

Notice of Exemption

Appendix E

To: Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812-3044

From: (Public Agency): County of Los Angeles
Department of Regional Planning, Subdivisions
320 West Temple Street
Los Angeles, CA 90012

County Clerk
County of: Los Angeles
12400 Imperial Highway
Norwalk, CA 90650

2025 056477



FILED
Mar 19 2025

Deann C. Logan, Registrar - Recorder/County Clerk

Electronically signed by BYRON PATTON JR

Project Title: Valencia Commerce Center Planning Area 4 Solid Fill CUP ("Proposed Project")

Project Applicant: The Newhall Land and Farming Company, (a California Limited Partnership)

Project Location - Specific: West of Commerce Center Drive, between Franklin Parkway and State Route 126, within PA-4 of Valencia Commerce Center ("Project Site")

Description of Nature, Purpose and Beneficiaries of Project: The Proposed Project is a request for a Solid Fill Conditional Use Permit (CUP) and ministerial revised rough grading plan to allow up to 1.35 million cubic yards (mcy) of dirt to be accepted from construction projects in the region to a previously disturbed area identified as a borrow site on the approved Parcel Map 26363 rough grading plan.

The site is referred to as Planning Area 4 (PA-4) within the Valencia Commerce Center (VCC). VCC was previously approved by Los Angeles County under Master CUP 87-360. PA-4 is an approximately 33.3-acre graded area and is part of a larger parcel which lies north of SR-126 and Castaic Creek, west of Commerce Center Drive, and south of Franklin Parkway in the Valencia Commerce Center.

Name of Public Agency Approving the Project: County of Los Angeles

Name of Person or Agency Carrying Out the Project: The Newhall Land and Farming Company

Exempt Status: (check one):

- Ministerial (Sec. 21080(b)(1); 15268);
- Declared Emergency (Sec. 21080(b)(3); 15269(a));
- Emergency Project (Sec. 1080(b)(4); 5269(b)(c));
- Categorical Exemption. State type and section number: Section 15304
- Statutory Exemptions. State code number: _____

THIS NOTICE WAS POSTED

ON March 19 2025

UNTIL April 18 2025

REGISTRAR - RECORDER/COUNTY CLERK

Reasons why project is exempt:

The Proposed Project qualifies under CEQA Guidelines Section 15304(c) as a minor alteration to private land involving the filling of earth into previously excavated land with material compatible with the natural features of the site, which was previously graded, and does not involve the removal of healthy, mature or scenic trees. Specifically, the Proposed Project entails the filling of earth at PA-4 by accepting soil from ongoing construction projects in the region (including, without limitation, the Metro I-5 freeway expansion project). The Metro I-5 project is the only reasonably foreseeable project at this time that is anticipated to deposit fill at PA-4. The Metro I-5 project was covered by a certified EIR (SCH #2007051028). While other currently unknown source sites may occur in the future, it would be speculative to consider any unknown source sites at this time. It is anticipated that any future source sites would be subject to CEQA. The accepted soil would be compatible with the existing features at the site, which was previously disturbed and graded. Accepted fill will be compatible with the existing features at the site by applying the performance standards for import fill material review and quality control testing, including field observation, detailed in Attachment 3, ENGEO, Imported Fill Compatibility with PA 4 Site, August 16, 2024 ("ENGEO Memo"). The ENGEO Memo explains that compatibility will be maintained by following Department of Toxic Substances Control (DTSC) Information Advisory for Clean Imported Fill Material (available at <https://dtsc.ca.gov/information-advisory-clean-imported-fill-material-fact-sheet/>) and having the project's registered engineer review results of analytical testing for comparison with environmental screening levels prior to bringing the import material to the site pursuant to said Advisory. The

Notice of Exemption

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ENGEO Memo concludes that "import fill materials for PA4 must be of similar composition to the on-site soil material." The acceptance of fill at PA-4 will not result in the generation of any new truck trips because the fill will be received from ongoing construction projects that require soil export. Therefore, the truck trips associated with these soil export projects will occur regardless of whether the soil is accepted at PA-4. Providing PA-4 as another potential receptor site increases optionality and may reduce the distance that some soil export trips will need to travel compared to traveling to other available receptor sites. Pursuant to CEQA Guidelines Section 15300.2, no exceptions to the exemption apply. See attached Technical Memorandum dated September 4, 2024, for additional information.

Lead Agency

Contact Person: Jodie Sackett Area Code/Telephone/Extension: 213-974-6433

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? Yes No

Signature: *Jodie Sackett* Date: 3-19-25 Title: Senior Planner

Signed by Lead Agency

Signed by Applicant





State of California—Department of Fish and Wildlife

2025 ENVIRONMENTAL DOCUMENT FILING FEE CASH RECEIPT

DFW 753.5a (REV. 01/01/25) Previously DFG 753.5a

RECEIPT Number: 19 — 03/19/2025 — 202503191240012
STATE CLEARING HOUSE # (if applicable)

SEE INSTRUCTIONS ON REVERSE. TYPE OR PRINT CLEARLY.

LEAD AGENCY LOS ANGELES COUNTY DEPARTMENT OF REGIONAL PLANNING, SUBDIVISIONS	LEAD AGENCY EMAIL	DATE 03/19/2025
COUNTY/STATE AGENCY OF FILING LOS ANGELES	DOCUMENT NUMBER 2025056477	

PROJECT TITLE VALENCIA COMMERCE CENTER PLANNING AREA 4 SOLID FILL CUP ("PROPOSED PROJECT")		
PROJECT APPLICANT NAME JODIE SACKETT	PROJECT APPLICANT EMAIL	PHONE NUMBER (213)974-6433
PROJECT APPLICANT ADDRESS 320 WEST TEMPLE STREET	CITY LOS ANGELES	STATE CA
		ZIP CODE 90012

PROJECT APPLICANT (Check appropriate box):

Local Public Agency School District Other Special District State Agency Private Entity

CHECK APPLICABLE FEES:

<input type="checkbox"/> Environmental Impact Report (EIR)	\$4,123.50	\$	<u>0.00</u>
<input type="checkbox"/> Mitigated/Negative Declaration (MND)(ND)	\$2,968.75	\$	<u>0.00</u>
<input type="checkbox"/> Certified Regulatory Program (CRP) document - payment due directly to CDFW	\$1,401.75	\$	<u>0.00</u>
<input checked="" type="checkbox"/> Exempt from fee			
<input checked="" type="checkbox"/> Notice of Exemption (attach)			
<input type="checkbox"/> CDFW No Effect Determination (attach)			
<input type="checkbox"/> Fee previously paid (attach previously issued cash receipt copy)			
<input type="checkbox"/> Water Right Application or Petition Fee (State Water Resources Control Board only)	\$850.00	\$	<u>0.00</u>
<input checked="" type="checkbox"/> County documentary handling fee		\$	<u>75.00</u>
<input type="checkbox"/> Other		\$	<u>0.00</u>

