subject to wildfire threat in the future as any location within the wildland urban interface (WUI) would be. However, the site is less threatened than it would be if it were adjacent to a denuded hillside dominated by non-native annual plants, or located adjacent to an exposed, south-facing slope. Protection of the site during a wildfire event should also be straight-forward under most circumstances. A wildfire occurring during a Santa Ana wind event will generally spread to the southwest as the winds blow that direction. As noted earlier, the hillside south of the project site is better controlled for wildfires, given fuel modification requirement, fire hydrants/water availability, and landscaped irrigation. Thus, the main potential threat of wildfire directly north or northeast of the project site are the two small hills on the opposite side of the freeway as the San Fernando valley lies to the north and northeast. Those two hills are small, relatively isolated, and contain primarily fast-burning non-native annuals. A wildfire originating there would threaten the project site in that embers may travel across the freeway, but the buildings will be fire-hardened (compliant with according to the requirements of CBC Chapter 7A, would be reviewed for fire access and safety by the City during site plan review and plan check, contain irrigated landscaping, and would contain minimal highly flammable non-native annual cover. Further, the freeway itself would provide an over 150-foot wide break that would somewhat reduce the likelihood of a wild fire spreading across the freeway. Therefore, a wildfire originating in those two small hills would be highly unlikely to result in an uncontrolled wildfire on the opposite side of the freeway.

a. Less than Significant Impact. The project may have a substantial impact if the project would substantially impact an adopted emergency response plan or emergency evacuation plan.

The project site is located close to an urban area with major roadways which would reduce evacuation complications. The project site is not enclosed by wildland vegetation and is located less than one-quarter mile from freeway off- and on-ramps and in close proximity to the San Fernando Valley, including areas that are not designated as a Fire Hazard Severity Zone or WUI. According to the Revised Traffic Study, the project would generate 89 AM peak hour trips, and 116 PM peak hour trips peak traffic entering and leaving the site. Although the trip estimates do not directly translate to the number of people being present at once on an average basis, it is reasonable for discussion purposes to suppose that the number of employee and visitor vehicles on site may number up to 116 during the peak of a busy day. As all of these vehicles would have quick and direct access to the freeway and a very short drive out of any potential danger zone the presence of the facility would not be expected to overwhelm evacuation proceedings should they occur during a busy workday. Therefore, the project would not have a substantial impact to an adopted emergency response plan or emergency evacuation plan and the impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Less than Significant Impact. The project may have a significant impact if the project would exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors.

The proposed development would place structures close to the road and buffered from the hillside to the south by a fire access lane and irrigated landscaping. Structures are of concrete construction and fire-hardened according to the requirements of CBC Chapter 7A and will be protected from embers, ash, or other burning debris blowing onto the property, and the main building will be fully sprinklered.⁵⁸ Fire lanes provide adequate access for firefighting operations, and hydrants will be provided per LACFD requirements to ensure sufficient water and water pressure during emergencies. The project is located in close proximity to the freeway and will allow quick dispersal during an emergency and quick access for firefighting operations. As noted in Section XV.a., Fire Protection, LACFD Station 68 is located at 24130 Calabasas Road, approximately 0.5 miles northwest of the project site and is equipped with a 3-person engine company and a 2-person paramedic squad with 5 daily-on duty personnel. Additionally, Station 125, located at 5215 Las Virgenes Road, is approximately 2.2 miles northwest of the project site. Project fuel modification activities will extend 200 feet from the structures and require approval from the LACFD. Through compliance with Fire Code requirements, and proximity to existing LACFD stations, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. No Impact. A project may have a significant impact if it would require the installation of associated infrastructure that may exacerbate fire risk or may result in temporary or ongoing impacts to the environment.

The project would connect to existing utilities that served the surrounding area. The project would have a fuel modification zone that will extend 200 feet from the structures which require approval from the LACFD. As the project would connect with existing utilities and have a fuel modification zone, the project would not install associated infrastructure that may exacerbate fire risk to significantly impact the environment. Therefore, the Project has a less than significant impact.

Mitigation Measures: No mitigation measures are required.

⁵⁸ State of California, California Building Code, Chapter 7A, 2016.

d. Less than Significant Impact. A project may have a significant impact if it would 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.

The project will develop the lower portions of the site which have already been disturbed, replacing areas of non-native annual vegetation with fire-hardened structures, hardscape, and irrigated landscaping, effectively decreasing fire risk for the property itself and the adjacent properties. Despite its presence in the WUI, the project site is a development on the stretch of land between Parkway Calabasas and Mureau Road which has been partially developed in the flat portions at the base of the hillside. Since development is already present, filling in the gap that is the subject property is an appropriate measure to reduce wildfire risk for this strip of developable land at the base of the hillside.

The project site location is not located in a landslide zone.⁵⁹ As indicated in response to Section X., Hydrology and Water Quality, stormwater runoff generated by the proposed building and hardscape would be required to comply with the LID Ordinance to manage increases in runoff through infiltration. The urban project location and compliance with applicable regulatory requirements would not expose people or structures to significant downslope or downstream flooding or landslide risks resulting from runoff, post-fire slope instability, or drainage changes. Therefore, impacts would be less than significant.

⁵⁹ California Department of Conservation, California Geologic Survey, Earthquake Zones of Required Investigation, Accessed on April 26, 2024 at: <https://maps.conservation.ca.gov/cgs/eqzapp/app/>

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects that cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact Analysis

a. Potentially Significant Unless Mitigation Incorporated. For the purpose of this analysis, a significant impact could occur if a project would significantly degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.

The project site is within a developed area adjacent to urban uses including a major highway, local road, and adjacent commercial uses. As in-fill, the proposed limits of disturbance are contained within a previously developed site. As discussed in response to Section IV., Biological Resources, the project site was queried for nine US Geological Survey 7.3-minute quadrangle regions: the quadrangle region containing the project site and the eight surrounding quadrangle regions. The Biological Assessment provided in Appendix C, supports the conclusion the site does not provide habitat for rare or endangered plant or animal species. Therefore, the project would not eliminate a plant or animal community or restrict the range of a plant or animal of a rare or endangered plant or animal. As discussed Section V., Cultural Resources, search results from the South Central Coastal Information Center, NAHC, US Geological Survey Maps, and a pedestrian survey of the site for historic resources on the project property were negative, therefore, the proposed project development would not eliminate any known important examples of major

periods of California history or prehistory, and would not eliminate known examples of California prehistory by observing regulatory compliance requirements. Potential impacts to unknown cultural resources would be less than significant with mitigation measures CUL-1, CUL-2 and CUL-3.

Mitigation Measures: No additional mitigation measures are required.

b. Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if the impacts of the proposed project, in conjunction with the impacts of related projects, would result in impacts that are less than significant when viewed separately but significant when viewed together. Although related projects identified and analyzed in the Transportation Analysis provided in Appendix L may be constructed in the project vicinity, the project’s VMT impact would be less than significant, and thus would not add substantially to cumulative VMT impacts. The project was screened out of a detailed VMT analysis because the project type would not generate an increase in regional VMT and is located in a low employee VMT area (i.e., an area with acceptable employee VMT). The project’s VMT impact would not be cumulatively considerable and cumulative transportation impacts would be less than significant. These related projects are provided in **Table XXI-1, Related Projects**.

