

## 5.0 ENVIRONMENTAL IMPACT ANALYSIS

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### 7. LAND USE AND PLANNING

#### 1. INTRODUCTION

As determined in the Initial Study provided in **Appendix 1** of this Draft Supplemental Environmental Impact Report (SEIR), the Modified Project will not result in the physical division of an established community, and will not conflict with any County of Los Angeles (County) land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, no further analysis of these issues is required. This SEIR section focuses specifically on the Modified Project's consistency with applicable General Plan and Area Plan goals, objectives, and policies related to Significant Ecological Areas (SEAs) and Hillside Management Areas (HMAs).

#### 2. ENVIRONMENTAL SETTING

##### a. Regulatory Setting

An overview of County plans that include goals, objectives, and policies related to HMAs and SEAs, including related issues such as hillsides, ridgelines, and biological resources is presented in **Table 5.7-1**, Land Use and Planning Regulatory Overview, beginning on page 5.7-2, followed by a detailed discussion of each plan.

##### (1) Los Angeles County General Plan 2035

Adopted by the County Board of Supervisors (Board) on October 6, 2015, the Los Angeles County General Plan 2035 (General Plan) directs future growth and development in the County's unincorporated areas and establishes goals, policies, and objectives that pertain to the entire County.

The General Plan designates 21 SEAs, areas where the County has deemed it important to facilitate a balance between limited development and resource conservation.<sup>1</sup> Each individual SEA is sized to support sustainable populations of its component species and includes undisturbed or lightly disturbed habitat along with linkages and corridors that

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<sup>1</sup> Los Angeles County, *Public Review Draft March 2015 General Plan*.

**Table 5.7-1  
Land Use and Planning Regulatory Overview**

Issue Area and Relevant Legislation	Applicable Agency
<b>County Regulations</b>	
<p><b>Los Angeles County General Plan 2035</b></p> <p>Adopted by the County Board of Supervisors (Board) on October 6, 2015, the Los Angeles County General Plan 2035 (General Plan) directs future growth and development in the County's unincorporated areas and establishes goals, policies, and objectives that pertain to the entire County. The General Plan designates 21 SEAs, areas where the County has deemed it important to facilitate a balance between limited development and resource conservation.<sup>a</sup> Each individual SEA is sized to support sustainable populations of its component species and includes undisturbed or lightly disturbed habitat along with linkages and corridors that promote species movement. As discussed further below, the Santa Clara River SEA passes through the Modified Project Site area and includes Castaic Creek, which traverses the VCC Planning Area. The Entrada South Planning Area is not located within and does not contain any portion of an SEA. HMAs are mountainous or foothill terrain with a natural slope of 25 percent or greater. The purpose of the Hillside Management Ordinance in County Code Title 22 is to regulate development within Hillside Management Areas to: (1) protect the public from natural hazards associated with steep hillsides; and (2) minimize the effects of development and grading on scenic resources. A detailed discussion of the goals, objectives, and policies related to SEAs and HMAs included in the various elements of the General Plan is provided below.</p>	Department of Regional Planning
<p><b>Santa Clarita Valley Area Plan: <i>One Valley One Vision 2012</i></b></p> <p>The Santa Clarita Valley Area Plan (Area Plan): <i>One Valley One Vision 2012</i>, sometimes referred to as OVOV, was adopted by the County on November 27, 2012, and became effective on December 27, 2012. The Area Plan recognizes the need to coordinate land uses and development with the provision of adequate infrastructure, conservation of natural resources, and common objectives for the Santa Clarita Valley (Valley). The Area Plan serves as a long-term guide for development in the unincorporated Santa Clarita Valley in conjunction with the incorporated Valley areas over the next 20 years. More specifically, the Area Plan sets forth area-wide planning policies for the Valley and establishes objectives for the individual communities in the Valley. A detailed discussion of the goals, objectives, and policies related to SEAs and HMAs included in the various elements of the Area Plan is provided below.</p>	Department of Regional Planning
<p><b>All Hazards Mitigation Plan</b></p> <p>The All-Hazards Mitigation Plan, which has been approved by the Federal Emergency Management Agency and the California Emergency Management Agency, provides policy guidance for minimizing threats from natural and human-made hazards in the County and includes a compilation of known, historic, and projected hazards in the County</p>	Department of Regional Planning, Department of Public Works
<p><b>Los Angeles County Significant Ecological Areas Ordinance</b></p> <p>The Los Angeles County SEA Ordinance establishes regulations to conserve the unique biological and physical diversity of the natural communities found within SEAs by requiring development to be designed to avoid and minimize</p>	Department of Regional Planning

**Table 5.7-1 (Continued)  
Land Use and Planning Regulatory Overview**

Issue Area and Relevant Legislation	Applicable Agency
<p>impacts to SEA resources. These requirements help ensure the long-term survival of the SEAs and their connectivity to regional natural resources. This ordinance regulates development within SEAs by: (1) protecting the biodiversity, unique resources, and geological formations contained in SEAs from incompatible development, as specified in the Conservation and Natural Resources Element of the General Plan; (2) ensuring that projects reduce the effects of habitat fragmentation and edge effects by providing additional technical review of existing resources, potential impacts, and required mitigations; (3) ensuring that development within a SEA conserves biological diversity, habitat quality, and connectivity to sustain species populations and their ecosystem functions into the future; and (4) directing development to be designed in a manner that considers and avoids impacts to SEA resources within the Los Angeles County region. The County’s updated SEA Ordinance (County Code Section 22.14.190) became effective on January 16, 2020.</p>	
<p><b>Los Angeles County Hillside Requirements</b>                      The County’s Hillside Management Area (HMA) Ordinance (County Code Section 22.56.217) became effective on November 5, 2015. The HMA Ordinance and the accompanying Hillside Design Guidelines are intended to ensure “that hillside development projects use sensitive and creative engineering, architectural, and landscaping site design techniques” to preserve natural features in hillside areas.<sup>b</sup> CUPs are required for all development located wholly or partly in an HMA other than those specifically listed in the Ordinance. The HMA Ordinance outlines a detailed process for CUP applications and conditions of approval, including open space designations and project design.</p>	<p>Department of Regional Planning</p>
<p><sup>a</sup> <i>Los Angeles County, Public Review Draft March 2015 General Plan.</i>  <sup>b</sup> <i>County of Los Angeles, Department of Regional Planning, Draft Hillside Management Area Ordinance, March 2015.</i>                      Source: <i>Eyestone Environmental, 2024.</i></p>	

promote species movement. As discussed further below, the Santa Clara River SEA passes through the Modified Project Site area and includes Castaic Creek, which traverses the VCC Planning Area. The Entrada South Planning Area is not located within and does not contain any portion of an SEA.

HMA’s are mountainous or foothill terrain with a natural slope of 25 percent or greater. The purpose of the Hillside Management Ordinance in County Code Title 22 is to regulate development within Hillside Management Areas to: (1) protect the public from natural hazards associated with steep hillsides; and (2) minimize the effects of development and grading on scenic resources.

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**(a) Land Use Element**

The County General Plan Land Use Element provides strategies and planning tools to facilitate development and revitalization efforts. Through its mapped land use designations, the Element guides the general location, distribution, and intensity of land use. As such, the Land Use Element serves as a tool for accommodating growth and coordinating future development in the County's unincorporated areas. The Land Use Element also addresses Special Management Areas, which are areas requiring additional development regulations to prevent the loss of life and property and/or to protect the natural environment and important resources. As discussed further below, portions of the Modified Project Site include several Special Management Areas, including an SEA and HMA.

The following goal and related policy contained in the Land Use Element relates to SEAs:

- **Goal LU-3:** A development pattern that discourages sprawl, and protects and conserves areas with natural resources and SEAs.
  - Policy LU 3.1: Encourage the protection and conservation of areas with natural resources, and SEAs.

No specific goals and policies within the Land Use Element relate to HMAs.

**(b) Conservation and Natural Resources Element**

The Conservation and Natural Resources Element sets policy direction for the long-term conservation of natural resources and the preservation of available open space areas. Among other issues, the Conservation and Natural Resources Element addresses the conservation of open space and biological resources, with special emphasis on the protection of hillside character and SEAs.

Within the Conservation and Natural Resources Element, the Open Space Resources Policy Map designates and categorizes all open space uses within the unincorporated areas of the County. The majority of the Modified Project Site is designated as a Special Management Area, defined as an area where special safety or mitigation measures are necessary to ensure the protection of natural or scenic resources, property, and/or human life. Such areas include, among others, hillside management areas, flood prone areas, SEAs, Coastal Resource Areas (CRAs), conservancy lands, parklands, national forests, and agricultural preserves. The Special Management Area designation is not intended to preclude development.

More specifically, the Santa Clara River SEA passes through the Modified Project Site area and includes Castaic Creek, which traverses the VCC Planning Area, according to the Conservation and Natural Resources Element's Significant Ecological Areas and Coastal Resource Areas Policy Map. In addition, much of the Entrada South Planning Area is designated as an HMA, primarily with 25 to 50 percent slopes, with limited and intermittent areas of 50 percent or greater slopes, per the Hillside Management Areas and Ridgeline Management Map. The VCC Planning Area also includes slopes of 25 to 50 percent. No significant ridgelines are located within the Modified Project Site.

