DRAFT ADDITIONAL ENVIRONMENTAL INFORMATION

for

DEERLAKE RANCH

Project No. 99-239 (5)

Tentative Tract Map No. 53138 Conditional Use Permit/Oak Tree Permit No. 99-239

State Clearinghouse No. 2000061049

Los Angeles County Department of Regional Planning

320 West Temple Street, 13th Floor Los Angeles, CA 90012

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1.0 **INTRODUCTION**

1.1 Purpose of Additional Environmental Information Document

This Additional Environmental Information document has been prepared to present additional environmental setting, impact analysis, mitigation measures, and alternatives information relative to the proposed Deerlake Ranch project (Project 99-239(5)), which was evaluated in the Draft Environmental Impact Report (SCH 2000061049). This document has been prepared in response to additional information provided by the project applicant as well as comments and testimony received on the Draft EIR during the public review period and Regional Planning Commission Public Hearings (January 23, 2002, April 10, 2002 and June 19, 2002). An additional Regional Planning Commission public hearing is scheduled for August 21, 2002.

Additional environmental information presented in this document includes:

- Relationship of the project site to the proposed Santa Susana Mountains / Simi Hills Significant Ecological Area
- Revised Alternative 2 Certificate of Compliance Buildout
- Reduced Density / Equestrian Alternative Additional Alternative 4
- Growth Inducing Impacts

The reduced density/equestrian alternative (Additional Alternative 4) has been proposed by the project applicant in response to comments received on the proposed project during the Draft EIR review period. The tentative tract map design for this alternative is currently being processed through the Los Angeles County Department of Regional Planning subdivision committee. other information contained in the Draft EIR for the Deerlake Ranch project dated November 2001 remains valid and unchanged, except where discussed within this document.

The Los Angeles County Department of Regional Planning is the designated lead agency in connection with preparation of this Additional Environmental Information document. Any written comments should be submitted to:

> Los Angeles County Department of Regional Planning 320 West Temple Street Impact Analysis Section Los Angeles, CA 90012

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1.2 Draft EIR Recirculation Requirements

Public Resources Code Section 21092.1 and CEQA Guidelines Section 15088.5 collectively outline the requirements for recirculation of an Environmental Impact Report (EIR) when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 of the CEQA Guidelines but before certification. The term information includes changes in the project or environmental setting as well as additional data or other information.

Section 15088.5(f)(2) of the CEQA Guidelines outlines the requirements for circulating and responding to comments received, when only a portion of the Draft EIR is recirculated. Pursuant to Section 15088.5(f)(2) of the CEQA Guidelines, reviewers should limit their comments to the new information contained in this Additional Environmental Information document. This draft Additional Environmental Information document is being circulated to each agency and individual contained in the Draft EIR distribution list and any other interested agencies or individuals who request a copy. All comments received on the Additional Environmental Information document will be responded to in the Response to Comments / Final EIR.

2.0 PROJECT DESCRIPTION

2.1 Draft EIR Project Description

The proposed project was originally submitted to the Los Angeles County Department of Regional Planning as a 538 unit single-family residential dwelling proposal on a 235.58 acre project site, and the 538 unit project was included in the Notice of Preparation (NOP) circulated for public agency and individual review and comment. All of the environmental analysis contained within the Draft EIR included the original 235.58 acre project site including 10 areas designated as NAP 1, 2, 3, 4, 5, 6, 7, 8, 9, and 10 on the project Vesting Tentative Tract Map (VTTM 53138). Although the existing and potential development of these 10 NAP areas were included in the environmental analysis as a cumulative impact (Section 3.0, Related Projects, Table 3.1), they have been excluded necessarily from the VTTM because the project applicant has not been able to acquire ownership of these areas. These NAP areas remain excluded from the VTTM.

Since the original project submittal (538 units), the project was reviewed by several public agencies including the Los Angeles County Department of Regional Planning Subdivision Review Committee, the Santa Monica Mountains Conservancy and various other local, state and federal agencies with regulatory authority over the proposed project. As part of the review process, and based upon comments received from reviewing agencies, the applicant has agreed to implement changes to the proposed project which reduce environmental effects associated with the originally submitted project through a variety of design refinements. These project changes have reduced the proposed project by 54 residential lots to a current total of 484 single-family detached residential lots. This has resulted in: (1) a substantial increase in preserved and dedicated natural open space; (2) reduced impacts to oak trees; (3) reduced impacts to traffic and circulation systems and public services; (4) reduced impacts to general biological resources; (5) reduced visual impacts; and (6) the addition of four pocket parks and a heli-spot.

This review process has resulted in a less impacting project as compared to the original submittal, consistent with the intent of the CEQA and Los Angeles County Department of Regional Planning policy. The proposed project (484 units) evaluated by the Draft EIR reduces impacts to all environmental factors, as compared to the originally submitted 538-unit project.

Tentative tract map 53138 is currently proposing the development of the 484 unit single-family residential subdivision on 230.58 acres, as illustrated in Figures 2.8 and 2.9 (Draft EIR), and summarized in Table 2.2. Total disturbance would be 153.90 acres, not including fuel modification impacts. As indicated in Table 2.1, the single-family residential pads would occupy a total of 61.71 acres or 27 percent of the project site. Undisturbed open space under the proposed project would comprise 76.67 acres or 33 percent of the project site. Undisturbed open space does not include the graded slopes, parks or trails located throughout the site.

When added to the proposed 76.67 acres of undisturbed open space, the slopes, parks and trails would result in a total open space of 142.49 acres or 61.8 percent of the total project site. The lots would be a minimum of 6,000 square feet and would be, for the most part, on single loaded streets. Additional proposed land uses include four park sites and a heli-spot, which would be used by the Los Angeles County Fire Department on an emergency only basis. The tentative tract map includes a total of 525 lots, with 484 dedicated to single-family residential land uses, 29 lots dedicated to open space, seven lots dedicated to streets, and one lot dedicated to the heli-spot.

Table 2.1 Summary of Proposed Land Uses (484 Unit)

Land Use	Area (acres)	Percent of Site
Single-family Residential Pads	61.71	27
Streets/Sidewalks	24.31	12
Undisturbed Open Space	76.67	33
Landscaped Slopes	60.72	26
Heli-spot	2.07	0.5
Parks	1.89	0.5
Trails	3.21	1
Total	230.58	100

Source: B&E Engineering, 2001.

Note: undisturbed open space includes portions of the project site offered for dedication to the Santa Monica Mountains Conservancy

No building plans are proposed at this time. However, all building design and construction would fit with the existing character of Southern California and comply with the requirements of Title 24 of the California Administrative Code.

Project Phasing

The entire project site has been master-planned as a unified residential community of 484 single-family residential lots and has been submitted to Los Angeles County for entitlement processing under Vesting Tentative Tract Map (VTTM) No. 53138 and Conditional Use Permit (CUP) No. 99-239. In addition, this Draft EIR assesses the entire project as submitted under the VTTM and CUP.

Although the project's discretionary application and EIR assessment would be for the entire project, with no subsequent entitlement phasing, it is anticipated that actual site and housing construction will occur in two to four phases in order to achieve a balance between infrastructure construction, market absorption of the proposed houses, and construction expenditures.

Regardless of the actual number of construction phases, all grading would be balanced on-site. Access and circulation will be constructed in an orderly manner consistent with the public safety, and utility systems (water, sewers, storm drains, etc.) will be constructed consistent with the public health and safety and the conditions of approval of the VTTM.