PAYMENT METHOD:

Cash Credit Check Other

TOTAL RECEIVED \$ 75.00

SIGNATURE X	AGENCY OF FILING PRINTED NAME AND TITLE INTERMEDIATE CLERK
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03/19/2025

12:48 PM PDT

LOS ANGELES CO RR/CC NORWALK
BUSINESS FILINGS
12400 IMPERIAL HIGHWAY
NORWALK, CA 90650

TERMINAL NAME: E3469302

ORDER# 198284504

PAYMENT

BUSINESS FILINGS \$75.00
202503191240012

AGENCY SUBTOTAL: \$75.00
LEXISNEXIS SERVICE FEE: \$1.75

TOTAL USD: \$76.75

CARD #: 5995 VISA
PAYMENT: CREDITCHIP READ-CONTACTLESS
MODE: ISSUER
AUTH CODE: 02763D
APP LABEL: VISA CREDIT
CVM:
AID: A00000000031010
ARQC: 924EDA02232354BD
AMOUNT: \$76.75

*** CARD APPROVED ***

AMOUNT PAID:
\$76.75

CUSTOMER COPY

Dean C. Logan
Los Angeles County Registrar / Recorder
12400 Imperial Highway, Norwalk, CA
(800)201-8999

BUSINESS FILINGS REGISTRATION

NORWALK DEPARTMENT HEADQUARTER

Cashier: B. PATTON JR



* 2 0 2 5 0 3 1 9 1 2 4 0 0 1 2 *

Wednesday, March 19, 2025 12:47 PM

Item(s)

<u>Fee</u>	<u>Qty</u>	<u>Total</u>
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NoE - County Posting Fee	1	\$75.00
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2025056477

Total		\$75.00
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Total Documents: 1

Customer payment(s):

Credit Card		\$75.00
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MEMORANDUM

To: Jodie Sackett, Senior Planner, Department of Regional Planning, Subdivisions
From: William Halligan, Esq., Senior Director/Sr. Environmental Counsel, Harris & Associates
RE: Class 4 Categorical Exemption for Valencia Commerce Center Planning Area 4
Date: September 4, 2024

The following memorandum documents the applicability of a Class 4 Categorical Exemption in compliance with Section 15304(c) the California Environmental Quality Act (CEQA) Guidelines for a Solid Fill Conditional Use Permit (CUP) for Valencia Commerce Center Planning Area 4 (PA-4), an approximately 33.3-acre previously graded area (Proposed Project). PA-4 is located in unincorporated Los Angeles County, west of Commerce Center Drive, generally bounded by Franklin Parkway to the north and west, Castaic Creek to the south, and the Logix office building to the east (Project Site). See Figure 1 for a depiction of PA-4.

Project Description

The Proposed Project is a request for a Solid Fill CUP, including a revision to the approved rough grading plan, to allow acceptance of approximately 1.35 million cubic yards (mcy) of dirt at PA-4, identified as a borrow site on the approved PM 26363 rough grading plan. The borrow site is located outside the boundary of PM 26363 but was included as an offsite improvement on the PM 26363 rough grading plan. PA-4 is approved for development under Master CUP 87-360.¹

The acceptance of fill at PA-4 will not result in the generation of any new truck trips because the fill will be received from ongoing construction projects that require soil export. Therefore, the truck trips associated with these soil export projects, including the Metro I-5 construction project, will occur regardless of whether the soil is accepted at PA-4. Providing PA-4 as another potential receptor site increases optionality and may reduce the distance that some soil export trips will need to travel compared to traveling to other available receptor sites.

The proposed grading plan revision is consistent with the development approved by CUP 87-360 and would allow for the acceptance of soil (up to 1.35 mcy) from ongoing construction projects in the region, including, without limitation, the Metro I-5 freeway expansion project currently under construction. Previously constructed bank stabilization improvements (installed as part of the PM 26363 development) are already in place to protect the proposed grading from the adjacent Castaic Creek.² The Metro I-5 project is the only reasonably foreseeable project at this time that is anticipated to deposit fill at PA-4. The Metro I-5 project was covered by a certified EIR (SCH #2007051028). While other currently unknown source sites may occur in the future, it would be speculative to consider any unknown source sites at this time. It is anticipated that any future source sites would be subject to CEQA. Accepted fill will be compatible with the existing features at the site by applying the performance standards for import fill material review and quality control testing, including field observation, detailed in Attachment 3, ENGeo, Imported Fill Compatibility with PA 4 Site, August 16, 2024 (“ENGeo Memo”). The ENGeo

¹ Valencia Commerce Center Environmental Impact Report, SCH No. 87-123005, 1991, covered Master CUP 87-360.

² An existing storm drain on PA4 would be reconstructed as part of the proposed project.

Memo explains that compatibility will be maintained by following Department of Toxic Substances Control (DTSC) Information Advisory for Clean Imported Fill Material (available at <https://dtsc.ca.gov/information-advisory-clean-imported-fill-material-fact-sheet/>) and having the project's registered engineer review results of analytical testing for comparison with environmental screening levels prior to bringing the import material to the site pursuant to said Advisory. The ENGEO Memo concludes that "import fill materials for PA4 must be of similar composition to the on-site soil material."