Relevant policies contained within the Conservation and Natural Resources Element that relate to SEAs and HMAs are listed below:

- **Goal C/NR-3:** Permanent, sustainable preservation of genetically and physically diverse biological resources and ecological systems, including: habitat linkages, forests, coastal zone, riparian habitats, streambeds, wetlands, woodlands, alpine habitat, chaparral, shrublands, and SEAs.
  - **Policy C/NR-3.1:** Conserve and enhance the ecological function of diverse natural habitats and biological resources.
  - **Policy C/NR-3.2:** Create and administer innovative County programs incentivizing the permanent dedication of SEAs and other important biological resources as open space areas.
  - **Policy C/NR-3.6:** Assist state and federal agencies and other agencies, as appropriate, with the preservation of special status species and their associated habitat and wildlife movement corridors through the administration of the SEAs and other programs.
  - **Policy C/NR-3.8:** Discourage development in areas with identified significant biological resources, such as SEAs.
  - **Policy C/NR 3.9:** Consider the following in the design of a project that is located within an SEA, to the greatest extent feasible:
    - Preservation of biologically valuable habitats, species, wildlife corridors and linkages;
    - Protection of sensitive resources on the site within open space;
    - Protection of water sources from hydromodification in order to maintain the ecological function of riparian habitats;

- Placement of the development in the least biologically sensitive areas on the site (prioritize the preservation or avoidance of the most sensitive biological resources onsite);
  - Design required open spaces to retain contiguous undisturbed open space that preserves the most sensitive biological resources onsite and/or serves to maintain regional connectivity;
  - Maintenance of watershed connectivity by capturing, treating, retaining, and/or infiltrating storm water flows on site; and
  - Consideration of the continuity of onsite open space with adjacent open space in project design.
- **Goal C/NR-13:** Protected visual and scenic resources.
    - **Policy C/NR-13.8:** Manage development in HMAs to protect their natural and scenic character and minimize risks from natural hazards, such as fire, flood, erosion, and landslides.
    - **Policy C/NR-13.9:** Consider the following in the design of a project that is located within an HMA, to the greatest extent feasible:
      - Public safety and the protection of hillside resources through the application of safety and conservation design standards;
      - Maintenance of large contiguous open areas that limit exposure to landslide, liquefaction and fire hazards and protect natural features, such as significant ridgelines, watercourses and SEAs.

As discussed in the Conservation and Natural Resources Element, the objective of the SEA Program is to conserve genetic and physical diversity by designating biological resource areas that are capable of sustaining themselves into the future. However, SEAs are not wilderness preserves. Much of the land in SEAs is privately-held, used for public recreation, or abuts developed areas. The General Plan goals and policies are intended to ensure that privately-held lands within the SEAs retain the right of reasonable use, while avoiding activities and developments that are incompatible with the long-term survival of the SEAs.

Many land uses may be compatible with SEAs or may partially or fully mitigate against potential impacts through careful site design and stewardship. In particular, certain residential, commercial, public and semi-public uses are considered compatible, and more complex or intensive types of developments are not precluded but may require additional technical review to ensure that projects properly identify existing resources and potential impacts. The Los Angeles County Department of Regional Planning assumes a

responsibility to assist these types of projects with site design in the early stages of planning to ensure that projects are sensitive to and compatible with the resources of the area and that the ecological function of the SEA is maintained.

Generally, complex or intensive types of developments in the SEAs require an SEA Conditional Use Permit (SEA CUP). The SEA Technical Advisory Committee (SEATAC) is an expert advisory committee that assists the Department of Regional Planning and the Los Angeles County Regional Planning Commission in assessing applications for SEA CUPs by providing recommendations on the biological analyses conducted for SEA CUPs and a project's compatibility with SEA resources.

### ***(c) Safety Element***

The General Plan Safety Element is intended to reduce the potential short and long-term risk of death, injuries, property damage, economic loss and social dislocation resulting from natural and man-made hazards. The Safety Element specifically addresses seismic and geotechnical hazards, flood and inundation hazards, fire hazards, extreme heat, sea level rise and emergency response. The Safety Element maps designate portions of the Modified Project Site as a Very High Fire Hazard Severity Zone (VHFHSZ) and the areas within and along the Santa Clara River are identified as Flood Hazard Zones. Specific policies contained within the Safety Element that relate HMAs are listed below:

- **Policy S-1.3:** Require developments to mitigate geotechnical hazards, such as soil instability and landsliding, in Hillside Management Areas through siting and development standards.
- **Policy S-4.1:** Prohibit new subdivisions in VHFHSZs unless:
  - (1) the new subdivision is generally surrounded by existing or entitled development or is located in an existing approved specific plan or is within the boundaries of a communities facility district adopted by the County prior to January 1, 2022, including any improvement areas and future annexation areas identified in the County resolution approving such district;
  - (2) the County determines there is sufficient secondary egress; and
  - (3) the County determines the adjoining major highways and street networks are sufficient for evacuation as well as safe access for emergency responders under a range of emergency scenarios, as determined by the County. Discourage new subdivisions in all other FHSZs.
- **Policy S-4.7:** Discourage building mid-slope, on ridgelines and on hilltops, and employ adequate setbacks on and below slopes to reduce risk from wildfires and post-fire, rainfall-induced landslides and debris flows

The Safety Element also incorporates by reference the All-Hazard Mitigation Plan. The All-Hazards Mitigation Plan, which has been approved by the Federal Emergency Management Agency and the California Emergency Management Agency, provides policy guidance for minimizing threats from natural and human-made hazards in the County and includes a compilation of known, historic, and projected hazards in the County.

Refer to Section 5.14 Wildfire of this Draft EIR for a discussion of Safety Element policies related to fire hazard zones that overlap with SEAs.

#### **(d) Public Services and Facilities Element**

The General Plan Public Services and Facilities Element promotes the orderly and efficient planning of public facilities and infrastructure in conjunction with land use development and growth. Services and facilities that are addressed in the Element include drinking water, sanitary sewers, solid waste, utilities, early care and education, and libraries. The Public Services and Facilities Element includes the following policy that relates to HMAs:

- **Policy PS/F-4.3:** Ensure the proper design of sewage treatment and disposal facilities, especially in landslide, hillside, and other hazard areas.

No policies within the Public Services and Facilities Element relate to SEAs.

#### **(2) Santa Clarita Valley Area Plan: *One Valley One Vision 2012***

The County has adopted a number of community-driven area plans, which are part of the General Plan and designed to more accurately address the needs of local communities and specific geographic areas throughout the County. These area plans are intended to refine and be consistent with the policies of the General Plan, as applied to a smaller geographic area, and provide the planning framework for that area while advancing the overarching policies of the General Plan.

The Santa Clarita Valley Area Plan (Area Plan): *One Valley One Vision 2012*, sometimes referred to as *OVOV*, was adopted by the County on November 27, 2012, and became effective on December 27, 2012.<sup>2</sup> The Area Plan recognizes the need to coordinate land uses and development with the provision of adequate infrastructure,

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<sup>2</sup> *The Santa Clarita Valley is defined as the area generally bounded by the Ventura County line on the west, the Los Padres and Angeles National Forest areas on the north, the Angeles National Forest on the east, and the major ridgeline separating Santa Clarita from the San Fernando Valley on the south.*



conservation of natural resources, and common objectives for the Santa Clarita Valley (Valley). The Area Plan serves as a long-term guide for development in the unincorporated Santa Clarita Valley in conjunction with the incorporated Valley areas over the next 20 years. More specifically, the Area Plan sets forth area-wide planning policies for the Valley and establishes objectives for the individual communities in the Valley. Area Plan Elements that address SEAs, HMAs, or related issues are discussed below.

**(a) Land Use Element**

The Area Plan Land Use Element guides the type, location, intensity, and density of future land uses through the Land Use Policy Map and associated land use designations. The Element also contains goals, policies, and implementation measures to ensure that new development and land uses reflect community goals, enhance quality of life, are supported by adequate services and infrastructure, ensure public safety, and conserve valuable resources.

In addition to the land use designations that guide development within the Valley, the Area Plan Land Use Policy Map identifies Significant Ecological Areas, including the Santa Clara River SEA which encompasses the Santa Clara River. Portions of the Modified Project Site fall within this SEA, specifically within the VCC Planning Area, as discussed further below. Objectives and policies set forth in the Land Use Element that relate to SEAs, HMAs, and related issues include the following:

- **Policy LU-1.3.2:** Substantially retain the integrity and natural grade elevations of significant natural ridgelines and prominent landforms that form the Valley's skyline backdrop.
- **Policy LU-1.3.3:** Discourage development on ridgelines and lands containing 50% slopes so that these areas are maintained as natural open space.
- **Policy LU-1.3.5:** Encourage flexible siting and design techniques within hillside areas in order to preserve steep slopes or other unique physical features, including density controlled development (clustering) in accordance with the provisions of the Zoning Ordinance, provided that all residential lots meet the minimum lot size requirements of a Community Standards District, where applicable.
- **Policy LU-1.3.6:** Encourage retention of natural drainage patterns and the preservation of significant riparian areas, both of which are commonly located in hillside areas.
- **Objective LU-6.1:** Maintain the natural beauty of the Santa Clarita Valley's hillsides, significant ridgelines, canyons, oak woodlands, rivers, and streams.