**Table XXI-1
Related Projects**

#	Project Name	Location	Land Use	Size
1	The Park Apartments	24100 Park Sorrento, Calabasas	Residential	107 DU
2	Calabasas Commons	4799 Commons Way, Calabasas	Residential	202 DU
3	Calabasas Auto Park	City of Calabasas	Auto Dealership	21,638 SF
4	Hidden Terraces Specific Plan	Mureau Road, Los Angeles County	Residential	180 DU
5	Hidden Terraces Specific Plan	Mureau Road, Los Angeles County	Residential	83 Beds
6	Barrett Medical Center	24820 Calabasas Road, Calabasas	Medical Office	25,030

Source: Associated Transportation Engineers, Kia of Calabasas: Revised Transportation Analysis, April 12, 2024.
DU = Dwelling Unit, SF = Square Feet

As previously evaluated in the impact analysis following each environmental factor in the Initial Study, the project impact conclusions were either “no impact,” “less-than-significant,” or “potentially significant unless mitigation incorporated.” Although the six related projects shown on Table XXI-1 may be constructed in the project vicinity, all project impacts were found to be less than significant or less than significant after mitigation, and thus the project contribution to potential cumulative impacts would not be cumulatively considerable. Therefore, with implementation of the mitigation measures identified in Section IV., Biological Resources, V., Cultural Resources, and VII., Geology and Soils cumulative impacts would be less than significant.

Mitigation Measures: No additional mitigation measures are required.

c. Potentially Significant Unless Mitigation Incorporated. A significant impact may occur if the proposed project has the potential to result in significant impacts, as discussed in the preceding sections. All potential impacts of the proposed project have been identified, and mitigation measures have been prescribed, where applicable to reduce potentially significant impacts to less than significant levels. Compliance with regulatory requirements and implementation of the mitigation measures in Section IV., Biological Resources, V., Cultural Resources, and VII., Geology and Soils, IX. would reduce substantial adverse impacts on human beings, either directly or indirectly, to less than significant.

Mitigation Measures: No additional mitigation measures are required.

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6.0 ACRONYMNS

AASHTO	American Association of State Highway and Transportation Officials
AB	Assembly Bill
ADT	average daily traffic
AFY	acre-feet per year
Air Basin	South Coast Air Basin
AQMP	Air Quality Management Plan
B-LI	Business Limited Intensity Commercial
BMPs	Best Management Practices
C & D	construction and demolition
CAAQS	California Ambient Air Quality Standards
CMC	Calabasas Municipal Code
CalEEMod	California Emissions Estimator Model
CAR	Commercial Auto Retailer
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CL	Commercial Limited
CNDDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	carbon monoxide
CR	Commercial, retail
CY	cubic yards
dB	decibels
EIR	Environmental Impact Report
ETWU	Estimated Total Water Usage
ESL	Environmental Screening Level
FAR	floor area ratio
Tataviam	Fernandeño Tataviam Band of Mission Indians
FHSZ	Fire Hazard Severity Zone
GHG	Greenhouse Gas
gpd	gallons per day
HP	horsepower
HVAC	heating, ventilation, and air conditioning
kBTU	kilo-British thermal units
kWh	kilowatt-hours
LACDPW	Los Angeles County Department of Public Works Hydrology
LACFD	Los Angeles Consolidated Fire Protection District
LADOT	Los Angeles Department of Transportation
LASD	Los Angeles County Sheriff's Department
LEED	Leadership in Energy and Environmental Design
LID	Low Impact Development
LOS	Level of Service
LST	Localized Significance Thresholds
LVMWD	Las Virgenes Municipal Water District
LVUSD	Las Virgenes Unified School District
MBTA	Federal Migratory Bird Treaty Act of 1918
Metro	Los Angeles County Metro
MLD	Most Likely Descendant

MMP	Mitigation and Monitoring Plan
MND	Mitigated Negative Declaration
mph	miles per hour
MPOs	Metropolitan planning organizations
MRZ	Mineral Resources Zone
MT	metric tons
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
ND	Negative Declaration
NHMLAC	Natural History Museum of Los Angeles County
NO _x	nitrogen oxides
O ₃	Ozone
OCP	Organochlorine Pesticide
OS-DR	open space, development restricted
Phase I ESA	Phase I Environmental Site Assessment Report
PM-10	Inhalable Particulates
PM-2.5	Ultra-Fine Particulates
Qa	alluvial material
RCNM	Roadway Construction Noise Model
ROG	reactive organic gases
RS	residential single-family
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SR 27	State Route 27
SR 46	State Route 46
SSC	Species of Special Concern
SWPPP	Storm Water Pollution Prevention Plan
tpd	tons per day
TWRF	Tapia Water Reclamation Facility
US 101	US Route 101
US EPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UWMP	Urban Water Management Plan
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOCs	Volatile Organic Compounds
WUI	wildland urban interface

7.0 PREPARERS

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8.0 RESPONSE TO COMMENTS

This section contains written comments received during the circulation period of the Draft Initial Study/Mitigated Negative Declaration (IS/MND) and responses to those comments. The 30-day public review period for the Draft IS/MND began on November 6, 2024, and ended December 6, 2024. The City of Calabasas (City) received four comment letters on the MND during the public review period. The following table lists the comment letters received in the order in which they were received.

Letter No.	Commenter
1	Sara Brunzell, Cultural Resources Management Division Manager, Fenandeño Tataviam Band of Mission Indians
2	Anthony Higgins, Acting LDR/CEQA Branch Chief, California Department of Transportation (Caltrans)
3	Anne Smith Boland, Vice President, Bob Smith BMW
4	Robert G. Luna, Sheriff, County of Los Angeles Sheriff Department

The comment letters listed above are presented with a response following each comment letter. Each comment letter is numbered sequentially with each issue raised within the comment letter assigned an alphabetical letter. The response to each comment identifies the number of the comment letter first followed by the alphabetical letter assigned to each issue. For example, Response 2-A responds to the first issue raised in Comment Letter 2.

From: Sarah Brunzell <Sarah.Brunzell@tataviam-nsn.us>
Sent: Tuesday, November 12, 2024 3:52 PM
To: Jaclyn Rackerby <jrackerby@cityofcalabasas.com>
Cc: Tom Bartlett <tbartlett@cityofcalabasas.com>; wbischoff@envicomcorporation.com; THCP <thcp@tataviam-nsn.us>; Glenn Michitsch <gmichitsch@cityofcalabasas.com>
Subject: Re: Closure Of Tribal Consultation - KIA - 24460 Calabasas Road

Good afternoon Ms. Rackerby,

Thank you for providing the draft MND for the Cultural Resources Management Division of the Fernand \tilde{e} no Tataviam Band of Mission Indians to review. Regarding the Mitigation Measures for Tribal Cultural Resources, our comments remain the same as those submitted via email October 9, 2024.

It's truly imperative that the Native American monitor be approved and provided by consulting Tribes on the NAHC list. AB 52 states the following:

" In recognition of California Native American **tribal** sovereignty and the unique relationship of California local governments and public agencies with California Native American tribal governments, and respecting the interests and roles of project proponents, it is the intent of the Legislature, in enacting this act, to accomplish all of the following:

...(8) Enable California Native American **tribes** to manage and accept conveyances of, and act as caretakers of, tribal cultural resources."

If the Tribal Monitor is not provided and approved by consulting Tribes on the NAHC list, the Mitigation Measure does not meet the requirements of AB 52.

Kind regards,



Sarah Brunzell

Cultural Resources Management Division Manager

- 📍 Tribal Historic and Cultural Preservation Department
- 📍 Fernand \tilde{e} no Tataviam Band of Mission Indians
- 📞 818-837-0794
- 📍 1019 2nd Street, San Fernando, CA 91340
- 📍 Native Sovereign Nation of Northern Los Angeles County



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**Fernand \tilde{e} no Tataviam
Band of Mission Indians**

*Proactively establishing entities
to overcome systemic barriers:*



Letter 1

Commenter: Sara Brunzell,
Cultural Resources Management Division Manager, Fenandeño Tataviam Band of Mission Indians

Date: November 12, 2024

Comment 1

“It's truly imperative that the Native American monitor be approved and provided by consulting Tribes on the NAHC list. AB 52 states the following:

“In recognition of California Native American tribal sovereignty and the unique relationship of California local governments and public agencies with California Native American tribal governments, and respecting the interests and roles of project proponents, it is the intent of the Legislature, in enacting this act, to accomplish all of the following:

...(8) Enable California Native American tribes to manage and accept conveyances of, and act as caretakers of, tribal cultural resources.”

