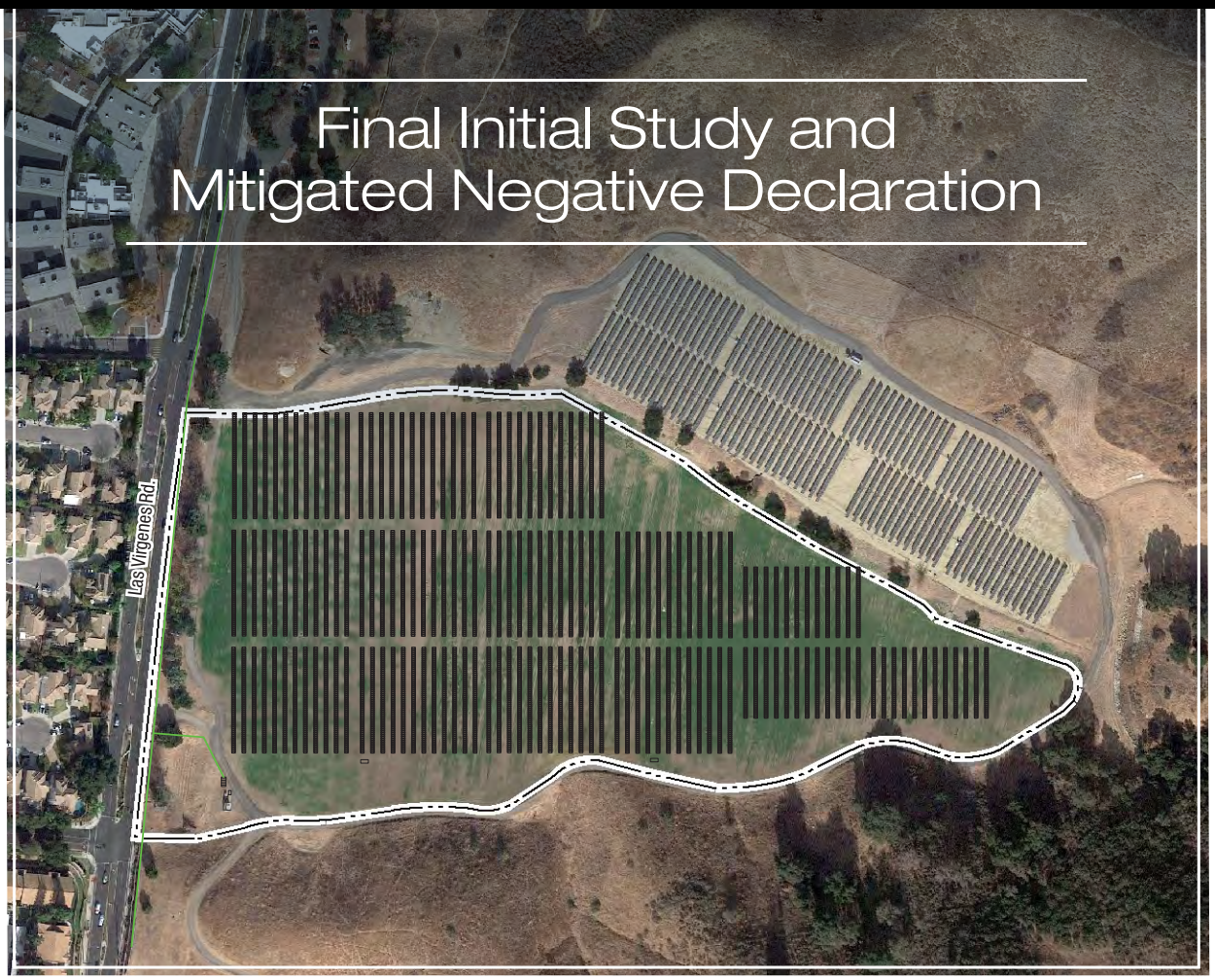
Joint Powers Authority
Solar Generation Project Phase II

Final Initial Study and Mitigated Negative Declaration



PREPARED FOR:

Las Virgenes-Triunfo Joint Powers Authority

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January 2019

JOINT POWERS AUTHORITY
SOLAR GENERATION PROJECT PHASE II

CLEAN ENERGY TO POWER
WATER AND WASTEWATER UTILITIES

FINAL INITIAL STUDY AND
MITIGATED NEGATIVE DECLARATION

Prepared for:

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January 7, 2019

SECTION

FIGURES

TABLES

APPENDICES

1.0 INTRODUCTION

This Initial Study/Mitigated Negative Declaration (IS/MND) was prepared pursuant to the applicable provisions of the California Environmental Quality Act (CEQA) statute and implementing guidelines, known as the CEQA Guidelines. The Las Virgenes Municipal Water District (LVMWD) and the Triunfo Sanitation District (TSD) form the Las Virgenes – Triunfo Joint Powers Authority (JPA). The JPA provides for the cooperative treatment of wastewater from TSD and is the applicant and lead agency for the proposed project. This IS/MND examines potential physical impacts to the environment as a result of implementation of the proposed JPA Solar Generation Project Phase II (project) to provide clean energy to power water and wastewater utilities. The purpose of this IS/MND is to inform the JPA Board (decision makers for the project), the public, neighboring jurisdictions, including the City of Calabasas, the County of Los Angeles, and other responsible agencies of the proposed project's environmental effects that may be significant and adverse, as well as describe regulations or mitigations to lessen or eliminate such impacts.

1.1 BACKGROUND

In late 2013, the JPA constructed an existing one megawatt (MW) solar electricity generation facility immediately northeast of the proposed project site boundary on an upper earthen terrace consisting of excess fill from a previous project. The JPA prepared, circulated and adopted an IS/MND for that project, which was subsequently constructed and is currently operational. At the time of the one MW project, the addition of a second phase was not known and would have been speculative to evaluate. For ease of reference, however, this IS/MND refers to the existing one MW project as the Phase I Project.

The currently proposed project, the JPA Solar Generation Project Phase II, consists of the construction and operation of a four to five megawatt (4-5 MW) solar electricity generation facility with ground-mounted photovoltaic solar panels on mechanical sun-tracking racking systems and associated electrical equipment on approximately 20 acres in the northeast portion of the North Canyon portion of the Rancho Las Virgenes property, an approximately 150-acre property owned by the JPA. The JPA has previously used the project site as a spray field for disposal of surplus recycled water during low demand seasons, but no longer needs the site for that purpose.

1.2 AUTHORITY TO PREPARE A NEGATIVE DECLARATION

The JPA is the lead agency for the review and approval of the proposed Solar Generation Project Phase II. Based on the findings of the Initial Study, the lead agency determined a Mitigated Negative Declaration (MND) is the appropriate environmental document to be prepared in compliance with CEQA. As provided for by CEQA §21064.5, an MND may be prepared for a project subject to CEQA when an Initial Study has identified potentially significant effects on the environment but revisions in the project have been made and, as a result, clearly no significant effect on the environment would occur.

This Final Initial Study and MND conforms with Section 15070, subsection (a), of the State of California CEQA Guidelines. The purpose of the Initial Study Checklist and MND is to

determine any potentially significant impacts associated with the proposed project and incorporate mitigation measures into the project design as necessary to reduce or eliminate the significant or potentially significant effects of the project.

1.3 OTHER AGENCIES THAT MAY USE THE MITIGATED NEGATIVE DECLARATION

This MND is intended to be used by other agencies that may have an interest in reviewing the project including, but not limited to, the City of Calabasas. The JPA would obtain all permits as required by law as detailed in Section 2.0, Project Description.

1.4 PUBLIC REVIEW PROCESS

In accordance with CEQA policy, a good faith effort at full disclosure has been made during the preparation of this MND to contact affected agencies, organizations and persons who may have an interest in this project.

In reviewing the MND, affected public agencies and the interested public should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment. A copy of the Draft MND and related documents were available for review at LVMWD headquarters located at 4232 Las Virgenes Road in Calabasas during regular business hours. During the public review and comment period, the Draft MND was made available for review at the Calabasas Library located at 200 Civic Center Way, Calabasas, 91302 (call 818-225-7616 for library hours).

Comments may be made on the MND in writing before the end of the public review period. A 30-day review and comment period from October 15, 2018, to November 15, 2018, was established in accordance with Section 15072(a) of the CEQA Guidelines. Following the close of the public comment period, the lead agency considered this MND and comments thereto in determining whether to approve the proposed project.

Written comments should be sent to the following address by 5:00 p.m., November 15, 2018:

Las Virgenes – Triunfo Joint Powers Authority
4232 Las Virgenes Road
Calabasas, CA 91302
Contact: John Zhao, P.E.
Telephone: (818) 251-2230

In accordance with CEQA Guidelines Section 15072(a), the JPA circulated the Draft MND for a 30-day review and comment period from October 15, 2018, to November 15, 2018. On October 11, 2018, the JPA sent Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration to owners and occupants of property contiguous to the project as required by CEQA Guidelines Section 15072(b). A copy of the NOI is provided in Appendix F. In addition, the JPA mailed NOIs with an insert map of the site plan and link to where the Draft MND was posted on the JPA website to a total of 644 owners and occupants of property in the local vicinity. No public comments were received during the public review period.

2.0 PROJECT DESCRIPTION

2.1 PROJECT LOCATION

The Las Virgenes-Triunfo Joint Powers Authority (JPA or Applicant) proposes the construction and operation of a four-to-five megawatt (4-5 MW) solar electricity generation facility at a location known as the north canyon of its Rancho Las Virgenes property, which lies approximately 1,500 feet south of the existing Las Virgenes Municipal Water District (LVMWD or District) headquarters office. The project site is on property owned by the JPA within in the City of Calabasas (City). The JPA is serving as lead agency under the California Environmental Quality Act (CEQA) for this Initial Study / Mitigated Negative Declaration (IS/MND).

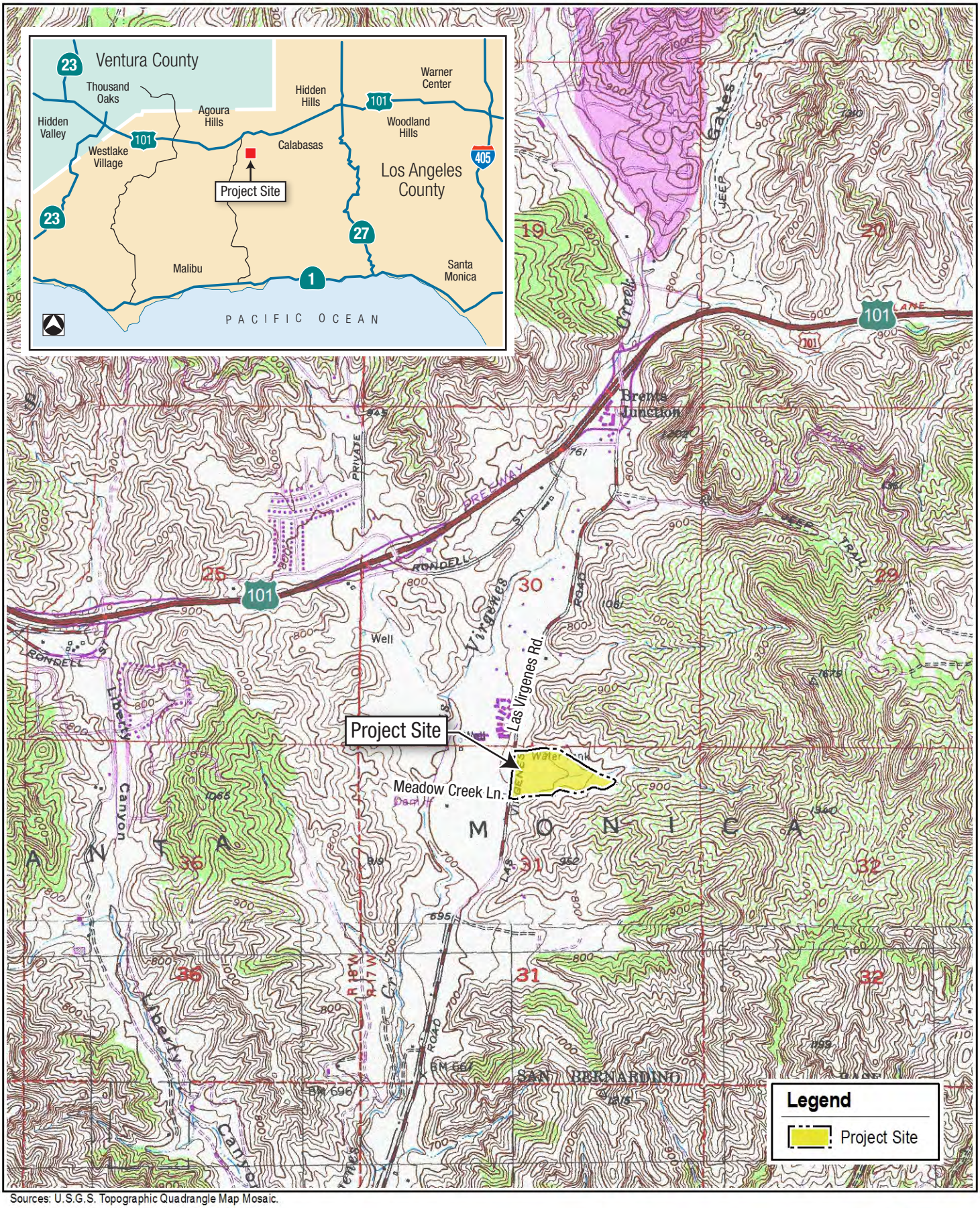
The project site is regionally located approximately 30 miles northwest of downtown Los Angeles and is located within a portion of Section 31, Township 1 North, Range 17 West as shown on the United States Geologic Survey 7.5' Calabasas Quadrangle as shown in **Figure 2-1, Vicinity Map**. The Ventura Freeway (U.S. 101) provides regional access to the area and the project site is approximately 1.15 miles south of U.S. 101 along the east side of Las Virgenes Road. The subject property lies immediately south of the Calabasas Bark Park[1] located at 4232 Las Virgenes Road, and is east of Las Virgenes Road, along a segment between the intersection of Meadow Creek Lane and Arthur E. Wright Middle School, as shown in **Figure 2-2, Project Location Map**. The project site is on property identified by the Los Angeles County Assessor as Assessor Parcel Number (APN) number 4455-025-900.

2.2 ENVIRONMENTAL SETTING

The site is currently vacant with no existing structures, as shown in Figure 2-2, Project Location Map. In late 2013, the JPA constructed an existing one MW solar electricity generation facility immediately northeast of the project site boundary on an upper earthen terrace consisting of excavated materials from the construction of the existing Rancho Las Virgenes Composting Facilities to the south of the project site in the early 1990s. The JPA uses this existing one MW solar generation facility to transmit solar electricity to the existing recycled water pump station located at LVMWD headquarters. The proposed project site has been previously cleared and graded to a relatively flat appearance, with a gentle existing grade of around 2% ascending from west to east. An existing private gravel road provides access into the property and around the perimeter of the site. The site is accessed from either the Bark Park parking lot or directly from a gate along Las Virgenes Road. Both entrances are gated and are not open to the public.

The Calabasas General Plan Land Use Map designates the property as Open Space – Resource Protection and the adjacent segment of Las Virgenes Road is within the Las Virgenes Scenic Corridor. The property is zoned Open Space (OS). Surrounding uses on the east side of Las Virgenes Road include the adjacent Phase I facility and the Bark Park (a neighborhood dog park) to the north, the LVMWD headquarters even further to the north, and undeveloped open space areas, including hillsides and ridgelines to the east and south. Development on the west side of Las Virgenes Road consists of residences (single-family and multi-family), Arthur E. Wright Middle School, a preschool, and Las Virgenes Unified School District offices.

[1] The Calabasas Bark Park is located on property owned by the JPA and leased for $1 per year to the City of Calabasas.



Sources: U.S.G.S. Topographic Quadrangle Map Mosaic.

JPA SOLAR GENERATION PROJECT PHASE II

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Vicinity Map

0 1,000 2,000 Feet

FIGURE 2-1

Sources: GoogleEarth Pro, Nov. 31, 2017.

JPA SOLAR GENERATION PROJECT PHASE II

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Project Location Map

0 150 300 Feet

FIGURE 2-2

Additionally, the City's General Plan shows the project site is located within a wildlife linkage and corridor, and a designated significant ridgeline lies along the northern boundary of the site.

The JPA previously used the site as a spray field to dispose of excess recycled water supplies by irrigation. The JPA has sufficient areas for irrigation at other areas in the vicinity and no longer needs the project site to serve this purpose. Irrigation activities are monitored by JPA to avoid surface ponding on the site. Other existing on-site activities include periodic tilling and mowing for weed and vegetation control, and the associated removal and replacement of surface spray irrigation pipes to facilitate vegetation management.

2.3 PROJECT CHARACTERISTICS

Proposed Solar Arrays and Electrical Equipment

The proposed project consists of the construction and operation of a four to five megawatt (4-5 MW) solar electricity generation facility with ground-mounted photovoltaic solar panels mounted on mechanical sun-tracking racking systems, an interconnection facility, and associated electrical equipment on approximately 20 acres in the northeast portion of the North Canyon portion of the JPA's Rancho Las Virgenes property, as shown in **Figure 2-3, Site Plan**. The associated electrical equipment would include new step-up transformers, inverters, panelboards, system disconnects, service meters, and switchgears necessary for the operation of the solar arrays. The electricity generated at the site would be transmitted along an existing dedicated underground line extension through the site and interconnected to an existing Southern California Edison (SCE) 16kV distribution line on the east side of Las Virgenes Road.

The solar arrays and inverters would be installed in rows with an east-west orientation within a gently sloping and previously disturbed portion of the property encircled by an existing dirt perimeter road along the base of slopes to the north, east, and south. The 20-acre development footprint where the solar arrays would be constructed is an oval shape approximately 1,530 feet long (east to west) by 725 feet across (north to south). The JPA used the site as spray field for disposal of surplus recycled water during low demand seasons, but no longer needs the site for that purpose. The existing, temporary, above-ground irrigation pipes on the project site would be removed prior to installation of the proposed solar arrays. An inactive 8-inch wide ductile iron utility pipeline also traverses the site underground east to west and would be removed during site preparation. An existing 24" recycled water pipeline traverses the westernmost extent of the project site along Las Virgenes Road as shown in Figure 2-3, any additional vegetation to screen the project would be planted 15 feet from the center of this pipeline.

The solar panel installation would be comprised of multiple rows of sun tracker system blocks. The solar panels would be mounted approximately three feet above the ground on a racking system bolted to steel poles driven into the ground in a grid pattern for each tracker block. The tracking system tilts the rows of solar panels to follow the sun during the day, starting with an east-facing position with a tilt angle of approximately 45 degrees, and ending with a west-facing position of approximately 45 degrees. At its starting and ending tilt positions, the maximum height of the upper edge of the solar panels would be approximately eight feet. A two-inch thick layer of gravel will be spread beneath the panels or other method approved by the District to control weed growth. The associated electrical equipment would be located to the southwest of

Source: GoogleEarth Pro, Dec. 31 2017.