- **Policy LU-6.1.3:** Ensure that new development in hillside areas is designed to protect the scenic backdrop of foothills and canyons enjoyed by Santa Clarita Valley communities, through requiring compatible hillside management techniques that may include but are not limited to density-controlled development (clustering) subject to the limitations in Policy LU-1.3.5; contouring and landform grading; revegetation with native plants; limited site disturbance; avoidance of tall retaining and build-up walls; use of stepped pads; and other techniques as deemed appropriate.
- **Objective LU-7.6:** Protect natural habitats through site design where reasonable and feasible.
  - **Policy LU 7.6.4:** Encourage site designs that protect oak trees, hillsides, and biological resources through creative solutions.
- **Objective LU-7.8:** Protect significant woodlands, heritage oak trees, and other biological resources from the impacts of development.
  - **Policy LU-7.8.2:** Protect all designated Significant Ecological Areas (SEAs) from incompatible development.

***(b) Conservation and Open Space Element***

The Area Plan's Conservation and Open Space Element establishes a policy framework for the designation and long-term preservation of open space within the Valley and addresses associated uses and benefits including park and recreational facilities, wildlife habitat preservation, scenic views, water recharge and watershed protection, air quality, cultural and historical resources, property values, and community character. The defined goals, objectives, and policies relate to the following issues: responsible management of environmental systems; geological, biological, water, cultural, historic, and scenic resources; air quality and greenhouse gas (GHG) reduction; park, recreation, and trail facilities; and open space. Specific policies contained within the Area Plan Conservation and Open Space Element that relate to SEAs, HMAs, and related issues include the following.

- **Objective CO-1.5:** Manage urban development and human-built systems to minimize harm to ecosystems, watersheds, and other natural systems, such as urban runoff treatment trains that infiltrate, treat, and remove direct connections to impervious areas.
  - **Policy CO-1.5.5:** Promote concentration of urban uses within the center of the Santa Clarita Valley through incentives for infill development and rebuilding, in order to limit impacts to open space, habitats, watersheds, hillsides, and other components of the Valley's natural ecosystems.

- **Objective CO-2.2:** Preserve the Santa Clarita Valley’s prominent ridgelines and limit hillside development to protect the valuable aesthetic and visual qualities intrinsic to the Santa Clarita Valley landscape. (Guiding Principle #7)
  - **Policy CO-2.2.2:** Ensure that graded slopes in hillside areas are revegetated with native drought tolerant plants or other approved vegetation to blend manufactured slopes with adjacent natural hillsides, in consideration of fire safety and slope stability requirements.
  - **Policy CO-2.2.5:** Promote the use of adequate erosion control measures for all development in hillside areas, including single family homes and infrastructure improvements, both during and after construction.
- **Objective CO-3.2:** Identify and protect areas which have exceptional biological resource value due to a specific type of vegetation, habitat, ecosystem, or location.
  - **Policy CO-3.2.4:** Protect biological resources in the designated Significant Ecological Areas (SEAs) through the siting and design of development which is highly compatible with the SEA resources. Specific development standards shall be identified to control the types of land use, density, building location and size, roadways and other infrastructure, landscape, drainage, and other elements to assure the protection of the critical and important plant and animal habitats of each SEA. In general, the principle shall be to minimize the intrusion and impacts of development in these areas with sufficient controls to adequately protect the resources. (Guiding Principle #10)
- **Objective CO-10.1:** Identify areas throughout the Santa Clarita Valley which should be preserved as open space in order to conserve significant resources for long-term community benefit.
  - **Policy CO-10.1.3:** Through dedications and acquisitions, obtain open space needed to preserve and protect wildlife corridors and habitat, which may include land within SEA’s, wetlands, woodlands, water bodies, and areas with threatened or endangered flora and fauna.
  - **Policy CO-10.1.5:** Maintain open space corridors along canyons and ridgelines as a way of delineating and defining communities and neighborhoods, providing residents with access to natural areas, and preserving scenic beauty.

Area Plan Appendix I: Significant Ecological Area Designations provides more comprehensive descriptions of the County’s SEAs located within the Valley. The Santa Clara River SEA encompasses the entire Los Angeles County reach of the Santa Clara River, primarily within unincorporated areas of Los Angeles County. The Santa Clara River SEA covers the length of the river and with the watershed extensions encompasses a wide

variety of topographic features and habitat types. The orientation and extent of the SEA also consists of the surface and subsurface hydrology of the Santa Clara River, from its headwater tributaries and watershed basin to the point at which it exits Los Angeles County jurisdiction. More discussion of the Santa Clara River SEA is provided in **Section 5.2**, Biological Resources, of this SEIR.

### **(3) Los Angeles County Significant Ecological Areas Ordinance**

The Los Angeles County SEA Ordinance establishes regulations to conserve the unique biological and physical diversity of the natural communities found within SEAs by requiring development to be designed to avoid and minimize impacts to SEA resources. These requirements help ensure the long-term survival of the SEAs and their connectivity to regional natural resources. This ordinance regulates development within SEAs by: (1) protecting the biodiversity, unique resources, and geological formations contained in SEAs from incompatible development, as specified in the Conservation and Natural Resources Element of the General Plan; (2) ensuring that projects reduce the effects of habitat fragmentation and edge effects by providing additional technical review of existing resources, potential impacts, and required mitigations; (3) ensuring that development within a SEA conserves biological diversity, habitat quality, and connectivity to sustain species populations and their ecosystem functions into the future; and (4) directing development to be designed in a manner that considers and avoids impacts to SEA resources within the Los Angeles County region. The County's updated SEA Ordinance (County Code Section 22.14.190) became effective on January 16, 2020.

As previously indicated, the Entrada South Planning Area is not located within and does not contain any portion of an SEA. Additionally, the VCC Planning Area is exempt from the requirements of the County's SEA Ordinance pursuant to the provisions of Section 22.102.040 of that ordinance. Specifically, Section 22.102.040(D) states that development requiring renewal of previously approved discretionary permits are exempt from the SEA Ordinance if: (1) the previously approved development footprint is not expanded; and (2) impacts to biological resources were reviewed under the prior permit. As discussed in **Section 3.0**, Project Description, of this SEIR, the VCC Planning Area was originally approved for development by Los Angeles County through the issuance of various entitlements, including CUP 87-360, and certification of an EIR (SCH No. 1987-123005) in 1991. The previously approved development footprint within the VCC Planning Area would not be expanded under the Modified Project, and impacts to biological resources were evaluated in the State-certified EIR. Nonetheless, for purposes of disclosure, an analysis of the consistency of the Project with the County's more recent SEA Ordinance is included in Appendix E of the Valencia Commerce Center Project Supplemental Biological Resources Technical report included as **Appendix 5.2b** of this SEIR and summarized in **Section 5.2**, Biological Resources, of this SEIR.

#### (4) Los Angeles County Hillside Requirements

As previously indicated, much of the Modified Project Site contains hillside land, defined as mountainous and hilly areas with 25 percent slopes or greater, particularly within the Entrada South Planning Area. The County's Hillside Management Area (HMA) Ordinance (County Code Section 22.104) became effective on November 5, 2015. The HMA Ordinance and the accompanying Hillside Design Guidelines are intended to ensure "that hillside development projects use sensitive and creative engineering, architectural, and landscaping site design techniques" to preserve natural features in hillside areas.<sup>3</sup> CUPs are required for all development located wholly or partly in an HMA other than those specifically listed in the Ordinance. The HMA Ordinance outlines a detailed process for CUP applications and conditions of approval, including open space designations and project design.

The Conservation and Natural Resources Element of the General Plan also addresses hillside issues, as discussed above. The Hillside Management designation is intended to protect the character and natural resource value of hillsides, including ridgelines, and minimize hazards associated with hillside development through innovative and sensitive design.

#### b. Existing Conditions

##### (1) Modified Project Site

##### Entrada South Planning Area

As shown in **Figure 3.0-4**, Aerial Photo of the Entrada South Planning Area, in **Section 3.0**, Project Description, of this SEIR, the Entrada South Planning Area consists of approximately 382.3 acres located west of Interstate 5 (I-5) and The Old Road and predominantly south of Six Flags Magic Mountain theme park (Six Flags Magic Mountain).<sup>4</sup> The Entrada South Planning Area is generally comprised of vacant land, abandoned oil wells and associated access roads, although a recently constructed extension of Magic Mountain Parkway traverses the planning area from east to west. In addition, the southern boundary of the Entrada South Planning Area is developed with Southern California Edison electric transmission lines and towers, and a 34-inch high-

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<sup>3</sup> County Code Section 22.104, Appendix I.

<sup>4</sup> The cited acreage of the Entrada South Planning Area reflects the area of Vesting Tentative Tract Map (VTTM) 53295. In addition, two small areas totaling 2.1 acres are located outside of the tract map, along the western and southern tract map boundaries, where related improvements would occur. Collectively, these areas are referred to as the Entrada External Map Improvements area, as illustrated in **Figure 3.0-4**, Aerial Photo of the Entrada South Planning Area, in **Section 3.0**, Project Description, of this SEIR.

pressure natural gas transmission pipeline operated by the Southern California Gas Company traverses the southernmost portion of the planning area from east to west. Smaller-diameter pipelines associated with past oil field operations may also be present.