If the Tribal Monitor is not provided and approved by consulting Tribes on the NAHC list, the Mitigation Measure does not meet the requirements of AB 52.”

Response 1

California Assembly Bill 52 (AB 52) requires tribal consultation; it does not require complete agreement on the text of mitigation measures. The quoted portions of AB 52 do not provide evidence that the mitigation measures are insufficient, and revisions of the mitigation measures are not required. AB 52 requires Tribal notification and consultation on projects that file a Notice of Preparation, Notice of Mitigated Negative Declaration or Notice of Negative Declaration. Notification was provided to Tribes that had requested to be notified of projects within the geographical area. The Fenandeño Tataviam Band of Mission Indians (FTBMI) requested consultation, which was undertaken by the City. Under AB 52, consultation ends when the parties reach mutual agreement or when either party determines that agreement cannot be reached, despite good faith and reasonable effort. The City consulted the FTBMI and revised mitigation measures based on the recommendations of the Tataviam, though not verbatim. The City concluded consultation with a letter to the Tataviam dated September 30, 2024, which included the IS/MND mitigation measure wording. These measures achieve the mutually agreed upon purpose to monitor and provide protocols for inadvertent discoveries.

The IS/MND includes mitigation measure TRI-1, Mitigation Monitoring (shown on pages 81 and 82), which states “The project applicant shall retain a professional Native American Tribal monitor who has a cultural affiliation to the project region to observe all ground disturbing activities of intact or potentially intact native soils.” The City has determined that it should not adopt mitigation measures that exclude other Tribes that may be traditionally and culturally affiliated with the geographic area of the project site or the City. If tribal cultural resources are encountered during construction, the Tataviam shall be notified, as discussed in TRI-2, Tribal Cultural Resource Discovery Protocol, TRI-3, Reburial of Native American Artifacts, and TRI-4, Inadvertent Discovery of Human Remains.

DEPARTMENT OF TRANSPORTATION

DISTRICT 7

100 S. MAIN STREET, MS 16

LOS ANGELES, CA 90012

PHONE (213) 266-3562

FAX (213) 897-1337

TTY 711

www.dot.ca.gov

*Making Conservation
a California Way of Life*

December 6, 2024

Jacklyn Rackerby
City of Calabasas
100 Civic Center Way
Calabasas, CA 91302RE: Kia Dealership Calabasas Project:
Mitigated Negative Declaration (MND)
GTS #07-LA-2024-04681
SCH # 2024110189
Vic. US 101 PM 36.544

Dear Jacklyn Rackerby:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. The proposed project consists of the demolition of remnant paved areas, foundations, retaining walls, and graded pads associated with a former plant nursery on the currently vacant site and the proposed construction, use, and maintenance of a new automobile dealership (inclusive of auto display and auto service), comprised of a two-story, 35-foot-tall commercial building and associated improvements totaling up to 47,897 SF of floor area. The majority of the site will be left undeveloped. In addition to the proposed dealership building, the project proposes a detached auto wash/detail facility, employee surface parking, rooftop parking, rooftop solar array, landscaping, signage, and exterior display/security lighting within the City of Calabasas. The project site encompasses 10.94 gross acres (476,553 SF) and is comprised of two parcels, identified with Assessor's Parcel Numbers 2069-009-008 and 2069-009-020. The City of Calabasas is the Lead Agency under the California Environmental Quality Act (CEQA).

The closest state facility is US 101. After reviewing the project's documents, Caltrans has the following comments:

Caltrans aims to reach zero traffic-related fatalities and serious injuries by 2050 as there is a direct link between impact speeds and the likelihood of fatality or serious injury. In alignment with this goal, Caltrans supports the Project's initiative to improve the frontage zone by installing a sidewalk to encourage transit use. To further enhance safety and

promote active transportation, Caltrans recommends the Lead Agency upgrade its Class II facility on Calabasas Road to include a painted buffer, at a minimum.

Given the project's proximity to the US-101, please ensure that the existing signal and traffic operations at US-101 ramps to Calabasas Road and all major intersections in the vicinity of the project can accommodate the additional project trips. For any required upgrades to traffic signals, the project will be responsible for covering the associated fees as Caltrans is not responsible for any fair-share contribution to the improvement.

Please be reminded any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans. Additionally, Caltrans recommends limiting large truck travel and construction traffic to off-peak commute hours. A permit will also be required for any heavy construction equipment and or materials that require the use of oversized transport vehicles on State highways. If construction traffic may impact State facilities, a detailed traffic control plan should be submitted to Caltrans for review.

If you have any questions, please feel free to contact Jaden Oloresisimo, the project coordinator, at Jaden.Oloresisimo@dot.ca.gov and refer to GTS # 07-LA-2024-04681.

Sincerely,



Anthony Higgins
Acting LDR/CEQA Branch Chief

cc: State Clearinghouse

Letter 2

Commenter: Anthony Higgins,
Acting LDR/CEQA Branch Chief, Caltrans

Date: December 6, 2024

Comment 2-A

“Caltrans aims to reach zero traffic-related fatalities and serious injuries by 2050 as there is a direct link between impact speeds and the likelihood of fatality or serious injury. In alignment with this goal, Caltrans supports the Project’s initiative to improve the frontage zone by installing a sidewalk to encourage transit use. To further enhance safety and promote active transportation, Caltrans recommends the Lead Agency upgrade its Class II facility on Calabasas Road to include a painted buffer, at a minimum.”

Response 2-A

The project would straighten the alignment of the existing painted Class II bicycle lane, enhancing safety and promoting active transportation (i.e., encouragement of increased use of active modes of transportation, such as walking and biking, as promoted by Senate Bill 99). The recommendation of a painted buffer is noted, but is not proposed as part of the project at this time. It should be noted that the project frontage and vicinity is a relatively small portion of the total extent of the Calabasas Road Class II bike lane within the City.

Comment 2-B

“Given the project’s proximity to the US-101, please ensure that the existing signal and traffic operations at US-101 ramps to Calabasas Road and all major intersections in the vicinity of the project can accommodate the additional project trips. For any required upgrades to traffic signals, the project will be responsible for covering the associated fees as Caltrans is not responsible for any fair-share contribution to the improvement.”

Response 2-B

As discussed in Section XVII, Transportation, California Senate Bill 743 (SB 743) was enacted in September 2013, changing the way transportation impact analysis is conducted under CEQA. Within the State’s CEQA Guidelines, these changes include the elimination of auto delay, Level of Service (LOS), and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant traffic impacts. The Governor’s Office of Planning and Research’s 2019 revisions to the CEQA Guidelines established that as of July 1, 2020, a lead agency must rely upon vehicle miles travelled (VMT) guidelines to assess transportation impacts, although a lead agency could begin reliance on the guidelines sooner.

Nonetheless, the project Transportation Analysis, included as Appendix L of the IS/MND, evaluated LOS at the major intersections in the vicinity of the project, including the intersections of the US-101 ramps and Calabasas Road. The Transportation Analysis concluded that the LOS of the intersections would not be substantially reduced by the project’s additional vehicle trips or cumulative vehicle trips.

12-6-24

CITY OF CALABASAS
PLANNING DEPT.

Bob Smith
EST. 1917



December 6, 2024

Ms. Jaclyn Rackerby
Planner
City of Calabasas
100 Civic Center Way
Calabasas, California 91302

Subject: KIA Dealership

Dear Jaclyn,

Thank you for agreeing to meet with us in October to discuss our concerns with the proposed KIA project driveway location adjacent to the Calabasas BMW Dealership. After our meeting, you indicated that City staff would speak to the KIA Applicant team about the significant safety and circulation concerns we discussed at our meeting. A few weeks later you provided an email response from KIA that essentially dismissed our comments and concerns, and they advised that driveway relocation changes are not feasible. We feel that public safety should be a priority and should not be dismissed by the city and should be fully vetted through the CEQA document as well as your Traffic and Transportation Commission. As such, we have engaged a civil engineer to prepare some conceptual site planning design options that address these driveway safety concerns. We have requested a meeting with City staff to further discuss these design alternatives to mitigate the identified public safety issues with the current KIA's proposed site plan.