Site Grading

Preliminary earthwork estimates indicate that the project site would require approximately 2.24 million cubic yards of excavation (cut) and an equal volume of fill, balanced on-site. The majority of the cuts would be less than 40 feet deep and fills would be of similar thickness, with the greatest cut being approximately 100 feet.

Transportation Improvements

Access to the project would be from Topanga Canyon Boulevard and Canoga Avenue. Two bridges would be constructed spanning Devil Canyon (Street "A" and Street "B") to provide internal circulation.

In addition, several improvements would be made to existing, off-site streets and intersections, including Topanga Canyon Boulevard, Canoga Avenue, Rinaldi Avenue, Chatsworth Street and DeSoto Avenue, as follows:

- In order to reduce the queuing on Poema Place/Mayan Drive and improve the overall operations at the Topanga Canyon Boulevard terminus area, a traffic signal would be installed at the intersection of Topanga Canyon Boulevard and Poema Place/Mayan Drive. The proposed traffic signal would be interconnected and operated in conjunction with the existing traffic signal at the intersection of Topanga Canyon Boulevard and SR-118 Westbound On/Off Ramps such that the two traffic signals would essentially function as one single traffic signal with the following signal (green light) phases:
 - Phase 1: Northbound Topanga Canyon Boulevard
 - Phase 2: Southbound Topanga Canyon Boulevard / Westbound Mayan Drive
 - Phase 3: Southbound Topanga Canyon Boulevard / Eastbound Poema Place
 - Phase 4: Westbound SR-118 Off Ramp
- Widen and restripe the westbound SR-118 off-ramp to provide an exclusive right-turn lane for traffic headed for either Mayan Drive or Poema Place. Therefore, traffic headed for either Mayan Drive or Poema Place would not have to wait for left turn bound traffic onto southbound Topanga Canyon Boulevard.
- Widen and restripe the westbound Mayan Drive approach to County Collector Street standards (40 feet of roadway width on a 64 feet of right-of-way) to provide a second left-turn lane. This would result in two left-turn lanes (the north left turn lane would also permit through traffic onto Poema Place), which would allow significantly more cars to turn southbound through the intersection during each green light phase.
- Widen and restripe the eastbound Poema Place approach to provide a second right-turn lane.
 This would result in two right-turn lanes (the north right turn lane would also permit through traffic onto Mayan Drive), which would allow significantly more cars to turn southbound through the intersection during each green light phase.

- Left-turn traffic signal phasing related to eastbound Chatsworth Street traffic at the DeSoto
 Avenue intersection, and construction of additional paving along both the northerly and
 southerly edges of Chatsworth Street adequate to lengthen the existing eastbound left-turn
 lane by approximately 100 feet.
- Left-turn traffic signal phasing related to southbound Canoga Avenue traffic at the Chatsworth Street intersection, and construction of approximately 100-feet of paving along the westerly edge of Canoga Avenue to provide for a left-turn lane onto eastbound Chatsworth Street. This paving would be considered temporary pending a City of Los Angeles project to widen this portion of Canoga Avenue to City of Los Angeles standards.
- Three-way stop signs at the intersection of Canoga Ave. and Candice Place and installation of a "No Left Turn" sign from southbound Canoga Ave. to Candice Place, prohibiting such movement between 6:00 A.M. and 9:00 A.M.
- Speed bumps along Canoga Ave. between SR-118 and Candice Place, and an additional speed bump south of Candice Place.
- "No Left Turn" signage at the intersection of Canoga Avenue and Celtic Place.
- Self-actuated flashing lights and the intersection of Canoga Avenue and Rinaldi Avenue for equestrian and pedestrian crossing.
- Paint a crosswalk on Chatsworth Street east of the intersection with Independence Avenue.
- Install permanent signs along Canoga Avenue displaying "Watch For Equestrians" or similar language.
- Install signs during the project construction period displaying "Jake Breaking Strictly Prohibited" or similar language.
- Contribute fair share to the City of Los Angeles Department of Transportation for purposes of implementing the City's traffic signal enhancement program (called ATSAC).

The improvements listed above, as deemed applicable by the City of Los Angeles, shall be guaranteed through the City's B-Permit process of the Bureau of Engineering of the Department of Public Works of the City of Los Angeles and must be completed to the satisfaction of the appropriate City of Los Angeles agency within six months after the issuance of a B-Permit by the City of Los Angeles.

Drainage Improvements

Implementation of the proposed project would include the construction of four debris and desilting basins. These basins would be located along the northern project site boundary and would serve to intercept debris from the upstream watershed, thereby reducing the peak storm water runoff volume currently being discharged into Devil Canyon.

In addition, at each point of storm water discharge through a proposed storm drain, an "energy-dissipating" structure would be constructed in accordance with Los Angeles County Department of Public Works (LACDPW) standards in order to reduce discharge velocities to a non-erosive level. These facilities will be operated and maintained by LACDPW.

Also, at each point of storm water discharge into natural drainage courses, including Devil Canyon, a continuous deflective separation (CDS) unit, with adsorbents would be constructed. These systems remove trash, soil and other particles, and, with the use of adsorbents, oils and grease. These units will be contained in sub-surface vaults, and will be operated and maintained by LACDPW.

Fuel Modification

The project site is located within an area designated as Fire Zone 4 (Very High Fire Hazard Severity Zone) and the proposed project contains a fuel modification plan. The fuel modification plan includes: (1) a setback zone (wet zone); (2) irrigated zone; (3) thinning zone; and (4) interface thinning zone standards. The plan provides zones of fire retardant, drought tolerant vegetation, and irrigation, which reduces fuel volumes and prevents rapid spread of fire from the natural area to the development area.

Utilities And Public Services

Potable water would be provided to the project by the Las Virgenes Municipal Water District's (LVMWD's) existing Twin Lakes Tanks and distribution system. Although this system currently serves the southerly portion of the site, the applicant will be required to reconstruct portions of the existing distribution mains from the tanks to Topanga Canyon Boulevard to allow for increased service.

Sanitary sewer service would be provided to the project by connecting to the existing County of Los Angeles sewer line in Topanga Canyon Boulevard at Poema Way and to the City of Los Angeles sewer line in Canoga Avenue. Small portions of the City's existing sewer mains within Canoga Avenue would require reconstruction to provide additional capacity for the project. The LVMWD has a service agreement with the City to accept sewage for conveyance, treatment, and disposal from LVMWD's Chatsworth service area to the Sepulveda Basin Treatment Plant, which includes this project site. In addition, the applicant is proposing to contribute funds to construct public main sewers that would serve the adjacent Twin Lakes Community.

Fire protection would continue to be provided to the project site and vicinity by the Los Angeles County Fire Department. In addition, the project applicant has agreed to grant the Fire Department an easement over land in the northeast corner of the project site (see Figure 2.8) as a "heli-spot." Although the heli-spot would be graded, no pavement or other facilities would be constructed.

Law enforcement would continue to be provided to the project site and vicinity by the Los Angeles County Sheriff's Department. In addition, the project applicant has agreed to construct a facility suitable for use as a Sheriff Department "Storefront" facility to service the project area. As shown on Figure 2.8, the substation would be located near the Topanga Canyon Boulevard entrance to the project site.