Note: Conceptual simulation for illustrative purposes only, final design and configuration may differ from that shown

JPA SOLAR GENERATION PROJECT PHASE II

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Site Plan

FEET 0 150 300

FIGURE 2-3

the solar panel array as shown in Figure 2.3. The electricity generated by the solar arrays will be transmitted to the existing SCE 16kV distribution lines through a newly-constructed interconnection facility as a new source of renewable energy, which the JPA will receive bill credits for by SCE. Although there would be no physical connection between the proposed solar arrays and existing JPA equipment and facilities, SCE will meter the new renewable energy supplied to the existing grid, therefore allowing SCE to credit the JPA for the electricity generated against existing demands and providing an indirect source of clean energy to power the JPA's existing water and wastewater utilities.

Existing private gates from Las Virgenes Road and the Calabasas Bark Park parking lot will provide site access for construction and maintenance. The existing gravel road will be retained and maintained to provide a 20-foot wide access road around the perimeter of the site in accordance with Los Angeles (LA) County Fire Department requirements. The project would continue to maintain a zone of vegetation management to comply with LA County Fire Department fuel modification requirements. Once operational, the site will be accessed only by personnel responsible for periodic testing and maintenance, which will include washing the solar panels annually.

Finish Grading and Construction

The project site is relatively level, having been previously rough graded and tilled as part of ongoing operations to spray excess recycled water and control vegetation growth. To construct the proposed solar generation facility, minimal finish grading will ensure a minimum two percent slope across the site to facilitate drainage and prevent stormwater from ponding within the project site. No soil import or export is proposed. The solar panels will be mounted on steel poles driven into the ground to a depth of six to 14 feet depending on geological conditions. The largest pieces of the proposed electrical equipment, such as transformers and a switchgear, will be installed on reinforced concrete pads.

Project construction phase is expected to begin in the Spring of 2019, and last 9 to 12 months with completion in 2020 and operations beginning upon completion. There is sufficient space for staging construction equipment, material delivery, and crew member parking entirely on site. Construction vehicles will access the site via the private gate at the Bark Park or through a private gate from Las Virgenes Road. Construction equipment used during grading is expected to include up to two graders, two dozers, one loader, one excavator, and a water truck. Finish grading will be conducted at various locations across the 20-acre site, such that not all of the earthmoving equipment listed would be in use simultaneously in the same location.

2.4 DISCRETIONARY ACTIONS

As lead agency, the JPA has assumed responsibility for preparing this document in accordance with the substantive and procedural requirements of CEQA. The decision to approve the project is within the purview of the JPA. The purpose of this IS/MND is to disclose and consider potential physical impacts to the environment associated with the project when making the decision to approve the project. The JPA made the Draft MND available for review to the public and public agencies for 30 days to provide comments on the "sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the

significant effects of the project might be avoided or mitigated" (CEQA Guidelines Section 15204). No public comments were received by the JPA by the close of the comment period on November 15, 2018.

The MND may also be used by responsible agencies with a responsibility for carrying out or approving the project, including the discretionary permits or approvals deemed applicable to the project. This includes, but is not limited to, the following:

- Southern California Edison – Interconnection Agreement
- County of Los Angeles Fire Department – Fuel Modification Plan Approval

3.0 FINDINGS

The JPA finds the proposed project would not have a significant adverse effect on the environment based on the Initial Study/Environmental Checklist (see Section 4.0) and the Environmental Evaluation Discussion (see Section 5.0) of the Checklist Questions. For potentially significant effects, mitigation measures have been incorporated into the project to ensure these impacts remain at less than significant levels. A Mitigated Negative Declaration (MND) is therefore proposed to satisfy the requirements of CEQA (PRC 21000 et. seq. 14 Cal. Code Resolution 15000 et. seq.). This conclusion is supported by the findings detailed in Section 3.1, Findings of No Significant Effect.

3.1 FINDINGS OF NO SIGNIFICANT EFFECT

1. *Aesthetics:* Project implementation would not significantly affect scenic vistas, scenic resources, the visual quality of the site or its surroundings, day or nighttime views, and would not result in significant light or glare effects (see Section 5.I., Aesthetics). Due to the site's limited visibility, which is concealed by terrain or screened by landscaping, the project would not substantially alter the visual character or quality of views from public viewpoints. However, a mitigation measure would further reduce visual impacts through improved vegetative screening (see Section 3.2, Mitigation Measures and Monitoring Program and Section 5.I., Aesthetics).

2. *Agriculture and Forestry Resources:* Project implementation would not significantly affect agricultural resources (see Section 5.2, Agricultural Resources). Although the Los Angeles County Important Farmland Map prepared by the California Department of Conservation shows the project site is designated as Prime Farmland,[2] no agricultural production occurs on this site nor are there areas adjacent to the site with active farmland. The project would not conflict with existing zoning for agricultural use because the site is zoned Open Space and is not enrolled in a Williamson Act contract. Since the site itself is not currently farmed, already owned by the JPA, and is was used for spraying excess recycled water, the proposed project would not substantially change existing soil conditions and would result in a less than significant impact regarding the conversion of farmland to a non-agricultural use. There are no forest lands on the project site or in the vicinity. Impacts to agricultural resources would be less than significant.

3*. Air Quality:* The proposed project would generate electricity from a renewable energy source (solar) to partially offset the JPA's reliance on non-renewable energy sources. The operations of the proposed project would not create long-term significant impacts and would not obstruct the implementation of the Air Quality Management Plan. Project construction would not create significant short-term construction related air quality impacts, as enhanced dust control measures are required by South Coast Air Quality Management District (SCAQMD) Rule 403 due to the non-attainment status of the air basin for Particulate Matter (PM)-10/PM-2.5 microns. Off-site construction emissions would be less than significant because no soil export would be performed. Construction and operational emissions would be below SCAQMD thresholds of significance, resulting in a less than significant air quality impact.

[2] California Department of Conservation 2010.

4. *Biological Resources:* No special-status species requiring a mandatory finding of significance under CEQA 15380 have been found or are expected at the site due to the highly disturbed non-native conditions, including the 20-foot perimeter roadway and 10-foot vegetation clearance buffer required by the LA County Fire Department. The site does not have any streambed or riparian habitat, wetlands, or jurisdictional waters of the U.S., and is not located within a Habitat Conservation Plan area. The project would be located within a habitat linkage and although fauna may avoid the site, which would not be vegetated, the project would not represent a barrier to wildlife movement as no fencing is proposed and wildlife could pass between the solar panels allowing for dispersal of fauna. No artificial night lighting is proposed that would dissuade wildlife from moving through the site. The project would not impact oak trees protected by City ordinance, however there are several protected oak trees within proximity to the project site boundary, and as such could be subject to root protection zone impacts, or inadvertent direct impacts from onsite construction equipment. Mitigation measures have been incorporated to reduce potential impacts to biological resources (nesting birds and oak trees) to below a level of significance (see Section 3.2, Mitigation Measures and Monitoring Program and Section 5.4, Biological Resources).

5. *Cultural Resources:* The project site is not located in a Cultural Resource Sensitivity Area depicted in the City General Plan. Based on a review of historic maps and aerial images the project site does not contain historic cultural resources. The results of the South Central Coastal Information Center, Native American Heritage Commission, and historic map database searches were negative for cultural resources within the project site. The surface survey was also negative for cultural resources within the project site. Based on the proximity of the project site to the Cultural Resource Sensitivity Area identified in the General Plan and the discovery of petroglyphs embedded in the nearby water diversion feature outside of the project site, mitigation measures for archaeological monitoring have been incorporated to reduce potential impacts to unknown cultural resources inadvertently discovered during ground disturbance to below a level of significance (see Section 3.2, Mitigation Measures and Monitoring Program and Section 5.V, Cultural Resources).

6. *Geology and Soils:* The project would not introduce habitable structures for residents or employees and as such would not result in a significant risk of injury or loss of life from geological hazards. As the site is currently graded and relatively level, the minimal earth movement proposed would not cause a significant risk for off-site persons or property. Prior to construction of the project, geological evaluations will be performed onsite to determine specifications for installation and ensure stability of the project components onsite. Therefore, significant impacts related to geologic hazards are not anticipated (see Section 5.VI, Geology and Soils).

7. *Greenhouse Gas Emissions:* The project would provide electricity from a renewable resource, which would result in a decrease in greenhouse gas emissions. There would be no conflict with any plan, policy, or regulation that has been adopted to reduce such emissions. Therefore, no significant impacts are anticipated (see Section 5.VII, Greenhouse Gas Emissions).

8. *Hazards and Hazardous Materials:* The project site has not been identified as potentially having contaminated soils or other hazardous materials or waste. Additionally, the project would

not involve the use of explosives or acutely hazardous materials, and would not generate hazardous emissions during operation. During construction, relatively small amounts of hazardous substances, such as lubricants and solvents, would be transported and handled in accordance with applicable federal, state and local laws regulating the management and use of hazardous materials. The project site has not been identified on a list of hazardous materials sites, according to data from the Department of Toxic Substances Control, and is not located within the vicinity of a private airstrip. Implementation of the project would not significantly impact emergency access during construction or operations and would not interfere with emergency evacuation plans. No significant impacts related to hazards or hazardous materials impacts would result (see Section 5.VIII, Hazards and Hazardous Materials).

9*. Hydrology and Water Quality:* Minor finish grading could result in pollutants such as excess sediment being transported by runoff water. During high volume storms, stormwater that does not percolate into the ground would drain westward to an existing debris basin near Las Virgenes Road that collects runoff from the project site, including first flush stormwater runoff and enter an existing debris basin which drains to Las Virgenes/Malibu Creek. The creek is currently listed on the State Water Resource Control Board's 303(d) list of impaired water bodies for coliform, nutrients, organic enrichment, scum, sedimentation, selenium, and trash.[3] As a regulatory requirement, the applicant would prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) in accordance with the State Water Resources Control Construction General Permit (Order Number 2009-0009-DWQ, as amended). Adherence to applicable water quality standards and waste discharge requirements stipulated in the Construction General Permit, would reduce impacts related to water quality standards to less than significant during construction.

During operations, the project would not significantly increase runoff water from the site nor interfere with groundwater recharge, as areas beneath the proposed solar panels would remain pervious and no substantial impervious surfaces are proposed. As such, the project would not contribute significant amounts of runoff water to the existing drainage pattern. The project is not located within 100-year flood plain nor are there levee or dam structures located upstream of the project site. No significant impacts are anticipated from the project's operation (see Section 5.IX, Hydrology and Water Quality).

10*. Land Use and Planning:* The proposed project would not physically divide an established community nor conflict with any applicable plan, policy, or regulation of an agency with jurisdiction over the project site including any applicable habitat conservation plan or natural community conservation plan. No significant impacts are anticipated (see Section 5.X., Land Use and Planning).

11*. Mineral Resources:* Project implementation would not result in the loss of availability of a known mineral resource or the loss of availability of a locally important and delineated mineral resource recovery site (see Section 5.XI., Mineral Resources).

12*. Noise:* Project construction activities would generate noise that could potentially exceed standard noise ordinance thresholds at nearby residences. The City of Calabasas noise

[3] 2014 and 2016, CWA Section 303(d), List of Water Quality Limited Segments, LA RWQCB.

ordinance provides an exception to the noise limitations for construction activities that occur during prescribed daytime hours. Mitigation measures have been identified that would reduce potential construction noise impacts to less than significant. The project would not expose sensitive receptors to significant ground vibrations during construction, and would not generate traffic noise levels that would contribute to a significant noise increase under existing or cumulative conditions. The project would not be located near a public or private airport (see Section 3.2, Mitigation Measures and Monitoring Program, and Section 5.XII., Noise).

13*. Population and Housing:* The project would not affect local housing availability, displace substantial numbers of people or impact population trends (see Section 5.XIII., Population and Housing).

14*. Public Services:* The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered government facilities (see Section 5.XIV., Public Services).

15*. Recreation:* The project would not significantly affect recreational facilities in the project vicinity nor does the project include or require the construction of recreational facilities (see Section 5.15, Recreation).

16*. Transportation/Traffic:* The project would not have a significant impact on transportation/traffic, including direct and cumulative effects and parking impacts, during operation or construction (see *Section 5.XVI., Transportation/Traffic*) or conflict with applicable policies, plans, programs or congestion management programs. Mitigation Measure Traffic-1 would ensure that appropriate traffic controls and scheduling are implemented during project construction, and that use of local roads by vehicles related to project construction is minimized. The project would not have any direct impacts on air traffic, as the site is not located in proximity to a regional or private airport, and does not include development of a private airstrip or heliport. The project would not alter roadway design, or introduce a land use that would be incompatible with existing traffic patterns. Impacts related to emergency access would be less than significant, as private entryways would be available for such access, and an existing dirt roadway network onsite will provide internal circulation.

17. *Tribal Cultural Resources*: The JPA notified Tribal Groups affiliated with the geographic area of the project site that submitted written requests for notification by sending a project scoping letter dated September 7, 2018. The JPA received no requests for consultation within 30 days of the project scoping letter. Based on the proximity of the project site to the Cultural Resource Sensitivity Area identified in the General Plan and the discovery of petroglyphs embedded in the nearby water diversion feature, mitigation measures for Native American monitoring have been incorporated to reduce potential impacts to unknown tribal cultural resources inadvertently discovered during ground disturbance to below a level of significance (see Section 3.2, Mitigation Measures and Monitoring Program and Section 5.XVII. Tribal Cultural Resources). Therefore, the project would result no significant effects to Tribal Cultural Resources.

18*. Utilities and Service Systems:* Project implementation would not significantly affect utilities and service systems, including water supply, wastewater treatment, and solid waste

disposal. Operation of the project would generate minimal solid waste, no wastewater, and water use would be limited to washing the solar panels approximately once annually (see Section XVIII., Utilities and Service Systems). The project does not propose facilities that would generate wastewater or provide such treatment, nor does the project require any new drainage facilities or be expected to result in a substantial increase of runoff. Operational solid waste would not be generated because no personnel would be employed onsite with the exception of periodic maintenance. Solid waste generated during project construction would not result in significant impacts to the Calabasas Landfill, which has adequate capacity to remain operational for the next ten years. The project would separate recyclable construction materials onsite for diversion from landfill disposal to facilitate the City's compliance with Assembly Bill 939 requirements. Any hazardous materials to be used on the site would be recycled, treated, and disposed of in accordance with federal, state, and local laws.

3.2 MITIGATION MONITORING AND REPORTING PROGRAM

The section contains the mitigation measures to be imposed on the project to reduce impacts to less than significant. Mitigation measures consist of:

Aesthetics

AES-1 To reduce the aesthetic impact of the solar arrays within the Las Virgenes Scenic Corridor, the applicant shall provide vegetative screening by planting additional vegetation at the time of project construction where gaps in the existing treeline along Las Virgenes Road allow substantially unscreened views of the project site. Any additional vegetation to screen the project shall be planted 15 feet from the center of the existing 24" recycled water pipeline that crosses north to south in the westernmost extent of the project site. Mitigation vegetation shall be placed so that visual screening of the site will be enhanced as the vegetation matures. Such planting shall not obstruct the existing gate and roadway that provides access to the site from Las Virgenes Road. Additional vegetation shall consist of a mix of evergreen and deciduous varieties, and the number, size, and placement of vegetation for visual screening shall be determined in consultation with the City of Calabasas Director of Community Services with respect to the City's Scenic Corridor designation.

Biological Resources

BIO-1 Project activities including, but not limited to, site preparation, construction, or fuel modification, with potential to disturb suitable bird-nesting habitat shall be prohibited within the breeding/nesting season for native bird species (February 1 through August 31). If project activities cannot feasibly avoid the breeding bird season, thirty days prior to the disturbance of suitable nesting habitat, the applicant shall arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within properties adjacent to the project site, as access to adjacent areas allows. A qualified biologist with experience in conducting breeding bird surveys shall conduct the surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than three (3) days prior to the initiation of

clearance/construction work. The field surveys shall determine if active nests of any bird species protected by the state or federal Endangered Species Acts, Migratory Bird Treaty Act, and/or the California Fish and Game Code Sections 3503, 3503.5, or 3511 are present at the limits of disturbance or within 500 feet of the limits of disturbance.

If active nests are identified during pre-construction surveys or discovered after construction has started, they will be protected with spatial buffers. Buffer size will be determined on a case-by-case basis by a qualified biologist based on site conditions, the species' life history and disturbance tolerance, the nest's distance to construction activities, and the type of construction ongoing in the vicinity of the nest. Buffers will be clearly delineated (e.g., using rope, flagging, signage); or they may also be defined by natural or man-made features that are deemed sufficient to prohibit access (e.g., tree rows, fences). Buffers will remain in place and will be monitored and maintained regularly during the nesting season or until the biologist determines that the young have fledged or the nest failed or construction has been completed.

BIO-2 Final site plan drawings shall be provided that clearly demonstrate that all ground disturbance activities would not encroach into any oak tree protection zone as defined by City ordinance. City ordinance defines the protection zone as 5 feet from the canopy dripline, and no less than 15 feet from the tree trunk.

Cultural Resources

CUL-1: A Lead/Permitting Agency-approved archaeologist that meets the Secretary of Interior qualifications and a Native American monitor will be on site during project grading until older alluvial material is encountered. The archaeological monitor will collect any prehistoric or older (pre-1950s) cultural material that is uncovered through grading or site clearing, and can halt construction within 50-feet of a potentially significant cultural resource if necessary. If potentially significant intact deposits are encountered, then a cultural resource "discovery" protocol will be followed (see below). If modern fill is encountered, then the monitor can instead "spot-check" grading until native soils are again encountered. Any demolition or removal of existing structures or features associated with the irrigation system will not require monitoring.

CUL-2: The inadvertent discovery of archaeological resources is always a possibility during ground disturbances; California Penal Code Section 622.5 addresses these findings. If buried materials of potentially-archaeological significance are inadvertently discovered within an undisturbed context during any earth-moving operation associated with the proposed project, then all work in that area shall be halted or diverted away from the discovery to a distance of 50-feet until a qualified senior archaeologist can evaluate the nature and/or significance of the find(s). If, upon assessment by a qualified senior archaeologist, the find is not determined to be significant, then construction may resume.

If the find is determined to be potentially significant, then the Lead/Permitting Agency will be immediately notified of the discovery. Construction will not resume in the locality of the discovery until consultation between the senior archaeologist, the project manager, the Lead/Permitting Agency, the Applicant's representative, and all other concerned parties, takes place and a reaches a conclusion approved by the Lead/Permitting Agency.