The planning area exhibits substantial topographic relief, with elevations ranging from approximately 1,000 to 1,400 feet above mean sea level (AMSL) and includes segments of four drainage courses referred to as Magic Mountain Canyon and Unnamed Canyons 1, 2, and 3, portions of which have been channelized and/or enclosed within storm drains. The Entrada South Planning Area is not located within and does not contain any portion of an SEA. It does, however, contain a significant amount of hillside lands, as described above.

Per the Area Plan, the existing land use designations within the Entrada South Planning Area are H5—Residential 5 south of Magic Mountain Parkway, CM—Major Commercial north of Magic Mountain Parkway, and OS-PR—Parks and Recreation south of the SCE electric transmission lines. The Entrada South Planning Area is currently zoned R-1—Single-Family Residence south of Magic Mountain Parkway, C-3—General Commercial north of Magic Mountain Parkway, and C-R—Commercial Recreation south of the SCE electric transmission lines.

### VCC Planning Area

As shown in **Figure 3.0-5**, Aerial Photo of the VCC Planning Area, in **Section 3.0**, Project Description, of this SEIR, the VCC Planning Area consists of approximately 328.8 acres in an undeveloped portion of the partially completed VCC industrial/business park center located west of I-5 and The Old Road, north of State Route 126 (SR-126), and east of Commerce Center Drive and the Chiquita Canyon Landfill.<sup>5</sup>

The VCC Planning Area contains areas of direct disturbance from past sand and gravel mining, cattle grazing, and agricultural operations. Limited agricultural uses still operate on a portion of the site. Also, Southern California Edison and Southern California Gas Company have distribution lines and access roads within easements on-site. The VCC Planning Area is dominated by north/south-trending ridges that lie north of Castaic Creek, near its confluence with Hasley Canyon. Site elevations range from approximately

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<sup>5</sup> *The Initial Study for the Modified Project, published in October 2021, listed the acreage of the VCC Planning Area as approximately 321 acres. However, upon subsequent filing of the parcel map with the County, the acreage was determined to be 328.8 acres. In addition, several small areas totaling 5.8 acres are located outside of the parcel map, where related infrastructure improvements (discussed below) would occur. This area is referred to as the VCC External Map Improvements area, as illustrated in **Figure 3.0-5**, Aerial Photo of the VCC Planning Area, in **Section 3.0**, Project Description, of this SEIR.*

980 feet above mean sea level in the Castaic Creek bottom to approximately 1,200 feet above mean sea level. The slopes on-site vary from steep to gentle. In addition, the Castaic Creek and Hasley Canyon wash areas within the site contain benches and braided channels with associated riparian/wash scrub vegetation. A portion of Castaic Creek within the VCC Planning Area is located within the current Santa Clara River SEA boundary.

The entire VCC Planning Area has a land use designation of IO—Industrial Office under the Area Plan and is zoned M-1.5-DP—Restricted Heavy Manufacturing with Development Program overlay.

## **(2) Surrounding Area**

The Santa Clarita Valley has experienced substantial population growth and urban development in recent years. The majority of this development is concentrated between and adjacent to I-5 and State Route 14 (SR-14), although much of the land west of I-5 has been designated for future residential, commercial, and related urban land uses in the approved Newhall Ranch Specific Plan and the County’s Area Plan. Land uses surrounding the Modified Project Site include existing residential subdivisions and commercial recreation and commercial/business park uses, combined with a variety of agricultural, oil production, and industrial uses.

More specifically, Six Flags Magic Mountain and vacant land planned for development are located directly north of the Entrada South Planning Area. The existing community of Westridge is located immediately south. The approved Mission Village community within the Newhall Ranch Specific Plan area is located immediately west of the Entrada South Planning Area and is currently under construction. The VCC Planning Area is surrounded by existing single-family residential and industrial uses to the north; existing industrial uses to the east; vacant land planned for development to the south; and the previously developed portions of the VCC industrial/business park as well as Chiquita Canyon Landfill to the west.

In addition, the City of Santa Clarita is located to the east and is separated from the Modified Project Site by The Old Road and I-5. The planned communities associated with the Newhall Ranch Specific Plan are located to the west.

## **3. SUMMARY OF IMPACTS FOR THE 2017 PROJECT**

### **Entrada South and VCC Planning Areas**

Section 4.14, Land Use, of the State-certified EIR analyzed impacts related to land use and planning resulting from the development of the Entrada South and VCC Planning Areas. The State-certified EIR determined that impacts related to the division of an

established community and conflicts with an applicable habitat conservation plan or natural community conservation plan would be less than significant. However, the State-certified EIR determined a significant and unavoidable project-level impact associated with conflicts with an applicable land use plan, policy, or regulation would occur due to establishment of a spineflower preserve in the Entrada South Planning Area, which would conflict with the site's then-existing agricultural zoning. This impact was acknowledged to be temporary pending the County's approval of a zone change but was nonetheless concluded to be significant and unavoidable as implementation of the zone change was beyond the control of the Applicant. No feasible mitigation was identified. However, this impact no longer exists because the agricultural zoning for the Entrada South Planning Area was removed by the Area Plan and the southern portion of Entrada South Planning Area is now zoned R-1 and C-R.<sup>6</sup> Furthermore, the State-certified EIR determined cumulative land use impacts to be less than significant.

The State-certified EIR determined all land use impacts associated with development of the VCC Planning Area would be less than significant, and no mitigation was required.

The State-certified EIR did not specifically address conflicts with SEA or HMA policies within the land use analysis, although associated impacts to biological resources were addressed in Section 4.5, Biological Resources; impacts related to grading and slope stability were addressed in Section 4.13, Geology and Geologic Resources; and visual impacts related to landform alteration were addressed in Section 4.15, Visual Resources.

#### **4. REGULATORY REQUIREMENTS AND PROJECT DESIGN FEATURES**

##### **a. Regulatory Compliance Measures**

In regard to biological resources and earthwork activities, the Modified Project shall comply with the following regulatory requirements:

- The Modified Project's design shall comply with and carry out the resource conservation, management, and permitting responsibilities associated with the approved Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan (RMDP/SCP), including establishment of a Spineflower Conservation Area within the Entrada South Planning Area.
- The Modified Project shall comply with all applicable building codes and standards, as well as the engineering recommendations set forth in the final

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<sup>6</sup> *County of Los Angeles, Santa Clarita Valley Area Plan: One Valley One Vision, 2012.*



Geotechnical Reports approved by the County Department of Public Works. In particular, all former landslides and surficial slope failures on-site shall be removed or partially removed, and slopes shall be stabilized, as needed. Graded slopes shall be planted and irrigated in conformance with the County's grading and erosion control requirements. Prior to issuance of a grading permit, the Project Applicant shall submit a grading plan to the Public Works Soils Section for verification of compliance with applicable County codes and policies, including grading requirements set forth in County Code Title 26.

Additional measures related to compliance with National Pollutant Discharge Elimination System (NPDES) permit requirements and implementation of Best Management Practices (BMPs) to reduce erosion and pollutants in stormwater discharges are discussed in **Section 5.6**, Hydrology and Water Quality—Water Quality, of this SEIR.

#### **b. Project Design Features**

No specific project design features are proposed with regard to land use.

#### **c. Relevant Modified Project Characteristics**

To accommodate the proposed development, the Applicant has submitted a request to change the existing R-1 (Single-Family Residence) zoning in the Entrada South Planning Area to MXD (Mixed-Use Development) zoning. Consistent with County Code Section 22.26.030, the MXD zone allows for a mixture of residential, commercial, and limited light industrial uses and buildings located in close proximity to transit. The MXD zone integrates a wide range of housing densities with community-serving commercial uses. The portions of the Entrada South Planning Area zoned C-3 (General Commercial) and C-R (Commercial Recreation) would remain unchanged.

The existing R-1 zone was adopted for the Entrada South Planning Area in 2012 and reflects the H5 (Residential 5) land use designation set forth by the Area Plan. The H5 land use designation permits residential development of up to five units per acre. In addition, supportive commercial and institutional uses serving the local area are permitted subject to a zone change to the appropriate designation.

The existing R-1 zone limits residential and commercial use types and development flexibility, such as clustering which helps concentrate development in less environmentally sensitive areas and promotes the provision of open space. In contrast, the MXD zoning designation would support development of a sustainable project that incorporates smart growth concepts and includes implementation of the Modified Project's Transportation Demand Management (TDM) Program and net-zero GHG commitment (discussed in **Section 5.9**, Transportation, and **Section 5.1**, Air Quality, of this SEIR, respectively), while

maintaining consistency with the H5 land use designation. The MXD zone is appropriate for the H5 land use designation given the integrated nature of Entrada South Planning Area with the adjacent Mission Village community (under construction), the other neighboring planned communities addressed in the TDM Program, and the proximity of the Entrada South Planning Area to existing and planned future transit stations/hubs. Specifically, the Entrada South Planning Area is located approximately 1.14 miles west of the existing McBean Regional Transit Center and near a central mobility hub planned as part of the Mission Village development. The TDM Program was analyzed in the State-certified EIR and contemplated the interconnected nature of the communities planned in and around the Modified Project Site, including those within the Newhall Ranch Specific Plan area, for purposes of facilitating alternative modes of transit and reducing vehicle trips. The proposed MXD zone would allow the development of 1,574 dwelling units and 730,000 square feet of non-residential development within the Entrada South Planning Area, consistent with the permitted H5 and C-3 densities and in close proximity to transit stations, while preserving natural open space and slopes on-site and enhancing walkability. These enhancements and the associated public and environmental benefits are consistent with a zone change in the Entrada South Planning Area from R-1 to MXD. In addition, the Zone Change would be consistent with the General Plan and the Area Plan, including the site's current H5 land use designation.