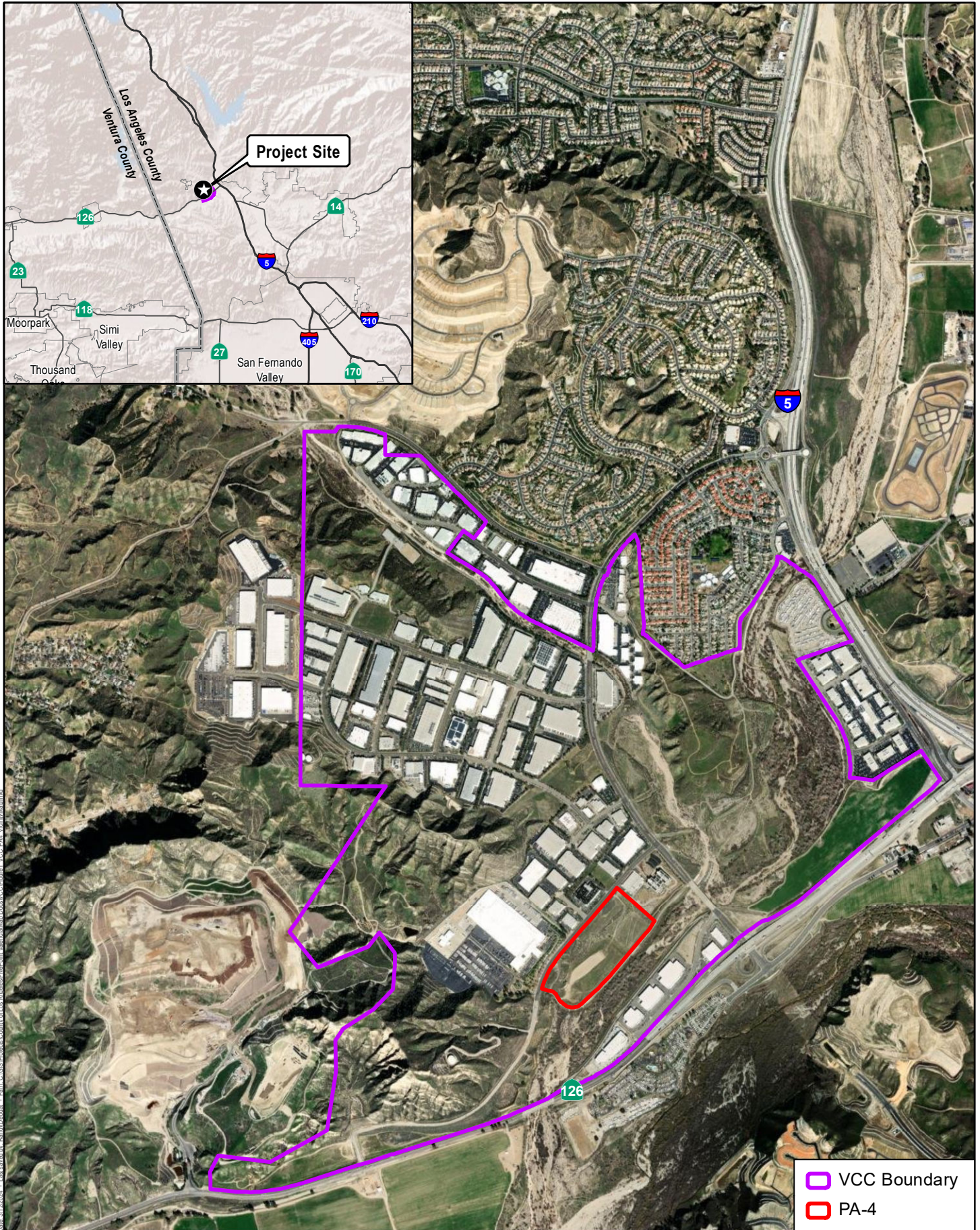
Categorical Exemption

CEQA Guidelines, Section 15300, includes a list of classes of projects that have been determined not to have a significant effect on the environment and are exempt from the provisions of CEQA.

Per CEQA Guidelines, Section 15304, Class 4 consists of minor public or private alteration in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes. Examples include but are not limited to:

- a. Grading on land with a slope of less than 10 percent, except that grading shall not be exempt in a waterway, in any wetland, in an officially designated (by federal, state, or local government action) scenic area, or in officially mapped areas of severe geologic hazard such as an Alquist-Priolo Earthquake Fault Zone or within an official Seismic Hazard Zone, as delineated by the State Geologist.
- b. New gardening or landscaping, including the replacement of existing conventional landscaping with water efficient or fire resistant landscaping.
- c. Filling of earth into previously excavated land with material compatible with the natural features of the site;
- d. Minor alterations in land, water, and vegetation on existing officially designated wildlife management areas or fish production facilities which result in improvement of habitat for fish and wildlife resources or greater fish production;
- e. Minor temporary use of land having negligible or no permanent effects on the environment including carnivals, sales of Christmas trees, etc;
- f. Minor trenching and backfilling where the surface is restored;
- g. Maintenance dredging where the spoil is deposited in a spoil area authorized by all applicable state and federal regulatory agencies;
- h. The creation of bicycle lanes on existing rights-of-way.
- i. Fuel management activities within 30 feet of structures to reduce the volume of flammable vegetation, provided that the activities will not result in the taking of endangered, rare, or threatened plant or animal species or significant erosion and sedimentation of surface waters. This exemption shall apply to fuel management activities within 100 feet of a structure if the public agency having fire protection responsibility for the area has determined that 100 feet of fuel clearance is required due to extra hazardous fire conditions.

As detailed below, the Proposed Project qualifies under Section 15304(c) as a minor alteration to private land that entails the filling of earth into previously excavated land with material compatible with the natural features of the previously graded site, which does not involve removal of healthy, mature or scenic trees. As described below, pursuant to CEQA Guidelines Section 15300.2, no exceptions to the exemption apply.



Date: 3/1/2024 - 1:14 PM; Path: C:\GIS\Projects\County of Los Angeles\Environment\MapDocs\VCC\Bound1_VCC_PA4_VCC\MapDocs\

Source: Maxar Imagery 2020.

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Categorical Exemption Applies to Project

CEQA Guidelines, Section 15304 (Class 4, Minor Alterations to Land) applies to the Proposed Project for the following reasons:

- a. The Proposed Project involves the minor alteration of private land that does not include the removal of any trees. PA-4 has previously been disturbed and graded in accordance with Grading Permit (GR 0820 0710100001) for Parcel Map 26363.
- b. In accordance with Section 15304, Subsection c, the Proposed Project involves the “filling of earth into previously excavated land with material compatible with the natural features of the site.” Specifically, the Proposed Project entails the filling of earth at PA-4 by accepting soil from ongoing construction projects in the region (including, without limitation, the Metro I-5 freeway expansion project). The Metro I-5 project is the only reasonably foreseeable project at this time that is anticipated to deposit fill at PA-4. The Metro I-5 project was covered by a certified EIR (SCH #2007051028). While other currently unknown source sites may occur in the future, it would be speculative to consider any unknown source sites at this time. It is anticipated that any future source sites would be subject to CEQA. The accepted soil would be compatible with the existing features at the site, which was previously disturbed and graded. Accepted fill will be compatible with the existing features at the site by applying the performance standards for import fill material review and quality control testing, including field observation, detailed in Attachment 3, ENGEO, Imported Fill Compatibility with PA 4 Site, July 12, 2024 (“ENGEO Memo”). The ENGEO Memo explains that compatibility will be maintained by following Department of Toxic Substances Control (DTSC) Information Advisory for Clean Imported Fill Material (available at <https://dtsc.ca.gov/information-advisory-clean-imported-fill-material-fact-sheet/>) and having the project’s registered engineer review results of analytical testing for comparison with environmental screening levels prior to bringing the import material to the site pursuant to said Advisory. The ENGEO Memo concludes that “import fill materials for PA4 must be of similar composition to the on-site soil material.”