If a significant cultural resource is discovered during earth-moving, complete avoidance of the find is preferred. However, further survey work, evaluation tasks, or data recovery of the significant resource may be required by the Lead/Permitting Agency if the resource cannot be avoided. In response to the discovery of significant cultural resources, the Lead/Permitting Agency may also add additional regulatory compliance for use during further site development, which may include cultural and/or Native American monitoring.

Tribal Cultural Resources

Mitigation measures CUL-1 and CUL-2 shall apply.

Noise

NOI-1 The construction contractor shall oversee that construction activities only occur from 7:00 a.m. to 6:00 p.m., Monday through Friday, and Saturday from 8:00 a.m. to 5:00 p.m. Construction shall not be permitted on Sunday or holidays without prior consultation with the City of Calabasas Community Development Director.

NOI-2 The construction contractor shall oversee that mobile earth-moving and construction equipment has properly operating and maintained mufflers.

4.0 INITIAL STUDY AND CHECKLIST

CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY AND CHECKLIST

1. Project title:
Joint Powers Authority (JPA) Solar Generation Project Phase II

2. Lead agency name and address:
Las Virgenes - Triunfo JPA
4232 Las Virgenes Road
Calabasas, California 91302

3. Contact person and phone number:
Mr. John Zhao, P.E.
Phone (818) 251-2230

4. Project location:
Within the 3900 and 4000 blocks of Las Virgenes Road, Calabasas, CA 91302

The project is located in western Los Angeles County within the City of Calabasas and occupies a portion of Section 31, Township 1 North, Range 17 West as shown on the United States Geologic Survey 7.5' Calabasas Quadrangle. The subject property lies immediately south of the Calabasas Bark Park located at 4232 Las Virgenes Road. The project site property is identified by the Los Angeles County Assessor as Assessor Parcel Number 4455-025-900. A component of the project is a proposed underground electrical transmission line within the project site connecting through a Southern California Edison (SCE) distribution box to the existing 16 kilovolt (kV) transmission lines west of the site along the east side of Las Virgenes Road. All project parcels are owned by the JPA.

5. Project sponsor's name and address:
Las Virgenes - Triunfo JPA
4232 Las Virgenes Road
Calabasas, California 91302

6. General plan designation:
Open Space – Resource Protection (City of Calabasas 2030 General Plan, October 2015)

7. Zoning:
OS (Open Space)

8. Description of project:
The proposed project would construct and operate a solar generation facility located in western Los Angeles County within the City of Calabasas, California. The purpose of the project is to provide a renewable source of energy to power the JPA's operations. The project components would consist of a solar electricity generation facility with ground-mounted photovoltaic solar panels mounted on mechanical sun-tracking racking systems, and associated electrical equipment on approximately 20 acres including new step-up transformers, inverters, panelboards, system disconnects, service meters, and switchgears necessary for the operation of the solar arrays.

The site would be accessed through existing private entry driveways from Las Virgenes Road and the Calabasas Bark Park parking lot (see attached project description in Section 2.0 for additional information).

9. **Surrounding land uses and setting:**
Surrounding land uses include the adjacent Calabasas Bark Park neighborhood recreation facility, and open space areas, as well as development on the opposite side of Las Virgenes Road that consists of residences (single-family and multi-family), Arthur E. Wright Middle School, a preschool, and Las Virgenes Unified School District offices.

10. **Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.):**
None.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

☒	Aesthetics	☐	Agriculture and Forestry Resources	☐	Air Quality
☒	Biological Resources	☒	Cultural Resources	☐	Geology /Soils
☐	Greenhouse Gas Emissions	☐	Hazards & Hazardous Materials	☐	Hydrology/Water Quality
☐	Land Use/Planning	☐	Mineral Resources	☒	Noise
☐	Population/Housing	☐	Public Services	☐	Recreation
☐	Transportation/Traffic	☒	Tribal Cultural Resources	☐	Utilities/Service Systems
☒	Mandatory Findings of Significance				

DETERMINATION:

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "less than significant with mitigation incorporated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described

on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project. Therefore, an EIR Addendum will be prepared.

Signature Date

Name: John Zhao, P.E., Principal Engineer

EVALUATION OF ENVIRONMENTAL IMPACTS:

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

    a) Earlier Analysis Used. Identify and state where they are available for review.
    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9. The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and
   b) the mitigation measure identified, if any, to reduce the impact to less than significance.

ENVIRONMENTAL IMPACTS (Explanations of all potentially and Less Than Significant Impacts are included in Section 5 *Discussion of Initial Study Environmental Checklist*)

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I.	**AESTHETICS.** Would the project:				
a.	Have a substantial adverse effect on a scenic vista?	☐	☒	☐	☐
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a scenic highway?	☐	☒	☐	☐
c.	Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d.	Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
II.	**AGRICULTURE AND FORESTRY RESOURCES.** Would the project:				
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☒	☐
b.	Conflict the existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	☒
c.	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☒	☐
d.	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e.	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒
III.	**AIR QUALITY.** The significance criteria				

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations. Would the project result in:				
a.	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b.	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c.	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d.	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e.	Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐
IV.	**BIOLOGICAL RESOURCES.** Would the project:				
a.	Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
c.	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) Through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e.	Conflict with any local policies or ordinances	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
protecting biological resources, such as a tree preservation policy or ordinance?				
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan?	☐	☐	☒	☐
V. CULTURAL RESOURCES: Would the project:				
a. Cause a substantial adverse change in significance of a historical resource as defined in CEQA Section 15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to CEQA Section 15064.5?	☐	☒	☐	☐
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒
d. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐
VI. GEOLOGY AND SOILS. Would the project:				
a. Exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☒	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table	☐	☐	☒	☐

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?				
e.	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
VII.	**GREENHOUSE GAS EMISSIONS.** Would the project:				
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b.	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐
VIII.	**HAZARDS AND HAZARDOUS MATERIALS.** Would the project:				
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f.	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?	☐	☐	☐	☒
g.	Impair implementation of or physically interfere with an adopted emergency response plan or	☐	☐	☒	☐

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	emergency evacuation plan?				
h.	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☒	☐
IX.	**HYDROLOGY AND WATER QUALITY.** Would the proposal result in:				
a.	Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b.	Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	☐	☐	☒	☐
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off site?	☐	☐	☒	☐
e.	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f.	Otherwise substantially degrade water quality?	☐	☐	☒	☐
g.	Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h.	Place within a 100-year flood plain structures, which would impede or redirect flood flows?	☐	☐	☐	☒
i.	Expose people or structures to a significant risk of loss, inquiry or death involving flooding, including	☐	☐	☐	☒

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
	flooding as a result of the failure of a levee or dam?				
j.	Inundation by seiche, tsunami, or mudflow?	☐	☐	☒	☐
X.	**LAND USE AND PLANNING**. Would the project:				
a.	Physically divide an established community?	☐	☐	☐	☒
b.	Conflict with applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☒	☐	☐
c.	Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☒	☐
XI.	**MINERAL RESOURCES**. Would the project:				
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b.	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒
XII.	**NOISE.** Would the project result in:				
a.	Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b.	Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c.	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒
d.	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
XIII. POPULATION AND HOUSING. Would the project:				
a. Induce substantial population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
XIV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	☐	☐	☐	☒
b. Police protection?	☐	☐	☐	☒
c. Schools?	☐	☐	☐	☒
d. Parks?	☐	☐	☐	☒
e. Other public facilities?	☐	☐	☐	☒
XV. RECREATION.				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒
XVI.	**TRANSPORTATION/TRAFFIC**. Would the project:				
a.	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐
b.	Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c.	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d.	Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e.	Result in inadequate emergency access?	☐	☐	☒	☐
f.	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒
XVII.	**TRIBAL CULTURAL RESOURCES.** Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a.	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	☐	☐	☐	☒
b.	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐
XVIII.	**UTILITIES AND SERVICE SYSTEMS.** Would the project:				
a.	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
b.	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c.	Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
d.	Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?	☐	☐	☒	☐
e.	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
f.	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g.	Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

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

5.0 DISCUSSION OF INITIAL STUDY ENVIRONMENTAL CHECKLIST

The following discussion of environmental impacts anticipated to result from the proposed project consists of a brief explanation for each of the answers provided in the Initial Study/Environmental Checklist. For each issue addressed below, the impacts associated with this project have been determined to be "Less Than Significant with Mitigation Incorporated", "Less Than Significant", or "No Impact." Source data and information has been provided to substantiate the level of significance determination for each environmental topic. The topics determined to be "Less Than Significant with Mitigation Incorporated" will have mitigation measures identified that would reduce impacts to a less than significant level. These mitigation measures will be incorporated into the Mitigation Monitoring and Reporting Program (MMRP) for implementation during project construction and operations.

I. AESTHETICS

a) Would the project have a substantial adverse effect on a scenic vista?

Less Than Significant with Mitigation Incorporated. The project would be constructed adjacent to similar solar energy infrastructure located at the margins of urban development within the City, where land uses transition from urban uses to open space. This discussion evaluates the project's potential impacts on scenic views from Las Virgenes Road, a City-designated Scenic Corridor, as well as from nearby public recreation areas and public trails. The following evaluation relies on City policies regarding visual resources, site reconnaissance by Envicom Corporation to determine relevant public viewpoints, and visual simulations by Interacta Inc., provided in **Appendix A**.

Scenic Views from Las Virgenes Road

The site is located within the Las Virgenes Scenic Corridor as designated by the City General Plan. The City defines the corridor as "a key cross-mountain roadway that provides primary access to the Malibu Creek State Park area and the Pacific Coast"[4] Properties within Scenic Corridors are covered by a Scenic Corridor Overlay Zone in the City's Zoning Map (Calabasas Municipal Code Section 17.18.040).

As described in the Community Design Element of the City General Plan, the purpose of the Scenic Corridor Overlay Zone is to "protect an important economic and cultural base of the City by preventing the destruction of the natural beauty and environment of the City; to safeguard and enhance property values; to protect public and private investment, buildings and open spaces; and to protect and enhance the public health, safety, and welfare."

The Scenic Corridor Overlay Zone district boundaries include all properties that are:

- Located within five hundred (500) feet of a road designated as a scenic corridor;
- Located between a designated scenic corridor road and the prominent ridgeline which defines the viewshed from the scenic corridor; or

[4] City of Calabasas General Plan 2030, 2008 pg. IX-28.

- Where the director determines development may have an impact upon the designated scenic corridor.

The project site is located adjacent to the Las Virgenes Road right-of-way and the western portion of the site is within the 500-foot limit for the Scenic Corridor Overlay. Further, the proposed solar panels would be installed at distances ranging from approximately 80 feet to 1,490 feet from Las Virgenes Road, and would be located between the roadway and a prominent ridgeline. Therefore, an evaluation was conducted of the visibility of scenic resources, considering the location of the proposed project elements, as seen from Las Virgenes Road. The analysis determined whether the project would represent a significant impact to scenic views of the hillside and mountain areas, which the traveling public may enjoy along the scenic corridor.

The site is situated within a canyon area with steep hillsides and ridgelines at its edges that restrict the viewshed of this site. The east-west trending ridgelines that define the northern and southern boundary of the project site viewshed conceal the project site from views along the majority of the designated scenic corridor, with the exception of an approximately 0.12-mile (approximately 650 feet) segment between Meadow Creek Lane and A.E. Wright Middle School. The project site is relatively level from previous grading and periodic tilling of soils for vegetation control and spraying recycled water. Existing solar panels immediately north of the site are set back from the roadway approximately 600-1,600 feet and situated against the base of the ridgeline along the northern site boundary. The existing solar panels are located on a slightly raised portion of the property, at approximately 790 feet to 800 feet above sea level (asl). The proposed panels would be located on the lower portion of the site, with the nearest panels to Las Virgenes Road being installed at an elevation of approximately 745 feet asl. The project site is relatively flat, with an existing average grade of approximately three percent. The project would create an even grade of about two percent across the site, which would result in the most distant panels from Las Virgenes Road being installed at an elevation of approximately 775 feet. The elevation of Las Virgenes Road along the project frontage ranges from about 739 to 742 feet.

To characterize existing conditions, photos of the site were taken from Las Virgenes Road to approximate views available to southbound and northbound motorists within the scenic corridor. Existing views from Las Virgenes Road are provided in **Figure 5.1-1** and **Figure 5.1-2**, which show southeasterly and northeasterly views, respectively. As seen in Figures 5.1-1 and 5.1-2, an existing row of trees and vegetation at the project boundary substantially screen views of the site from Las Virgenes Road, consisting of a mix of deciduous and evergreen varieties. In addition to the nearly continuous row of roadside trees, the foreground view includes existing utility poles and associated overhead transmission lines. From sporadic viewing locations along this roadway, through gaps in the existing roadside trees and where a gated access road enters the subject property, the site has the appearance of an agricultural field, with undeveloped hillsides and ridgelines seen in the background. The deciduous varieties of the existing roadside trees provide less visual screening during winter months, however the mix of deciduous and evergreen trees as provided on the site is consistent with City of Calabasas stated guidelines regarding landscaping for scenic corridors. Due to the roadway being at

Photo 1A – Southeasterly view from Las Virgenes Road near A.E. Wright Middle School. Photo taken June 30, 2018.

Photo 1B – Southeasterly view of the project site. Photo taken June 30, 2018.

Photo 1C – Southeasterly view of the project site. Photo taken June 30, 2018.

Photo 1D – Southeasterly view of the project site. Photo taken June 30, 2018.

Photo 1E – Southeasterly view of the project site. Photo taken June 30, 2018.

Southeasterly Views of Existing Conditions

Photo 2A – Northeasterly view from Las Virgenes Road at Meadow Creek Lane. Photo taken June 30, 2018.

Photo 2B – Northeasterly view of the project site. Photo taken June 30, 2018.

Photo 2C – Northeasterly view of the project site. Photo taken June 30, 2018.

Photo 2D – Northeasterly view of the project site. Photo taken June 30, 2018.

Photo 2E – Northeasterly view of the project site. Photo taken June 30, 2018.

Northeasterly Views of Existing Conditions

slightly lower elevations than the northern and southern ends of the project site, views from those portions are also screened by roadside slopes and vegetation.

The project would add additional rows of solar panels on the site adjacent to the existing solar panels located at the northern edge of the site. The additional solar panels would be located approximately 100 feet to 160 feet from the centerline of Las Virgenes Road, and extend to the east. The proposed solar panels would be mounted approximately 3 feet above ground on poles driven into the ground. When rotated to the most upright position, each panel would reach a maximum height of approximately eight feet above ground. Visual simulations of the proposed solar panels were created from conceptual plans to provide a representation of how the additional solar panels would appear from Las Virgenes Road, when the panels are rotated at the greatest extent. **Figure 5.1-3** shows the view locations for the visual simulations, which were chosen as representative locations of a worst-case impact, due to the relative lack of existing screening vegetation compared to other portions of the site. **Figure 5.1-4** and **Figure 5.1-5** present the two visual simulations from Las Virgenes Road, and show the existing conditions photos for comparison. **Figure 5.1-6** provides an additional visual simulation of the proposed project with additional vegetation provided for visual screening between the roadway and the proposed panels. Due to the relatively flat site topography, which would be made flatter by the project, potential views of the solar panels from the roadway would primarily consist of the front row of panels only. As seen in the simulations, the addition of vegetation would substantially screen the proposed panels from view by motorists as well as pedestrians along Las Virgenes Road.

The project design would place the proposed solar panels at elevations approximately 150 to 300 feet lower than the ridgelines that dominate the viewshed and represent visible scenic resources. The region's topography, high ridgelines, and visual screening from existing trees along the site frontage limit the potential for public views of the project site from the roadway and reduce the project's potential impact to the scenic vista. However, the extent of the proposed solar panels across the site would adversely affect the scenic vista available from Las Virgenes Road where there are gaps in the existing vegetation at the project boundary. Implementation of mitigation measure **AES-1** would increase visual screening of the project by adding vegetation between the proposed panels and the roadway, which would reduce potential impacts to scenic vistas within the Las Virgenes Road Scenic Corridor to less than significant.

Mitigation Measure

AES-1: To reduce the aesthetic impact of the solar arrays within the Las Virgenes Scenic Corridor, the applicant shall provide vegetative screening by planting additional vegetation at the time of project construction where gaps in the existing treeline along Las Virgenes Road allow substantially unscreened views of the project site. Any additional vegetation to screen the project shall be planted 15 feet from the center of the existing 24" recycled water pipeline that crosses north to south in the westernmost extent of the project site. Mitigation vegetation shall be placed so that visual screening of the site will be enhanced as the vegetation matures. Such planting shall not obstruct the existing gate and roadway that provides access to the site from Las Virgenes Road. Additional vegetation shall consist of a combined mix of evergreen and deciduous varieties, and the number, size, and

Source: GoogleEarth Pro, Dec. 31, 2017.

View Locations for Visual Simulations

FEET 0 225 450

FIGURE 5.1-3

Source: Interacta Inc., July 14, 2018.

Note: Conceptual simulation for illustrative purposes only, final design and configuration may differ from that shown

Visual Simulation from Location 1

FIGURE 5.1-4

Source: Interacta Inc., July 14, 2018.

Note: Conceptual simulation for illustrative purposes only, final design and configuration may differ from that shown

Visual Simulation from Location 2

FIGURE 5.1-5

Source: Interacta Inc., July 14, 2018.

Note: Conceptual simulation for illustrative purposes only, final design and configuration may differ from that shown

Visual Simulation of Vegetative Screening

FIGURE 5.1-6

placement of vegetation for visual screening shall be determined in consultation with the City of Calabasas Director of Community Services with respect to the City's Scenic Corridor designation.

Scenic Views from Public Recreation Areas

The project site is located near public parks, including the Calabasas Bark Park and Juan Bautista de Anza Park, managed by the City of Calabasas, and the Malibu Creek State Park managed by the California Department of Parks and Recreation. Additionally, public trail systems cross open space areas in the site vicinity. This analysis evaluates the project's potential to impact views from these locations.

Public Parks

The Calabasas Bark Park is located adjacent to the northern boundary of the project site. A ridgeline between the properties visually separates the project site from the Bark Park. As such, the project would not impact views from this park.

Juan Bautista de Anza Park is located at the intersection of Las Virgenes Road and Lost Hills Road approximately 0.5 mile southwest of the project site. Northeast views towards the project site from this park are characterized by existing multi-family developments and intervening ridgelines that prevent views of the project site from this location.

Malibu Creek State Park is a 7,000-acre recreational area for hiking biking and equestrian use. The park entrance is approximately 2.5 miles south of the project site on Las Virgenes Road. The park boundary extends north towards the project site along the west side of Las Virgenes Road. Intervening ridgelines prevent views of the project site from this location. Some portions of the park are located along the crest of the Santa Monica Mountains and as such have extended views of the region including various cities along the U.S. 101 corridor. It is possible that the site would be within views from some elevated portions of Malibu Creek State Park, however due to distances of over four miles, and elevation differences of about 1,000 feet, the project site would blend with other urban aspects of landscape of western Calabasas if visible in views from the higher elevations of this State Park.