As it relates to earthwork, the Modified Project would involve balanced cut and fill operations. Total earthwork (i.e., moving soil from one on-site location to another) is estimated to include approximately 6.5 million cubic yards within the Entrada South Planning Area and approximately 3.5 million cubic yards within the VCC Planning Area.

## 5. THRESHOLDS OF SIGNIFICANCE

Based on Appendix G of the CEQA Guidelines and other relevant criteria, the Los Angeles County Department of Regional Planning has determined that a project would have a significant impact related to land use based on the following criteria:

**Threshold 5.7-1:** Would the Project physically divide an established community?

**Threshold 5.7-2:** Would the Project cause a significant environmental impact due to a conflict with any County land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

**Threshold 5.7-3:** Would the Project conflict with goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas?

As discussed in the Initial Study prepared for the Modified Project, provided in **Appendix 1** of this SEIR, the Modified Project would result in less than significant impacts related to the physical division of an established community or conflicts with any County land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, no further discussion of Thresholds 5.7-1 and 5.7-2 is provided.

## 6. ENVIRONMENTAL IMPACTS OF THE MODIFIED PROJECT

### a. Methodology

The analysis of land use impacts considers the consistency of the Modified Project's consistency with applicable General Plan and Area Plan goals, objectives, and policies related to SEAs and HMAs that regulate land use on the Project Site.

The emphasis of the analysis is on inconsistency and potential conflicts between the Modified Project and existing applicable planning documents related to SEAs and HMAs, and whether any inconsistencies would cause a significant environmental effect. The Modified Project is considered consistent with the provisions of these planning documents if it meets the general intent of the applicable planning document. A given project need not be in perfect conformity with each and every policy nor does state law require precise conformity of a proposed project with every policy or land use designation. *Sequoyah Hills Homeowners Association v. City of Oakland* (1993) 23 Cal.App. 4<sup>th</sup> 704. Courts have also acknowledged that "general and specific plans attempt to balance a range of competing interests. It follows that it is nearly, if not absolutely, impossible for a project to be in perfect conformity with each and every policy set forth in the applicable plan." *Sierra Club v. County of Napa* (2004) 121 Cal.App.4<sup>th</sup> 1490, 1510-1511. For an impact to be considered significant, any inconsistency would also have to result in a significant adverse change in the environmental not already addressed in the other resource chapters of this SEIR.

### b. Project Impacts

**Threshold 5.9-3:** Would the Project conflict with goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas?

## (1) Hillside Management Areas

### (a) *Entrada South and VCC Planning Areas*<sup>7</sup>

As discussed in the Initial Study prepared for the Modified Project, included as **Appendix 1** of the SEIR, the Modified Project would not conflict with the Hillside Management Area Ordinance, which establishes regulations related to hillside management.

As previously indicated, much of the Entrada South and VCC Planning Areas contain hillside land. While most of these areas consist of 25 to 50 percent slopes, there are limited and intermittent areas with 50 percent or greater slopes. As prescribed in the Hillside Management Area Ordinance, CUPs for hillside development are required for each planning area. Specifically, proposed CUP 00-210 for the Entrada South Planning Area requests development in an HMA, while all future development within the VCC Planning Area must comply with existing CUP 87-360 and the associated design provisions approved by the County in 1991. Per the *Findings of the Board of Supervisors and Order* (Findings) for CUP 87-360, the VCC Planning Area was depicted within the Non-urban and Industrial categories of the countywide General Plan and within the Hillside Management, Commercial, and Industry categories of the then-current Santa Clarita Valley Areawide Plan. The Board of Supervisors concurrently considered and approved a local plan amendment re-designating the land use categories on portions of the VCC site to Industrial and Hillside Management. Per the *Resolution of the Board of Supervisors of the County of Los Angeles Relating to the Adoption of an Amendment to the Santa Clarita Valley Areawide General Plan* (Resolution), the VCC Project “[e]ncourages the efficient use of land through a more concentrated pattern of urban development, including the focusing of new urban growth into areas of suitable land” and “the potentially significant impacts of Geotechnical, Flood Hazard, Natural Resources and open space impacts will be reduced to levels of insignificance.” Based on the above, because hillside management has already been included as part of the approved CUP, further detailed analysis of HMAs within the VCC Planning Area is not required. As such, the discussion below primarily focuses on the Entrada South Planning Area, though aspects of the Modified Project relevant to the VCC Planning Area are included for informational purposes.

Furthermore, **Table 5.7-2**, Applicable Goals, Objectives, and Policies Related to HMAs, on page 5.7-21 provides an analysis of the Project’s consistency with relevant General Plan and Area Plan goals, objectives, and policies related to HMAs. As discussed therein, the Modified Project represents clustered development in an area with existing

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<sup>7</sup> Where impacts associated with both planning areas are similar or identical, the analysis has been combined to reduce redundancy.

**Table 5.7-2  
Applicable Goals, Objectives, and Policies Related to HMAs**

Objective/Policy	Consistency Evaluation
<b>Los Angeles County General Plan 2035 Conservation and Natural Resources Element</b>	
<p><b>Goal C/NR 13:</b> Protected visual and scenic resources.</p> <p><b>Policy C/NR 13.8:</b> Manage development in HMAs to protect their natural and scenic character and minimize risks from natural hazards, such as fire, flood, erosion, and landslides.</p> <p><b>Policy C/NR 13.9:</b> Consider the following in the design of a project that is located within an HMA, to the greatest extent feasible:</p> <ul style="list-style-type: none"> <li>• Public safety and the protection of hillside resources through the application of safety and conservation design standards;</li> <li>• Maintenance of large contiguous open areas that limit exposure to landslide, liquefaction and fire hazards and protect natural features, such as significant ridgelines, watercourses and SEAs.</li> </ul>	<p><b>Consistent.</b> With regard to protecting the natural and scenic character of HMAs, graded slopes would be revegetated with native, drought-tolerant plants or other approved vegetation to blend with adjacent natural hillsides. Open space areas, including Unnamed Canyon 2 and the Spineflower Preserve within the Entrada South Planning Area and Castaic and Hasley Creeks in the VCC Planning Area, would be maintained to preserve scenic character. The proposed development also incorporates a cluster development approach to preserve a larger portion of the site as open space. Additionally, the Modified Project would not impact any prominent ridgelines identified in the Area Plan.</p> <p>With regard to risk minimization, in accordance with the Hillside Management Area Ordinance, impacts associated with natural hazards, such as erosion, liquefaction and slope stability, would be less than significant with implementation of mitigation (see the Geotechnical Memo included in Appendix IS-3 of the Initial Study and applicable analysis in the State-certified EIR). Furthermore, as evaluated in Section 5.5, Hydrology, and Section 5.14, Wildfire, of this SEIR, as well as in the Initial Study prepared for the Project and attached as Appendix A of this SEIR, the Modified Project would account for risks from natural hazards, such as fires, and floods. Furthermore, the Modified Project is subject to the applicable mitigation measures and project design features identified in the State-certified EIR and VCC CUP EIR, as well as additional mitigation measures and project design features identified in this Supplemental EIR, to reduce impacts related to natural hazards (see Executive Summary for additional discussion).</p> <p>With respect to watercourses and SEAs, the Modified Project would enhance and restore portions of the drainage channel referred to as Unnamed Canyon 2 within the Entrada South Planning Area, thus reducing permanent impacts to biological resources and jurisdictional waters and providing additional open space within the developed portions of the Modified Project Site. Within the VCC Planning Area, the Modified Project would provide increased environmental protections to wetlands and related biological resources by reducing permanent impacts to Hasley Creek and Castaic Creek. As with the Entrada South Planning Area, this environmentally beneficial modification would result in increased open space, restored drainage areas, and habitat for species for the VCC Planning Area.</p>