No Exceptions to the Exemption Apply

There are general exceptions to the Class 4 exemption depending on the nature or location of the project, pursuant to CEQA Guidelines Section 15300.2. As described below, none of the following exceptions apply to the Project.

- a. **Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located -- a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.**

PA-4 has already been disturbed and graded pursuant to Grading Permit (GR 0820 0710100001) for Parcel Map 26363 and therefore does not involve a particularly sensitive environment. The location of the Proposed Project would not impact an environmental resource of hazardous or critical concern that has been designated, precisely mapped, or officially adopted pursuant to law by federal, state, or local agencies. This exception does not apply.

- b. **Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.**

The Project is consistent with development authorized under Master CUP 87-360 and would not conflict with land use and zoning designations for the Project Area. The Proposed Project is not associated with successive projects of the same type in the same place that over time could cause a cumulatively considerable impact. Therefore, this exception does not apply.

c. **Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.**

As discussed below, no significant impacts due to unusual circumstances are associated with the Proposed Project.

As a threshold matter, there are no unusual circumstances that apply to PA-4. PA-4 has been previously graded. The Proposed Project does not involve characteristics that are unusual for the Class 4 exemption.

In addition, although no unusual circumstances apply, for informational purposes only, the following assessment considers whether there is a reasonable possibility that the Proposed Project would cause a significant impact.

The Proposed Project is consistent with Master CUP 87-360, which allowed for the development of the Valencia Commerce Center, including PA-4, and was previously disturbed and graded. Therefore, the Project would not cause new environmental impacts associated with the disturbance of the land, such as to sensitive habitat or biological resources. The Project also would continue to be bound by the Grading Permit and related requirements, such as the Storm Water Pollution Prevention Plan, and therefore would not significantly impact water quality. Further, the Proposed Project would not increase demand on utilities, water supply or sewer, or other public services facilities.

Although no unusual circumstances apply, for informational purposes only, specific assessments of traffic and air quality were prepared, summarized as follows:

Traffic: A Truck Haul Route Analysis was conducted by Stantec Consulting Services Inc (see Attachment 1) for the Project. The acceptance of fill at PA-4 will not result in the generation of any new truck trips because the fill will be received from ongoing construction projects that require soil export. Therefore, the truck trips associated with these soil export projects will occur regardless of whether the soil is accepted at PA-4. In fact, providing PA-4 as a potential receptor site increases optionality may reduce the distance that some soil export trips will need to travel compared to other available receptor sites. The Metro I-5 project is located near PA-4. Metro has expressed the desire to dispose of fill from the I-5 project at PA-4 because PA-4 is a closer site than other disposal sites in the region. Therefore, PA-4 would reduce truck trip lengths for Metro to export soil from the I-5 project compared to other regional disposal options. The purpose of this analysis is to assess whether the acceptance of soil at PA-4 from such existing truck trips would impact local roadways in close proximity to PA-4.

The analysis was conducted with the assumption that approximately 1.35 mcy of fill material would be accepted at PA-4 over a period of approximately 3 years.³ The study found that assuming the haul truck operations occur for an average of 300 days per year for a duration of 3 years, 230 truck trips per day would result (115 inbound and 115 outbound) on average. Daily activity would vary, and a maximum daily number of truck trips would not exceed 350 truck trips per day (1.5 times the average). For analysis purposes, a maximum of 350 truck trips per day from construction projects in the region were assumed yielding approximately 35 truck trips per hour based on a 10-hour workday (approximately 17 to 18 inbound trucks and 17 to 18 outbound trucks per hour). This equates to approximately 1 truck entering and leaving the site every 3 to 4 minutes on average. The haul trucks would utilize SR 126 from I-5 and exit via an existing right-turn at Wolcott Way utilizing an existing dedicated deceleration/right-turn lane. From Wolcott Way, trucks would proceed onto Franklin Parkway and enter the site via an existing right-turn from Franklin Parkway.

³ Actual duration of accepting soil at PA4 may take longer depending on the availability of export for ongoing construction projects in the region.

Empty trucks would exit the site via an existing left-turn onto Franklin Parkway and return to SR 126 via an existing protected left-turn at the signalized intersection at Wolcott Way.

Franklin Parkway is an existing 2-lane roadway that currently carries approximately 6,000 average daily trips (ADT) and the addition of up to 350 truck trips per day would have a negligible effect on the roadway capacity, which is approximately 12,000 ADT. The existing intersection of Wolcott Way at SR 126 currently operates at LOS A with AM and PM peak hour utilization ratios 0.44 and 0.49, respectively. The addition of up to 35 truck trips per hour would have a negligible effect on the intersection capacity. The truck trips would not adversely affect the capacity of Franklin Parkway or the intersection of Wolcott Way and SR 126, each of which currently operate well under capacity. Accordingly, the acceptance of soil at PA4 would not significantly impact local roadways. See Attachment 1 for additional details.

Air Quality: As noted above, the acceptance of fill at PA-4 will not cause any new truck trips because the fill will be received from ongoing construction projects that already require soil export (and the emissions associated with such soil export). Therefore, the emissions associated with these soil export projects will occur regardless of whether the soil is accepted at PA-4. Providing PA-4 as another potential receptor site increases optionality and may reduce the distance that some soil export trips will need to travel compared to traveling to other available receptor sites. Nonetheless, an Air Quality Memorandum was prepared by Ramboll for the Project (see Attachment 2). The purpose of the analysis was to assess whether the acceptance of soil at PA-4 from such existing truck trips would cause air quality emissions associated with truck trip travel along local roadways in close proximity to PA-4. These emissions were compared to the AQMD mass daily construction Significance Thresholds. The analysis showed that the hauling activity would be less than the adopted thresholds of significance.

For regional mass emissions, Ramboll estimated the daily emissions that would be generated by hauling trucks carrying soil to PA-4. These emissions were compared to the AQMD mass daily construction Significance Thresholds.⁴ The hauling activity associated with the proposed soil acceptance will not exceed the AQMD's mass daily construction significance thresholds. Therefore, regional emissions resulting from the proposed soil acceptance will be less than significant.

Ramboll also conducted a Localized Significance Threshold ("LST") analysis to assess whether the hauling activity may have localized impacts near the Project. This analysis was conducted to assess the localized air quality impacts of the hauling trucks closer to the Project. The hauling activity associated with the proposed soil acceptance will not exceed the LST thresholds for the applicable Source Receptor Area (SRA). Therefore, local emissions resulting from the proposed soil acceptance would be less than significant.

Accordingly, the acceptance of soil at PA4 would not significantly impact local air quality. See Attachment 2 for additional details.

- d. Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.**

The California State Scenic Highway System Map does not designate any state scenic highways within the vicinity of PA-4. Therefore, this exception does not apply.