We have reviewed the CEQA document prepared for the proposed project and have the following comments/questions:

1. Was this project reviewed by the City's Transportation & Traffic Commission (TTC)? If not, we request that this project should be fully reviewed through the city's standard process as Calabasas Road corridor is major street within the city. This should be a clearance item for project hearings. TTC may request additional studies that should be included in the CEQA review.
2. The driveway separation between the existing KIA site driveway (previously Sperling Nursery) and the secondary BMW driveway is measured at ~70' from outside edge to outside edge. This existing condition driveway separation distance provides for a safe configuration for turning movements between these two driveways. This ~70' distance is the typical minimum driveway separation distance per Los Angeles County code. The proposed project driveway was moved approximately 59' to the west, toward our secondary driveway leaving only 11' of driveway separation between our existing eastern driveway and the proposed KIA driveway entrance! Attached is an exhibit demonstrating the limited driveway separation. What design standards were applied to the KIA project? Please provide a comprehensive study of typical driveway separations for arterial streets for commercial/auto uses. An



11' separation between two busy driveways with cars is a very unsafe condition. The CEQA document fails to analyze this drastically reduced driveway separation.

3. The Applicant should also prepare a circulation study to analyze safe movements for pedestrians, bicycles, and vehicles entering or exiting these driveways. Only vehicular circulation was studied. The current location of the KIA driveway is located too close to our existing secondary driveway. This circulation study should include vehicular pedestrian, and bicycle traffic counts for both the existing uses and proposed project along with cumulative impacts for this corridor. According to the ATE report, the proposed project is to provide sidewalk improvements as part of the project to promote pedestrian connections to local transit and retail areas. A multi-modal circulation impacts analysis was not provided for this changed condition and is lacking in the CEQA analysis. We feel this is a very unsafe condition and there will be accidents, or worse, fatalities. There will be more vehicles and people on the street if this project is approved, yet the driveway separation distance analysis was not fully analyzed as part of the MND technical studies. All of this could be mitigated by changing the driveway location back to the existing driveway cut off of Calabasas Road. One City's General Plan Circulation Element goals for Calabasas Road, listed as a critical roadway corridor, is to "enhance vehicular, bicycle, and pedestrian circulation and safety". KIA's proposed driveway location is not consistent with the City's adopted General Plan with the relocation of this driveway due to this change of land use.
4. Our engineers briefly studied alternatives to address our driveway separation safety concerns and provide a few options which we'd like to further discuss with the City. Please study moving the driveway back to the current location and reducing a couple of onsite parking spaces. Please prepare a shared parking study to analyze the practical parking needs for the proposed KIA dealership. Another option to consider is to reduce the number of cars on display at the project parking lot frontage and relocate bicycle racks. This would allow for the use of the existing driveway location and provide the same number of onsite parking spaces proposed. The parking study states that the project just meets the development code parking requirement. We feel that a loss of a few parking spaces, or car display locations, trumps public safety. It seems the main reason the Applicant is unwilling to maintain the existing driveway location is to meet the parking count requirement onsite. A small parking reduction for inventory parking should be studied to offset the significant public safety concerns.
5. We'd also like to see a complete line-of-sight analysis for the proposed driveway location. The analysis included in the ATE report only studied the proposed KIA driveway. It does not even discuss the BMW driveway located 11' to the west of the proposed KIA driveway. The scope of this analysis is incomplete for CEQA review. It appears that the tall monument sign along the frontage will also pose visibility issues which is another public safety concern. This is not mentioned in ATE's line of sight analysis section of their report either. Further, ATE recommends red curb stripping/no parking along the Calabasas Road frontage for 50' east and west of the KIA driveway. This may result in the loss of valuable on-street parking in front of our BMW dealership. This potential loss of parking impact needs to be analyzed in the MND.
6. What traffic calming mitigation measures were studied for the proposed project as part of CEQA? We see vehicles moving at high speeds along Calabasas Road. Mixing vehicles, pedestrians, and bicycles all



moving in different directions and some at high speeds is a recipe for disaster. The posted 40 mph speeds are not adhered to or enforced. We'd like to have speeds and traffic calming studied near the proposed driveway location and cumulatively for the Calabasas Road section from the Audi to the Mercedes dealership to assess safety risks. This study should be presented to the TTC to evaluate. The TTC may require supplemental studies and/or mitigations for this project that need to be addressed prior to going to hearings.

We urge the City to take these public safety concerns seriously for the benefit of the community. It is clear that complete traffic, circulation, and public safety impacts analyses have not been fully assessed in the MND. This project needs to be taken to TTC for review and additional engineering analyses may need to be conducted and included in the project's CEQA document.

Please include this letter in the record files for this project.

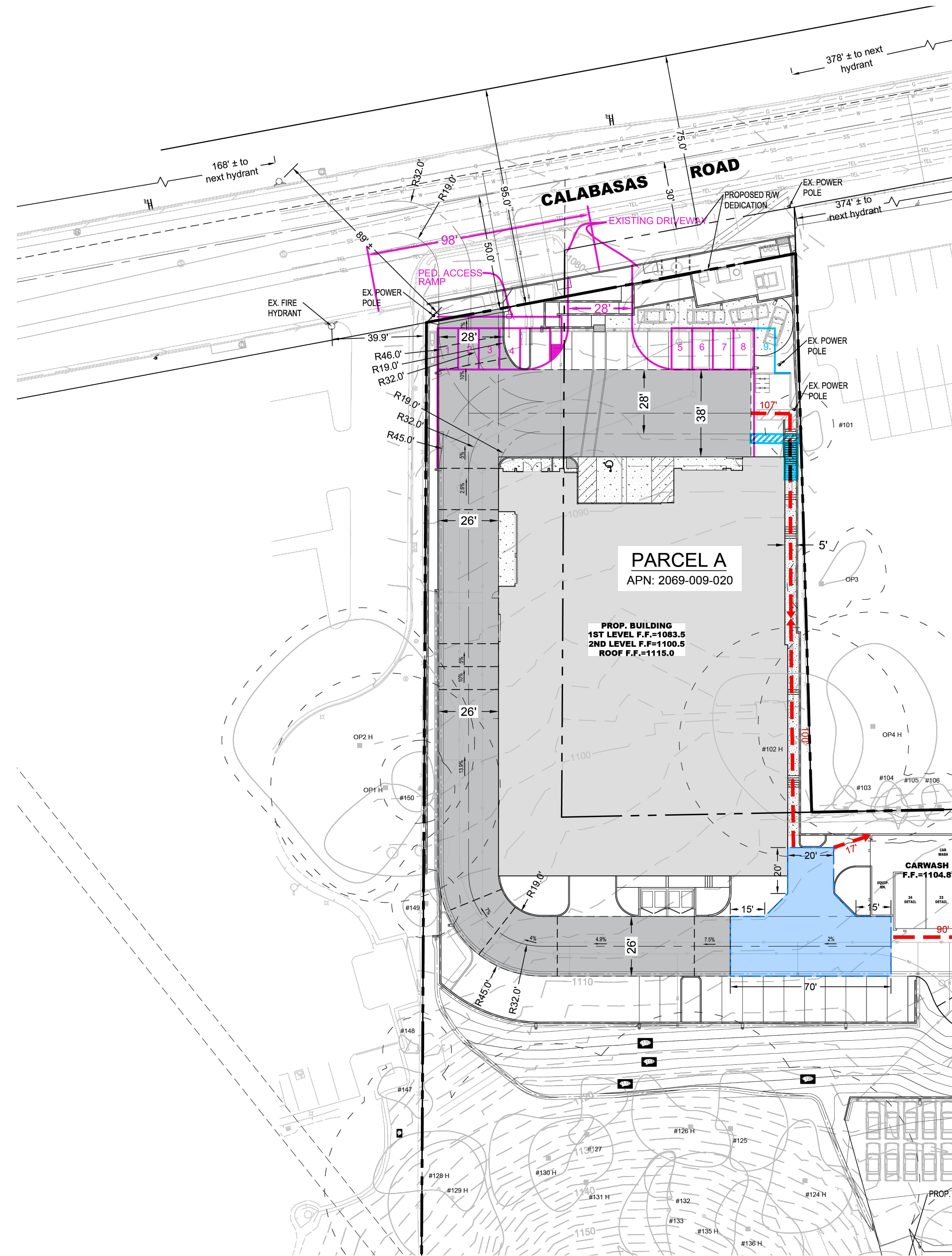
Sincerely,

A handwritten signature in black ink, appearing to be 'AB' or similar initials.