**Table 5.7-2 (Continued)  
Applicable Goals, Objectives, and Policies Related to HMAs**

Objective/Policy	Consistency Evaluation
	<p>In addition, as stated previously, the Modified Project’s proposed uses are consistent with the land use designations from the Area Plan, which allow for residential and commercial development in the Entrada South Planning Area and light industrial uses within the VCC Planning Area, and therefore are consistent with the Area Plan’s comprehensive approach for protecting the region’s visual and scenic resources as well as maintaining large areas of open space (i.e., the Spineflower Preserve).</p> <p>Accordingly, the Modified Project as a whole is consistent with Goal C/NR 13, Policy C/NR 13.8, and Policy C/NR 13.9 related development with the HMAs.</p>
<b>Los Angeles County General Plan 2035 Safety Element</b>	
<p><b>Policy S 1.3:</b> Require developments to mitigate geotechnical hazards, such as soil instability and landsliding, in Hillside Management Areas through siting and development standards.</p>	<p><b>Consistent.</b> See discussion with regard to Policy C/NR 13.8 and Policy C/NR 13.9.</p>
<p><b>Policy S 4.1:</b> Prohibit new subdivisions in VHFHSZs unless:</p> <p>(1) the new subdivision is generally surrounded by existing or entitled development or is located in an existing approved specific plan or is within the boundaries of a communities facility district adopted by the County prior to January 1, 2022, including any improvement areas and future annexation areas identified in the County resolution approving such district; (2) the County determines there is sufficient secondary egress; and (3) the County determines the adjoining major highways and street networks are sufficient for evacuation as well as safe access for emergency responders under a range of emergency scenarios, as determined by the County. Discourage new subdivisions in all other FHSZs.</p>	<p><b>Consistent.</b> The Modified Project Site is located in a VHFHSZ; however, the Modified Project is consistent with Safety Element Policy S 4.1 because the Modified Project is located within Los Angeles County Community Facilities District #3 (Valencia/Newhall Area), consistent with the first factor. The Modified Project Site’s multiple ingress/egress roads that intersect off site primary and major transportation routes, including I-5 and SR-126, is consistent with the second factor. Finally, with respect to the third factor, the State-certified EIR determined that the 2017 Approved Project would have a less than significant impact on adopted emergency response plans and emergency evacuation plans based and the analysis in Section 5.14 and the Evacuation Plan included as Appendix 5.14b demonstrates that the Modified Project would not cause a new significant impact, or substantially increase the severity of a previously analyzed impact related to evacuation or emergency response.</p>
<p><b>Policy S 4.7:</b> Discourage building mid-slope, on ridgelines and on hilltops, and employ adequate setbacks on and below slopes to reduce risk from wildfires and post-fire, rainfall-induced landslides and debris flows.</p>	<p><b>Consistent.</b> Areas containing slopes are located within the Entrada South Planning Area. Building pads would be stepped to address risks related to erosion, landslides, debris flow and other hazards. As evaluated in Section 5.5, Hydrology, and Section 5.14, Wildfire, of this SEIR, as well as in the Initial Study prepared for the Project and attached as Appendix A of this SEIR, the Modified Project would address risks from natural hazards, such as wildfires and post-fire, rainfall-induced landslides and</p>

**Table 5.7-2 (Continued)**  
**Applicable Goals, Objectives, and Policies Related to HMAs**

Objective/Policy	Consistency Evaluation
	debris flows.
<b>Los Angeles County General Plan 2035 Public Services and Facilities Element</b>	
<b>Policy PS/F 4.3:</b> Ensure the proper design of sewage treatment and disposal facilities, especially in landslide, hillside, and other hazard areas.	<b>Consistent.</b> All necessary permits, agreements, and approvals would be obtained as part of the Modified Project, thus ensuring the proper design of the wastewater conveyance systems on-site.
<b>Santa Clarita Valley Area Plan: One Valley One Vision 2012 Land Use Element</b>	
<b>Policy LU-1.3.2:</b> Substantially retain the integrity and natural grade elevations of significant natural ridgelines and prominent landforms that form the Valley's skyline backdrop.	<b>Consistent.</b> The Modified Project would not impact significant natural ridgelines identified in the Area Plan or any of the prominent landforms that form the Valley's skyline.
<b>Policy LU-1.3.3:</b> Discourage development on ridgelines and lands containing 50% slopes so that these areas are maintained as natural open space.	<b>Partially Consistent.</b> The Modified Project would not impact any significant ridgelines identified in the Area Plan. As with the 2017 Project, while development would occur within portions of the Entrada South Planning Area that contain 50 percent or greater slopes (i.e., approximately 50.4 acres out of 314.7 acres to be developed), open space areas would be preserved along the southern portion of Entrada South and thus the project would apply a clustered design approach to reduce development impacts. Furthermore, the Modified Project is consistent with the Area Plan, which designates the majority of the Entrada South Planning Area, including areas with 50 percent or greater slopes, for residential and commercial land uses (H5 and CM, respectively). Furthermore, as discussed in the consistency analyses for Policies LU-1.3.5, LU-1.3.6, and LU-6.1.3 and CO-2.2.2, CO-2.2.5, and CO-10.1.5 below, the Modified Project would not conflict with other policies related to hillside development. Lastly, although some development within the Entrada South Planning Area will occur on slopes greater than 50% as stated above, the Modified Project is consistent with the Area Plan's land use designations, which accounted for the allocation of uses within the area to project open space and hillside areas, while applying a clustered design approach and providing onsite open space areas.
<b>Policy LU-1.3.5:</b> Encourage flexible siting and design techniques within hillside areas in order to preserve steep slopes or other unique physical features, including density controlled development (clustering) in accordance with the provisions of the Zoning Ordinance, provided that all residential lots meet the minimum lot size requirements of a Community Standards	<b>Consistent.</b> The Modified Project represents clustered development and building pads would be stepped, new uses would be clustered on-site, and open space areas would be provided throughout the site.

**Table 5.7-2 (Continued)**  
**Applicable Goals, Objectives, and Policies Related to HMAs**

Objective/Policy	Consistency Evaluation
District, where applicable.	
<p><b>Policy LU-1.3.6:</b> Encourage retention of natural drainage patterns and the preservation of significant riparian areas, both of which are commonly located in hillside areas.</p>	<p><b>Consistent.</b> The Modified Project includes the enhancement and restoration of portions of the Unnamed Canyon 2 drainage channel within the Entrada South Planning Area. In addition within the VCC Planning Area, the Modified Project would provide increased environmental protections to wetlands and related biological resources by reducing permanent impacts to Hasley Creek and Castaic Creek. The Modified Project would also implement hydromodification control BMPs during the post development (operational) phase in order to retain the natural drainage patterns and would not result in new hydromodification impacts to the water courses on-site, as discussed in Section 5.5, Hydrology and Water Quality—Hydrology, and Section 5.6, Hydrology and Water Quality—Water Quality, of this SEIR.</p>
<p><b>Objective LU-6.1:</b> Maintain the natural beauty of the Santa Clarita Valley’s hillsides, significant ridgelines, canyons, oak woodlands, rivers, and streams.</p> <p><b>Policy LU-6.1.3:</b> Ensure that new development in hillside areas is designed to protect the scenic backdrop of foothills and canyons enjoyed by Santa Clarita Valley communities, through requiring compatible hillside management techniques that may include but are not limited to density-controlled development (clustering) subject to the limitations in Policy LU 1.3.5; contouring and landform grading; revegetation with native plants; limited site disturbance; avoidance of tall retaining and build-up walls; use of stepped pads; and other techniques as deemed appropriate.</p>	<p><b>Consistent.</b> See discussion of LU-1.3.5 regarding the design of the Project and discussion of Policy C/NR 13.8 and Policy C/NR 13.9 regarding protecting the scenic and visual qualities of the area. Specifically, building pads would be stepped, new uses would be clustered on-site, and open space areas would be provided throughout the site. Graded slopes would be revegetated with native, drought-tolerant, or other approved vegetation to blend with adjacent natural hillsides. Furthermore, the Modified Project would not impact significant ridgelines or any of the prominent landforms that form the Valley’s skyline.</p>
<p><b>Policy LU-7.6.4:</b> Encourage site designs that protect oak trees, hillsides, and biological resources through creative solutions.</p>	<p><b>Consistent.</b> While the Modified Project would result in the removal of Oak Trees, the design of the Modified Project has reduced the number of Oak Trees to be removed when compared with the 2017 Project. In addition, as discussed in detail in Section 5.2, Biological Resources, of this SEIR, mitigation measures would continue to be implemented to ensure construction avoidance of preserved Oak Trees and require replacement of Oak Trees at specified ratios. These mitigation measures would reduce impacts to Oak Trees to less than significant levels. In addition, as part of the Modified Project, building pads would be stepped, new uses would be clustered on-site, and open space areas</p>



**Table 5.7-2 (Continued)  
Applicable Goals, Objectives, and Policies Related to HMAs**

Objective/Policy	Consistency Evaluation
	<p>would be provided throughout the site. The Modified Project also includes the enhancement and restoration of portions of the Unnamed Canyon 2 drainage channel. The modified channel design would reduce permanent impacts to biological resources and jurisdictional waters and provide additional open space within the developed portions of the Entrada South Planning Area. Overall, the proposed design elements would help to protect hillsides and biological resources.</p>
<p><b>Santa Clarita Valley Area Plan: One Valley One Vision 2012 Conservation and Open Space Element</b></p>	
<p><b>Objective CO-2.2:</b> Preserve the Santa Clarita Valley’s prominent ridgelines and limit hillside development to protect the valuable aesthetic and visual qualities intrinsic to the Santa Clarita Valley landscape. (Guiding Principle #7)</p> <p><b>Policy CO-2.2.2:</b> Ensure that graded slopes in hillside areas are revegetated with native drought tolerant plants or other approved vegetation to blend manufactured slopes with adjacent natural hillsides, in consideration of fire safety and slope stability requirements.</p>	<p><b>Consistent.</b> Graded slopes would be revegetated with native, drought-tolerant, or other approved vegetation to blend manufactured slopes with adjacent natural hillsides. Furthermore, the Modified Project would not impact prominent ridgelines identified in the Area Plan. Also refer to the consistency analysis for Policy LU-6.1.3, above.</p>
<p><b>Policy CO-2.2.5:</b> Promote the use of adequate erosion control measures for all development in hillside areas, including single family homes and infrastructure improvements, both during and after construction.</p>	<p><b>Consistent.</b> As evaluated in the Initial Study and Geotechnical Memo included as Appendix 1 of this SEIR, the Modified Project would implement erosion control measures to reduce impact to less than significant levels both during and after construction.</p>
<p><b>Policy CO-10.1.5:</b> Maintain open space corridors along canyons and ridgelines as a way of delineating and defining communities and neighborhoods, providing residents with access to natural areas, and preserving scenic beauty.</p>	<p><b>Consistent.</b> See discussion of LU-1.3.5 regarding the design of the Project and discussion of Policy C/NR 13.8 and Policy C/NR 13.9 regarding protecting the scenic and visual qualities of the area. The Modified Project includes the enhancement and restoration of portions of the Unnamed Canyon 2 drainage channel. The modified channel would be restored as a natural, open, vegetated drainage channel with grade control structures that would generally retain the look and feel of a natural drainage, thus reducing permanent impacts to biological resources and jurisdictional waters and providing additional open space within the developed portions of the Modified Project site. This environmentally beneficial modification would result in increased open space, restored drainage areas, and increased habitat for species as compared to the impacts evaluated in the State-certified EIR. In addition, the Modified Project would not impact significant ridgelines identified in the Area Plan.</p>
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**Table 5.7-2 (Continued)**  
**Applicable Goals, Objectives, and Policies Related to HMAs**