⁴ Available at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25>. Accessed: July 2023.

- e. Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.**

EnviroStor is the Department of Toxic Substances Control’s (DTSC’s) online data management system for tracking cleanup, permitting, enforcement, and investigation efforts at hazardous waste facilities and sites with known or suspected contamination issues, pursuant to Section 65962.5 of the Government Code. The EnviroStor database was reviewed to determine if any hazardous waste sites are located within PA-4. It was determined that no hazardous waste sites are located within PA-4. Therefore, this exception does not apply.

- f. Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.**

PA-4 was reviewed in both the 1991 VCC EIR and the 2006 PM 26363 MND for historic resources. The 1991 VCC EIR evaluated impacts to cultural resources and the 2006 PM 26363 MND evaluated impacts with regard to archaeological, historical, and paleontological resources. As PA-4 is fully disturbed and the Proposed Project would not increase the disturbance area beyond what was already disturbed by approved Grading Permit, impacts to cultural resources would not be significant. Additionally, PA-4 has already been graded and no structures are located on-site. As a result, the Project will not result in any adverse change in the significance of a historical resource.

Conclusion

For the reasons stated above, the Proposed Project meets all conditions required for a Class 4 Categorical Exemption under CEQA.

Attachments

1. Traffic Technical Memo
2. Air Quality Technical Memo
3. Fill Compatibility for PA-4 Technical Memo

References

- California, State of. Accessed July 2023. California State Scenic Highway System Map.
- California Environmental Quality Act (Public Resources Code Sections 21000—21189).
- California Environmental Quality Act Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000—15387).
- Department of Toxic Substances (DTSC). Accessed July 2023. EnviroStor Database. http://www.https://www.envirostor.dtsc.ca.gov/public/map/?global_id=60000660.
- ENGEO. August 16, 2024. Imported Fill Compatibility with PA 4 Site
- Los Angeles, County of. September 1991. Valencia Commerce Center Environmental Impact Report.
- Los Angeles, County of. July 2006. PM 26363 Mitigated Negative Declaration.
- Ramboll. July 2023. Valencia Commerce Center Planning Area 4- Air Quality Impacts for Proposed Soil Receptor Site.
- Stantec Consulting Services Inc. August 2024. Valencia Commerce Center Planning Area 4 – Analysis of Accepting Soil from Construction Projects in the Region.

Attachment 1 – Traffic Technical Memo

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To: Alex Herrell
FivePoint

From: Daryl Zerfass
Irvine

Project/File: 2042604600

Date: August 6, 2024

Reference: Valencia Commerce Center Planning Area 4 - Analysis of Accepting Soil from Construction Projects in the Region

The purpose of this memo is to address the truck trips associated with the planned acceptance of fill material to Planning Area 4 of the Valencia Commerce Center, located in unincorporated Los Angeles County just north of State Route 126 (SR 126) and just west of Interstate 5 (I-5), in the Santa Clarita Valley.

Valencia Commerce Center Planning Area 4 is located in the area generally bounded by Franklin Parkway to the north and west, the Castaic Creek to the south, and the Logix office building to the east. Approximately 1.35 million cubic yards (CY) of fill material from construction projects in the region, such as Metro's I-5 North County Enhancement Project in Santa Clarita (see **Figure 1** for location), will be accepted at the site over a period of approximately 3 years. The period for accepting fill material may be longer depending on availability of soil from construction projects in the region.

The acceptance of fill at Planning Area 4 will not cause any new truck trips because the fill will be received from ongoing construction projects that already require soil export (and the truck trips associated with such soil export). Therefore, the truck trips associated with these soil export projects will occur regardless of whether the soil is accepted at Planning Area 4. In fact, providing Planning Area 4 as another potential receptor site increases optionality and may reduce the distance that some soil export trips will need to travel compared to traveling to other available receptor sites. The purpose of this analysis is to assess whether the acceptance of soil at Planning Area 4 from such existing truck trips would impact local roadways in close proximity to Planning Area 4.

A typical haul truck can carry up to 14 CY of material. Assuming an average of 13 CY per truck, 1.35 MCY would equate to approximately 103,850 truck trips each way (i.e., 103,850 inbound loaded trucks trips and 103,850 outbound empty truck trips), for a total of 207,700 truck trips over 3 years.

Assuming the haul truck activities equate to soil being accepted at Planning Area 4 from construction projects in the region for an average of 300 days per year for a duration of 3 years equates to approximately 230 truck trips per day (115 inbound and 115 outbound) on average. Daily activity would vary, and a maximum daily number of truck trips from construction projects in the region is not expected to exceed 350 truck trips per day (1.5 times the average).

For analysis purposes, a maximum of 350 truck trips per day from construction projects in the region has been assumed. This equates to in approximately 35 truck trips per hour based on a 10-hour workday (approximately 17 to 18 inbound trucks and 17 to 18 outbound trucks per hour). This equates to approximately 1 truck entering and leaving the site every 3 to 4 minutes on average.

Reference: Valencia Commerce Center Planning Area 4 - Truck Haul Route Analysis

The origin of the import material is anticipated to be from east of the site. As shown in the attached **Figure 2**, the haul trucks would utilize SR 126 from I-5 and exit via a right-turn at Wolcott Way utilizing a dedicated deceleration/right-turn lane. From Wolcott Way, trucks would proceed onto Franklin Parkway and enter the site via a right-turn from Franklin Parkway. Empty trucks would exit the site via a left-turn onto Franklin Parkway and return to SR 126 via a protected left-turn at the signalized intersection at Wolcott Way.

Franklin Parkway is a 2-lane roadway that currently carries approximately 6,000 average daily trips (ADT)¹ and the addition of up to 350 truck trips per day would have a negligible effect on the roadway capacity, which is approximately 12,000 ADT. The intersection of Wolcott Way at SR 126 currently operates at LOS A with AM and PM peak hour utilization ratios of 0.44 and 0.49, respectively.² The addition of up to 35 truck trips per hour would have a negligible effect on the intersection capacity.

In conclusion, to accept up to 1.35 MCY at Planning Area 4, the haul truck activity would equate to approximately 103,850 truck trips each way from construction projects in the region (103,850 inbound loaded truck trips and 103,850 outbound empty truck trips), for a total of 207,700 truck trips from construction projects in the region over a period of approximately 3 years. The number of truck trips per day would vary and would average approximately 230 truck trips per day with a maximum of approximately 350 truck trips per day from construction projects in the region. These truck trips would not adversely affect the capacity of Franklin Parkway or the intersection of Wolcott Way and SR 126, each of which currently operate well under capacity.

Sincerely,

STANTEC CONSULTING SERVICES INC.