As the project site cannot be viewed from public parks within the City of Calabasas, and if visible from distant portions of Malibu Creek State Park, would not alter the visual character of such views, the project would have no impacts on views from those public parks.

Public Trails

Public trails in the vicinity of the project site provide recreation opportunities for hiking, biking, and equestrian use. These trails include the New Millennium Loop Trail, the Bark Park Trail, a network of additional trails to the north and east of the project site, and the Grasslands Trail, which provides access into Malibu Creek State Park from Juan Bautista de Anza Park. To evaluate visual impacts from these locations, photographs were taken from key locations along each of these trails that represented potential viewpoints of the project site.

The Grasslands Trail is accessed from Juan Bautista de Anza Park, discussed above, does not provide views of the project site. From that location, the trail extends southerly, parallel to Las

Virgenes Road. This trail crests a small ridge approximately 0.7 mile from the park, or about 1.3 miles from the project site. Northeasterly views from this location (towards the project site) include ridgelines that are generally east-west trending, which conceal the project site from view. As this point is representative of the higher elevations attained on this trail north of Mulholland Highway, views from this location would be similar to other views along this trail in regards to visibility of the proposed project.

The Bark Park Trail is located north of the project site and is accessed from Las Virgenes road via the Bark Park parking lot. This trail is at one point approximately 300 feet from the project site; however, an intervening ridgeline prevents views of the proposed project site from the Bark Park Trail.

The New Millennium Loop Trail is located within open space and existing residential developments to the east of the project site. Accessed via the Bark Park Trail (among other access points), a network of trails traverses the nearby hills, although due to distance and rugged terrain, only the New Millennium Loop Trail would provide views of the project site. At a location east of the project site, approximately 1.3 miles from Las Virgenes Road and an elevation of 1,200 feet (400 feet higher than the project site), trail users would be able to view the site from the New Millennium Loop Trail at a distance of approximately 0.4 mile. As the trail continues to the south, the project site remains generally in view for a distance of approximately 0.6 mile as shown on **Figure 5.1-7**. This distance represents seven percent of the overall New Millennium Loop Trail, and a smaller proportion of the overall trail network within this region. The project site lies at distances of between 0.4 and 0.6 miles along this trail segment, with a difference in elevation of 400 to 500 feet below the trail. As seen in a representative photograph provided in Figure 5.1-6, views from this trail segment include open space areas, and the urban development area of western Calabasas. The project site is seen in the transitional area between urban development and the undeveloped ridgelines, and has the appearance of an agricultural field due to vegetation clearance and periodic soil tilling that occurs on the site. From this distance and elevation, the project would not block views of significant ridgelines or other scenic resources. The project would not significantly change the character of views from this location, which includes views of residences, commercial buildings, and the U.S. 101 Freeway.

Due to the small proportion of the public trail system from which the project site can be viewed, the distance and elevation difference of those views, and the existing urban features within the viewshed, the proposed solar panels would not have a substantial adverse effect on scenic views from public trails. Therefore, the visual impact of the proposed project on scenic views from all analyzed public recreation areas would be less than significant.

Other Views

The project site is located within a viewshed characterized by a transition from existing urban development west of Las Virgenes Road to open space. Views from private locations are typically not analyzed in CEQA documents. However, to remain sensitive to potential public concerns and in the interest of a good faith effort at full disclosure, the following discussion considers the project site's visibility and potential to substantially alter the existing natural scenery from private viewpoints.

Trail View – Westerly view of the project site as seen from the New Millennium Loop Trail, showing residences and commercial development of western Calabasas. Photo taken February 2, 3013.

As discussed previously, the mountainous site topography restricts views of the project from residences with the exception of those areas to the west and southwest of the project site. This orientation conceals the project from the majority of residences in western Calabasas. Some existing residential developments, identified as having east-facing views toward the project site, are also located at elevations that afford partial views of the project site. These private single-family residential developments with partial views of the project site include those located along:

- Lost Springs Drive and other associated roadways, which are located a distance of approximately 1,600 to 3,000 feet west of the project site;
- Calabasas Hills Road, Mountain Shadows Road and other associated roadways, which are located approximately 2,200 to 4,000 feet west from the project site; and
- Marks Road from which as many as ten residences may have partial views of the site from distances of 5,000 to 6,000 feet west of the project site.

Views from any of these locations would be characterized as having existing urban and rural elements. Private views from these residences toward the project site would include the high ridgeline areas of central Calabasas and existing residential and commercial developments. The project site would appear on the eastern edge of this urbanized portion of Calabasas as development transitions to a rural and open space appearance. **Figure 5.1-8** provides an existing conditions photo and a visual simulation of the proposed project as viewed from a location along Calabasas Hills Road, where the site may be observed between existing vegetation and structures. The location depicted in Figure 5.1-8 is the location where the project was most visible from a public roadway west of the project site. As seen in Figure 5.1-8, due to distance, intervening landscaping, and existing buildings, the proposed project would be partially visible from portions of this public roadway. The project would be visually subordinate to the ridgelines and would not block views of the ridgelines designated as significant in the City General Plan and represent the scenic resources with the highest value and visibility from private residences in western Calabasas. Although CEQA analyses typically evaluate public views, the proposed project would not block views of the significant ridgelines, even from private residences on this street.

Visual simulations of the project from Marks Road, Lost Springs Drive, and other area roadways were not generated as no public portion of those roadways would provide views of the project site. Although private views are not typically a concern under CEQA, due to the spatial separation and difference in elevation between the project site and the residences from which the project would be partially visible, the proposed solar arrays would not obstruct views of the significant ridgelines and would appear subordinate to the existing landscape.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Less Than Significant with Mitigation Incorporated. Construction of the solar electricity generation facility on the project site would not damage scenic resources such as trees, rock outcroppings or historic buildings visible from an officially designated state scenic highway. As

Source: Interacta Inc., July 14, 2018.

Note: Conceptual simulation for illustrative purposes only, final design and configuration may differ from that shown

Visual Simulation from Calabasas Hills Road

FIGURE 5.1-8

shown on the California Department of Transportation's Scenic Highway Mapping System,[5] the portion of Las Virgenes Road that lies adjacent to the subject property is not designated as a state scenic highway (although the City designates it a Scenic Corridor). Therefore, the project would result in no impact regarding scenic resources with a state scenic highway.

Further, the proposed project site would not be visible from Malibu Canyon – Las Virgenes Highway (N1), the nearest Los Angeles County designated Scenic Highway, which extends from State Route 1 (PCH) to Lost Hills Road, approximately 0.4 miles south of the project site.[6] The proposed project would not affect views from the County Designated Scenic Highway portion of Las Virgenes Road, and the project would result in no impact regarding scenic resources with a County scenic highway.

The segment of Las Virgenes Road that lies adjacent to the project site is designated as a Scenic Corridor by the City General Plan, and impacts to scenic vistas were evaluated in light of the policies and requirements of the Las Virgenes Corridor Design Plan as described in Sections 5.I-a, regarding scenic vistas, and 5.X., Land Use and Planning. The project would not require removal of protected oak trees as defined by City of Calabasas Ordinance. Any oak tree encroachment impacts would be mitigated by BIO-2 as discussed in Section 5.IV., Biological Resources. Implementation of **AES-1** would reduce the visual impact of the project within a City scenic highway to less than significant through the provision of vegetative screening.

c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Less Than Significant Impact. The project would be located a disturbed site with existing irrigation lines and limited visibility from public roadways due to topography and existing vegetative screening along Los Virgenes Road. By locating the solar arrays on relatively flat, previously-disturbed land, the project design minimizes landform alteration and avoids disturbing hillsides and ridgelines that offer the most visible and highest value scenic resources of the site. Overall, impacts to the existing visual character or quality of the vicinity would be less than significant.

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

Less Than Significant Impact. The project site is currently open space with no structures onsite, and no associated lighting or reflective surfaces to produce glare.

Lighting

The proposed solar generation facility would not be occupied by personnel, would not include a habitable structure, and would not require any artificial lighting to operate. As such, the project

[5] California Department of Transportation, California Scenic Highway Mapping System, Accessed at: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/ on July 23, 2018.
[6] California Department of Transportation, Officially Designated County Scenic Highways, accessed at: http://www.dot.ca.gov/design/lap/livability/scenic-highways/ on July 23, 2018.

would be consistent with the City's policies and ordinance related to lighting. Construction activities would generally be limited to the hours of 7:00 A.M. to 6:00 P.M. due to noise ordinance restrictions and would not be expected to occur during evening hours requiring temporary lighting. Any lighting of the construction site for work activities or security would be temporary and would not be considered a substantial source of light. Therefore, the project would have no impact regarding lighting.

Glare

Glare is defined as a harsh uncomfortably bright light, and can be either direct from a light source, or indirect from reflected light. The reflection of light from smooth surfaces such as window glass may be perceived as glare. Buildings constructed of highly reflective materials from which the sun reflects at a low angle commonly cause adverse glare.

To produce electricity from sunlight effectively, solar panels are designed to absorb light and minimize reflection, and therefore the solar panels proposed for this project would be constructed of non-glare material that would minimize reflected light and associated glare impacts. Due to the project being constructed of non-glare materials, and with roadside trees that visually screen the project site from travelers along Las Virgenes Road and residences to the west, glare impacts would be less than significant.

II. AGRICULTURE AND FORESTRY RESOURCES

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Less Than Significant Impact. The Los Angeles County Important Farmland Map prepared by the California Department of Conservation shows the project site is designated as Prime Farmland,[7] however no agricultural production occurs on this site. The site was previously used as a spray field to dispose of excess recycled water supplies by spray irrigation, not agricultural production. The JPA has sufficient areas for irrigation and does not utilize the site to serve this purpose. Additionally, there are no adjacent areas to the site actively being farmed.

As the project would replace one non-agricultural use for another, the project would have no impact on farmland resources. Existing soils would remain on site and no soil export is proposed. Consequently, the project would have a less than significant impact on agricultural resources.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The proposed project site is not zoned for agricultural use or enrolled in a Williamson Act contract, no impact would occur.

[7] Los Angeles County Important Farmland Map, California Department of Conservation, 2016, Accessed on July 5, 2018 at: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf.

c) Would the project involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?

Less Than Significant Impact. Refer to II.2-a above. The site is not currently farmed and the proposed project would not substantially alter the existing landforms or soil conditions. Although the site was previously used to dispose of excess recycled water by spray irrigation, the site no longer serves that purpose.

The City of Calabasas General Plan Land Use Element does not have a land use designation for agricultural production and does not identify any lands in the City as farmland. Therefore, as the site is not currently used for, or zoned for, agricultural production, the project would not convert farmland to non-agricultural use. As no agricultural production currently occurs at this site, impacts regarding conversion of farmland would be less than significant.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. There are no forest lands on the project site or in the vicinity. Therefore, no impact would occur.

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. As noted in the General Plan, the City has no agricultural land in active production. The site is zoned Open Space and is not farmed or used for agricultural production. The site is not occupied by forest land.

III. AIR QUALITY

This analysis is based on the California Emissions Estimator Model (CalEEMod.2016.3.2) modeling calculations provided in **Appendix B**. CalEEMod was developed by the South Coast Air Quality Management District (SCAQMD) and provides a model to calculate anticipated emissions for land use projects. Project operations would consist of the generation of electricity from a renewable resource, and would not generate air pollutant emissions from area or mobile sources with the exception of periodic maintenance activities.

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The proposed project site is located within the South Coast Air Basin (SCAB), which includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. Air quality conditions in the SCAB are under the jurisdiction of the SCAQMD.

National Ambient Air Quality Standards (AAQS) were established in 1971 for six pollutants, with states retaining the option to add other pollutants, require more stringent compliance, or to include different exposure periods. Because California had established AAQS several years before the Federal action, and because of unique air quality problems introduced by the restrictive dispersion meteorology that affects much of the State, there is a considerable difference between State and Federal clean air standards. These standards are the levels of air quality pollutants considered safe, with an adequate margin of safety, to protect the public health and welfare. Subsequent legislation such as the Federal Clean Air Act Amendments (CAAA) of 1990, and further scientific study, has resulted in modifications and additions to National and State AAQS regulations.

State and Federal laws require jurisdictions that do not meet clean air standards to develop plans and programs that will bring those areas into compliance. The SCAQMD is the agency responsible for regulating air pollution in the project area. The SCAQMD 2016 Air Quality Management Plan (AQMP) evaluates integrated strategies and control measures to reduce pollutant emissions and meet specified deadlines for attainment of clean air standards. The project would generate electricity from a renewable energy source (solar) to reduce reliance on electricity generated by fossil fuel-burning electrical generation facilities. Electricity generated by the project would be directly transmitted to the Southern California Edison (SCE) “grid” via existing overhead transmission wires that pass along the project boundary. The metered electrical output of the proposed solar facility to the SCE network would be credited to JPA to offset the billed use of SCE electricity supplies to power JPA facilities. The project would generate electricity from a renewable source (solar) to supplement SCE electricity supplies, which would reduce emissions of pollutants from SCE facilities to meet regional needs. Therefore, the project would not conflict with the AQMP and impacts would be less than significant.

b) Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact. Construction of the project would consist of minor grading to smooth out the ground surface and provide a relatively constant two percent grade across the site. As the site is relatively flat, with an average grade of approximately three percent, grading activities would not require extensive soil removal or placement. No export or import activities would be needed and all grading would be balanced onsite.

Construction

Dust emissions generated during construction are called "fugitive emissions” because such emissions are not amenable to collection and discharge through a controlled source. SCAQMD Rule 403 provides regulatory dust control measures that would apply to the minor grading related to this project because of the non-attainment status of the air basin for particulate matter 10 microns in diameter (PM-10). Construction activity also generates dust particulate matter in the 2.5-micron diameter (PM-2.5) range. Applicable Rule 403 regulations for construction dust emissions on construction sites are listed below, although additional requirements may apply:

- Apply soil stabilizers or moisten inactive areas.
- Prepare a high wind dust control plan.
- Stabilize previously disturbed areas if subsequent construction is delayed.
- Water exposed surfaces as needed to avoid visible dust leaving the construction site (typically 3 times/day).
- Minimize in-out traffic from construction zone.
- Sweep streets daily if visible soil material is carried out from the construction site.

In addition to particulate matter (PM-10 and PM-2.5) emissions, construction activities generate larger dust particles that are chemically non-reactive and are readily filtered out by human breathing passages. These larger fugitive dust particles are therefore not regulated by SCAQMD, although such particles could potentially be a soiling nuisance as they settle out on parked cars, outdoor furniture or landscape foliage. The deposition distance of most soiling nuisance particulates is less than 100 feet from the source under normal wind conditions. There are no sensitive receptors within 100 feet from the project construction site perimeter; therefore, the project would not be expected to result in soiling nuisances due to large dust particles.

Construction activities also generate emissions from heavy equipment exhaust. The CalEEMod 2016.3.2 computer model was used to calculate emissions from a construction equipment fleet and schedule anticipated by CalEEMod, as well as specific equipment related to this project. **Table 5.3-1** provides the results of the construction emission modeling.

Table 5.3-1
Construction Activity Maximum Daily Emissions

Construction Year	Daily Maximum Construction Emissions [a]					
	ROG	**NO_x**	**CO**	**SO_2**	**PM-10**	**PM-2.5**
2019	4.8	52.1	22.6	<0.1	7.7	4.7
2020	1.2	13.0	11.6	<0.1	0.7	0.7
SCAQMD Thresholds [b]	**75**	**100**	**550**	**150**	**150**	**55**
Significant Impact?	No	No	No	No	No	No

Source: CalEEMod.2016.3.2 output in appendix B.
[a] Pursuant to SCAQMD Rule 403, construction emissions reflect application of water to exposed surfaces three times daily for dust suppression.
[b] South Coast Air Quality Management District, SCAQMD Air Quality Significance Thresholds, Rev. March 2015.

As shown in Table 5.3-1, based on the results of the CalEEMod analysis, the worst-case daily emissions estimated for the project from construction activities would be far below SCAQMD Thresholds for the criteria pollutants analyzed. Therefore, air quality impacts due to project construction would be less than significant.

Localized Significance Thresholds

The SCAQMD developed parameters to evaluate ambient air quality on a local level in addition to the more regional emissions-based thresholds of significance evaluated above. These analysis elements are called Localized Significance Thresholds (LSTs), and were developed in response to the Governing Board's Environmental Justice Enhancement Initiative 1-4. The LST methodology was provisionally adopted in October 2003 and formally approved by SCAQMD's Mobile Source Committee in February 2005.

Use of an LST analysis for a project is optional. For the proposed project, the primary source of possible LST impact would be during construction. LSTs are only applicable to the following criteria pollutants: oxides of nitrogen (NOx), carbon monoxide (CO), and particulate matter (PM-10 and PM-2.5). LSTs represent the maximum emissions from a project that are not expected to cause or contribute measurably to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor.

The SCAQMD has issued guidance on applying CalEEMod to LSTs, and has published pollutant concentration data for 1, 2 and 5-acre sites for sensitive receptors at varying distances. Although the site is greater than 5 acres, for a conservative analysis, the project's emissions have been evaluated based on the LST criteria for a 5-acre site, which are lower (i.e., more stringent) than criteria that would apply to a 20-acre site.

The closest sensitive uses to the project site perimeter are residences located to the west, across Las Virgenes Road, at a distance of approximately 50 meters (approximately 164 feet) from the proposed solar panel placement. For a conservative analysis, a receptor distance of 50 meters was used as a reference for this project to compare with the LST screening tables, although project activities would be as far as 500 meters from sensitive receptors. According to LST guidance, only on-site construction activity is considered in the LST analysis.

Table 5.3-2
Localized Significance Thresholds and On-Site Construction Emissions

	CO	Nox	PM-10	PM-2.5
Max. On-Site Construction Emissions [a]	21	52	7.3	4.6
Localized Significance Thresholds [b]	**1,537**	**212**	**35**	**8**
Significant Impact?	No	No	No	No
Source: CalEEMod Output in Appendix B. [a] with application of water to disturbed soils for dust suppression pursuant to SCAQMD Rule 403. [b] W. San Fernando Valley Source Receptor Area; 5-acre project site; 50 meters from receptor				

As shown in Table 5.3-2, on-site emissions would be below the LSTs for construction, with application of water to exposed soils for dust suppression pursuant to SCAQMD Rule 403. Compliance with regulatory requirements such as Rule 403 requiring the periodic watering of active construction sites to reduce fugitive dust emissions during grading would ensure air quality and LST impacts would be less than significant.