Objective/Policy	Consistency Evaluation
<i>Source: Eyestone Environmental, 2024.</i>	

uses and the proposed uses are consistent with the Area Plan's land use designations. The Modified Project would not involve development within a significant ridgeline, as none are located on-site, and the Modified Project would address risks from natural hazards such as fire, flood, erosion, and landslides. In addition, the Modified Project would enhance and restore portions of the drainage channel referred to as Unnamed Canyon 2 within the Entrada South Planning Area. This modification would result in increased open space, restored drainage areas, and habitat for species as compared to the 2017 Project evaluated in the State-certified EIR. Additionally, as with the 2017 Project, while development would occur within portions of the Entrada South Planning Area that contain 50 percent or greater slopes (i.e., approximately 50.4 acres out of 314.7 acres to be developed), proposed development incorporates a clustering approach that would preserve a larger portion of the site as natural open space and maintain the undeveloped slopes in accordance with hillside management policies. The Modified Project would also comply with the Subdivision Access Standards, included in County Code Title 21, Ch. 21.24, which provide specific regulations related to secondary evacuation access for subdivisions. Thus, as discussed in **Table 5.7-2**, Applicable Goals, Objectives, and Policies Related to HMAs, the Modified Project as a whole would be consistent with applicable goals, objectives, and policies related to HMAs.

Additionally, although not applicable to individual projects, the County's All Hazards Mitigation Plan provides policy guidance for minimizing threats from natural and human-made hazards in the County and includes a compilation of known, historic, and projected hazards in the County. Many of the provisions of the All Hazards Mitigation Plan are applicable to lands located in HMAs. Chapter 5 of the All Hazards Mitigation Plan includes potential actions and projects to help achieve the goals of the plan. These include, but are not limited to, a public outreach campaign for red flag warnings; vegetation management programs; fireproofing critical facilities in VHFHSZs; watershed ecosystem restoration; green streets/living streets; brush clearance programs; and development of community wildfire protection plans. The Modified Project would not conflict with, and in many cases would support, implementation of these actions and projects. For example the Modified Project includes a detailed Construction Fire Prevention Plan and combustible materials management during construction (see Project Design Features PDF-WF-1 and PDF-WF-2); vegetation management and fuel modification measures (see Project Design Features PDF-WF-3 and PDF-WF-4); and preparation of a comprehensive Fire Protection Plan and Wildfire Evacuation Plan (see Project Design Features PDF-WF-5 and

PDF-WF-6). Thus, the Modified Project would be consistent with the relevant provisions of the All Hazards Mitigation Plan.

Based on the above, the Modified Project is consistent with the applicable goals, objectives, and policies of the General Plan and Area Plan related to Hillside Management Areas and the Modified Project would not result in any new or substantially more severe significant impacts related to HMAs as compared to those of the 2017 Project evaluated in the State-certified EIR.

## **(2) Significant Ecological Areas**

### ***(a) Entrada South Planning Area***

As previously discussed, the Entrada South Planning Area does not contain any portion of an SEA. Therefore, Modified Project development within the Entrada South Planning Area would not conflict with the applicable SEA goals, objectives, and policies set forth in the General Plan.

### ***(b) VCC Planning Area***

As indicated earlier, the Santa Clara River SEA passes through the Modified Project Site area and includes the portion of Castaic Creek within the VCC Planning Area. As discussed above and in **Section 5.2**, Biological Resources, of this SEIR, the Modified Project is exempt from the requirements of the County's SEA Ordinance pursuant to the provisions of Section 22.102.040 of that ordinance. Specifically, Section 22.102.040(D) states that development requiring renewal of previously approved discretionary permits are exempt from the SEA Ordinance if: (1) the previously approved development footprint is not expanded; and (2) impacts to biological resources were reviewed under the prior permit. As discussed in **Section 3.0**, Project Description, of this SEIR, the VCC Planning Area was originally approved for development by Los Angeles County through the issuance of various entitlements, including CUP 87-360 and certification of an EIR (SCH No. 1987-123005) in 1991. Additionally, the previously approved development footprint for the VCC Planning Area would not be expanded under the Modified Project. As such, the Modified Project is exempt from the SEA Ordinance. Nonetheless, for purposes of disclosure, an analysis of the consistency of the Project with the County's more recent SEA Ordinance is included in Appendix E of the Valencia Commerce Center Project Supplemental Biological Resources Technical Report included as **Appendix 5.2b** of this SEIR and summarized in Section 5.2, Biological Resources, of this SEIR.

In addition, the only proposed changes and refinements within the VCC Planning Area compared to the 2017 Project are comprised of additional environmental protections. Specifically, as previously discussed, the Modified Project would provide increased

environmental protections to wetlands and related biological resources by reducing permanent impacts to Hasley Creek and Castaic Creek. Although these areas may be temporarily impacted during construction, as analyzed in the State-certified EIR, they would be restored and revegetated after construction based on the Modified Project design, thereby reducing permanent impacts to certain vegetation communities and jurisdictional stream habitat. This modification would result in increased open space, restored drainage areas, and habitat for species.

An analysis of the Project's consistency with General Plan and Area Plan goals, objectives, and policies related to SEAs is provided in **Table 5.7-3**, Applicable Goals, Objectives, and Policies Related to SEAs, on page 5.7-29. As discussed therein, the Modified Project represents infill development within a partially urbanized area of the Valley, and substantial open space would be retained and enhanced, including approximately 130 acres within the Entrada South Planning Area and a total of 198.8 acres of open space within the VCC Planning Area, of which approximately 157 acres would be natural areas within Hasley and Castaic Creeks. In addition, as discussed in detail in **Section 5.2**, Biological Resources, of this SEIR the Modified Project would not result in any new or more severe significant impacts to biological resources as compared to the 2017 Project. Specifically, the Modified Project would preserve and enhance biological resources and ecological systems on-site and the Modified Project would provide increased environmental protections to wetlands and related biological resources by reducing permanent impacts to Hasley Creek and Castaic Creek. Furthermore, as detailed in Section 5.2, Biological Resources, of this SEIR, the Project includes numerous design features to preserve and enhance the biological resources and ecological systems associated with the Santa Clara River SEA (e.g., hydromodification control BMPs, protective fencing, etc.). As such, the Modified Project would support General Plan Goal LU 3, Policy LU 3.1, Goal C/NR 3, Policy C/NR 3.8, Policy C/NR 3.9, and Area Plan Policy LU-7.8.2, Objective.

Based on the above, the Modified Project is consistent with goals, objectives, and policies of the General Plan and Area Plan related to Significant Ecological Areas. Impacts would be less than significant.

### **(3) Conclusion**

The Modified Project would not conflict with the applicable General Plan and Area Plan goals, objectives, and policies related to HMAs or SEAs. Impacts would be less than significant. Therefore, the Modified Project would not result in any new or substantially more severe significant impacts related to HMAs and SEAs as compared to those identified in the State-certified EIR for the 2017 Project.