Daryl Zerfass PE, PTP
Principal, Transportation Planning & Traffic Engineering
Phone: (949) 302-8995
daryl.zerfass@stantec.com

Attachments: Figure 1 – Haul Material Source Location
Figure 2 – Haul Route

¹ Westside Santa Clarita Valley Roadway Phasing Analysis – 2022 Update, Stantec, May 2023.

² Ibid.



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Legend




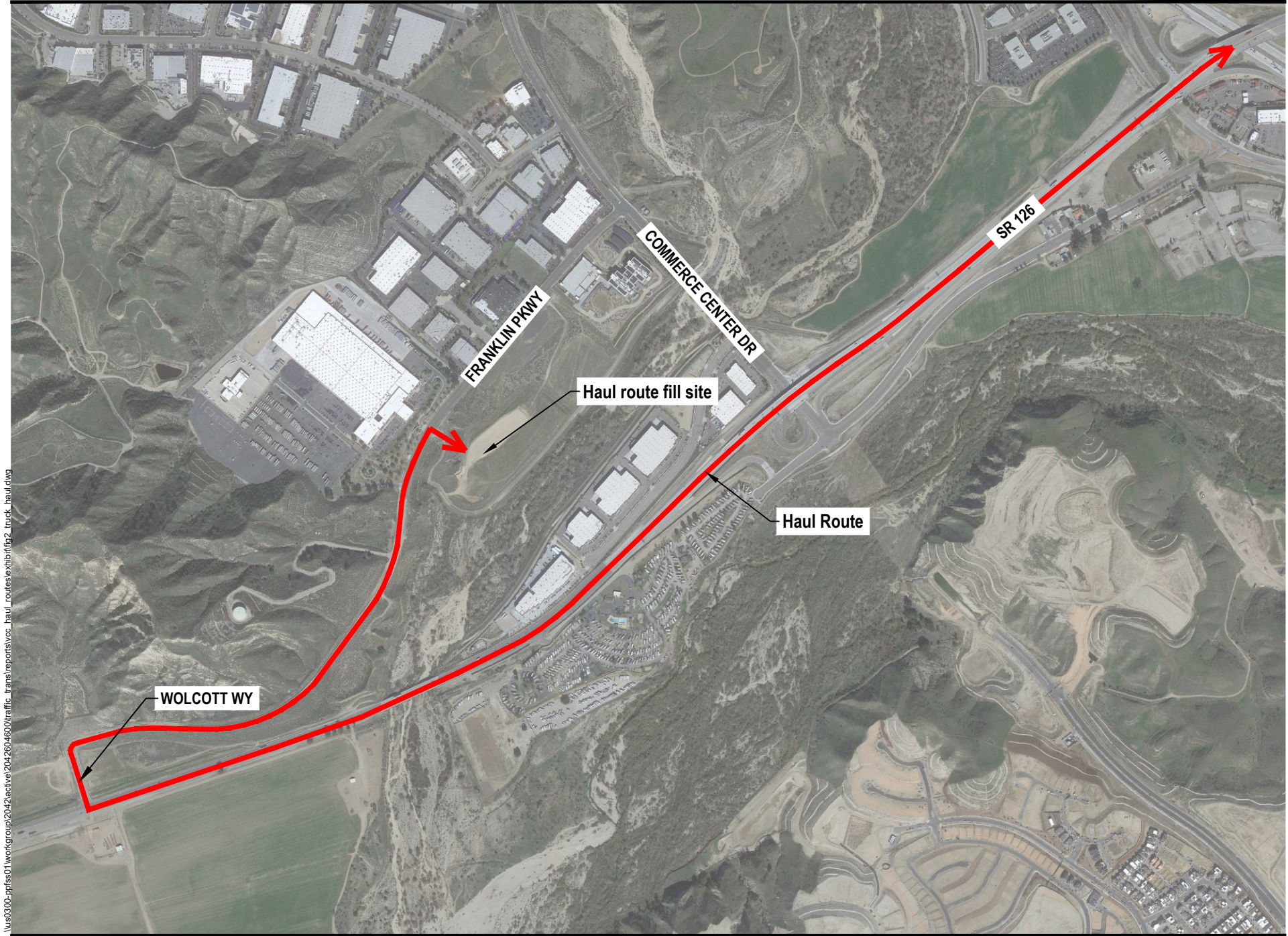
-  Planning Area 4 (Fill Site)
-  Haul Route
-  Metro's I-5 North County Enhancement Project (Fill Source Site)

Figure 1

Haul Material Source Location





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Figure 2
Haul Route

Attachment 2 – Air Quality Technical Memo

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MEMORANDUM

To: The Newhall Land and Farming Company

From: Eric C. Lu, Ramboll

Subject: **VALENCIA COMMERCE CENTER PLANNING AREA 4 – AIR QUALITY IMPACTS FOR PROPOSED SOIL RECEPTOR SITE**

The Proposed Project is a request for a Solid Fill Conditional Use Permit (CUP) to allow up to 1.35 million cubic yards (mcy) of dirt to be accepted from construction projects in the region to a previously disturbed area identified as a borrow site on the approved PM 26363 rough grading plan. The site is located outside the boundary of PM 26363 but was included as an offsite improvement on the PM 26363 rough grading plan.

The site is part of a future phase of the Valencia Commerce Center (VCC)¹ referred to as Planning Area 4 (PA-4). PA-4 is an approximately 34.8-acre graded area and is part of a larger parcel which lies north of SR-126 and Castaic Creek, west of Commerce Center Drive, and south of Franklin Parkway in the Valencia Commerce Center.

The Valencia Commerce Center including PA-4 is approved for development under Master CUP 87-360. The proposed CUP is consistent with the development approved by Master CUP 87-360, which had already planned for development of PA-4. The proposed CUP would allow for the acceptance of soil from ongoing construction projects in the region.

The acceptance of fill at PA-4 will not cause any new truck trips because the fill will be received from ongoing construction projects that already require soil export (and the emissions associated with such soil export). Therefore, the emissions associated with these soil export projects will occur regardless of whether the soil is accepted at PA-4. In fact, providing PA-4 as another potential receptor site increases optionality and may reduce the distance that some soil export trips will need to travel compared to traveling to other available receptor sites. The purpose of this analysis is to assess whether the acceptance of soil at PA-4 from such existing truck trips would cause air quality emissions associated with truck trip travel along local roadways in close proximity to PA-4.

August 1, 2023

Ramboll
5 Park Plaza
Suite 500
Irvine, CA 92614
USA

T +1 949 261 5151
F +1 949 261 6202

www.ramboll.com

¹ VCC was approved for development by Los Angeles County in 1991 through the certification of an Environmental Impact Report (EIR; SCH No. 1987123005).