Operation

The project's emissions during operations would be negligible as there would be no buildings to be occupied and no daily trips generated. Operational emissions would be limited to those generated by periodic maintenance activities such as washing, resulting in mobile emissions from service vehicles, and since the access road would not be paved, minor dust emissions could also result. These activities would generally be performed using a single vehicle; therefore, emissions from these activities would be considerably less than the daily amount emitted during construction activities. As shown in Table 5.3-1, the daily emissions from all construction activities would not exceed thresholds of significance; therefore, emissions from a single service vehicle accessing the site on a periodic basis would be well below any thresholds of significance. As the project operations would consist of the generation of electricity from a renewable resource, and thus would not result in combustion of fossil fuels with the exception of periodic maintenance activities, operation of the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

c) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less Than Significant Impact. See response 5.3-b. Due to the non-attainment status of the SCAB for PM-10, SCAQMD Rule 403 requires an aggressive dust control program be implemented during project construction. As shown in Table 5.3-1, fugitive dust emissions of PM-10 from construction activities would be far below the SCAQMD threshold of significance of regional emissions and would not be considered a cumulatively considerable net increase. LST impacts are evaluated specifically for the nearest sensitive receptor, and the project's dust emissions would not be anticipated to result in a cumulatively considerable contribution to LST impacts at other more distant locations.

The project proposes to construct a facility to generate electricity from a renewable resource, and as such would reduce emissions on a regional basis by offsetting electrical supplies currently generated by off-site utilities which combust fossil fuels in the generation of electricity. The project would not generate additional daily vehicle trips as it would only be accessed periodically for maintenance. As such, based on the project's reduction of long-term emissions from existing fossil fuel combustion for electricity generation, this project would have a less than significant cumulative impact.

d) Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Substantial pollutant concentrations associated with development are typically found in areas directly adjacent to congested roadway intersections. These areas of vehicle congestion have the potential to be subjected to concentrations of air pollutants from exhaust fumes, creating pockets of elevated levels of CO, which are called "hot spots". As exhaust fumes from vehicular traffic are the primary source of CO, there is a direct relationship between traffic/circulation congestion and potential CO impacts. As the operations of the proposed project would not generate daily trips that would contribute to a worsening of

traffic levels, impacts related to substantial pollutant concentrations would be less than significant.

e) Would the project create objectionable odors affecting a substantial number of people*?*

Less Than Significant Impact. Although offensive odors seldom cause physical harm, they can be annoying and cause concern. Construction activities typically associated with strong odors, including asphalt paving and painting, would not be conducted with development of this project, which would require only minor finish grading and solar array installation. During operations, the proposed solar panels and associated electrical equipment would not produce odors that would be noticeable offsite. Potential odor impacts would be less than significant.

IV. BIOLOGICAL RESOURCES

This section is based on a literature review and a field survey of the project site conducted by Mr. Tyler Barns, Biologist at Envicom Corporation on July 11, 2018. Information related to the source material and references for the following impact analysis is provided in **Appendix C**.

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

Less than Significant with Mitigation Incorporated. Special-status plant species either have unique biological significance, limited distribution, restricted habitat requirements, particular susceptibility to human disturbance, or a combination of these factors.

Special-Status Plant Species

Special-status plant species are those plants listed, proposed for listing, or candidates for listing as Threatened or Endangered by the U.S. Fish and Wildlife Service (USFWS) under the Federal Endangered Species Act (FESA); those listed or proposed for listing as Rare, Threatened, or Endangered by the CDFW under the California Endangered Species Act (CESA); and plants on the CNPS Inventory of Rare and Endangered Vascular Plants with a California Rare Plant Rank (CRPR) of 1A (plants presumed extirpated in California and either rare or extinct elsewhere), 1B (plants considered to be rare, threatened, or endangered species in California and elsewhere), 2A (plants presumed extirpated in California, but more common elsewhere), and 2B (plants considered rare, threatened, or endangered in California, but more common elsewhere). CEQA Guidelines, Section 15125(a), also directs that special emphasis should be placed on resources that are rare or unique to the region.

An evaluation of the potential for occurrence at the site of special-status plant species known to occur in the region was undertaken through a search of the CNPS Online Inventory of Rare and Endangered Plants, 8th ed. (CNPS 2018) and the CNDDB Rarefind 5 application (CDFW 2018) for sensitive “elements” reported within the Calabasas quadrangle, and eight others that surround it, namely Simi, Santa Susana, Oat Mountain, Thousand Oaks, Canoga Park, Point Dume, Malibu Beach, and Topanga. The CNDDB/CNPS derived lists are provided in Appendix

C. Based upon a review of the resources and databases listed above, 48 special-status vascular plant species have been documented within the nine USGS quadrangles. The analysis of the potential for occurrence of special-status plants is presented in Appendix C, including growth form, blooming period, protection status, primary habitat associations, and an evaluation of their potential for occurrence at the site. The evaluation considers the potential for occurrence within the biological survey area, i.e., within the development footprint and vicinity. Most special-status plant species known to occur in the region are precluded from occurring at the site due to lack of suitable habitat or because the site is outside of the known range of the species. Other species particularly shrubs and many of the perennial herbs could be confirmed as absent as they were not found during the survey.

No plant species listed as rare, threatened, or endangered that would require a mandatory finding of significance pursuant to CEQA 15380 were found during the biological survey of the site. Lists of vascular plants and animals observed during the survey are provided in **Appendix C-1**. Furthermore, no special-status plant species have potential to occur within the proposed project limits due to its highly modified, disturbed, and non-native condition. As no special-status species requiring a mandatory finding of significance under CEQA 15380 have been found or are expected at the site, impacts to special-status plant species are less than significant.

Special-Status Wildlife Species

For the purposes of this assessment, special-status wildlife species are those species that are listed, proposed for listing, or that meet the criteria for listing as endangered, threatened, or rare under the FESA or CESA; and those that are listed on the CDFW Special Animals list with a designation of SSC (California Species of Special Concern) or CFP (California Fully Protected). Special-status wildlife species also include species considered to be Locally Sensitive by the County of Los Angeles. The status codes for special-status wildlife are described in Appendix C. CEQA Guidelines, Section 15125(a), also directs that special emphasis should be placed on resources that are rare or unique to the region.

No special-status wildlife was observed during the July 11, 2018 survey. As described previously, a white-tailed kite (*Elanus leucurus*) was observed foraging at the site in 2013. White-tailed kites likely use the field and non-native grasslands in the surrounding area for foraging on a routine basis, and could potentially nest in the native oak woodlands in the vicinity of the project site.

Several special-status wildlife species that were not observed during surveys of the site may occur at or in the vicinity of the site, even if in some cases only infrequently, in transit, or on a temporary basis. An assessment of the potential for occurrence of special-status wildlife species is provided in Appendix C.

Special-status vertebrate wildlife species that may forage regularly at the project site with varying probabilities ranging from high to low depending on the species include the coast horned lizard (*Phrynosoma blainvillii*) California Special Concern [CSC], white-tailed kite (*Elanus leucurus*) [CSC], northern harrier (*Circus cyaneus*) [CSC], and loggerhead shrike (*Lanius ludovicianus*) [CSC]. Additional species that may also forage rarely or occasionally with probabilities ranging from moderate to very low include golden eagle (*Aquila chrysaetos*) [CFP],

mountain plover (*Charadrius montanus*) [CSC], burrowing owl (*Athene cunicularia*) [CSC], short-eared owl (*Asio flammeus*) [CSC], grasshopper sparrow (*Ammodramus savannarum*) [CSC], Vaux's swift (*Chaetura vauxi*) [CSC], black swift (*Cypseloides niger*) [CSC], and bank swallow (*Riparia riparia*) California Threatened [CT]. Five species of special-status bats listed as Species of Special Concern (CSC) may also forage aerially over the property (see Appendix C for list of potentially occurring bat species), but are not expected to roost at the site. The American badger (*Taxidea taxus*) [CSC] may also potentially forage or move through the site. The loggerhead shrike may nest in oak trees within the project limits, if present. No other potentially occurring wildlife species would inhabit or reproduce at the site, although the white-tailed kite and grasshopper sparrow could nest within native habitats in the vicinity.

The loss of 18 acres irrigated non-native habitat would not have a substantial adverse effect on individuals or populations of these special-status species because the project site does not provide particularly important or valuable habitat for these species, and because these species would continue to use undeveloped portions of the JPA's 150-acre Rancho Las Virgenes property as well as natural habitats in the surrounding area, much of which is protected as open space, as foraging habitat. In addition, with the exception of the coast horned lizard, which could be present with low probability in the existing solar facility and adjacent to the existing access roadways but not at the proposed solar site, all potentially occurring special-status wildlife species would be capable of escaping harm during project activities. Weed abatement adjacent to the access road would only potentially impact a very small number of individuals of the coast horned lizard, if the species is present, and would not adversely affect a coast horned lizard population that may be present in the area. Furthermore, no special-status wildlife species would be harmed by the operation of the solar facility. For these reasons, impacts to special-status wildlife species would be less then significant.

Nesting Birds

Grading and construction if conducted during the nesting bird season (February 1 to August 31) would have the potential to result in disturbances to nearby trees that could contain active bird nests. In addition, grading and construction would occur within 500 feet of native habitats that could contain active nests of raptors and other bird species, which could be susceptible to indirect impacts by increased human activity or construction noise. Project activities that result in the loss of bird nests, eggs, and young would be in violation of one or more of California Fish and Game Code sections 3503 (any bird nest), 3503.5 (birds-of-prey), or 3511 (Fully Protected birds). In addition, the purposeful removal or destruction of one or more active nests of any other birds listed by the federal Migratory Bird Treaty Act of 1918 (MBTA), whether nest damage was due to vegetation removal or to other construction activities, would be considered a violation of the MBTA, and therefore would be a significant, but mitigable impact with implementation of **BIO-1**.

Mitigation Measures

BIO-1: Project activities, including but not limited to site preparation, construction, or fuel modification activities, with potential to disturb suitable bird-nesting habitat shall be prohibited within the breeding/nesting season for native bird species (February 1 through August 31). If project activities cannot feasibly avoid the breeding bird season, thirty days prior to the disturbance of suitable nesting

habitat, the applicant shall arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within properties adjacent to the project site, as access to adjacent areas allows. A qualified biologist with experience in conducting breeding bird surveys shall conduct the surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than three (3) days prior to the initiation of clearance/construction work. The field surveys shall determine if active nests of any bird species protected by the state or federal Endangered Species Acts, Migratory Bird Treaty Act, and/or the California Fish and Game Code Sections 3503, 3503.5, or 3511 are present at the limits of disturbance or within 500 feet of the limits of disturbance.

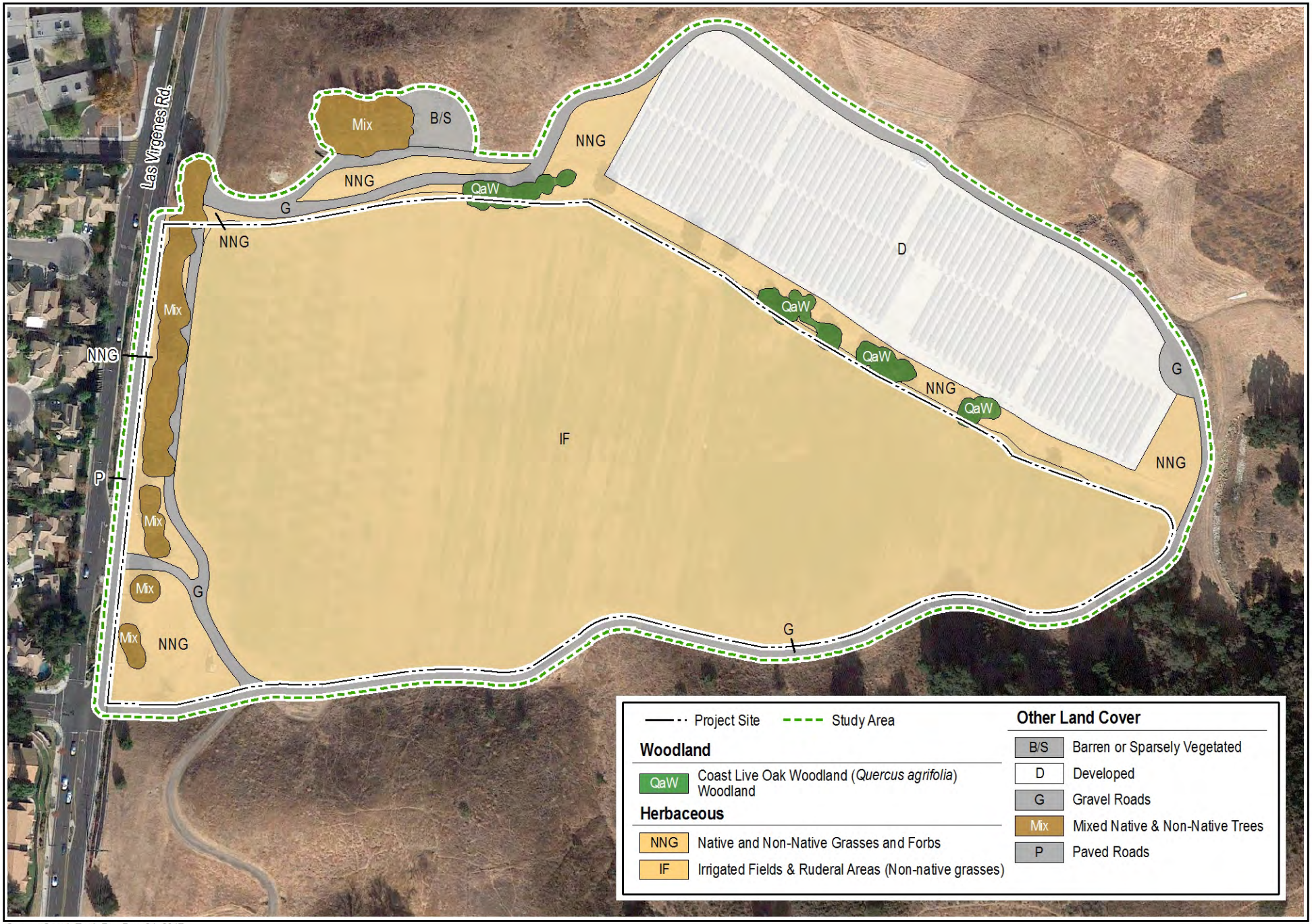
If active nests are identified during pre-construction surveys or discovered after construction has started, they will be protected with spatial buffers. Buffer size will be determined on a case-by-case basis by a qualified biologist based on site conditions, the species' life history and disturbance tolerance, the nest's distance to construction activities, and the type of construction ongoing in the vicinity of the nest. Buffers will be clearly delineated (e.g., using rope, flagging, signage); or they may also be defined by natural or man-made features that are deemed sufficient to prohibit access (e.g., tree rows, fences). Buffers will remain in place and will be monitored and maintained regularly during the nesting season or until the biologist determines that the young have fledged or the nest failed or construction has been completed.

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

Less Than Significant Impact. The vegetation at the solar site and adjacent to the access road consists of non-native grasses and forbs, planted trees, or developed and landscaped areas (See **Figure 5.4-1, Generalized Vegetation Map**). There are no sensitive plant communities or habitats within the project limits.

Vegetation Communities

The existing solar field is developed with solar panels over barren ground. The areas immediately adjacent to the existing solar field and along the access roadways include invasive bromes and mustards and other weeds typical of disturbed sites. The most prevalent species in this area are bromes (*Bromus* spp.), foxtail barley (*Hordeum murinum*), bur-clover (*Medicago polymorpha*), prickly sow-thistle (*Sonchus asper*), hoary mustard (*Hirschfeldia incana*), black mustard (*Brassica nigra*), and curly dock (*Rumex crispus*). Italian thistle (*Carduus pycnocephalus*), milk thistle (*Silybum marianum*), tocalote (*Centaurea melitensis*), small-flowered cheeseweed (*Malva parviflora*), red-stemmed filaree (*Erodium cicutarium*), slender wild oats (*Avena barbata*), and bull thistle (*Cirsium vulgare*) as well as scattered native plants including, narrow leaf milkweed (*Asclepias fascicularis*), coyote bush (*Baccharis pilularis*), California sagebrush (*Awrtemisia californica*), coast goldenbush (*Isocoma menziesii var. vernonioides*), and California aster (*Corethrogyne filaginifolia*) are also represented.



Source: GoogleEarth Pro, Dec. 31, 2017.

JPA SOLAR GENERATION PROJECT PHASE II

envicom

Generalized Vegetation Map

0 100 200 Feet

FIGURE 5.4-1

The proposed project site is dominated by a non-native bunchgrass interspersed with other non-native herbs, primarily curly dock and was mowed to less than six (6) inches at the time of the July survey. The embankment between the project site and the existing solar field is also weedy and highly disturbed, although several native coast live oaks (*Quercus agrifolia*) of varying sizes as well as three small native valley oaks (*Quercus lobata*) and three small non-native black locust trees (*Robinia pseudoacacia*) are planted there. Some of the oaks between the existing solar field and the proposed project site constitute oak woodlands but others are part of a disconnected row of trees. While some of the oak trees meet the membership rules to be considered a vegetation community, these trees have been planted. In addition, there are numerous oak trees located west of the project along Las Virgenes Road. These trees appear to have been planted as they are mixed with other introduced species including Allepo pine (*Pinus halepensis*) and Tipa (*Tipuana tipu*). These trees have been categorized as mixed trees. Due to their non-native, managed, and disturbed condition, the plant communities within the project limits are not sensitive and project impacts to plant communities would be less than significant.

c) Would the project have a substantial adverse effect on federally protected wetlands (including marshes, vernal pools, and coastal wetlands) or waters of the United States, as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means?

No Impact. According to the USFWS NWI, a portion of designated riverine habitat (R4SBC) is located within the easternmost portion of the proposed site. The designated habitat was interpreted from aerial photography using 1:80,000 scale, black and white imagery from 1976. The USFWS cautions that wetlands or other mapped features may have changed since the date of the imagery and/or field work, stating that "there may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site."[8]

Based on the field survey conducted July 11, 2018, there are no streambeds or riparian habitat within the project limits. The drainage indicated by the NWI terminates in an existing detention basin northeast of the site. The detention basin has a standpipe, which implies the drainage has been culverted. A second detention basin and standpipe are located southwest of the project site. The proposed development would not be located within or disturb the existing detention basins. Therefore, there would be no impact to federally protected wetlands (including marshes, vernal pools, and coastal wetlands) or waters of the United States.

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

Less Than Significant Impact. The project site does not contain a native wildlife nursery site. To assess the project's impacts on wildlife movement, the City of Calabasas General Plan, the Santa Monica Mountains National Recreation Area (SMMNRA) Land Protection Plan (March

[8] USFWS National Wetlands Inventory *Data Limitations, Exclusions and Precautions* Website. Available at: https://www.fws.gov/wetlands/Data/Limitations.html.