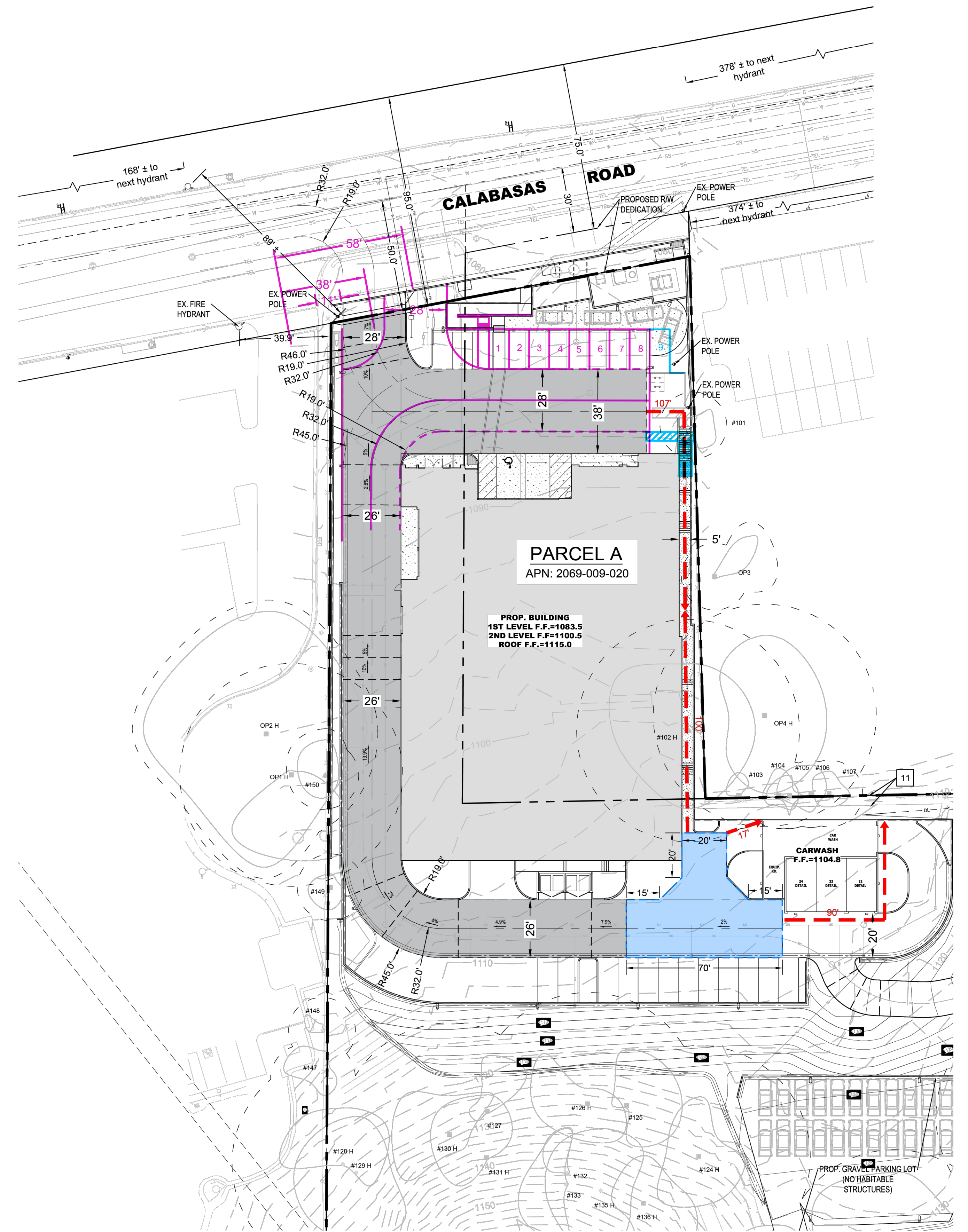
Anne Smith Boland

Vice President

cc: Michael Klein
Tom Bartlett
Glenn Michitsch

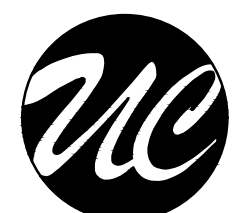


CONCEPTUAL DRIVEWAY LOCATION
OPTION 1

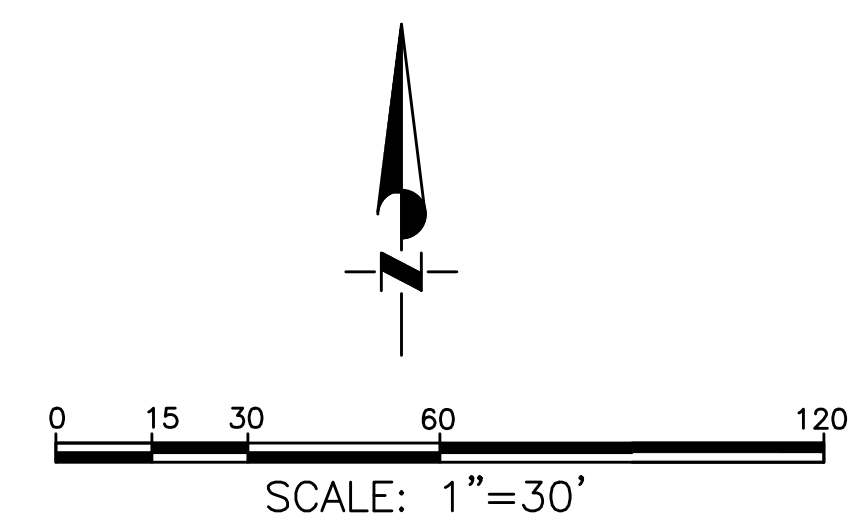


CONCEPTUAL DRIVEWAY LOCATION
OPTION 2

PREPARED BY:



UNITED CIVIL, INC.
30141 AGOURA ROAD, SUITE 215
AGOURA HILLS, CA 91301
PH: (818) 707-8648
FAX: (818) 707-8649



KIA CAR DEALERSHIP
CITY OF CALABASAS

DATE: 12/10/2024

Letter 3

Commenter: Anne Smith Boland,
Vice President, Bob Smith BMW

Date: December 6, 2024

Associated Transportation Engineers (ATE), the firm that prepared the project Transportation Analysis in Appendix L, on which IS/MND analysis in Section XVII was based, assisted with the preparation of the following responses to Letter 3.

Comment 3-A

“Was this project reviewed by the City’s Transportation & Traffic Commission (TTC)? If not, we request that this project should be fully reviewed through the city’s standard process as Calabasas Road corridor is major street within the city. This should be a clearance item for project hearings. TTC may request additional studies that should be included in the CEQA review.”

Response 3-A

The project was not reviewed by the City’s TTC, because it does not review projects of this type. TTC does not evaluate land development projects, unless specifically directed to do so by the City Council. The project is not a roadway capacity-increasing or safety-related capital improvement project (such as new signal, roundabout, or pedestrian crossing), which are the types of projects reviewed by TTC.