In this memorandum, Ramboll analyzes the air quality impacts that would result from the proposed CUP involving the acceptance of soil at PA-4 from other projects east of the site. The analysis compares these results to the South Coast Air Quality Management (AQMD) mass regional and local air quality significance thresholds. The analysis shows that air quality impacts from accepting the soil at PA 4 will be less than the significance thresholds. The methodology and results for this analysis are summarized below.

Regional Mass Emissions

Ramboll estimated the daily emissions that would be generated by hauling trucks carrying soil in proximity to the VCC PA-4 site from locations east of the site. These emissions were compared to the AQMD mass daily construction Significance Thresholds.² As demonstrated in **Table 1**, emissions from the hauling activity associated with the proposed soil imports will not exceed the AQMD’s mass daily construction Significance Thresholds. Therefore, regional emissions resulting from the proposed soil acceptance will be less than significant.

Key assumptions in this analysis included:

- Haul trucks were assumed to be Class 8 diesel-fueled trucks
- Hauling activity was conservatively assumed to be 350 truck trips per day³
- Hauling trip lengths were estimated as the distance from I-5 to the VCC PA-4 planning site to account for the truck route specific to PA-4 since detailed truck routes may not have been included in general analyses of truck export trips associated with the soil export construction projects in the region.⁴
- Mobile emission factors were estimated using CARB’s on-road emissions model EMFAC v.1.0.2⁵ with the following additional model inputs:
 - Calendar Year: 2023
 - Region: South Coast Air Basin
 - Model Year: Aggregate
 - Speed: Aggregate
- Fugitive road dust emissions were estimated using US EPA’s AP-42 Compilation of Air Emission Factors for paved roads.⁶

Localized Air Quality Evaluation

Ramboll conducted a Localized Significance Threshold (“LST”) analysis to assess whether the hauling activity may have localized impacts near the VCC Project. This analysis was conducted to assess the localized air quality impacts of the hauling trucks in proximity to the VCC Project. Thus, in this analysis,

² Available at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25>. Accessed: July 2023.

³ Per a memo generated by the project’s traffic consultant Stantec, the acceptance of up to 1.35 mcy of fill over a 3-year period would equate to an average of 230 truck trips per day and a maximum of 350 truck trips per day from construction projects in the region. Ramboll’s analysis conservatively assumes 350 truck trips per day.

⁴ Per a memo generated by the project’s traffic consultant Stantec, the soil material is anticipated to originate from east of the PA-4 site from construction projects in the region. Thus, to access the site haul trucks would need to utilize SR 126 from I-5, exit at Wolcott Way, and proceed onto Franklin Way.

⁵ Available at: <https://arb.ca.gov/emfac/emissions-inventory>. Accessed: July 2023.

⁶ Available at: https://www3.epa.gov/ttn/chief/old/ap42/ch13/s021/final/c13s02-1_2002.pdf. Accessed: July 2023.

Ramboll compared the daily hauling emissions estimated in Table 1 to the LST mass-rate thresholds⁷ for Source Receptor Area ("SRA") 13, where VCC PA-4 is located.

As demonstrated in **Table 2**, emissions from the hauling activity associated with accepting the proposed soil from projects in the region will not exceed the LST thresholds for the applicable SRA. Therefore, local emissions resulting from accepting the proposed soil will be less than significant.

Key assumptions in this analysis included:

- Project size was conservatively assumed to be one acre since this is associated with the most stringent LST threshold. The total area of the haul route from the I-5 to the VCC PA-4 site is greater than one acre.
- Receptor distance was conservatively assumed to be 25 meters since this is associated with the most stringent LST threshold.

⁷ Available at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2>. Accessed: July 2023.

TABLES

Table 1. Mass Daily Emissions for Proposed Hauling Activity

Planning Area 4, Valencia Commerce Center
 Los Angeles County, California

	Maximum Daily On-Site Emissions (lbs/day)					
	NO _x	VOC	PM ₁₀	PM _{2.5}	SO _x	CO
Mobile Emissions from Proposed Hauling Activity ¹	10.20	0.30	0.36	0.16	0.04	4.05
Entrained Road Dust Emissions from Proposed Hauling Activity ²	--	--	0.76	0.19	--	--
Total Daily Emissions from Proposed Hauling Activity ³	10.20	0.30	1.12	0.35	0.04	4.05
South Coast AQMD Mass Daily Thresholds for Construction ⁴	100	75	150	55	150	550
Would Proposed Hauling Activity Exceed Thresholds?	No	No	No	No	No	No

Constants for Exhaust Emissions:

Maximum Daily Hauling Truck Activity⁵ 350 trips/day
 Hauling Truck Trip Length⁶ 3.32 miles/trip

Constants for Entrained Road Dust Emissions:

	PM ₁₀	PM _{2.5}	
Particle Size Multiplier ⁷	1.00	0.25	g/VMT
Silt Loading Factor ⁸	0.10	0.10	g/m ²
Mean Vehicle Weight ⁸	2.40	2.40	tons
Number of "Wet" Days ⁸	16	16	days

Notes:

¹ Mobile emissions from proposed hauling are estimated using emission factors from CARB's onroad emissions model, EMFAC2021 v.1.0.2, the daily hauling truck activity, and the hauling trip length. Emissions presented here are inclusive of running exhaust emissions, idling emissions, starting emissions, and emissions from tire wear and brake wear. For the EMFAC2021 model run, hauling vehicles are assumed to be diesel-fueled heavy heavy duty trucks operating within the South Coast Air Basin in Calendar Year 2023.

² Fugitive road dust emissions from proposed hauling activity are estimated using equations and constants from the EPA AP-42 Compilation of Air Emission Factors, Section 13.2.1-1: Paved Roads. Available at: https://www.epa.gov/sites/default/files/2020-10/documents/13.2.1_paved_roads.pdf.

³ Total daily emissions are estimated as the sum of mobile emissions, including exhaust emissions and emissions from brake and tire wear, and entrained road dust emissions.

⁴ South Coast AQMD thresholds are available at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=25>.

⁵ Daily hauling truck activity was provided by the project traffic consultant in July 2023.

⁶ Hauling truck trip length is estimated as the distance from I-5 to the VCC PA-4 site.

⁷ Particle size multiplier values are from EPA AP-42, Table 13.2.1-1. Available at: https://www.epa.gov/sites/default/files/2020-10/documents/13.2.1_paved_roads.pdf.

⁸ Mobile emissions for CEQA projects are estimated based on CalEEMod2022, the state's preferred emissions model. The silt loading factor, vehicle weight, and number of wet days are derived from CalEEMod default values. Silt loading factor and mean vehicle weight values are from CalEEMod2022 Appendix C (available at: https://www.caleemod.com/documents/user-guide/04_Appendix%20C.pdf) and the number of "wet" days is the CalEEMod default value for the project location.