1998), and the South Coast Missing Linkages Project: A Linkage Design for the Santa Monica Mountains-Sierra Madre Connection (2006) were reviewed to determine if the project site is within an area that has been identified as an important wildlife corridor or an important linkage necessary for maintaining connectivity between large areas of core natural habitat. The project site was also evaluated in conjunction with surrounding habitats for its potential importance to wildlife movement through field investigation and review of recent aerial photographs of the area.

The City of Calabasas General Plan (Figure IV-1, Significant Ecological Areas, Linkages, and Corridors) identifies the project site as within a wildlife linkage. The wildlife linkage included in the City's General Plan encompasses a wide swath of natural habitats located to the east of Las Virgenes Road that extend from the southern city limits near Mulholland Road to the 101 Freeway, as well as north of the 101 Freeway. These areas are part of a landscape-scale habitat linkage referred to as the Santa Monica-Sierra Madre Connection, which is important for facilitating wildlife movement and maintaining habitat connectivity between the Santa Monica Mountains and inland habitats, including the Simi Hills and Sierra Madre Mountains (Penrod, K. et. al., 2006). These areas are also identified as part of an important habitat linkage in the SMMNRA Land Protection Plan. General Plan Policy IV-2 directs that the City should ensure that new developments maintain the biotic habitat value of habitat linkages.

The solar facility would be developed within a habitat linkage, and although wildlife could continue to pass through the facility between the solar panels (the facility would not be fenced), the facility would deter wildlife movement, as the ground surface of the facility would not be vegetated. Wildlife would likely avoid the facility, preferring to use adjacent vegetated areas or natural areas in the vicinity of the project site for movement.

Although installation of the facility would partially fragment the habitat linkage by introducing infrastructure where none previously existed, the project would not represent a barrier to movement or disrupt the capacity of the habitat linkage to provide opportunities for dispersal of fauna over the short or long-term. In addition, the project would not result in removal of native habitats within the habitat linkage, and no artificial night lighting is proposed that could dissuade wildlife from using the area. Therefore, impacts to wildlife movement are considered to be less than significant.

e) Conflict with any local policies or ordinance protecting biological resources, such as a tree preservation policy or ordinance?

Less than Significant with Mitigation Incorporated. Oak trees and scrub oak habitat (species in the genus Quercus) within the City of Calabasas are protected by the City's Oak Tree Ordinance. A permit is required to cut, relocate, or remove oak trees larger than two inches in diameter at any location above the tree's natural grade. A permit is also required for encroachment within a qualified oak tree's (also larger than two inches in diameter at any location above the tree's natural grade) protection zone, which is defined as five feet beyond the dripline and in all cases at least 15 feet from the trunk of the tree, or in the case of oak trees that are larger than 24" in diameter at least 50 feet from the trunk of the tree.

There are several ordinance-sized coast live oaks (*Quercus agrifolia*) and valley oaks (*Quercus lobata*) located on the slope between the existing solar field and the proposed project site as well as those along Las Virgenes Canyon Road in near proximity to the project site (see Figure 5.4-1 for general location). These oak trees appear to have been planted at the site.

Final plans for the project have not been prepared at a scale that clearly depicts the proposed extent of ground disturbing activities in relation to the oak tree protection zones. When the project design is finalized, a site plan would be provided at a scale that can clearly show the relationship between areas to be disturbed by construction and the oak tree protection zones as required by mitigation measure **BIO-2**. This measure insures that final site plans clearly demonstrate that the protection zones will not be encroached upon by ground disturbing activities. As the existing project site boundary maps do not provide information on the exact extent of ground disturbance activities, and are not provided at a scale that a determination can be made if tree protection zones would be avoided, impacts to oak trees are considered to be significant, but mitigable. Mitigation stated below would reduce potentially significant impacts to oak trees to less than significant.

Mitigation Measures

BIO-2: Final site plan drawings shall be provided that clearly demonstrate that all ground disturbance activities would not encroach into any oak tree protection zone as defined by City ordinance. City ordinance defines the protection zone as 5 feet from the canopy dripline, and no less than 15 feet from the tree trunk.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?

Less Than Significant Impact. The project site is not located within a Habitat Conservation Plan, Natural Community Conservation Plan, or other such plan. In 1976, the County of Los Angeles designated the area approximately 0.75 mile north of the site as the Palo Comado Canyon Significant Ecological Area (SEA #12) as shown in Figure IV-1 of the City of Calabasas General Plan (March 2014) showing the extent of SEA #12 within the City limits. Although the project site was not included as part of the SEA designation in 1976, the County has since revised the SEA boundaries and the SEA name has been changed to the Santa Monica Mountains SEA. Although Los Angeles County regulations regarding SEAs are only applicable to unincorporated County area and not to land within incorporated Cities, the City's General Plan and Zoning Ordinance protect Los Angeles County SEAs located within City boundaries from incompatible development.

The project site is not within the SEA and the biological survey did not find biotic communities and vegetative associations consistent with the principal priorities of the SEA. Therefore, project impacts to SEAs would be less than significant. The project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

V. CULTURAL RESOURCES

This section is based on a Phase I Cultural Resource Assessment letter report (Cultural Report) prepared by Envicom Corporation on September 13, 2018, provided in **Appendix D**.

a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?

No Impact. The project site is not located in a Cultural Resource Sensitivity Area as depicted in the City General Plan (General Plan Figure XI-1). After conducting a site survey and reviewing 18 historical maps and aerial imagery, the Cultural Report concluded the Project Site does not contain historic cultural resources. The site contains no existing structures and was previously used as a spray field for the disposal of excess recycled water. The project would result in no impact regarding a substantial adverse change in the significance of a historical resource.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less Than Significant with Mitigation Incorporated. The project site is not located in a Cultural Resource Sensitivity Area as depicted in the City General Plan (General Plan Figure XI-1). However, the hillsides and ridges east of the project site limits are within a cultural resource sensitivity area. The project does not propose major ground disturbance activities to construct the solar facility which has been previously disturbed. Only minimal finish grading would be necessary to ensure a maximum two percent slope across the project site to facilitate drainage. As concluded in the Cultural Report, the results of the South Central Coastal Information Center, Native American Heritage Commission, and historic map database record searches were negative for cultural resources within the project site. The surface survey was also negative for cultural resources within the project site. However, based on the close proximity of the project site to the Cultural Resource Sensitivity Area identified in the City General Plan, the proximity of Las Virgenes Road, and the discovery of petroglyphs embedded in the nearby water diversion feature, the Cultural Report recommended cultural resource and Native American monitoring during ground excavation. Implementation of mitigation measures **CUL-1** and **CUL-2** would reduce impacts to unknown cultural resources inadvertently discovered within an undisturbed context during ground disturbance by requiring archaeological monitoring and providing a discovery protocol.

Mitigation Measures

CUL-1: A Lead/Permitting Agency-approved archaeologist that meets the Secretary of Interior qualifications and a Native American monitor will be on site during project grading until older alluvial material is encountered. The archaeological monitor will collect any prehistoric or older (pre-1950s) cultural material that is uncovered through grading or site clearing, and can halt construction within 50-feet of a potentially significant cultural resource if necessary. If potentially significant intact deposits are encountered, then a cultural resource “discovery” protocol will be followed (see below). If modern fill is encountered, then the monitor can instead “spot-check” grading until native soils are again encountered. Any

demolition or removal of existing structures or features associated with the irrigation system will not require monitoring.

CUL-2: The inadvertent discovery of archaeological resources is always a possibility during ground disturbances; California Penal Code Section 622.5 addresses these findings. If buried materials of potentially-archaeological significance are inadvertently discovered within an undisturbed context during any earth-moving operation associated with the proposed project, then all work in that area shall be halted or diverted away from the discovery to a distance of 50-feet until a qualified senior archaeologist can evaluate the nature and/or significance of the find(s). If, upon assessment by a qualified senior archaeologist, the find is not determined to be significant, then construction may resume.

If the find is determined to be potentially significant, then the Lead/Permitting Agency will be immediately notified of the discovery. Construction will not resume in the locality of the discovery until consultation between the senior archaeologist, the project manager, the Lead/Permitting Agency, the Applicant's representative, and all other concerned parties, takes place and a reaches a conclusion approved by the Lead/Permitting Agency.

If a significant cultural resource is discovered during earth-moving, complete avoidance of the find is preferred. However, further survey work, evaluation tasks, or data recovery of the significant resource may be required by the Lead/Permitting Agency if the resource cannot be avoided. In response to the discovery of significant cultural resources, the Lead/Permitting Agency may also add additional regulatory compliance for use during further site development, which may include cultural and/or Native American monitoring.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature*?*

No Impact. The project site is not located in a cultural resource sensitivity area shown on the City General Plan. The paleontological summary of the Cultural Report found that the entire Project Site is located within recent alluvium, which is not sensitive for paleontological resources. The project site has been previously disturbed and roughly graded and would only require minor finish grading to ensure proper site drainage. The project would, therefore, have no impact on paleontological resources or unique geologic features.

d) Would the project disturb any human remains, including those interred outside of formal cemetery?

Less Than Significant Impact. The site has been previously disturbed by grading and by ongoing periodic tilling activities for vegetation control. Additionally, due to the previous grading of the site, construction of the facility would require minimal ground disturbance to ensure a two percent grade across the site to facilitate drainage. Therefore, the potential for construction activities to encounter human remains is minimal. The inadvertent discovery of human remains is always a possibility during ground disturbances; State of California Health and Safety Code

Section 7050.5 addresses these findings. This code section states that in the event human remains were uncovered, no further disturbance would occur until the County Coroner determines the origin and disposition of the remains pursuant to California Public Resources Code Section 5097.98. Compliance with these regulatory requirements would reduce impacts resulting from the inadvertent discovery of human remains to less than significant.

VI. GEOLOGY AND SOILS

a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:

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

No Impact. Although no active faults have been mapped within the City, the City lies in a seismically active region that is prone to occasional earthquakes.[9] According to the Southern California Earthquake Data Center Map (SCEDC), there are 25 active faults and potentially active faults within 25 miles of Calabasas. There are no known active or potentially active faults that cross the project site and the site is not within an Alquist-Priolo Earthquake Fault Zone.[10] As the project site is not located within a State designated Earthquake Fault Zone, and there are no active faults within the City limits, the potential for ground rupture due to faulting onsite is considered remote. As the project does not propose any habitable structures, the project would result in no impact regarding the exposure of people or habitable structures to potential substantial adverse effects rupture of a known earthquake fault.

ii) Strong seismic ground shaking?

Less Than Significant Impact. As noted in Section 5.6.a.ii, although no active faults have been mapped within the City of Calabasas, the City lies in a seismically active region that is prone to occasional earthquakes, and there are 25 active faults and potentially active faults within 25 miles of the City. Major faults in this region of Southern California include the San Andreas Fault Zone, the Newport-Inglewood Fault, and the San Fernando-Sierra Madre Fault Zone, which are located approximately 40 miles to the north, 20 miles to the southeast, and 18 miles to the northeast of the project site respectively and therefore may affect Calabasas.

While a certain level of exposure to seismic ground shaking is expected in seismically active southern California, the project does not propose habitable structures, therefore, the project would have a less than significant impact regarding the exposure of people or structures to potential substantial adverse effects related to strong seismic ground shaking.

[9] City of Calabasas, 2030 General Plan EIR, December 2008.
[10] City of Calabasas 2030 General Plan, Safety Element, pg. VII-2.

iii) Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Liquefaction is a seismic phenomenon where saturated soils lose strength when severely shaken and develop excess pore pressures. This phenomenon is currently understood to be of concern in the upper 50 feet of the subsurface profile. The site within an area susceptible to seismically induced liquefaction according to the California Geological Survey Seismic Hazard Zones Map for the Calabasas Quadrangle. As the proposed project consists of the construction and operation of a solar electricity generation facility, no residents or employees would occupy the site on a regular basis. Once operational, the site would only be accessed by personnel for periodic maintenance, including washing the solar panels approximately once annually. Therefore, impacts pertaining to liquefaction would be less than significant.

iv) Landslides

Less than Significant Impact. Landslide hazard areas are generally considered to exist when substantial slopes are located on or immediately adjacent to a property. The California Public Resources Code defines an earthquake-induced landslide area as an area where previous occurrence of landslide movement, or local topographic, geologic, geotechnical and subsurface water conditions indicate a potential for permanent ground displacements such that mitigation would be required.

The subject site is not within an area mapped as susceptible to earthquake-induced landslides on the California Geological Survey Seismic Hazard Zones Map for the Calabasas Quadrangle. Additionally, as no residents or employees would occupy the site on a regular basis, impacts regarding the expose people or structures to potential substantial adverse effects from landslides would be less than significant.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The project would not result in substantial grading or landform altering activities that could lead to an appreciable increase in soil erosion or loss of topsoil. Although the site has previously been graded to a near level condition, construction would include minor grading to ensure a two percent slope across the site to facilitate drainage and prevent storm water from ponding. During any grading activities, a water truck would spray the site to control dust in accordance with SCAQMD Rule 403, which would minimize the loss of topsoil. Additionally, the water truck would also be employed to control dust from the onsite dirt roads used by construction workers onsite. Therefore, impacts would be less than significant.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in, on or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?

Less Than Significant Impact. Calabasas is located within a seismically active region and the site is shown to be within an area susceptible to seismically induced liquefaction on the California Geological Survey Seismic Hazard Zones Map for the Calabasas Quadrangle.

However, the project proposes no habitable structures, would not result in substantial grading or landform altering activities, and soil would not become unstable as a result of project activities which consist of minor finish grading and the installation of solar arrays. Therefore, impacts would be less than significant.

d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks of life or property?

Less Than Significant Impact. Expansive soils contain clay particles that change in volume (shrink or swell) due to a change in the soil moisture content, and structure foundations placed on expansive soils could potentially result in foundation damage and erosion. The project would not create habitable structures, and no residents or employees would occupy the site on a regular basis. See responses to 5.6 a) i – iv above for discussion of risks from geologic hazards. Impacts would be less than significant.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The proposed solar arrays would not require onsite wastewater treatment, and no septic tanks or wastewater disposal systems are proposed. No impact would occur.

VII. GREENHOUSE GAS EMISSIONS

Certain gases emitted by human activity have been implicated in global climate change, and are commonly referred to as greenhouse gases (GHG) due to their role in trapping heat near the surface of the earth. The following analysis is based on the CalEEMod.2016.3.2 emissions modeling calculations included as Appendix B. The CalEEMod was developed by the South Coast Air Quality Management District (SCAQMD) and provides a model to calculate operational emissions of greenhouse gases (expressed as CO_2(e)) from development projects. This analysis was performed for construction activities only, as operations of the solar powered electricity generating facility would reduce GHG emissions[11] relative to existing conditions. It is noted that SCAQMD recommended mitigation measures for projects that exceed allowable GHG emission thresholds include the provision of solar powered generation facilities (such as this proposed project). Therefore, implementation of this project would be recognized as a means of reducing long-term GHG emissions.

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. For purposes of planning and regulation, Section 15364.5 of the California Code of Regulations defines GHGs to include carbon dioxide (CO_2), methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. These gases have

[11] The proposed facility would provide electricity from solar energy which does not produce greenhouse gases, and the facility would not include onsite staff (except for periodic maintenance), therefore GHG emissions from mobile sources and energy use would be minimal. Additionally, the project would reduce the amount of SCE electricity and associated GHG emissions which currently result from operation of the existing recycled water pump station.

varying potentials for trapping heat in the atmosphere, so for analysis of impacts, these emissions are reported as a cumulative amount of all of these regulated gases, modified by the proportional heat trapping potential of each one relative to that of CO_2. The resulting amount is reported as a carbon dioxide equivalent, or CO_2(e).

California has passed several bills regarding GHG regulations, including Assembly Bill (AB) 32. A major component of AB 32 related to development such as the proposed project is a mandate that California's GHG emissions be reduced to 1990 levels by 2020. Section 15064.4 of the California Code of Regulations specifies a process for evaluating the significance of GHG emissions by quantifying a project's emissions, determining if they are significant, and specifying mitigation if impacts are found to be potentially significant. At each of these steps, the guidelines afford the lead agency substantial flexibility.

The SCAQMD Governing Board adopted an Interim quantitative GHG Significance Threshold on December 5, 2008 of 10,000 Metric Tons (MT) CO_2(e) per year for industrial projects where the SCAQMD is the lead agency (e.g., stationary source permit projects, rules, plans, etc.). In September 2010, SCAQMD provided revisions that recommended a threshold of 3,500 MT CO_2(e) per year for residential/commercial projects. This recommended 3,500 MT annual emissions threshold has been used as a significance guideline for this analysis.

Construction Activity GHG Emissions

The CalEEMod air quality computer model (discussed in Section 5.III., Air Quality), estimated that construction activities for this project would generate a total of 232.8 MT CO_2(e) emissions. SCAQMD GHG emissions policy for evaluating impacts from construction activities is to amortize emissions over a 30-year lifetime, which yields an amortized level of less than 8 MT CO_2(e) emissions per year for build-out of this project, an impact well below the 3,500 MT annual emissions significance threshold noted above.

Operational GHG Emissions

The proposed facility would provide electricity from solar energy which does not produce greenhouse gases, and the facility would not include onsite staff (except for periodic maintenance), therefore GHG emissions from mobile sources and energy use would be minimal and would not exceed significance thresholds. Additionally, the project would be used to supplement SCE electricity supplies, increasing the percentage of electricity produced by renewable sources, and offsetting some portion of the electricity supply that is currently generated by fossil-fuel combustion. Therefore, impacts related to GHG emissions would be less than significant.

b) Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. See response to 5.7.a. The project's GHG emissions would not exceed the applicable significance thresholds that have been adopted or recommended for the State's compliance with AB 32. As this project would generate electricity from a renewable resource, it would not be in conflict with any plan, policy, or regulation that has been adopted to reduce GHG emissions, therefore this impact would be less than significant.

VIII. HAZARDS AND HAZARDOUS MATERIALS

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

No Impact. Development and operation of the project would not involve the routine transport, use, or disposal of hazardous materials. Therefore, the project would have no impact regarding this issue.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less than Significant Impact. Relatively small amounts of hazardous substances, such as lubricants, fuels, and solvents may be used onsite for construction and minimally required routine maintenance of the project; however, these materials shall be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Consequently, use of these materials for their intended purpose would not pose a significant risk to the public or environment, and impacts would be less than significant.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. As analyzed in response 5.8-a, during the operational phase, the project would not generate hazardous emissions or handle acutely hazardous materials. As described in response 5.8-b, hazardous materials used during the construction phase and minimally required routine maintenance during operation, such as lubricants, fuels, and solvents may be transported, handled, and disposed of in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Although the closest school, A.E. Wright Middle School, is within a quarter mile of the project site, project construction and operation would not involve hazardous or acutely hazardous materials. As noted in response to 5.8-b, existing regulatory requirements would ensure the proper handling or transportation of hazardous materials. No hazardous materials would be stored on the site during operations. Further, operation of solar arrays would generate zero emissions. Therefore, potential impacts are considered less than significant.