Comment 3-B

“The driveway separation between the existing KIA site driveway (previously Sperling Nursery) and the secondary BMW driveway is measured at ~70’ from outside edge to outside edge. This existing condition driveway separation distance provides for a safe configuration for turning movements between these two driveways. This ~70’ distance is the typical minimum driveway separation distance per Los Angeles County code. The proposed project driveway was moved approximately 59’ to the west, toward our secondary driveway leaving only 11’ of driveway separation between our existing eastern driveway and the proposed KIA driveway entrance! Attached is an exhibit demonstrating the limited driveway separation. What design standards were applied to the KIA project? Please provide a comprehensive study of typical driveway separations for arterial streets for commercial/auto uses. An 11’ separation between two busy driveways with cars is a very unsafe condition. The CEQA document fails to analyze this drastically reduced driveway separation.”

Response 3-B

The proposed driveway location would allow for sufficient perpendicular sight distance to allow for left turns from the project site. Additionally, for the existing driveway location fronting the project site, there is limited space to create increased site distance without altering the frontage of the adject property of the east, which is outside the purview of the proposed project. Furthermore, alterations to the street frontage further east may potentially encroach on existing oak trees along Calabasas Road.

The Los Angeles County Code provision discussed in the comment is not applicable to the project, because it is within the jurisdiction of the City of Calabasas rather than unincorporated Los Angeles County. The City has found the proposed driveaway design to be eligible for approval. The Draft IS/MND discusses safety of the project driveway on pages 78 and 79 in response to CEQA checklist XVII.c. As discussed in the Draft IS/MND, the proposed driveway would have sufficient sight distance, with proposed 50-foot no parking zones on both sides of driveway and restricted-height project landscaping. As evaluated in detail

in Appendix L, Transportation Analysis, by ATE, the site distances for the project driveway are consistent with the American Association of State Highway and Transportation Officials' (AASHTO's) specifications (see also Response 3-E, below).

Additionally, the proposed project includes an 'alternative' driveway placement option which relocates the driveway from the currently proposed 11' separation 9' further, for 20' separation between the proposed driveway and existing adjacent driveway.

Comment 3-C

“The Applicant should also prepare a circulation study to analyze safe movements for pedestrians, bicycles, and vehicles entering or exiting these driveways. Only vehicular circulation was studied. The current location of the KIA driveway is located too close to our existing secondary driveway. This circulation study should include vehicular pedestrian, and bicycle traffic counts for both the existing uses and proposed project along with cumulative impacts for this corridor. According to the ATE report, the proposed project is to provide sidewalk improvements as part of the project to promote pedestrian connections to local transit and retail areas. A multi-modal circulation impacts analysis was not provided for this changed condition and is lacking in the CEQA analysis. We feel this is a very unsafe condition and there will be accidents, or worse, fatalities. There will be more vehicles and people on the street if this project is approved, yet the driveway separation distance analysis was not fully analyzed as part of the MND technical studies. All of this could be mitigated by changing the driveway location back to the existing driveway cut off of Calabasas Road. One City's General Plan Circulation Element goals for Calabasas Road, listed as a critical roadway corridor, is to 'enhance vehicular, bicycle, and pedestrian circulation and safety'. KIA's proposed driveway location is not consistent with the City's adopted General Plan with the relocation of this driveway due to this change of land use.”

Response 3-C

The comment does not provide substantial evidence that the proposed driveway distance would decrease safety or that the General Plan would not allow the proposed driveway design. The project would improve vehicular circulation and safety by allowing better left turn access onto Calabasas Road by relocating the driveway as proposed in the project Site Plan. Additionally, for the existing driveway location fronting the project site, there is limited space to create increased site distance without alteration the frontage of the adjacent property of the east, which is outside the purview of the proposed project. Furthermore, alterations to the street frontage further east may potentially encroach on existing oak trees along Calabasas Road, and onto private property over which the City has no existing legal authority to physically improve. Additionally, the project did prepare a traffic study to evaluate access, circulation, and potential project impacts, including pedestrian, bicycle, and transit facilities. Recommendations from the traffic study have been incorporated into the project.

The project would improve bicycle and pedestrian circulation and safety through the frontage improvements. A sidewalk would be added, and pedestrians would no longer have to walk in the existing Class II bicycle lane. Additionally, the existing Class II bicycle lane alignment would be made straighter. Therefore, the project is consistent with the City's adopted General Plan goal of enhancing multimodal transportation and safety.

Comment 3-D

“Our engineers briefly studied alternatives to address our driveway separation safety concerns and provide a few options which we'd like to further discuss with the City. Please study moving the driveway back to the current location and reducing a couple of onsite parking spaces. Please prepare a shared parking study to analyze the practical parking needs for the proposed KIA dealership. Another option to consider is to reduce the number of cars on display at the project parking lot frontage and relocate bicycle racks. This would allow for the use of the existing driveway location and provide the same number of onsite parking

spaces proposed. The parking study states that the project just meets the development code parking requirement. We feel that a loss of a few parking spaces, or car display locations, trumps public safety. It seems the main reason the Applicant is unwilling to maintain the existing driveway location is to meet the parking count requirement onsite. A small parking reduction for inventory parking should be studied to offset the significant public safety concerns.”

Response 3-D

The comment does not provide evidence that the distance between the proposed project driveway and the existing Bob Smith BMW driveway would create safety issues. The proposed driveway location would allow for sufficient sight distance to allow for outbound left turns from the project onto Calabasas Road. As discussed in the Draft IS/MND, the proposed driveway would have sufficient site distance, with proposed 50-foot no parking zones on both sides of driveway and restricted-height project landscaping. Regarding the amount of parking, the City has reviewed City municipal code requirements, and the parking proposed and finds the parking plan adequate.

Comment 3-E

“We’d also like to see a complete line-of-sight analysis for the proposed driveway location. The analysis included in the ATE report only studied the proposed KIA driveway. It does not even discuss the BMW driveway located 11’ to the west of the proposed KIA driveway. The scope of this analysis is incomplete for CEQA review. It appears that the tall monument sign along the frontage will also pose visibility issues which is another public safety concern. This is not mentioned in ATE’s line of sight analysis section of their report either. Further, ATE recommends red curb stripping/no parking along the Calabasas Road frontage for 50’ east and west of the KIA driveway. This may result in the loss of valuable on-street parking in front of our BMW dealership. This potential loss of parking impact needs to be analyzed in the MND.”

Response 3-E

The project Transportation Analysis, included as Appendix L of the Draft IS/MND analyzed the line-of-sight for the project driveway, as discussed on pages 78 and 79 and Appendix L of the Draft IS/MND (beginning on page 19, under “Site Access and Circulation”, and including Figures 12 and 13, which provide sight distances for the project driveway and Calabasas Road). As shown in the Appendix L report, the distance looking to the east and west from the driveway satisfies the AASHTO 440-foot corner sight distance requirement. The AASHTO minimum stopping sight distance for a 40-mph design speed is 300 feet. As illustrated on Figure 13, the sight distance looking from the east and west of the driveway satisfies the AASHTO 300-foot stopping sight distance requirement. The proposed driveway would have sufficient site distance, with proposed 50-foot no parking zones on both sides of driveway and restricted-height project landscaping. The existing Bob Smith BMW driveway and the proposed project driveway would not obscure each other’s lines of sight.

Street parking in front of the BMW dealership would not be lost, because there is an existing no-parking zone associated with the fire hydrant to the west of the BMW driveway and no parking in front of this driveway itself. As parking within 15 feet of a fire hydrant is legally prohibited⁶⁰ and the fire hydrant is approximately 35 feet west of the shared property line with the project, parking is already prohibited within the 50 feet of street frontage west of the shared property line and thus within approximately 61 feet of the proposed project driveway. It should be noted that on-street parking does not belong to the owner of the land that it fronts but is available to the public. In addition, parking supply and demand is not a CEQA transportation issue and does not need to be analyzed in the IS/MND. As stated on page 77 of the Draft IS/MND, SB 743 changed the way transportation impact analysis is conducted under CEQA and the Governor’s Office of Planning and Research’s 2019 revisions to the CEQA Guidelines established that a

⁶⁰ Per California Vehicle Code, Division 11, Chapter 9, Section 22514.

lead agency must rely upon VMT guidelines to assess transportation impacts. Transportation impacts are less than significant, as discussed in the Draft IS/MND.