Abbreviations:

CalEEMod - California Emissions Estimator Model	NO _x - nitrogen oxides
CARB - California Air Resources Board	PM ₁₀ - coarse particulate matter
CEQA - California Environmental Quality Act	PM _{2.5} - fine particulate matter
CO - carbon monoxide	South Coast AQMD - South Coast Air Quality Management District
EMFAC - Emission FACTors model	SO _x - sulfur oxides
EPA - Environmental Protection Agency	VCC - Valencia Commerce Center
lbs - pounds	VMT - vehicle miles traveled
m - meter	VOC - volatile organic compounds

Table 2. Localized Significance Threshold Analysis for Proposed Hauling Activity

Planning Area 4, Valencia Commerce Center
 Los Angeles County, California

	Maximum Daily On-Site Emissions (lbs/day)				
	CO	NO _x	1-hour NO _x ³	PM ₁₀	PM _{2.5}
Total Daily Emissions from Proposed Hauling Activity ¹	3.48	8.74	8.74	0.96	0.30
SCAQMD LSTs ²	590	114	63	4	3
Would Proposed Hauling Activity Exceed 1 Acre Thresholds?	No	No	No	No	No

Constants:

¹ Total daily emissions are estimated in Table 1.

² LSTs are conservatively based on a receptor located 25 meters from a 1-acre project site within SRA 13 (Santa Clarita Valley). Distance was measured using Google Earth. LSTs were obtained from the 2008 SCAQMD Final Localized Significance Threshold Methodology, Appendix C, Mass Rate LST Look-up Tables. Available at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>. : <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2>.

³ An approximated LST was estimated to evaluate the federal 1-hour NO₂ standard, as the SCAQMD LST has not been updated to reflect this standard. This value was estimated by scaling the SCAQMD LST that represents the state 1-hr NO₂ standard with the ratio of the federal to state 1-hr NO₂ standard (0.10 ppm/0.18 ppm).

Abbreviations:

CARB - California Air Resources Board
 CO - carbon monoxide
 EMFAC - EMISSION FACTors model
 lbs - pounds
 LST - localized significance threshold
 NO_x - nitrogen oxides
 PM₁₀ - coarse particulate matter

PM_{2.5} - fine particulate matter
 SCAQMD - South Coast Air Quality Management District
 SO_x - sulfur oxides
 SRA - source receptor area
 VCC - Valencia Commerce Center
 VOC - volatile organic compounds

Attachment 3 – Fill Compatibility for PA-4 Technical Memo

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Project No.
6538.VCC.PA4

July 12, 2024
Revised August 16, 2024

Newhall Land and Farming Company
25124 Springfield Court, Suite 300
Valencia, CA 91355

Subject: Valencia Commerce Center – Planning Area 4
Newhall Ranch
Los Angeles County, California

IMPORTED FILL COMPATIBILITY WITH PA 4 SITE

The Newhall Land and Farming Company is seeking a Conditional Use Permit to accept fill from construction projects in the region at Planning Area 4 located within the larger Valencia Commerce Center development area. The site is located west of Commerce Center Drive, along the southern side of Franklin Parkway in Valencia, California, and includes a gross area of approximately 35 acres. The site is located on the northwestern (right) bank of Castaic Creek, just north (upstream) of the creek's confluence with the Santa Clara River.

Our Technical Memorandum for Import Fill Requirements (Reference 1) outlines the established requirements for accepting fill material at Planning Area 4, the Valencia Commerce Center, and within Newhall's properties in and around the Newhall Ranch Specific Plan Area. Our Geotechnical Report for Review of 40-Scale Rough Grading Plan (Reference 2) includes additional import fill standards in Section 6.6.1.

Reference 1 and Section 6.6.1 of Reference 2 provide standards for import fill material review and quality control testing, including field observation. Per References 1 and 2, import fill material will conform with the Department of Toxic Substances Control (DTSC) Information Advisory for Clean Imported Fill Material¹, and that the project's registered engineer will review results of analytical testing for comparison with environmental screening levels prior to bringing the import material to the site. Furthermore, References 1 and 2 provide geotechnical import requirements for material. As discussed in Reference 1 and 2, the project's registered engineer will be present on site during import operations to provide environmental and geotechnical observation of approved import material.

As outlined in Section 6.6.1 of Reference 2, import fill materials for PA4 must be of similar composition to the on-site soil material. Section 2.6 of Reference 2 summarizes the general subsurface conditions encountered during field exploration. The on-site soil material within PA4 is generally comprised of silty, clayey, and gravelly alluvial sand (Quaternary Alluvium, Qa) with a small fraction of pebbly conglomerate and sandstone bedrock (Saugus Formation, QTs).

Imported fill material for PA4 is anticipated to be generated from construction sites within the region. Regional geologic mapping conducted primarily by R.F. Yerkes and R.H. Campbell shows

¹ <https://dtsc.ca.gov/information-advisory-clean-imported-fill-material-fact-sheet/>

the greater Santa Clarita Valley area to be underlain by similar geologic units as those mapped within PA4, including alluvial deposits, sandstone, and siltstone. Similar geologic conditions are mapped throughout the Los Angeles County region. Similar soil materials, as are present at PA4, will likely be generated from excavations across the greater Santa Clarita Valley area and Los Angeles Region, which will be screened for acceptance based on the standards described above. Further, accepted fill will comply with all applicable regulatory standards in conformance with Reference 1 and Section 6.6.1 of Reference 2.

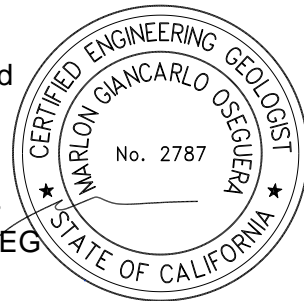
In summary, based on the standards described in Reference 1 and Reference 2, imported fill will be with materials compatible with the natural features of the Planning Area 4 site.

We are pleased to be of service to you on this project. If you have any questions, please contact us.

Sincerely,

ENGEO Incorporated


Marlon Oseguera, CEG



mo/au/jjt/dt

Attachment: Selected References


Josef J. Tootle, GE



SELECTED REFERENCES

1. ENGEO. 2022. Technical Memorandum, Import Fill Requirements, Newhall Ranch, Los Angeles County, California. May 16, 2022. Project No. 6538.100.007.
2. ENGEO. 2024. Geotechnical Report, Review of 40-Scale Rough Grading Plan, Valencia Commerce Center – Planning Area 4, Los Angeles County, California. April 15, 2024. Project No. 6538.VCC.PA4.

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