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. Based on data provided by the Department of Toxic Substances Control (DTSC),[12] the project site has not been identified on a list of hazardous materials sites. As the project

[12] California Department of Toxic Substances Control, EnviroStor, Accessed on July 5, 2018 at: https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=4029+N.+Las+Virgenes+Road.

would not be located on a site identified as a significant hazard to the public or the environment, no project impacts would occur.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The nearest airport is the Van Nuys airport approximately 12 miles to the northeast. Given this distance, no feature of the project would result in a safety hazard in this regard.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact. Refer to response 5.8-e. No private airstrips have been identified in the vicinity.

g) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The project would be located approximately 600 feet from Las Virgenes Road and thus would not physically interfere with any emergency response or evacuation plan associated with that roadway. The Los Angeles County Fire Department, which serves the project area, maintains a Multi-hazard Functional Response Plan, which addresses the area's planned response to emergency situations including incidents involving major hazardous material upset.[13]

Access to the site for construction and maintenance operations would be through the two existing private gates, from Las Virgenes Road and from the Calabasas Bark Park parking lot. The existing dirt road would be maintained to provide a 20-foot wide access road around the perimeter of the site in accordance with direction from the Los Angeles County Fire Department. Construction traffic would be temporary in nature and would not significantly interfere with emergency response or evacuation plans because there is sufficient space on site for equipment staging, material delivery, and crew member parking. Project operation would generate no new vehicle trips. Impacts would be less than significant.

h) Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Less Than Significant Impact. The project site is in a Very High Fire Hazard Severity Zone as delineated by the County of Los Angeles Fire Department (2015 General Plan). Although the site is surrounded by urban development to the west, the eastern portion of the site is bounded by open space. At the direction of the Fire Department, the project would continue to maintain a zone of vegetation management in compliance with County Fire Department fuel modification requirements. The project would not be staffed and would not expose people to risk of injury or death from wildland fires. Therefore, impacts would be less than significant.

[13] City of Calabasas General Plan EIR, Section 4.6 Hazards and Hazardous Materials.

IX. HYDROLOGY AND WATER QUALITY

a) Would the project violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. The construction phase of the project could result in disturbed soils from minor finish grading for a maximum two percent slope across the site to facilitate stormwater drainage and prevent ponding within the project area. Other minor disturbance onsite would occur removal of existing underground utility lines and during installation of the solar panel mounts.

Construction

Grading disturbs soils and can create the potential for offsite sediment transport during rain events. If runoff enters nearby waterbodies, the increased sedimentation can adversely affect aquatic habitat. Sedimentation related to construction sites is caused by erosion of unprotected graded slopes and poor stockpile management. The project does not propose substantial grading activities and no import or export of soil is proposed. Commonly used construction materials can also pollute downstream water resources if the materials are allowed to be carried offsite with stormwater runoff, or soak into the soil. Such a short-term impact would be considered potentially significant.

The JPA maintains an existing debris basin near Las Virgenes Road that collects runoff from the project site, including first flush stormwater runoff. During high volume storms, stormwater that does not percolate into the ground would drain westward on the site and enter this existing debris basin and the surrounding storm water conveyance system, which drains to Las Virgenes/Malibu Creek. The creek is currently listed on the State Water Resource Control Board's 303(d) list of impaired water bodies for coliform, nutrients, organic enrichment, scum, sedimentation, selenium, and trash.[14]

As a regulatory requirement, the applicant would prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) in accordance with the State Water Resources Control Construction General Permit (Order Number 2009-0009-DWQ, as amended). The Construction General Permit specifies Board Waste Discharge Requirements for Discharges for Storm Water Runoff Associated With Construction and Land Disturbance Activities.[15] Compliance with permit requirements and preparation of a SWPPP would require the applicant to monitor adherence to applicable water quality standards and waste discharge requirements stipulated in the Construction General Permit, including the implementation of construction site Best Management Practices (BMPs) and specific monitoring, sampling, and testing procedures for stormwater leaving the site. Compliance with these regulatory requirements would reduce impacts related to water quality standards to less than significant during construction.

[14] 2014 and 2016, CWA Section 303(d), List of Water Quality Limited Segments, LA RWQCB.
[15] State Water Resources Control Board, Order No. 2009-0009-DWQ 9 as amended by Order No. 2010-0014-DWQ and 2012-0006-DWQ) https://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml.

Operation

Facility operations in general can introduce pollutants into the storm drain system if such materials are not properly used, stored, and disposed of by on-site maintenance personnel. The proposed project would not significantly increase runoff water from the site, as areas beneath proposed solar panels would remain pervious. The poles on which the solar panels would be mounted would be driven into the ground to a depth of six to 14 feet, depending on geological conditions. The associated electrical equipment would be installed on small reinforced concrete pads, which would not result in a significant quantity of runoff. A two-inch thick layer of gravel, which is permeable, would be spread beneath the panels or other method approved by the District to control weed growth. As designed, the project area would remain permeable, allowing stormwater to percolate into the ground during operations similar to existing conditions or drain into existing stormwater infrastructure during high volume rain events, therefore operational impacts related to water quality standards would be less than significant.

b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of a local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Less Than Significant Impact. The LVMWD would supply the relatively small amounts of water required for washing the project solar panels (approximately once per year) and would not directly use groundwater supplies. The proposed project would not interfere with groundwater recharge, as the majority of the site would remain pervious. Therefore, the project would have a less than significant impacts to groundwater supplies. The project site previously served as water spray fields for excess recycled water; however, JPA has other spray fields sufficient for this purpose outside the project area. Therefore, the project would not interfere substantially with groundwater recharge.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or offsite?

Less Than Significant Impact. The introduction of impervious surfaces can intercept rainfall that would otherwise percolate naturally into the soil and discharge into local waterways. Although the proposed project would introduce impervious surfaces at the site – solar panels, mounts, and associated electrical equipment – the ground beneath the arrays would remain permeable, thereby allowing stormwater to percolate into the soil and preventing substantially increased drainage to downstream water bodies. Therefore, this project would not substantially alter existing onsite drainage patterns. During high volume rain events, stormwater that is not infiltrated on site would be directed to the existing detention basin at the western end of the site maintained by the JPA near Las Virgenes Road. By not significantly altering drainage patterns across the site, the project would not result in substantial erosion or siltation on site or off site. Therefore, this impact would be less than significant.

d) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite?

Less Than Significant Impact. Refer to response 5.9-c. This impact would be less than significant.

e) Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. During high volume rain events that exceed the capacity of on-site soils to absorb rainfall through percolation, runoff water currently drains in a westerly direction to an existing debris basin near the western property boundary at Las Virgenes Road. The proposed grade of the topography would continue to directs runoff to this existing stormwater debris basin without traversing adjacent properties such that the project would not adversely affect hydrologic conditions in the vicinity. By maintaining the permeability of the ground beneath the solar arrays, the project would allow stormwater to continue to infiltrate onsite as it does under existing conditions. As a result, the project would not create or contribute runoff water which would exceed the capacity of existing stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, impacts would be less than significant.

f) Would the project otherwise degrade water quality?

Less Than Significant Impact. Refer to responses 5.9-a through 5.9-e. The project impact would be less than significant.

g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary of Flood Insurance Rate Map (FIRM) or other flood hazard delineation map?

No Impact. The project does not propose to construct housing or any habitable structures. Therefore, the project would have no impact.

h) Would the project place within a 100-year flood plain structures, which would impede or redirect flood flows?

No Impact. Refer to response 5.9-e. The project site is not located within a 100-year floodplain,[16] therefore the project would have no impact regarding a 100-year flood plain. Additionally, the proposed solar panels would be mounted on poles approximately three feet above ground and the ground would be covered in gravel, which is pervious material. Therefore, the proposed project would not impede or redirect flood flows.

[16] Federal Emergency Management Administration, Flood Insurance Rate Map: Los Angeles County, California (and Incorporated Areas), Map Number 06037C1264F, September 26, 2008.

i) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

No Impact. There are no levee or dam structures located upstream of the project site within the sub-watershed where the site is located. The project would result in no impact.

j) Would the project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?

Less Than Significant Impact. See response 5.9-d. There are no structures or reservoirs located upstream of the project site within the sub-watershed where the site is located that would pose a risk of seiche. The project site would not be at risk from tsunami hazards as it is not located in a tsunami hazard zone and is approximately seven (7) miles inland. Although the site is adjacent to a hillside, the project would not place habitable structures on the site, therefore risks related to loss, injury or death would be less than significant.

X. LAND USE AND PLANNING

a) Would the project physically divide an established community?

No Impact. The project site is located at a transition from urban land uses exist adjacent to open space. Existing land uses in the vicinity of the project site include Las Virgenes Road, residential neighborhoods, and a school to the west; open space to the east; a neighborhood park, open space and LVMWD headquarters to the north; and open space and JPA properties including an existing composting facility to the south. No established communities would be physically divided by the proposed project.

b) Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact with Mitigation Incorporated. The project site is located within the City of Calabasas. The City General Plan designation for the project site is Open Space – Resource Protection (OS-RP), and The City zoning for the site is Open Space (OS). The City's zoning map also designates a Scenic Corridor along Las Virgenes Road that includes the segment adjacent to the subject property and extends 500 feet outward from the roadway.

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The OS-RP designation applies to lands whose primary purpose is the protection of public health and safety, preservation of sensitive environmental resources, or resource management. The project would be consistent with policies provided in the Open Space Element of the City's General Plan. The applicable General Plan policies pertaining to the project site are analyzed below.

Specifically, the Open Space Element includes Policy III-2 to "limit the permitted intensity of development within lands designated as open space to that which is consistent with the community's environmental values and that will avoid significant impacts to sensitive environmental features, including but not limited to woodlands, riparian areas, wildlife habitats, wildlife movement corridors, and habitat linkages." The project would be consistent with this policy in that significant impacts would be avoided to sensitive environmental features as listed in this Policy (also refer to Section 5.IV., Biological Resources).

The Open Space Element also includes Policy numbers III-5, III-7 and III-14 which address limiting landform modification within designated open space areas to preserve ridgelines and other significant landforms, incorporating native or transitional landscape screening for development within and adjacent to designated open space areas and the preservation of significant ridgelines, respectively.

With regard to Policy III-5, minimal finish grading would ensure a maximum two percent slope across the site to facilitate drainage and prevent stormwater from ponding within the project area. Therefore, the project will not modify the project site's landform to the extent that it will significantly impact ridgeline views or that of other significant landforms as the site will be relatively level. Consistency with Policy III-7 is demonstrated by the existence of a near-continuous line of roadside trees (deciduous and evergreen) that provide screening along Las Virgenes Road. (AES-1 requires further screening, which would further reduce the impact, as discussed in Section 5.I., Aesthetics.) Lastly, the project would be consistent with Policy III-14 in that the overall size and extent of the project, once completed, will not severely impact views of significant ridgelines. Consistent with these policies limiting landform modification, the project is sited on previously-disturbed and relatively level topography at the base of existing, natural slopes.

The project would also be consistent with the General Plan's Conservation Element; specifically, Policy numbers IV-37 through IV-39, which promote the use of solar energy and the incorporation of solar energy into existing developments, as the project's main purpose is to construct a solar generation facility.

Las Virgenes Road Corridor Design Plan

The project would be constructed along a portion of Las Virgenes Road designated as a scenic corridor by the City General Plan. The project site is approximately 50 to 1,600 feet from Las Virgenes Road, which is within the 500-foot limit described as the Scenic Corridor Overlay Zone and between a significant ridgeline; therefore, the project is subject to the Las Virgenes Road Scenic Corridor Design Guidelines.

As discussed in Section 5.I. Aesthetics, this project would not conflict with the design guidelines for the Las Virgenes Road Scenic Corridor. Specifically, an existing row of trees, consisting of a mix of deciduous and evergreen varieties, provides substantial screening of the site. As discussed under topic 5.1-a, mitigation measure **AES-1** would provide for additional vegetation as appropriate to substantially fill gaps in the row of trees, providing additional screening and preserving the visual quality of the scenic corridor. The Las Virgenes Road Corridor Design Plan also addresses planned traffic improvements, which the project would not obstruct or impact.

With implementation of mitigation measure AES-1, the project would be consistent with the Las Virgenes Road Corridor Design Plan, and no conflicts with this design plan or impacts would result.

c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Less Than Significant Impact. Refer to response 5.4-f under the topic of Biological Resources. The proposed project would have a less than significant impact.

XI. MINERAL RESOURCES

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. No historical mining activities are known to have occurred directly on or adjacent to the project site. The California Geologic Survey designates areas in the western portion of Calabasas in which the project site is located as Mineral Resource Zone (MRZ) 1, indicating that no significant mineral deposits are present. The Calabasas General Plan Policy IV-45 prohibits the extraction of mineral resources that could result in significant environmental impacts. The project does not propose mineral extraction; therefore, there would be no impact to mineral resources.

b) Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. See response 5.11-a. Based on the analysis, there would be no impact from the proposed project.

XII. NOISE

a) Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact with Mitigation Incorporated. Projects can result in the exposure of persons to, or generation of, noise levels in excess of standards from temporary construction activity, the permanent operation of a project, or both. Construction activity generates noise from the use of heavy equipment and powered hand tools whereas project operations generate noise from features such as air conditioning units or traffic increases on roadways. The following evaluates the potential for the project to result in the exceedance of applicable noise standards during construction and operations.

Noise Sensitive Receptors

The Calabasas General Plan Noise Element defines sensitive receptors as residences, schools, hotels, and hospitals where excessive noise can interfere with normal activities. The nearest

sensitive receptors to the Project site are single-family residences, the nearest of which is located approximately 150 feet west of the nearest proposed solar panel. Other sensitive uses in the vicinity of the project site include A. E. Wright Middle School buildings located over 200 feet northwest of the nearest proposed solar panel, as well as multi-family residences and a private preschool located at farther distances from the site.

Construction Noise Impacts

Project construction would generate temporary noise that could potentially impact sensitive uses. The nearest sensitive use is a single-family residence located approximately 150 feet west of the nearest proposed solar panel. To comply with the City's Municipal Code Section 17.20.160 - C.4., construction activities would be restricted to the hours of 7:00 a.m. and 6:00 p.m. Mondays through Fridays, and 8:00 a.m. and 5:00 p.m. Saturdays. Construction activities would not occur on Sundays or legal holidays.

As discussed in Section 3.0, Project Description, construction for the proposed installation of solar panels would require only minimal finish grading. Construction equipment used during grading is expected to include up to two graders, two dozers, one loader, one excavator, and a water truck. Grading activities would be conducted at various locations across the 20-acre site, such that not all of the earthmoving equipment listed would be in use simultaneously nearest existing residences. Although no soil export is proposed, haul trucks would be used to deliver gravel to the site.

Solar Array Installation

To drive the mounts for the proposed solar arrays into the ground, contractors would need to use a pile-driving rig. Although a pile-driving rig would be the noisiest piece of construction equipment anticipated, the project would reduce the construction noise generated by using a vibratory, as opposed to an impact, pile driver. The proposed solar panels would then be assembled onto the posts. A vibratory pile driver is a mobile piece of equipment that would move across the project site as required for each post to be installed. The typical noise level for this equipment is 96 dBA at 50 feet from the source[17], the highest or worst-case noise level on the site during all phases of construction.

Point sources of noise are attenuated – reduced – by a factor of 6 dB per doubling of distance from the source through geometrical (spherical) spreading of sound waves. The project site would require over 1,000 feet of distance to reduce "worst-case" construction noise levels from a vibratory pile driver of 96 dBA down to 70 dBA, the City's conditionally acceptable exterior noise level standard for residential and public facility land uses. The nearest proposed solar array would be approximately 150 feet from the nearest the nearest sensitive receptor, an existing single-family residence. This distance would attenuate noise levels from vibratory pile driver down to 87 dBA at the nearest sensitive receptor. Therefore, nearby residences may be subject to temporary construction noise levels exceeding City standards for normal exposure. However, the City's Municipal Code (Section 17.20.160 - C.4.) allows for higher noise levels during construction of development projects, stating that ordinance noise level standards are not

[17] Federal Transit Administration, Transit Noise and Vibration Impact Assessment (Report No. FTA-VA-90-1003-06, May 2006, Table 12-1, Construction Equipment Noise Emission Levels.

applicable to "Noise sources associated with construction, including the idling of construction vehicles, provided such activities do not take place before 7:00 a.m. or after 6:00 p.m. on any day except Saturday in which no construction is allowed before 8:00 a.m. or after five p.m. No construction is allowed on Sunday's or federal holidays." Therefore, temporary noise impacts associated with construction, although temporarily and intermittently high, would be considered less than significant given that those activities would not occur during the times restricted by ordinance. Implementation of mitigation measure **NOI-1** would ensure the project complies with the construction noise prohibitions under the City Municipal Code as they apply to these activities. Mitigation measure **NOI-2** is provided to reduce noise impacts to sensitive receptors further by requiring construction equipment to have properly maintained mufflers.

Site Preparation and Grading

In preparation for installation of the solar arrays, the site would undergo minor finish grading. A grader typically emits 85 dBA at 50 feet from the source[18], and the simultaneous use of two graders in close proximity would result in a sound level of 88 dBA at 50 feet from the source. In a worst-case scenario of two graders being operated simultaneously at the westernmost edge of the construction equipment activity area nearest the exiting residences across Las Virgenes Road, the project would result in exterior noise levels of 79 dBA at the nearest residence. As noted in the previous analysis of construction noise impacts related to installation of the mounts for the solar arrays, the City's Municipal Code (Section 17.20.160 - C.4.), states that the ordinance noise level standards are not applicable to noise sources associated with construction, provided such activities comply with the times restricted by the ordinance. Mitigation measure NOI-1 would ensure that construction contractors comply with the timeframes allowed by the City Municipal Code and mitigation measure NOI-2 requires equipment to have properly maintained mufflers to reduce the impact of construction noise.

Implementation of mitigation measure NOI-1 and NOI-2 would reduce construction noise impacts to a less than significant level.

Mitigation Measures

NOI-1: The construction contractor shall oversee that construction activities only occur from 7:00 a.m. to 6:00 p.m., Monday through Friday, and Saturday from 8:00 a.m. to 5:00 p.m. Construction shall not be permitted on Sunday or holidays without prior consultation with the City Community Development Director.

NOI-2: The construction contractor shall oversee that all mobile equipment will have properly operating and maintained mufflers.