Public school students would attend schools within the Los Angeles Unified School District, including Chatsworth Elementary School (Grades K-5), Germain Elementary School (Grades K-5); Lawrence Middle School (Grades 6-8); and Chatsworth High School (Grades 9-12). The applicant will pay school fees to LAUSD as required by state law.

Electrical service would be provided to the site by Southern California Edison (SCE), through several overhead facilities serving the property. With implementation of the proposed project, existing overhead facilities would be replaced with an underground system. Southern California Gas Company (The Gas Company) supplies natural gas to the project vicinity through a system of subsurface gas mains and pipelines. Although currently there are no natural gas facilities on the project site, there is a six-inch gas main located at Topanga Canyon Boulevard near the project site. The proposed project includes the construction of all related utility improvements.

Cable services would be provided to the project site by Time Warner Communications. In addition, the applicant has agreed to include the adjacent Twin Lakes Community within the application for cable services.

Open Space Characteristics

In addition to the 31 acres of riparian habitat and project buffer areas already dedicated to the SMMC, approximately 19.2 acres of additional riparian and other open space areas, six acres of additional buffer areas will be dedicated to the SMMC and 8.6 acres of other open space, as a result of the proposed project. These lots would be dedicated to the SMMC at the time the final maps are recorded. In total, 76.67 acres of the project site is proposed for dedication as permanent undisturbed open space.

In addition, open space lots subject to fuel modification would be deeded to the HOA, subject to an easement for SMMC. All other open space lots containing manufactured slopes or other improved features would be deeded to the HOA.

In addition, to the on-site open space, the applicant has secured an option to purchase an approximate 159-acre parcel north of the project site for use as off-site mitigation for biological resources. The proposed mitigation parcel is located north of the community of Chatsworth, on the south flank of the Santa Susana Mountains in unincorporated Los Angeles County. This parcel would be purchased by the applicant and dedicated to the SMMC and in conjunction with the

Biological Mitigation Plan, would mitigate project-related biological resource impacts to less than significant levels.

Park Areas

The proposed project includes four pocket parks on approximately 1.89 acres, which would be located within the project site boundaries and may include playground equipment and would be deeded to the HOA. In addition to the park funds that would be provided pursuant to Government Code Section 66477 ("Quimby Act"), the applicant has entered into an agreement with the Santa Monica Mountains Conservancy (SMMC) and Mountains Recreation and Conservation Authority (MRCA) to provide funding for construction of improvements, as directed by Los Angeles County, on a community park and equestrian staging facilities. The proposed trail system, to be offered for dedication to Los Angeles County, would loop the project site, connecting to existing trails at the terminus of Canoga Avenue and westerly of Topanga Canyon Boulevard with existing trails to the east, north, and west of the site. In addition, the proposed project includes shorter loop trails, both on the project site and on properties owned by other public agencies, which also would be dedicated to the County of Los Angeles, subject to approval of the appropriate public agencies to construct them on their respective properties. Equestrian trail access would be provided to a portion of the 32 proposed equestrian lots.

In addition, stop signs or other warning signals would be installed at locations where future trails would cross public roads. Temporary trails would be constructed during construction activities in order for trails to remain open.

3.0 ADDITIONAL ENVIRONMENTAL INFORMATION

The information contained in Section 3.0 of this document has been developed to augment environmental setting, project impact, and mitigation measure development information contained in the DEIR.

3.1 Relationship to the Proposed Santa Susana Mountains / Simi Hills Significant Ecological Area

Section 4.3 in the Draft EIR contains a discussion of the relationship between the existing Significant Ecological Area adjacent to the project site and the consultant proposed revisions to the County's SEA /General Plan program. Additional information is provided for purposes of clarification.

Proposed Santa Susana Mountains / Simi Hills SEA

A draft Significant Ecological Area Update Study (November 2000) has been prepared for the Los Angeles County Department of Regional Planning and is currently undergoing staff review and modification. The stated purpose of the SEA study is to 1) evaluate existing SEAs for changes in biotic conditions, 2) consider additional areas for SEA status within unincorporated Los Angeles County, 3) delineate SEA boundaries based upon biotic evaluation and 4) propose guidelines for managing and conserving biological resources within these areas. The draft SEA study also attempts to link approximately 60 existing SEAs within unincorporated Los Angeles County into 12 new SEA areas covering a total of 442,983 acres, or an approximate 251 % increase in area over the existing SEA designated areas (176,174 acres). If adopted, the proposed SEA boundaries would be incorporated into the Conservation / Open Space Element of the general plan update program that is scheduled to be implemented over the next two years. The SEA background report indicates that a broad outreach program was conducted to develop the SEA Study recommendations. The existing SEA boundary is shown in Exhibit 1 and the Proposed SEA Boundary, which covers a majority of the project site, is shown in Exhibit 2.

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The proposed SEA located within and adjacent to the project site is the Santa Susana Mountains / Simi Hills SEA. The Santa Susana Mountains / Simi Hills SEA includes all or portions of existing SEA Nos. 13, 14, 20, 21, 63 and 64. The proposed Santa Susana Mountains SEA includes a total of 26,795 acres. The draft SEA study evaluates the location, area description, existing land use, ownership, vegetation wildlife, wildlife movement, sensitive biological resources, regional biological value and recommended management practices for the proposed SEA.

SEA Evaluation Criterion

The SEA Update Study contains a criterion analysis that has been developed to identify prospective SEAs and SEA expansion areas and includes the following environmental factors:

Does the area being evaluated contain:

- 1) The habitat of core populations of endangered or threatened plant or animal species?
- 2) On a regional basis, biotic communities, vegetation associations and habitat of plant and animal species that are either unique or are restricted in distribution?
- Within Los Angeles County, biotic communities, vegetation associations and habitat of plant and animal species that are either unique or are restricted in distribution?
- 4) Habitat that at some point in the life cycle of a species or group of species serves as concentrated breeding, feeding, nesting or migrating grounds and is limited in availability either regionally or within Los Angeles County?
- 5) Biotic resources that are of scientific interest because they are either an extreme in physical, geographical limitations, or represent unusual variation in a population or community?
- Areas that would provide for the preservation of relatively undisturbed examples of the original natural biotic communities of Los Angeles County?

The SEA study indicates documents compliance with these factors for the entire 26,795 acre proposed Santa Susana Mountains / Simi Hills SEA for each of the above identified criteria and indicates that the criterion is met for Nos. 2, 3, 4, and 6, with Nos. 1 and 5 not meeting the criteria. The following evaluates the project in terms of the established SEA criterion. The following analysis documents how the proposed project relates to each criteria:

Exhibit 1 Existing SEA Boundary

Exhibit 2 Proposed SEA Boundary

Criterion 1: Habitat of core populations of endangered or threatened plant or animal species.

Numerous in-depth biological assessments of the project site (1998, 1999 and April, November and December, 2000) have been prepared as part of the Draft EIR preparation process and have determined that no endangered or threatened plant or animal species occur within the boundaries of the project site. The project site has been surveyed for, and does not contain Santa Susana Tarweed, California gnatcatcher, arroyo toad, red legged frog, least Bell's vireo or any other listed state or federally listed plant or animal species.

Criterion 2: Regional biotic communities, vegetation associations and habitat of plant and animal species that are either unique or are restricted in distribution.