**Table 5.7-3  
Applicable Goals, Objectives, and Policies Related to SEAs**

Objective/Policy	Consistency Evaluation
<b>Los Angeles County General Plan 2035 Land Use Element</b>	
<p><b>Goal LU 3:</b> A development pattern that discourages sprawl, and protects and conserves areas with natural resources and SEAs.</p> <p><b>Policy LU 3.1:</b> Encourage the protection and conservation of areas with natural resources, and SEAs.</p>	<p><b>Consistent.</b> A portion of Castaic Creek within the VCC Planning Area is located within the current Santa Clara River SEA boundary. The Modified Project represents residential, commercial, and light industrial development within a partially urbanized area of the Valley, and substantial open space would be retained and enhanced, including a total of 198.8 acres of open space within the VCC Planning Area, of which approximately 157 acres would be natural areas within Hasley and Castaic Creeks. When compared with the 2017 Project, the Modified Project would provide increased environmental protections to wetlands and related biological resources by reducing permanent impacts to Hasley Creek and Castaic Creek. Although these areas may be temporarily impacted during construction, as analyzed in the State-certified EIR, they would be restored and revegetated after construction based on the Modified Project design, thereby reducing permanent impacts to certain vegetation communities and jurisdictional stream habitat. This environmentally beneficial modification would result in increased open space, restored drainage areas, and habitat for species Refer to Section 5.2, Biological Resources, of this SEIR for further details of how the Modified Project would preserve and enhance the biological resources and ecological systems on-site, including those associated with the Santa Clara River SEA.</p>
<b>Los Angeles County General Plan 2035 Conservation and Natural Resources Element</b>	
<p><b>Goal C/NR 3:</b> Permanent, sustainable preservation of genetically and physically diverse biological resources and ecological systems, including: habitat linkages, forests, coastal zone, riparian habitats, streambeds, wetlands, woodlands, alpine habitat, chaparral, shrublands, and SEAs.</p> <p><b>Policy C/NR-3.1:</b> Conserve and enhance the ecological function of diverse natural habitats and biological resources.</p> <p><b>Policy C/NR-3.2:</b> Create and administer innovative County programs incentivizing the permanent dedication of SEAs and other important biological resources as open space areas.</p> <p><b>Policy C/NR-3.6:</b> Assist state and federal agencies and other agencies, as appropriate, with the preservation of special status species</p>	<p><b>Consistent.</b> With regard to SEAs and protection of biological resources, refer to the discussion for Goal LU 3 and Policy LU 3.1, above and Section 5.2 Biological Resources of this SEIR.</p>

**Table 5.7-3 (Continued)  
Applicable Goals, Objectives, and Policies Related to SEAs**

Objective/Policy	Consistency Evaluation
and their associated habitat and wildlife movement corridors through the administration of the SEAs and other programs.	
<b>Policy C/NR 3.8:</b> Discourage development in areas with identified significant biological resources, such as SEAs.	<b>Consistent.</b> See discussion with regard to Goal LU 3 and Policy LU 3.1, above and Section 5.2 Biological Resources of this SEIR.
<p><b>Policy C/NR 3.9:</b> Consider the following in the design of a project that is located within an SEA, to the greatest extent feasible:</p> <ul style="list-style-type: none"> <li>• Preservation of biologically valuable habitats, species, wildlife corridors and linkages;</li> <li>• Protection of sensitive resources on the site within open space;</li> <li>• Protection of water sources from hydromodification in order to maintain the ecological function of riparian habitats;</li> <li>• Placement of the development in the least biologically sensitive areas on the site (prioritize the preservation or avoidance of the most sensitive biological resources onsite);</li> <li>• Design required open spaces to retain contiguous undisturbed open space that preserves the most sensitive biological resources onsite and/or serves to maintain regional connectivity;</li> <li>• Maintenance of watershed connectivity by capturing, treating, retaining, and/or infiltrating storm water flows on site; and</li> <li>• Consideration of the continuity of onsite open space with adjacent open space in project design.</li> </ul>	<b>Consistent.</b> See discussion above for Goal LU 3 and Policy LU 3.1. In addition, the Modified Project would implement hydromodification control BMPs during the post development (operational) phase and would not result in new hydromodification impacts to the water courses on-site, as discussed in Section 5.5, Hydrology and Water Quality—Hydrology, and Section 5.6, Hydrology and Water Quality—Water Quality, of this SEIR. Also refer to Section 5.2 Biological Resources for the additional design features that would be implemented as part of the Modified Project to preserve and enhance the SEA.
<b>Santa Clarita Valley Area Plan: One Valley One Vision 2012 Land Use Element</b>	
<p><b>Objective LU 7.8:</b> Protect significant woodlands, heritage oak trees, and other biological resources from the impacts of development.</p> <p><b>Policy LU-7.8.2:</b> Protect all designated Significant Ecological Areas (SEAs) from incompatible development.</p>	<b>Consistent.</b> A portion of Castaic Creek within the VCC Planning Area is located within the current Santa Clara River SEA boundary. The Modified Project represents commercial, residential, and light industrial development within a partially urbanized area of the Valley, and substantial open space would be retained and enhanced, including a total of 198.8 acres of open space within the VCC Planning Area, of which approximately 157 acres would be natural areas within Hasley and Castaic Creeks. When compared with the 2017 Project, the Modified Project would provide increased environmental protections to wetlands and related biological resources by reducing permanent impacts to Hasley Creek and

**Table 5.7-3 (Continued)  
Applicable Goals, Objectives, and Policies Related to SEAs**

Objective/Policy	Consistency Evaluation
	<p>Castaic Creek. Although these areas may be temporarily impacted during construction, as analyzed in the State-certified EIR, they would be restored and revegetated after construction based on the Modified Project design, thereby reducing permanent impacts to certain vegetation communities and jurisdictional stream habitat. This environmentally beneficial modification would result in increased open space, restored drainage areas, and habitat for species Refer to Section 5.2, Biological Resources, of this SEIR for further details of how the Modified Project would preserve and enhance the biological resources and ecological systems on-site, including those associated with the Santa Clara River SEA.</p>
<p><b>Santa Clarita Valley Area Plan: One Valley One Vision 2012 Conservation and Open Space Element</b></p>	
<p><b>Objective CO-3.2:</b> Identify and protect areas which have exceptional biological resource value due to a specific type of vegetation, habitat, ecosystem, or location.</p> <p><b>Policy CO-3.2.4:</b> Protect biological resources in the designated Significant Ecological Areas (SEAs) through the siting and design of development which is highly compatible with the SEA resources. Specific development standards shall be identified to control the types of land use, density, building location and size, roadways and other infrastructure, landscape, drainage, and other elements to assure the protection of the critical and important plant and animal habitats of each SEA. In general, the principle shall be to minimize the intrusion and impacts of development in these areas with sufficient controls to adequately protect the resources. (Guiding Principle #10)</p>	<p><b>Consistent.</b> With regard to SEAs and protection of biological resources, refer to the discussion for Policy LU-7.8.2, above and Section 5.2 Biological Resources of this SEIR.</p>
<p><b>Objective CO-10.1:</b> Identify areas throughout the Santa Clarita Valley which should be preserved as open space in order to conserve significant resources for long-term community benefit.</p> <p><b>Policy CO-10.1.3:</b> Through dedications and acquisitions, obtain open space needed to preserve and protect wildlife corridors and habitat, which may include land within SEA's, wetlands, woodlands, water bodies, and areas with threatened or endangered flora and fauna.</p>	<p><b>Consistent.</b> With regard to SEAs and protection of biological resources, refer to the discussion for LU-7.8.2, above and Section 5.2 Biological Resources of this SEIR.</p>

**Table 5.7-3 (Continued)**  
**Applicable Goals, Objectives, and Policies Related to SEAs**

Objective/Policy	Consistency Evaluation
<p><i>Source: Eyestone Environmental, 2024.</i></p>	

## 7. CUMULATIVE IMPACTS

As with the Modified Project, the related projects would be required to comply with relevant land use policies and regulations through review by the County, other regulatory agencies, and through CEQA review. Since the Modified Project overall would be consistent with applicable land use policies related to SEAs and HMAs, the Modified Project would not incrementally contribute to cumulative inconsistencies with such policies. Therefore, the Modified Project and related projects would not result in significant cumulative impacts related to land use consistency. As such, the Modified Project would not result in any new or substantially more severe significant cumulative impacts related to land use as compared to the 2017 Project.

## 8. MITIGATION MEASURES

As discussed in **Section 2.0**, Executive Summary, of the SEIR, the Modified Project would continue to be subject to the mitigation programs previously adopted by CDFW and the County in conjunction with the State-certified EIR and the 1991 VCC EIR, respectively. However, as indicated below, no mitigation has been previously adopted to address land use impacts.

### a. Previously Approved Mitigation from the State-Certified EIR

#### Entrada South Planning Area

The State-certified EIR did not specifically address conflicts with SEA or HMA policies within the land use analysis, and thus mitigation measures were not included in Section 4.14, Land Use, of the State-certified EIR.

As previously discussed, the State-certified EIR determined that development of the Entrada South Planning Area under the 2017 Project would result in a significant and unavoidable impact associated with conflicts with an applicable land use plan, policy, or regulation since establishment of a spineflower preserve would conflict with the site's then-existing agricultural zoning. This impact was acknowledged to likely be temporary pending the County's approval of a zone change but was nonetheless concluded to be significant and unavoidable as implementation of the zone change was beyond the control of the



Applicant. No feasible mitigation was identified. However, as discussed earlier, this impact no longer exists since the southern portion of the Entrada South Planning Area is now zoned R-1 and C-R.

### **VCC Planning Area**

The State-certified EIR determined all land use impacts associated with development of the VCC Planning Area would be less than significant, and no mitigation was required.

As such, there are no mitigation measures from the State-certified EIR that are applicable to the Modified Project to address impacts related to land use.

#### **b. Previously Approved Mitigation from the VCC EIR**

The VCC EIR determined all land use impacts associated with development of the VCC Planning Area would be less than significant, and no mitigation was required. As such, there are no mitigation measures from the VCC EIR that are applicable to the Modified Project to address impacts related to land use.

#### **c. Proposed Mitigation for the Modified Project**

No additional mitigation measures related to land use and planning are required for the Modified Project.

## **9. LEVEL OF SIGNIFICANCE AFTER MITIGATION**

Based on the analysis above, impacts related to consistency with General Plan policies regarding SEAs and HMAs were determined to be less than significant without mitigation. Therefore, no mitigation measures are required or included. The Modified Project would not result in any new or substantially more severe impacts related to land use as compared to the 2017 Project.