[18] Federal Transit Administration, Transit Noise and Vibration Impact Assessment (Report No. FTA-VA-90-1003-06, May 2006, Table 12-1, Construction Equipment Noise Emission Levels.

Operational Noise Impacts

For land use compatibility planning purposes, State law requires that noise levels measured during evening and nighttime hours are given an artificial increase of 5 dB and 10 dB respectively, because communities are more sensitive to noise intrusion during these quiet times. Therefore, a noise level measurement called the Community Noise Equivalent Level (CNEL) incorporates these evening and nighttime penalties for noise levels over a 24-hour period. For operational noise, the Noise Element of the City General Plan establishes interior and exterior noise guidelines for noise-sensitive receptors within the City. The guidelines limit indoor noise exposure to 45 dB CNEL. An exterior noise exposure of 65 dB CNEL allows the interior standard to be met without any specialized structural attenuation because normal noise attenuation within residential structures with closed windows is about 20 dB. Therefore, to protect the health and welfare of residents, the City recommends an exterior noise exposure of 65 dB CNEL for residences and for public facilities such as schools. Noise levels up to 70 dB CNEL are considered "conditionally acceptable" and are permitted if noise mitigation measures have been evaluated.

The City of Calabasas Municipal Code (Section 17.20.160_ limits exterior noise exposure for residences to 65 dB from 7:00 a.m. to 10:00 p.m. Monday through Friday (8:00 a.m. to 10:00 p.m. on weekends), with all other times having stricter limitations. This noise restriction also applies to public facility land uses such as schools (without the variation for weekend days). The operation of solar panels to generate electricity would not produce noises audible to off-site receptors. Therefore, the project would have no operational noise impact.

b) Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Construction activities and street traffic are common external sources of vibration that can be perceptible inside residences. The effects of ground-borne vibration include discernable movement of building floors, rattling of windows, and shaking of items on shelves. These effects generally occur due to resonances in the structural components of a building, which can amplify groundborne vibration.
Groundborne vibrations from construction activities rarely reach levels that can damage structures. Since vibration is typically not an issue, very few jurisdictions have adopted vibration significance thresholds. Vibration thresholds have been adopted for major public works construction projects, but these relate mostly to structural protection (cracking foundations or stucco) rather than to human annoyance. Vibration is commonly measured as the root mean square velocity of a vibrating object, expressed in units of vibration decibels (VdB). These vibration decibels diminish with distance from the source. For typical construction equipment, the Federal Transit Administration has estimated vibration levels at various distances from sensitive receptors. In the absence of a City designated significance threshold for vibrations, a range of effects from various levels of vibrations are listed in **Table 5.12-1**:

Table 5.12-1
Human Response to Transient Vibration

Vibration Level PPV (inches/second)	Human Response
2.00	Severe
0.90	Strongly perceptible
0.24	Distinctly perceptible
0.03	Barely perceptible
Source: Caltrans Transportation and Construction Vibration Guidance Manual, 2013.	

Typical vibration levels for a non-impact (vibratory or sonic) pile driver as listed in the FTA Transit Noise & Assessment Handbook is 0.17 PPV at 25 feet from the source.[19] A distance of 150 between the source and the nearest existing residential building would attenuate this vibration level to 0.01 PPV which is less than the barely perceptible level of 0.03 PPV for human response and far below vibration damage criteria for buildings of 0.2 PPV.[20] Therefore, vibration impacts related to project construction would be less than significant.

c) Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

No Impact. The Project site would not result in a substantial permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project because the operation of the solar panels would not generate noises audible to off-site receptors. Therefore, no impact would occur.

d) Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact with Mitigation Incorporated. The term 'substantial temporary or periodic increase' is not defined in the CEQA Initial Study Checklist so, for the purpose of this analysis, an increase in noise that would exceed applicable noise standards is considered a substantial temporary increase. As discussed in response to topic 5.12.a, regarding construction noise impacts, the nearest residences would be exposed to worst-case noise levels of up to 87 dBA from a vibratory pile driver and 79 dBA from the simultaneous use of two graders at the westernmost edge of the construction activity area. The City Municipal Code (Section 17.20.160 - C.4.) states that ordinance noise level standards are not applicable to construction, provided activities comply with the times restricted by the ordinance. Mitigation measure NOI-1 would ensure that construction contractors comply with the allowed timeframes and mitigation measure NOI-2 requires equipment to have properly maintained mufflers to reduce the impact of construction noise. Implementation of mitigation measure NOI-1 and NOI-2 would reduce construction noise impacts to a less than significant level.

[19] Federal Transit Administration, Transit Noise and Vibration Impact Assessment (Report No. FTA-VA-90-1003-06, May 2006, page 217.
[20] Ibid., Table 12-3. Construction Vibration Damage Criteria.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The project site is not located in close proximity to a public airport, and the project would not be affected by an airport land use plan. Therefore, no impacts would occur.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The project site is not located in close proximity to a private airstrip. Therefore, no impacts would occur.

XIII. POPULATION AND HOUSING

a) Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes or businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact. The project site is currently open space with no existing above ground structures. Implementation of the project would not introduce a facility that would require staffing, or otherwise introduce population growth into the area, either directly or indirectly.

b) Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. The project site is currently open space and vacant with no existing or proposed housing. Therefore, no existing housing units would be displaced as a result of implementing the project.

c) Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. There are no existing residents on the project site, therefore, the project would have no impact with regard to this issue.

XIV. PUBLIC SERVICES

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

i) Fire protection?

No Impact. The Los Angeles County Fire Department, Calabasas Station #125 would provide fire protection and emergency first responder services for the project. This station is located at 5215 Las Virgenes Road, approximately two driving miles north of the project site and staffed with a 3-person engine company and a 4-person truck company. The target response for fire-related emergencies within the City is five minutes.[21]

The entire City of Calabasas is in a very high fire hazard zone; however, the project does not propose habitable structures that would result in a significant increase in demand for fire protection services. Additionally, in accordance with LA County Fire Department requirements, the project would maintain the existing 20-foot wide dirt access road along the site perimeter vegetation clearance buffer zone to create a defensible space for the project. The project would not increase population and would not result in the need for new or altered fire protection facilities. Therefore, the project would have no impact.

ii) Police protection?

No Impact. The Los Angeles County Sherriff's Department Malibu/Lost Hills Station provides police protection services to the entire Calabasas area, including the project site. Response times for this station average from about 4.7 minutes for emergency calls to about 23.6 minutes for routine calls.[22]

The proposed project would not increase the population within the City and thus would not increase the number of calls received by the Sherriff's Substation. Therefore, the project would have no impact on police protection services, and no new police facilities would be required.

iii) Schools?

No Impact. The Las Virgenes Unified School District provides public education to students in the project area. The project site is within the service area for Calabasas High School (22855 West Mulholland Highway), A.E. Wright Middle School (4029 Las Virgenes Road), and Lupin Hill Elementary School (26210 Adamor Road).[23] The project would not increase population and would not generate new students. Therefore, no new school facilities would be required and the project would have no impact.

iv) Parks?

No Impact. The project is located in an area of the City served by existing park facilities, which include:

[21] General Plan EIR, Section 4.11, Public Services, December 2008.
[22] General Plan EIR, Section 4.11, Public Services, December 2008.
[23] Las Virgenes Unified School District, District Schools Directory, Accessed on July 5, 2018 at: http://locator.decisioninsite.com/?StudyID=85023#.

- The Calabasas Bark Park - a one-acre park located immediately north of the project site on Las Virgenes Road. This park also serves as a trailhead for a multi-use trail network through open spaces to the east.
- Juan Bautista de Anza Park - an 8-acre park and recreational facility located 0.6 mile south of the project site at the intersection of Las Virgenes Road and Lost Hills Road. This park contains recreational facilities such as a multi-use game court, multi-purpose room, and picnic area This park also serves as a trailhead for a multi-use trail network through public open space areas to the south.
- Malibu Creek State Park - a 7,000-acre regional recreational open space area located approximately two miles south of the project that provides opportunities for hiking, fishing, bird watching, and horseback riding.

The project would not increase the population or generate new park users; therefore, no new parks would be required to be constructed. The project would have no impact on the provision of public parks.

v) Other public facilities?

No Impact. Refer to responses 5.14-a (i-iv) above. Given the low intensity of the use, which would not generate on-site employees or any housing, no other public facilities would be substantially impacted. No additional public facilities impacts would occur.

XV. RECREATION

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. Refer to response 5.14-a (iv). The proposed project would not result in impacts to parks or park facilities, including recreational uses and facilities. No impact would occur.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. Refer to response 5.14-a (iv). The project does not include or require the construction of recreational facilities. No impact would occur.

XVI. TRANSPORTATION/TRAFFIC

a) Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Less Than Significant Impact. The majority of construction workers and delivery trucks that would access the project site during construction would approach the site from U.S. 101 traveling south on Las Virgenes Road passing through the Las Virgenes Road/Agoura Road intersection and entering the site. Construction staging areas and employee vehicles would be contained entirely onsite.

Construction

The project's short-term increase in traffic volumes due to construction would not cause a significant impact on area roads due to the scope of the construction activities and the sufficiently of space on site for material delivery, equipment staging, and crew member parking. Project construction would result in a temporary increase in traffic on area roadways as construction workers and delivery trucks bringing equipment and materials access the site. The number of construction workers to be onsite daily would vary within a maximum of up to 20[24] workers on a given day. The project would not result in soil import or export hauling activities, as only minimal finish grading would be done to ensure a maximum two percent slope across the site to facilitate drainage.

Due to on-site staging, parking, and circulation, construction traffic would not block emergency vehicle access along Las Virgenes Road or other area roadways. The scale of the project and compliance with standard regulatory requirements for traffic control during construction would ensure appropriate traffic controls and scheduling are implemented, therefore, the project would have a less than signification construction traffic impact.

Operations

The project would not provide habitable structures for residents or employees, and would not be occupied in the course of daily operations, with the exception of periodic maintenance visits. Therefore, once operational, the project would not increase the daily traffic rates on area roadways and would have a less than significant impact.

b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Less Than Significant Impact. Based on the Los Angeles County Congestion Management Program (CMP) guidelines,[25] intersection monitoring locations must be examined if the project would add 50 peak hour trips (A.M. or P.M. peak hours). The CMP guidelines also require that freeway monitoring locations must be examined if the project would add 150 peak hour trips or more. As discussed in response 5.16-a, project operations would not result in any daily trips on area roadways. During construction, in a worst-case scenario assuming every worker occupies a single vehicle, the project would have a maximum addition of 20 peak hour trips, below both

[24] Zhao, John, P.E., Principal Engineer, Email Correspondence with Envicom Corporation, July 10, 2018.
[25] 2010 Draft Congestion Management Program for Los Angeles County, County of Los Angeles Metropolitan Transportation Authority, 2010.

the 50 peak hour and 150 peak hour trip thresholds. Therefore, the project would result in a less than significant impact.

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. The proposed project would not have any direct impacts on air traffic, as the site is not located in proximity to a regional or private airport, and does not include development of a private airstrip or heliport.

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. The project would not alter roadway design, or introduce a land use that would be incompatible with existing traffic patterns.

e) Result in inadequate emergency access?

Less Than Significant Impact. Access to the site would be via private gates along Las Virgenes Road and from the Calabasas Bark Park parking lot. These private entryways would be available for emergency access and allow internal circulation via the existing dirt road network onsite. The project would maintain an existing 20-foot wide perimeter access road for emergency Fire Department access. Therefore, impacts related to emergency access would be less than significant.

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

No Impact. The project would not conflict with the City transit plans including planned improvements to the Las Virgenes corridor as described in the City's Las Virgenes Road Corridor Design Plan. The planned improvements include the provision of Class II bike lanes and sidewalks along the roadway segment adjacent to the proposed project. The closest proposed solar array would be located approximately 60 feet from the northbound travel lanes of Las Virgenes roadway and would not interfere with construction of bike lanes or sidewalks should the City proceed with such plans.

XVII. TRIBAL CULTURAL RESOURCES

This section is based on a Phase I Cultural Resource Assessment prepared by Envicom Corporation dated September 13, 2018, provided in Appendix D, and a project scoping letter to Tribal Groups that submitted a written request to the JPA for notification under California Assembly Bill (AB 52). A copy of the project scoping letter is provided in Appendix E.

Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of

the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

No Impact. The City General Plan includes a map of Cultural Resource Sensitivity Areas[26], which indicates that the project site is not located within a Cultural Resource Sensitivity Area. As concluded in the Cultural Report, the results of the South Central Coastal Information Center, Native American Heritage Commission, and historic map database search of 18 historical maps of were negative for cultural resources within the project site. The surface survey was also negative for cultural resources within the project site. The site contains no existing structures and was previously used as a spray field. Therefore, the project would result in no impact regarding a substantial adverse change in the significance of a historical resource.

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant Impact with Mitigation Incorporated. The JPA, as lead agency, sent a project scoping letter dated September 7, 2018, to Tribal Groups affiliated with the geographic area that submitted a written request for notification under AB 52. Should a California Native American Tribe request consultation regarding the project site within 30 days of receipt of the project scoping letter, the JPA as lead agency would facilitate such consultation in accordance with AB 52. The JPA received no requests for consultation within 30 days of the project scoping letter. Therefore, the project would have no impact regarding potential substantial adverse changes in the significance of a known tribal cultural resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant. Given the inadvertent discovery of unknown archaeological resources is always a possibility during ground disturbances, implementation of Mitigation Measures CUL-1 and CUL-2 would reduce impacts to unknown cultural resources inadvertently discovered during ground disturbance by requiring Native American monitoring and providing a discovery protocol.

Mitigation Measures

Mitigation measures CUL-1 and CUL-2 shall apply.

XVIII. UTILITIES AND SERVICE SYSTEMS

c) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

[26] Calabasas General Plan 2030, Figure XI-1, Potential Cultural Resource Areas, http://www.cityofcalabasas.com/pdf/documents/gpac/CalabasasFinalGeneralPlan.pdf

No Impact. The project does not propose to provide facilities that would generate wastewater or facilities that would provide such treatment. As such, the project would have no impact.

d) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects?

Less Than Significant Impact. The project site would not provide facilities that would generate wastewater. Onsite water use would be limited to washing of the solar panels, which is expected to occur approximately once annually. Water for this activity would be provided by LVMWD and would be delivered by truck to the site. Due to the limited amount of washing activities to occur, water supply impacts would be less than significant.

e) Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

No Impact. The ground surface beneath the mounted solar panels would remain permeable, similar to the existing site condition. Additionally, minimal finish grading would ensure a maximum two percent slope across the site to facilitate drainage. During high volume storms, stormwater that does not percolate into the ground would drain westward on the site and enter an existing stormwater detention basin at the western end of the site. Therefore, runoff water would not be expected to significantly increase as a result of the project and no new drainage facilities would be required.

f) Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less Than Significant Impact. The project would not increase water supply and would result in a minimal demand for water, as onsite water use would be limited to washing of the solar panels expected to occur approximately once annually. Water for this activity would be provided by LVMWD from existing supplies and would be delivered by truck to the site. Due to the limited amount of washing activities to occur, water supply impacts would be less than significant.

e) Would the project result in determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

No Impact. Refer to response 5.17-a and -b. As discussed above, no wastewater would be generated by the project, and therefore no impact would occur.

f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less Than Significant Impact. The County of Los Angeles operates the Calabasas Landfill located at a travel distance of approximately 2.7 miles from the project site. The City's 2030

General Plan EIR reports that Calabasas Landfill is permitted to receive 3,500 tons of solid waste per day and as of 2008 was accepting 1,555 tons per day and is estimated to be operational through 2028.

Construction of the project would result in solid waste consisting of product packaging and scrap material. Solid waste from construction activities would be separated onsite to divert recyclable materials from that to be placed in a landfill. Operations of the project would not result in solid waste generation, as no personnel would be employed on the site or visit the site, with the exception of periodic maintenance activities. As the project's construction would be completed in approximately 9 to 12 months, and as the solid waste generation from this small project would be relatively minimal after recycling, and the Calabasas landfill has adequate capacity to remain operational for the next ten years, impacts to the Calabasas Landfill would be less than significant.

g) Would the project comply with federal, state, and local statues and regulations related to solid waste?

No Impact. The project would comply with the California Integrated Waste Management Act of 1989 (AB 939), which requires each city and county in California to prepare, adopt, and implement a Source Reduction and Recycling Element and mandates 50 percent diversion of waste being disposed. Although the City of Calabasas has not adopted a Construction and Demolition ordinance to regulate the recycling or disposal of construction debris, the City has adopted a more general goal of diverting 75 percent of all solid waste. The JPA has committed to recycling construction waste where possible.

The project would separate recyclable materials onsite for diversion from landfill disposal to facilitate the City's compliance with AB 939 requirements. Any hazardous materials to be used on the site would be recycled, treated, and disposed of in accordance with federal, state, and local laws, and therefore no impact would result under this criterion.

XIX. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact with Mitigation Incorporated. Mitigation has been incorporated into the project to reduce potentially significant impacts to biological resources on the project site to less than significant levels. Biological issues are discussed in detail in under Section 5.4, Biological Resources, and Appendix C of this document. As analyzed in under Section 5.5, Cultural Resources, the site is vacant, contains no historical resources, and would result in a less than significant impact with mitigation incorporated on unknown archeological resources inadvertently encountered during ground disturbance. Implementation of the mitigation measures provided in Section 3.2, Mitigation Monitoring and Reporting Program,

would reduce impacts on the environment regarding biological and cultural resources to less than significant levels.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact. The proposed project, along with planned development in the area, would not result in cumulative impacts beyond those identified as project level impacts. As the project site would not generate an increase in population, or provide a facility for employees, project impacts would be limited to the construction period for many environmental issue areas such as traffic, air quality, GHG emissions, and noise. The project would result in a reduction of cumulative GHG emissions, as the proposed solar generation facility would offset electricity supplies currently generated by SCE and provide an indirect source of clean energy to power JPA's existing water and wastewater utilities.

As concluded in the previous discussions in Section 5.0 for each of the environmental topics, impacts from the proposed project are considered to be less than significant, or would be reduced to less than significant after the incorporation of mitigation measures.

The project would incrementally contribute to cumulative impacts related to development within the City of Calabasas and the surrounding areas; however, no cumulatively considerable significant impacts would result with implementation of the project. In the absence of cumulatively significant impacts, the effects of the project would be less than significant.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant Impact. The project would result in environmental effects of the project would not cause substantial adverse effects on human beings as discussed in this MND for each topic in the environmental checklist. Once operational, the site would be accessed only by personnel responsible for annual testing and maintenance activities, and would not have post-construction impacts that would cause substantial adverse effects on human beings. Project compliance with goals and policies established in the City of Calabasas General Plan would ensure that direct or indirect effects on human beings would be less than significant.