Onsite vegetation and biotic communities primarily include chaparral with small areas of willow and oak woodland, which are dependent on specific ecological conditions. Chaparral is a common habitat type throughout southern California. Portions of Devil's and Brown Canyon's are located onsite, and contain much of sensitive onsite resources (oak and willow woodland) and have been, or will be, dedicated to the Santa Monica Mountains Conservancy (SMMC).

SEA study identified species, including the Santa Susana tarplant, are either not found onsite or in the case of willow woodland are preserved in undisturbed natural open space and dedicated to the SMMC.

Criterion 3: Within Los Angeles County, biotic communities, vegetation associations and habitat of plant and animal species that are either unique or are restricted in distribution

Onsite vegetation and biotic communities primarily include chaparral with small areas of preserved willow and oak woodland. Chaparral is a common habitat type throughout Los Angeles County and southern California and the woodlands are found in similar ecological settings throughout southern California. Plummer's mariposa Lily, a federal species of concern and a CNPS 1 is found onsite.

Criterion 4: Habitat that at some point in the life cycle of a species or group of species serves as concentrated breeding, feeding, nesting or migrating grounds and is limited in availability either regionally or within Los Angeles County

The project site would serve as nesting or migrating habitats for a number of wildlife species. Wildlife movement in the vicinity of the project site the immediate vicinity is not important for regional wildlife movement. Devil's Canyon serves as a minor wildlife movement corridor, portions of which have been dedicated to the SMMC and other portions will be dedicated. The corridor is severely restricted by existing urban development and flood control structures immediately south of the project site.

Criterion 5: Biotic resources that are of scientific interest because they are either an extreme in physical, geographical limitations, or represent unusual variation in a population or community

As the draft SEA report concludes, the project site does not contain biotic resources of scientific interest, or unusual limitations or variation. Onsite vegetation is primarily chaparral which is abundant within Los Angeles County and throughout Southern California and the areas of willow and oak woodlands are limited only in their topographical setting.

Criterion 6: Areas that would provide for the preservation of relatively undisturbed examples of the original natural biotic communities of Los Angeles County?

The project site is not relatively undisturbed since it has been subdivided since 1927 and several residential structures, roads, power lines and associated infrastructure, including a dam and a bridge, has been developed onsite. The project has also been effected by the increased fire frequency founding the urban interface areas.

3.2 Alternative 2 – Certificate of Compliance Buildout

The Draft EIR contains analysis of several alternatives to the proposed project including Alternative 2 – Certificate of Compliance build out. The draft EIR describes the certificate of compliance build out as follows:

Alternative 2 includes the development of approximately 525 residential units. This development would occur in the same area covered by the 657 existing or eligible Certificate of Compliance lots which have been created from the original Record of Survey lots.¹ Each of these 657 existing lots has a minimum area of 6,000 square feet, consistent with the existing land use designation of "Rural Community" and existing zoning of "R-1-6000" (see Figure 5.1). Each of the Certificate of Compliance lots have recorded easements to a public street and each of these 657 lots is eligible for a building permit, provided certain health and safety issues can be satisfied, including: (1) legal and physical access; (2) potable water, including fire fighting requirements; (3) adequate sewage disposal; and (4) compliance with zoning code lot size and setback requirements. However, approximately 20 percent of the total number of lots would be "lost" to roads, slope, and other infrastructure improvements, the actual number of buildable lots would be 525 units.²

These lots were derived from the original 2,275 Record of Survey lots through a series of lot mergers consistent with the State Subdivision Map Act and the County Subdivision Ordinance. The corresponding Certificates of Compliance were issued and recorded by the County Department of Regional Planning in 2000 and 2001.

This alternative analysis assumes no development of the 74 acres within the project site which were not previously subdivided under the Record of Survey Maps and do not have Certificates of Compliance. Therefore, the site acreage under this alternative would be approximately 230 acres in size, and the total disturbed area would be reduced to approximately 126 acres. The revised Alternative 2 site plan is shown in Exhibit 3.

¹ (From DEIR): Currently 564 6,000 sf minimum residential lots have received unconditional Certificates of Compliance from Los Angeles County. An additional 94 lots will be eligible for Unconditional Certificates of Compliance through the lot merger process consistent with the Subdivision Map Act and the Los Angeles County Subdivision Ordinance.

⁽From DEIR): Lower Twin Lakes have developed 105 homes on 338 of the original Record of Survey Lots; or a ratio of 3.2 Record of Survey lots per residential unit. If the same ratio were applied to the 2,575 Record of Survey lots that make up the 657 Certificate of Compliance lots, the project would potentially yield 804 residential units.

Exhibit 3 Revised Alternative 2 Site Plan

Subsequent to circulation of the Draft EIR, the project applicant prepared an engineered site plan for the Certificate of Compliance Alternative, which includes access and utility improvements designed to meet current Los Angeles County health, safety and public welfare standards. This site plan is shown in Exhibit 4 and contains a total of 444 residential lots, which is a reduction of 81 residential lots from the 525-lot Certificate of Compliance alternative shown in the DEIR. As shown here, the Revised Alternative 4 site plan proposes similar access to the project site as the 484 lot proposed project, including two (2) bridges spanning Devil Canyon and a series of series of circulation streets providing access to each of the certificate of compliance lots.

Following is a summary of more specific data concerning development for this revised alternative:

- Because the development of the Certificate of Compliance lots would not be subject to subdivision standards under the State Subdivision Map Act, all streets within the project would be private and would meet County Fire Department standards but not public road standards.
- Water, sewer and storm drain systems would be constructed under Las Virgenes
 Municipal Water District and County of Los Angeles standards, and dedicated to these
 agencies with appropriate easements over the private streets as in the proposed project..
- The development plan shown in Exhibit 4 reflects the coordinated grading and the private road system, meeting County Fire Department standards, required for the issuance of building permits for each of the 444 lots.
- Because the volume of grading shown on the attached plan exceeds 100,000 cubic yards., approval of the grading plan ("the project") by the County would be subject to a Conditional Use Permit (CUP) as would the development of contiguous lots under common ownership.

 Because approval of the hillside management CUP is a discretionary action, it will be subject to the provisions of the California Environmental Quality Act (CEQA), addressing such issues as soils and geology, drainage, biology (including oak trees under a separate Oak Tree Permit), wildlife, and circulation.

Environmental Impact

The revised Alternative 2 would result in a reduction in environmental effects of approximately 15% as compared to Alternative 2 (525 lots) contained in the Draft EIR, and a reduction of approximately 8% as compared to the proposed project (484 Lots).

The following analysis discusses Revised Alternative 2 (444 Lots) as compared to the proposed project of 484 residential units.

Aesthetics/Visual: As with the proposed project, implementation of revised Alternative 2 would result in conversion of vacant land to that of a residential development. Views from residential and recreational uses adjacent to the site would be changed; however, this alternative would not conflict with County regulations regarding view resources. Views from County designated first priority scenic highway routes (SR-118 and Topanga Canyon Boulevard) would be limited under this alternative, due to site topography. As with the proposed project, impacts would be considered adverse, but not significant.

Air Quality: Under this alternative the number of residential units, compared to the proposed project of 484, would decrease by approximately eight percent. Therefore, it would be expected that operational air quality impacts would also decrease. Air quality impacts related to construction activities would be similar, as the types and number of equipment required would be the same. In addition, as with the proposed project, grading activities under this alternative would be limited to 30,000 cubic yards of material per day. Air quality impacts related to both construction and operational activities associated with this alternative would not be significant with implementation of mitigation measures recommended for the proposed project.