Comment 3-F

“What traffic calming mitigation measures were studied for the proposed project as part of CEQA? We see vehicles moving at high speeds along Calabasas Road. Mixing vehicles, pedestrians, and bicycles all moving in different directions and some at high speeds is a recipe for disaster. The posted 40 mph speeds are not adhered to or enforced. We’d like to have speeds and traffic calming studied near the proposed driveway location and cumulatively for the Calabasas Road section from the Audi to the Mercedes dealership to assess safety risks. This study should be presented to the TTC to evaluate. The TTC may require supplemental studies and/or mitigations for this project that need to be addressed prior to going to hearings.”

Response 3-F

As discussed in the Draft IS/MND on page 77, potential system enhancements identified in the Circulation Element of the General Plan are implemented at a City level, rather than the project level. Furthermore, traffic calming measures are not appropriate on Calabasas Road, as it is designated an arterial roadway by the City. In addition, the proposed project would not affect vehicle speeds on Calabasas Road. Mitigation is only a requirement for significant impacts and the project has no significant transportation impacts, therefore, mitigation is not required.

As discussed in Response 3-A, the City’s TTC would not review this project, because it does not review projects of this type. TTC does not review land development projects, unless specifically directed by the City Council. The project is not a roadway capacity-increasing or safety-related capital improvement (such as new signal, roundabout, or pedestrian crossing) project, which are the types of projects reviewed by TTC.



OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALL OF JUSTICE

ROBERT G. LUNA, SHERIFF



December 12, 2024

Jaclyn Rackerby, Planner
Community Development Department Planning Division
100 Civic Center Way,
Calabasas, California 91302

Dear Ms. Rackerby:

**KIA DEALERSHIP CALABASAS PROJECT
NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION
REVIEW COMMENTS**

Thank you for inviting the Los Angeles County Sheriff's Department (Department) to review and comment on the November 2024 Notice of Intent to adopt a Mitigated Negative Declaration (IS/MND) for the proposed Kia Dealership Calabasas Project (Project). The proposed Project is located at 24460 Calabasas Rd., City of Calabasas (City) and within the service area of the Department's Malibu-Lost Hills Station (Station). It is likely the construction of the proposed Project will cumulatively impact the current level of service provided by the Station for the potential increase in day and nighttime population and may require a reevaluation with the law enforcement services agreement once the project is complete.

Please see the attached review comments provided by our Station (see correspondence dated December 09, 2024, from Lieutenant Dustin A. Carr).

For future reference, the Department provides the following updated address and contact information for all requests for reviews comments, law documents, and other related correspondence:

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

A Tradition of Service
— Since 1850 —

Ms. Rackerby

- 2 -

December 12, 2024

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

Attention: Planning Section

Should you have any questions regarding this matter, please contact me, at (323) 526-5657, or your staff may contact Ms. Bee Bee Pee, of my staff, at (323) 526-5697.

Sincerely,

ROBERT G. LUNA, SHERIFF



Tracey Jue, Bureau Director
Facilities Planning Bureau

TJ:BB:ns

c: Jennifer L. Seetoo, Captain, Malibu/Lost Hills Sheriff's Station (LHS)
Dustin A. Carr, Operations Lieutenant, LHS
Andrew B. Cruz, Captain, Contract Law Enforcement Bureau (CLEB)
Erick F. Martinez, Lieutenant, CLEB
Julie A. Lowe, Sergeant, CLEB
Jennifer Fang, Assistant Bureau Director, Facilities Planning Bureau (FPB)
Kelly Chiu, Capital Projects Program Manager, FPB
Bee Bee Pee, Departmental Facilities Planner I, FPB
Chrono
File
(ENV- Kia Dealership Calabasas Project)

COUNTY OF LOS ANGELES
SHERIFF'S DEPARTMENT
"A Tradition of Service Since 1850"

DATE: December 9, 2024

FILE NO:

OFFICE CORRESPONDENCE

FROM:  DUSTIN A. CARR, LIEUTENANT
MALIBU/LOST HILLS STATION

TO: TRACY JUE, DIRECTOR
FACILITIES PLANNING BUREAU

**SUBJECT: REVIEW COMMENTS ON THE DRAFT INITIAL STUDY/MITIGATED
NEGATIVE DECLARATION FOR KIA DEALERSHIP CALABASAS
PROJECT**

Malibu-Lost Hills Sheriff's Station (station) reviewed the Draft Initial Study/Mitigated Negative Declaration (IS/MND), dated November 2024, for the Kia Dealership Calabasas Project (project). The project consists of the demolition of existing paved areas, foundations, retaining walls, and graded pads associated with a former plant nursery on the currently vacant site and the proposed construction, use, and maintenance of a new automobile dealership consisting of a two-story, 35-foot-tall commercial building and associated improvements totaling approximately 48,000 SF of floor area. The majority of the approximately 11-acre site will be left undisturbed. In addition to the proposed dealership building, the project proposes a detached auto wash/detail facility, employee surface parking, rooftop parking, a rooftop solar array, landscaping, signage, and exterior display/security lighting within the city of Calabasas (city).

According to the IS/MND Section XIV, page 69 Population and Housing, the proposed project is expected to have a less than significant impact; "As the proposed project would not generate a residential population, cause a substantial increase in employment, or extend existing or new infrastructure that would indirectly induce population growth, the project would have less than significant impacts associated with population growth." However, the proposed project will increase the number of current employees and visitors and the daytime and nighttime population of the station's service area, contributing to a cumulative impact and the potential to generate increased demand for law enforcement services.

In addition, according to Section XV Public Services for Police Service of the IS/MND, page 72, the proposed project is expected to have less than a significant impact on law enforcement services provided by the station. The IS/MND incorrectly reflects the project site in Region I and target response times. The station would service the project site, and the standard target

response times for the station are Routine calls: 60 minutes, Priority calls: 30 minutes, and Emergent calls: 15 minutes. The station's average response time is routine calls: 39.9 minutes, priority calls 11.7 minutes, and emergency calls 7.7 minutes. It is important to note that these times do not necessarily reflect a patrol vehicle dispatching from the station but rather from where the patrol deputy is at the time of the call.

The IS/MND also incorrectly states that there are 25 patrol deputies on patrol at any given time. This number will vary depending on the shift; however, approximately 14 patrol deputies work on average per shift.

Additional clarification is needed with the IS/MND as the Sheriff's Department no longer has patrol regions. Thus, the project site is no longer referenced as Region I. The station is part of the North Patrol Division.

The station remains concerned that continued growth and intensification of commercial buildings within the service area will ultimately contribute to significant cumulative impacts on our law enforcement resources and operations from this project and other developments previously approved within the city. It is reasonable that, although planned, continued development within the city will significantly increase the demand for law enforcement services and facilities. Meeting such demands requires additional resources, including patrol deputies, other sworn deputies, support personnel, and attendant assets, such as patrol vehicles, support vehicles, communications equipment, weaponry, office furnishings, equipment, etc. Resources should be evaluated as projects are completed.

Assigning additional law enforcement personnel to the station to meet an acceptable service ratio will require discussion with the city and potential modification of the law enforcement services agreement for additional support personnel and equipment assets. The Project Applicant will be required to pay all applicable development fees and/or law enforcement facilities mitigation fees associated with the project.

Also, the station reviewed the proposed building area to provide the following comments:

1. Special Protection Requirements or Recommendations:

- a. The Department recommends that the principles of Crime Prevention through Environmental Design (CPTED) be

incorporated into the design plans. The goal of CPTED is 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. The station recommends the installation of security cameras to reduce opportunities for criminal activities, where feasible.