Biological Resources: Under revised Alternative 2, total site disturbance would be similar to the proposed project.³ Due to similar area of site disturbance, this alternative would result in a similar loss of existing habitat as the proposed project. Similar to the proposed project, this alternative would affect on-site wildlife species, CDFG-regulated riparian habitat, and Corps-regulated waters. As with the proposed project, implementation of mitigation measures would reduce site impacts to less than significant.

Cultural Resources: As with the proposed project, grading activities associated with revised Alternative 2 have the potential to damage cultural resources on the project site. However, on-site resources have been identified and recovered as a result of field investigations. Therefore, as with the proposed project impacts, no significant impacts would be anticipated. Impacts would be similar to those associated with the proposed project, as the area of disturbance under this alternative would be similar.

Geology and Soils: Implementation of revised alternative 2 would require an estimated 1.6 million cubic yards of grading, approximately 640,000 cubic yards less than required for the proposed project. Potential risk associated with exposure of residents to seismic hazards and on-site soils would be similar to the proposed project. Therefore, impacts regarding geology and soils would be similar to the proposed project and would not be significant.

Hydrology and Water Quality: Drainage improvements required for revised Alternative 2 would essentially be the same as for the proposed project. Therefore, with implementation of mitigation measures, impacts would be less than significant and similar to those of the proposed project.

Noise: Under this alternative, the number of residential units, compared to the proposed project of 484, would decrease by approximately eight percent. As the number of residential units and number of daily vehicle trips would be less than the proposed project, operational noise impacts would incrementally decrease. However, this decrease would not be perceptible and would not be significant with implementation of mitigation measures. In addition, due to the proposed layout of

The area of disturbance would be similar to the project. The site area that was not previously subdivided under the Record of Survey Maps would not be included in Revised Alternative 2.

revised Alternative 2, no residential units would be located in the southwest corner of the project site, which is subject to traffic-related noise greater than 65 dBA. As with the proposed project, mitigation measures would reduce impacts to less than significant. Construction activities would be the same with implementation of revised Alternative 2 as those associated with the proposed project, and therefore would generate similar noise levels. As with the proposed project, with implementation of mitigation, this alternative would not result in significant construction noise impacts. Noise impacts under this alternative would be less than significant and less than those associated with the proposed project.

Public Services – Fire Protection: The number of residential units and expected number of residential population would decrease under revised Alternative 2, and the resulting demand on fire protection services would be less. Impacts with regard to response times would be similar to those associated with the proposed project, as would fire protection services related to area wild fires. As with the proposed project, development of this alternative would require a fuel modification plan to minimize or retard the spread of dry brush and wildfire into the area. Therefore, with mitigation, fire protection impacts would be less than significant, and incrementally less than those associated with the proposed project.

Public Services – Police Protection: The number of residential units and expected number of residential population would decrease under this alternative, by approximately eight percent. Therefore, the resulting demand for police protection services would be reduced as compared to the proposed project. Impacts with regard to response times would be similar to those associated with the proposed project. Police protection impacts would not be significant and incrementally less than those associated with the proposed project.

Public Services – Schools: As the number of residential units, and therefore, the expected residential population would be reduced with implementation of this alternative, the resulting demand for schools would also decrease. Based on student generation factors, implementation of this alternative would result in an estimated 456 new students (192 elementary students, 112 middle school students, and 152 high school students). Area elementary, middle, and high schools would have sufficient space for students generated by revised Alternative 2. Impacts would be less than

significant and incrementally less than those associated with the proposed project.

Public Services – Library: As the number of residential units, and therefore, the expected residential population would be reduced with implementation of this alternative, the resulting demand for libraries would also incrementally decrease. Based on County planning guidelines, this alternative (approximate population of 1,430) would require a total of 501 square feet of additional library space and 2,860 additional materials (e.g., books, periodicals, audio tapes, videos, etc.). As with the proposed project, Los Angeles County Ordinance requires that new residential subdivisions pay a library fee to ensure impacts to library facilities are mitigated. Therefore with mitigation, impacts would be less than significant, and less than those associated with the proposed project.

Transportation/Traffic: As discussed in Section 4.12, the traffic analysis completed for the proposed project is based on a worst-case scenario of 538 residential dwelling units. However, under this alternative the number of residential units, compared to the proposed project of 484, would decrease by approximately eight percent, and anticipated traffic impacts would also decrease. However, the same intersections would be impacted as those discussed for the proposed project, and require the same mitigation. Therefore, impacts would be similar and less than significant with implementation of the mitigation measures included for the proposed project.

Utilities – Water Supply: As the number residential units and expected population for this alternative would be decreased as compared to the proposed project, the amount of water required for the project would also decrease. Implementation of revised Alternative 2 would result in a decrease in demand of approximately 27,287 gpd for domestic water consumption (based upon 737.5 gpd per unit). Therefore, water supply impacts would be reduced as compared to the proposed project, and not significant.

Utilities – Wastewater: As the number of residential units and expected population for this alternative would be reduced as compared to the proposed project, the amount of sewage generated would also decrease by approximately 9,250 gpd (based on 250 gpd per unit). Therefore, wastewater generation impacts would be reduced as compared to the proposed project and not significant.

Utilities – Solid Waste: As the number of dwelling units and expected residential population for this alternative would be reduced as compared to the proposed project, the net amount of solid waste generated would also decrease. Implementation of revised Alternative 2 would result in the increased generation of approximately 466 pounds (0.23 tons) of solid waste per day (based on 12.23 pounds per household per day). This would not be considered a significant impact. Impacts would be less than those associated for the proposed project and would not be significant.

Utilities – Electricity: As the number of residential units and expected population for this alternative would be reduced as compared to the proposed project, the amount of electricity required would also decrease. Implementation of Alternative 2 would result in the increased demand of approximately 194,713 kWh of electricity per year (based on 5,262.5 kWh per dwelling unit per year). Impacts would be incrementally less than those associated with the proposed project and would not be significant.

Utilities – Natural Gas: As the number of residential units and expected population for this alternative would be reduced as compared to the proposed project, the amount of natural gas required would also decrease. Implementation of revised Alternative 2 would result in the increased demand of approximately 2,869 Mcf of natural gas per year (based on 79.98 Mcf per unit per year). Impacts would be less than those associated with the proposed project and would not be significant.

Revised Alternative 2 would result in generally reduced impacts than the proposed project with regard to environmental resource areas. Impacts with regard to biological resources, cultural resources, aesthetics/visual, air quality (construction), geology and soils, hydrology and water quality, and transportation/circulation would be similar as those for the proposed project.

Comparison to Project Objectives

Revised Alternative 2 would generally meet all of the applicants project objectives as stated in Section 2.3.of the Draft EIR.

3.3 Reduced Density / Equestrian Alternative - Additional Alternative 4

In response to comments received on the proposed project from the public hearing process, the applicant has proposed a reduced density / equestrian lot alternative to the currently proposed 484 SFD unit project. This alternative, referred to as Additional Alternative 4, proposes 424 single family residential lots, including 32 minimum 15,000 SF estate lots, of which many will be equestrian lots, as a result of their location adjacent to the existing and proposed equestrian trails. Additional Alternative 4 is shown in Exhibit 4 and summarized in Table 3.1 and 3.2. Additional Alternative 4 meets all of the project objectives contained in Section 2.3 of the Draft EIR.

Table 3.1
Summary of Additional Alternative 4 - Reduced Density / Equestrian Alternative Land Uses

Land Use	Area (acres)	Percent of Site
Single-family Residential Pads	61.71	27
Streets/Sidewalks	21.56	10
Undisturbed Open Space	76.67	33
Landscaped Slopes	63.47	28
Heli-spot	2.07	0.5
Parks	1.89	0.5
Trails	3.21	1
Total	230.58	100

Note: Undisturbed open space acreage includes are offered for dedication to the Santa Monica Mountains Conservancy

As shown in Table 3.1, the land use summary breakout is substantially the same as the land use summary associated with the proposed 484 unit lot project evaluated in the Draft EIR, except that the Additional Alternative 4 will have approximately 2% less impervious surfaces (streets/sidewalks) than the 484-unit project. The project site plan has been modified to reduce (12%) the number of residential lots within the same proposed development area. Minimum 15,000 SF estate / equestrian lots are proposed along the west and north perimeter of the upper portion of the development area. These estate / equestrian lots will result in a less dense appearing viewshed from existing offsite views of the property site from areas to the west. The remaining public views of the proposed project would remain unchanged.

Required access and utility infrastructure improvement would remain substantially the same as that proposed for the 484-lot project. All mitigation measures contained in the draft EIR for the proposed 484 lot project, including the applicant's community commitments, would be required for this alternative.

In comparison to the proposed project evaluated in the Draft EIR, Additional Alternative 4 proposes 424 single family residential lots, (including 32 estate/equestrian lots), a 12% reduction.

As a result of the density reduction associated with this alternative, impacts to traffic, air quality, noise, and public services and utilities would be incrementally reduced by approximately the same 12%. Physical impacts to onsite resources associated with this alternative, including soils & geology, hydrology, biological resources, aesthetics may remain the same or similar to the proposed project. Additional potential land use compatibility and odor impacts would result under this alternative relative to the proposed equestrian lots adjacent to smaller single-family residential lots/homes. The location of the proposed equestrian lots adjacent to the existing and proposed equestrian trails and implementation of standard Los Angeles County equestrian horse keeping measures/zoning code requirements, as well as appropriate project Covenants, Conditions and Restrictions, would reduce these potential impacts to levels less than significant.

The environmental analysis contained in this Additional Environmental Information document is based upon the proposed 424 lot alternative in comparison to the proposed 484 unit project evaluated in the Draft EIR, and the potential cumulative impact of the existing and future development of the NAP areas within the project development envelope.

Total disturbance associated with this alternative would be 153.90 acres, not including fuel modification impacts. As indicated in Table 3.1, the single-family residential pads would occupy a total of 61.71 acres or 27 percent of the project site. Undisturbed open space under the proposed project would comprise 76.67 acres or 33 percent of the project site. Undisturbed open space does not include the graded slopes, parks or trails located throughout the site. All of these acreages are the same as the proposed project.

Additional proposed land uses include four park sites and a heli-spot, which would be used by the Los Angeles County Fire Department on an emergency only basis. The tentative tract map includes a total of 461 lots with 424 dedicated to single-family residential land uses, 29 lots dedicated to open space, 7 lots dedicated to streets and 1 lot dedicated to the heli-spot.

The 424-unit project has been designed to provide a variety of lot sizes and widths (see Table 3.2). Estate/equestrian lots, which average 17,485 SF., are situated along the northerly and westerly boundary to provide access to the proposed trails. In addition, this alternative provides for a low-

Exhibit 4 Reduced Density – Additional Alternative 4

density buffer for Devil Canyon and the ridgeline to the north. The southwestern portion of the project has large lots than the proposed project, averaging 14,724 SF, compatible with the existing, rolling topography. Smaller flat lot, averaging 10,220 SF, are located on the flatter portion of the existing plateau, while split-level lots, averaging 10,591 SF, are located in the lower, steeper areas in the southern portion of the site.

Table 3.2
Summary of New Alternative 4 Residential Lots

Type of Lot	Minimum	Maximum	Average	Number of Lots		
50-Foot Wide Split Lots			=			
6,000 to 8,000 sf	6,000 sf	7,980 sf	6,990 sf	67		
8,000 to over 10,000 sf	8,058 sf	21,301 sf	14,680 sf	59		
		Subtotal	10,591 sf	126		
50-Foot Wide Flat Lots						
6,000 to 8,000 sf	6,000 sf	7,998 sf	6,999 sf	126		
8,000 to over 10,000 sf	8,010 sf	23,920 sf	15,965 sf	55		
		Subtotal	9,723 sf	181		
65-Foot Wide Lots						
8,000 to over 10,000 sf	8,193 sf	20507 sf	14350 sf	85		
		Subtotal	14350 sf	85		
Estate / Equestrian Lots						
15,000 sf	15,050 sf	19,919 sf	16150	32		
		Subtotal	16150	32		
	Total Number of Lots 424					

Source: B&E Engineering, 2002.

No building plans are proposed at this time. However, all building design and construction would fit with the existing character of Southern California and comply with the requirements of Title 24 of the California Administrative Code.

Since all equestrian lots will be placed along portions of the project perimeter, adjacent to future dedicated trails, existing and future open space, future landscaped areas, and other undeveloped properties, their use will be compatible with those of the non-equestrian residential lots within the project.

Environmental Impact

The Additional Alternative 4 (424 lots) would result in a reduction in environmental effects of approximately 12% as compared to the proposed project (484 Lots). The following analysis

discusses the environmental effects associated with Additional Alternative 4 (424 Lots) as compared to the proposed project of 484 residential units.

Aesthetics/Visual: As with the proposed project, implementation of Additional Alternative 4 would result in conversion of vacant land to that of a residential development. Views from residential and recreational uses adjacent to the site would be changed; however, this alternative would not conflict with County regulations regarding view resources. Views from County designated first priority scenic highway routes (SR-118 and Topanga Canyon Boulevard) would be limited under this alternative, due to site topography. Additional Alternative 4 differs from the proposed project in that it provides large low-density lots along the northerly and westerly project boundaries, providing for a visual buffer to adjacent areas. As with the proposed project, impacts would be considered adverse, but not significant.

Air Quality: Under this alternative the number of residential units, compared to the proposed project of 484, would decrease by approximately 12 percent. Therefore, it would be expected that operational air quality impacts would also decrease. Air quality impacts related to construction activities would be similar, as the types and number of equipment required would be the same. In addition, as with the proposed project, grading activities under this alternative would be limited to 30,000 cubic yards of material per day. Air quality impacts related to both construction and operational activities associated with this alternative would not be significant with implementation of mitigation measures recommended for the proposed project.

Biological Resources: Under Additional Alternative 4, total site disturbance would be similar to the proposed project.⁴ Due to similar area of site disturbance, this alternative would result in a similar loss of existing habitat as the proposed project. Similar to the proposed project, this alternative would affect on-site wildlife species, CDFG-regulated riparian habitat, and Corpsregulated waters. As with the proposed project, implementation of mitigation measures would reduce site impacts to less than significant.

The area of disturbance would be similar to the project. The site area that was not previously subdivided under the Record of Survey Maps would not be included in Revised Alternative 2.

Cultural Resources: As with the proposed project, grading activities associated with Additional Alternative 4 have the potential to damage cultural resources on the project site. However, on-site resources have been identified and recovered as a result of field investigations. Therefore, as with the proposed project impacts, no significant impacts would be anticipated. Impacts would be similar to those associated with the proposed project, as the area of disturbance under this alternative would be similar.