- b. The proposed project will benefit from a landscaping maintenance program that would minimize opportunities for individuals to hide. The station also recommends limiting the height of hedge-type plants to allow visibility from the street, and trees should not block the line of sight of building addresses from street patrol car height.
- c. The installation of security cameras for a video monitoring system and building lights with motion sensors is beneficial where feasible. In addition, the proposed locations of exterior building security cameras shall be considered in areas where law enforcement can adequately identify vehicle license plates upon entry/exit into the proposed project with adequate lighting to enhance visibility. The installation of security cameras inside the building at each level's entry/exit points, elevators, and stairwells can be considered where feasible.
- d. Effective traffic and security plans will be developed to address potential issues from vandalism and burglaries at the proposed project site in coordination with all jurisdictional approvals.
- e. A Construction Traffic Management Plan should also be established as part of the proposed project to address construction-related traffic congestion and emergency access issues. If temporary lane closures are necessary for installing utilities, emergency access should be maintained at all times. Flag persons and/or detours should be provided as needed to ensure safe traffic operations, and construction signs

should be posted to advise motorists of reduced construction zone speed limits.

- f. Provide a numerical address on the corner of the building that can be easily viewed from the street.
- g. Where feasible, install a fence or CMU wall on the backside of the property at a height high enough so that it is not scalable for easy access into the Project area.

Currently, the station has no further comments on the proposed project. However, the station reserves the right to amend or supplement our assessment upon subsequent reviews of the proposed project once additional information becomes available.

Thank you for including the station in the review process for the proposed project. If you have any questions, please contact Operations Lieutenant Dustin A. Carr at (818)-878-1808.

Letter 4

Commenter: Robert G. Luna,
Sheriff, County of Los Angeles Sheriff Department

Date: December 12, 2024

Comment 4-A

“According to the IS/MND Section XIV, page 69 Population and Housing, the proposed project is expected to have a less than significant impact; ‘As the proposed project would not generate a residential population, cause a substantial increase in employment, or extend existing or new infrastructure that would indirectly induce population growth, the project would have less than significant impacts associated with population growth.’ However, the proposed project will increase the number of current employees and visitors and the daytime and nighttime population of the station’s service area, contributing to a cumulative impact and the potential to generate increased demand for law enforcement services.”

Response 4-A

The project population of employees and visitors would be a very small portion of the total population or employment in the City, which had 23,500 residents and 25,100 employees in 2019,⁶¹ as discussed in the Draft IS/MND. The project employees and visitors would also be a small portion of the projected net growth between 2019 and 2050 of 1,437 resident and 1,200 employees in the City, as the Draft I/SMND also discusses. Therefore, the project population would not substantially contribute to increased demand for law enforcement or other public services.

Comment 4-B

“In addition, according to Section XV Public Services for Police Service of the IS/MND, page 72, the proposed project is expected to have less than a significant impact on law enforcement services provided by the station. The IS/MND incorrectly reflects the project site in Region I and target response times. The station would service the project site, and the standard target response times for the station are Routine calls: 60 minutes, Priority calls: 30 minutes, and Emergent calls: 15 minutes. The station’s average response time is routine calls: 39.9 minutes, priority calls 11.7 minutes, and emergency calls 7.7 minutes. It is important to note that these times do not necessarily reflect a patrol vehicle dispatching from the station but rather from where the patrol deputy is at the time of the call.

The IS/MND also incorrectly states that there are 25 patrol deputies on patrol at any given time. This number will vary depending on the shift; however, approximately 14 patrol deputies work on average per shift.

Additional clarification is needed with the IS/MND as the Sheriff’s Department no longer has patrol regions. Thus, the project site is no longer referenced as Region I. The station is part of the North Patrol Division.”

Response 4-B

The Final IS/MND will include the revised information about target response times, the number of patrol deputies, and patrol division information. The impact conclusion will not change; impacts to police services will be less than significant and no mitigation measures are required.

⁶¹ SCAG 2024-2050 RTP/SCS, Current Demographics & Growth Forecast Appendix, Table 12 and 13, Adopted April 4, 2024.

Comment 4-C

“The station remains concerned that continued growth and intensification of commercial buildings within the service area will ultimately contribute to significant cumulative impacts on our law enforcement resources and operations from this project and other developments previously approved within the city. It is reasonable that, although planned, continued development within the city will significantly increase the demand for law enforcement services and facilities. Meeting such demands requires additional resources, including patrol deputies, other sworn deputies, support personnel, and attendant assets, such as patrol vehicles, support vehicles, communications equipment, weaponry, office furnishings, equipment, etc. Resources should be evaluated as projects are completed.

Assigning additional law enforcement personnel to the station to meet an acceptable service ratio will require discussion with the city and potential modification of the law enforcement services agreement for additional support personnel and equipment assets. The Project Applicant will be required to pay all applicable development fees and/or law enforcement facilities mitigation fees associated with the project.”

Response 4-C

Cumulative effects on police services would be less than significant, as discussed on page 94 of the Draft IS/MND. The project applicant will pay all applicable development fees and/or law enforcement facilities mitigation fees associated with the project.

Comment 4-D

“Also, the station reviewed the proposed building area to provide the following comments:

1. Special Protection Requirements or Recommendations:
 - a. The Department recommends that the principles of Crime Prevention through Environmental Design (CPTED) be incorporated into the design plans. The goal of CPTED is 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. The station recommends the installation of security cameras to reduce opportunities for criminal activities, where feasible.
 - b. The proposed project will benefit from a landscaping maintenance program that would minimize opportunities for individuals to hide. The station also recommends limiting the height of hedge-type plants to allow visibility from the street, and trees should not block the line of sight of building addresses from street patrol car height.
 - c. The installation of security cameras for a video monitoring system and building lights with motion sensors is beneficial where feasible. In addition, the proposed locations of exterior building security cameras shall be considered in areas where law enforcement can adequately identify vehicle license plates upon entry/exit into the proposed project with adequate lighting to enhance visibility. The installation of security cameras inside the building at each level’s entry/exit points, elevators, and stairwells can be considered where feasible.
 - d. Effective traffic and security plans will be developed to address potential issues from vandalism and burglaries at the proposed project site in coordination with all jurisdictional approvals.
 - e. A Construction Traffic Management Plan should also be established as part of the proposed project to address construction-related traffic congestion and emergency access issues. If

temporary lane closures are necessary for installing utilities, emergency access should be maintained at all times. Flag persons and/or detours should be provided as needed to ensure safe traffic operations, and construction signs should be posted to advise motorists of reduced construction zone speed limits.

- f. Provide a numerical address on the corner of the building that can be easily viewed from the street.
- g. Where feasible, install a fence or CMU wall on the backside of the property at a height high enough so that it is not scalable for easy access into the Project area.

Response 4-D

The project would incorporate appropriate security measures to protect the site. The project would have security lighting. The height of hedges and placement of trees would not substantially obscure visibility of the site, as shown on the project plans, included as Appendix A of the Draft IS/MND. The backside of the project would not be easily accessible due to the undeveloped hillside behind the project. A variable height retaining wall would be built at the southern edge of the project.

9.0 CORRECTIONS

This section lists corrections to the Initial Study/Mitigated Negative Declaration (IS/MND), based on written comments received during the circulation period of the IS/MND.

1. Section XV, Public Services of the Draft IS/MND states on page 72 that the project site is within Region I. The Sherriff's Department no longer has patrol regions and the area is no longer referred to as Region I. The project vicinity is part of the North Patrol Division. Corrections were made accordingly.
2. Section XV, Public Services of the Draft IS/MND discusses standard police response times on page 72. The standard target response times for the station are Routine calls: 60 minutes, Priority calls: 30 minutes, and Emergency calls: 15 minutes. The station's average response time is routine calls: 39.9 minutes, priority calls: 11.7 minutes, and emergency calls: 7.7 minutes. It is important to note that these times do not necessarily reflect a patrol vehicle dispatching from the station but rather from where the patrol deputy is at the time of the call. Corrections were made accordingly.
3. Section XV, Public Services of the Draft IS/MND states on page 72 that the police station will have 25 patrol deputies. The actual number of deputies on patrol will vary depending on the shift; however, approximately 14 patrol deputies work on average per shift. Corrections were made accordingly.