Geology and Soils: Implementation of Additional alternative 4 would require an estimated similar grading volume requirements as the proposed project. Potential risk associated with exposure of residents to seismic hazards and on-site soils would be similar as compared to the proposed project. Therefore, impacts regarding geology and soils would be similar than those associated with the proposed project and would not be significant.

Hydrology and Water Quality: Drainage improvements required for Additional Alternative 4 would essentially be the same as for the proposed project. Therefore, with implementation of mitigation measures, impacts would be less than significant and similar to those of the proposed project.

Noise: Under this alternative, the number of residential units, compared to the proposed project of 484, would decrease by approximately 12 percent. As the number of residential units and number of daily vehicle trips would be less than the proposed project, operational noise impacts would incrementally decrease. However, this decrease would not be perceptible and would not be significant with implementation of mitigation measures. As with the proposed project, mitigation measures would reduce impacts to less than significant. Construction activities would be the same with implementation of Additional Alternative 4 as those associated with the proposed project, and therefore would generate similar noise levels. As with the proposed project, with implementation of mitigation, this alternative would not result in significant construction noise impacts. Noise impacts under this alternative would be less than significant and less than those associated with the proposed project.

Public Services – Fire Protection: The number of residential units and expected number of residential population would decrease under Additional Alternative 4, and the resulting demand on fire protection services would be less. Impacts with regard to response times would be similar to those associated with the proposed project, as would fire protection services related to area wild fires. As with the proposed project, development of this alternative would require a fuel modification plan to minimize or retard the spread of dry brush and wildfire into the area. Therefore, with mitigation, fire protection impacts would be less than significant, and incrementally less than those associated with the proposed project.

Public Services – Police Protection: The number of residential units and expected number of residential population would decrease under this alternative, by approximately 12 percent. Therefore, the resulting demand for police protection services would be reduced as compared to the proposed project. Impacts with regard to response times would be similar to those associated with the proposed project. Police protection impacts would not be significant and incrementally less than those associated with the proposed project.

Public Services – Schools: As the number of residential units, and therefore, the expected residential population would be reduced with implementation of this alternative, the resulting demand for schools would also decrease. Based on student generation factors, implementation of this alternative would result in less student generation than the proposed project. Area elementary, middle, and high schools would have sufficient space for students generated by Additional Alternative 4. Impacts would be less than significant and incrementally less than those associated with the proposed project.

Public Services – Library: As the number of residential units, and therefore, the expected residential population would be reduced with implementation of this alternative, the resulting demand for libraries would also incrementally decrease. Based on County planning guidelines, this alternative would require less square feet of additional library space and less materials (e.g., books, periodicals, audio tapes, videos, etc.) than the propose project. As with the proposed project, Los Angeles County Ordinance requires that new residential subdivisions pay a library fee to ensure impacts to library facilities are mitigated. Therefore with mitigation, impacts would be less than

significant, and less than those associated with the proposed project.

Transportation/Traffic: As discussed in Section 4.12, the traffic analysis completed for the proposed project is based on a worst-case scenario of 538 residential dwelling units. However, under this alternative the number of residential units, compared to the proposed project of 484, would decrease by approximately 12 percent, and anticipated traffic impacts would also decrease. However, the same intersections would be impacted as those discussed for the proposed project, and require the same mitigation. Therefore, impacts would be similar and less than significant with implementation of the mitigation measures included for the proposed project.

Utilities – Water Supply: As the number residential units and expected population for this alternative would be decreased as compared to the proposed project, the amount of water required for the project would also decrease. Implementation of this alternative would result in a decrease in demand for domestic water consumption as compared to the propose project. Therefore, water supply impacts would be reduced as compared to the proposed project, and not significant.

Utilities – Wastewater: As the number of residential units and expected population for this alternative would be reduced as compared to the proposed project, the amount of sewage generated would also decrease by approximately 12 percent as compared to the proposed project. Therefore, wastewater generation impacts would be reduced as compared to the proposed project and not significant.

Utilities – Solid Waste: As the number of dwelling units and expected residential population for this alternative would be reduced as compared to the proposed project, the net amount of solid waste generated would also decrease. Implementation of this alternative would result in a decreased generation of solid waste per day. This would not be considered a significant impact. Impacts would be less than those associated for the proposed project and would not be significant.

Utilities – Electricity: As the number of residential units and expected population for this alternative would be reduced as compared to the proposed project, the amount of electricity required would also decrease. Implementation of Additional Alternative 4 would result in a reduced

demand for electricity. Impacts would be incrementally less than those associated with the proposed project and would not be significant.

Utilities – Natural Gas: As the number of residential units and expected population for this alternative would be reduced as compared to the proposed project, the amount of natural gas required would also decrease. Implementation of this alternative 2 would result in a decreased demand for natural gas. Impacts would be less than those associated with the proposed project and would not be significant.

Additional Alternative 4 would result in generally reduced impacts than the proposed project with regard to environmental resource areas. Impacts with regard to biological resources, cultural resources, aesthetics/visual, air quality (construction), geology and soils, hydrology and water quality, and transportation/circulation would be similar as those for the proposed project.

Comparison to Project Objectives

Additional Alternative 4 would generally meet all of the applicant's project objectives as stated in Section 2.3.of the Draft EIR.

3.4 Growth Inducing Impacts

Growth inducing impacts are discussed in Section 6.3 of the Draft EIR. Section 6.3 evaluates the growth inducing impacts of the 484-unit project as follows:

Section 15126.2(d) of the CEQA Guidelines requires that an EIR "discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment."

The proposed project is not expected to generate growth beyond the proposed 484 single-family residential lots, as the project does not include any major infrastructure improvements which would be of service to vacant, off-site properties. Infrastructure improvements included as part of the project are aimed at meeting only the needs of the project and the

existing Twin Lakes Community elated to public health and safety issues. Transportation mitigation would be implemented to reduce traffic impacts and would exceed project requirements. However, the proposed project improvements would be relatively minor and would not be expected to foster development in the areas that would not otherwise occur.

The proposed project is located in an areas primarily developed with residential neighborhoods of both single-family and multi-family dwelling units. Further, the implementation of the proposed project would be a reduction in land use intensity as the project site was previously divided by means of several Licensed Surveyor's Maps in 1927 and 1928 into approximately 2,275 lots. As discussed in Section 2.2, 31 acres has been dedicated to the Santa Monica Mountain Conservancy (SMMC) as part of a pre-project Memorandum of Understanding (see Appendix C). The project site is surrounded by land protected from further development, and, therefore, it would not encourage or contribute to pressures for redevelopment or alternative types of development in the area. Existing commercial uses in the area would be expected to accommodate the slight increase in demand for commercial services resulting from project residents.

As discussed in Section 3.3 of this document, Additional Alternative 4 – (Reduced Density / Equestrian Alternative) proposes a total of 424 residential lots, including 32 minimum 15,000 SF estate/ equestrian lots (See Exhibit 5). The County of Los Angeles is requesting and the applicant will offer to dedicate to the County of Los Angeles a 60- foot-wide easement for a future street to the north of the project site. The proposed easement will extend to the northerly property line of the project site from an interior project street and will also provide appropriate future construction slope easements (see Exhibit 5). This future access easement would be required of any proposal on the subject property and is not exclusively proposed by Additional Alternative 4. The offer to dedicate an easement to the north has been included in this alternative in response to comments from property owners north of the project site ("Northern Properties") claiming that they currently have no physical access to their parcels.

The following additional analysis has been prepared to document the potential additional growth inducing impacts that could occur in relationship to the proposed project.

Description of Northern Properties

The Northern Properties consist of the following (see Exhibits 6 & 7):

- Lots 2, 3, 7 & 8 of Section 6, T2N, R16W; the southerly 1320 feet of Section 31, T3N, R16W; and Lot 1 of Section 1, T2N, R17W, are under single ownership
- Lot 6 of Section 6, T2N, R16W, is under one ownership
- Lot 4 of Section 6, T2N, R16W, is under several ownerships, with approximately 70% of the total area owned by Los Angeles County
- Lot 5 of Section 6, T2N, R16W, known as the "Deerlake Highlands Addition", is under multiple ownerships, with approximately 65% of the total area owned by Los Angeles County
- Lot 4 of Section 1, T2N, R17W, is a part of Tract 34108 and has been dedicated to the MRCA as permanent open space.

Access Rights of Northern Properties

With respect to existing access rights of the Northern Properties through and across the Deerlake Ranch property and the SMMC 10' strip, the set of private easements and access parcels that were created over the Deerlake Ranch property in the 1920's (*i.e.*, the Twin Lakes and Deerlake Highlands subdivisions) reserved a network of internal Private Access_Easements and Parcels, such as Saugus Road ("Access Easements"). These easements and parcels were created for the benefit of the Deerlake Highlands and Twin Lakes Subdivisions only, and were not created for the benefit or the use of any Northern Properties shown on Exhibits 5.

Lots 5, 6, 7 and 8, which are adjacent to the MRCA's 10-foot strip, do not have recorded Access Easements, Access Easements by Necessity or Access Easements by Implication over that strip, nor over the Deerlake Ranch site.

Further research was conducted with respect to the historical and current access used by the owners of Lots 5, 6, 7 & 8. Lots 7 & 8 are currently accessed off Browns Canyon Road, which is a public

right-of-way. Lot 6 is accessed by a dirt road, which runs across Lots 7 & 8 and connects to Brown's Canyon Road. There are no access roads currently serving Lot 5.

Due to the probable existence of unrecorded deeds with respect to Lot 5 between 1851 and 1875, common ownership of Lot 5 with the Lots which lie to the east could not be established. Therefore, Access Easements by Necessity or Implication to Brown's Canyon Road, while likely, could not be proven.

Although the Northern Properties have no apparent right of access across either the MRCA's 10-foot strip, or the Deerlake Ranch project site, the County's requirement for an easement for a future street requires that potential growth-inducing impacts of this action be evaluated.

Development Potential of Northern Properties

As shown in Exhibits 5, 6 & 7, and stated above, the only Northern Properties having no apparent legal access to a public street are those situated within Lots 4, 5 & 6 of Section 6 (see Exhibit 6). Therefore, the proposed offer of dedication to the County of an easement for a future street could provide future access to these properties, provided that they obtained access rights through Lot 7 of Section 6 (see Exhibit 6), and the 10-foot strip of land owned by the Santa Monica Mountains Conservancy.

The intensity of potential development of these properties will be a function of the County general Plan, zoning, number of existing legal lots, topography, and availability of access and other infrastructure. Table 3.3 summarizes the development potential of these properties based on General Plan and zoning designations, as well as on the number of existing legal lots.

Table 3.3 Development Potential of Northern Properties

LOT 6, SECTION 6

Slope Rate %	Area (AC)	General Plan	General Plan	Mid-Range	Zoning (A-2-1)	Exist.
		Low Density	High Density		Max. Density	Lots
0-24.99	34.2	6.84	34.20	20.00		
25-49.99	4.36	0.44	2.18	1.00.00		
Over 50	0.00	N/A	0.00	0.00		
Total	38.56	7.28	36.38	21.00	19.00	1.00

LOTS 4 & 5, SECTION 6 (Including the 60 Acres "Deerlake Addition"

Slope Rate %	Area (AC)	General Plan	General Plan	Mid-Range	Zoning (A-2-1)	Exist.
		Low Density	High Density		Max. Density	Lots
0-24.99	70.9	14.18	70.90	42.00		
25-49.99	8.49	0.85	4.25	2.00		
Over 50	0.00	N/A	0.00	0.00		
Total w/County Lots	79.39	15.03	75.15	44.00	39.00	30.00
Total W/O County Lots	25.00	4.00	23.00	13.00	12.00	2.00

(see Notes 4 A, B) (see Notes 4 D, H)

NOTES:

- 1. Preliminary analysis based on USGS Quadsheet topo
- 2. Based on exist. zoning of A-2, max. density = 1 unit/2 ac.
- 3. Mid-range = $(GP Low + GP High) \times 1/2$
- 4- A- Area of Deerlake Addition = \pm 60 Acres
 - B- Area North of Deerlake Addition = \pm 20 Acres
 - C- There are 116 privately owned lots within Deerlake Addition totaling 20+ ac.
 - D- All 116-lots within Deerlake addition are smaller than 2 acres (A-2-2 zoning)
 - E- Development of the 116 lots assumes mergers to comply with A-2-2 zoning
 - F- The remaining $40\pm$ ac. in Deerlake Addition is owned by L.A. County
 - G- Reflects privately-owned lots only; no development of County-owned lots is assumed
 - H- There are 2 privately owned lots larger than 2 acres within the +/- 20 acres north of Deerlake Addition

As shown in, Table 3.3, the majority of the property contained within the Deerlake Highlands Addition (Lot 5), as well as the area to the north (Lot 4), is owned by the County of Los Angeles. For purposes of this analysis, it is can be assumed that the county will not develop their holdings and will more than likely transfer ownership to the SMMC. The remaining privately owned parcels could be developed, each with a single residence, provided that they met current zoning and public health and safety requirements.

Following is a summary of the development potential of the privately owned parcels within Lots 4, 5 & 6 of Section 6, as shown in Exhibit 6:

• General Plan, Mid-Range Density: 34 units

Zoning Conformance: 31 units

Existing 2-Acre Parcels: 3 units

Based on the above data, only three (3) parcels which may have direct access to the future road easement could be developed without having to obtain discretionary approvals from Los Angeles County, including CEQA review. Both the General Plan Mid-Range Density and the Zoning Conformance development scenarios require the filing of a subdivision map and a Hillside Management Conditional Use Permit in order to achieve those densities.

In addition, the subject project cannot provide water for potable and fire flow uses for these properties to the north since the project is at the upper elevation limits of the Las Virgenes Municipal Water District's Twin Lakes Tanks service area. These northern properties would have to work with the District to provide an independent conveyance, storage and distribution system for any development using public water.

Assuming that between 3 and 34 single family residential units could meet the above outlined requirements, and assuming that the individual parcel owners could obtain access rights from other private owners, the County and the SMMC, the proposed project could result in minor incremental growth inducing effects for the Deerlake Highlands Addition area. These 3 to 34 residential units represent between 0.7% and 7.9% of the number of residential units proposed for the project site and would not be considered significant growth inducing impacts.

Exhibit 5 Property Ownership North of Project Site

Exhibit 6 Aerial Photograph with assessor parcels

Exhibit 7 Deerlake Highland Addition Area Parcels