

#	Commissioner	Comment	City Response
Circulation Element			
1	Byrne	The updated Circulation Element contains a discussion of potential evacuation scenarios for the city. Those computer-generated analyses were prepared by consultants working for the city on the General Plan updates. Based on past experience I find that the results of those analyses are often not representative of actual conditions. The model chosen for the analyses and the assumptions and variables contained in those analyses are not clearly known. Has the city of Calabasas critically reviewed the traffic analyses to determine that the validity of the model and the assumptions used in those analyses?	This comment is noted and is addressed in the Evacuation Report Executive Summary. Public Works has reviewed the findings of the evacuation study. The purpose of the assessment is to identify bottlenecks in the roadway network and inform policy development. The emergency evacuation study does not recreate past evacuation events or predict future evacuation events.
2	Byrne	Despite possible flaws in the study, the study does reveal that the volume of traffic in the Las Virgenes Valley area quickly exceeds the capacity of the roadway(s) when there is an evacuation on the west side of the city. It is my (and my families) personal experience that during even relatively small and isolated incidents gridlock occurs on the freeway and local streets	This comment is noted.
3	Byrne	It is clear from personal experience and from the recent analyses that the Las Virgenes Valley area presently has significant problems with traffic congestion during emergency events. It is further clear that a solution to the problem is not available. The problem will be compounded by allowing additional development in areas where more structures and individuals are at risk from damage and evacuation due to wildfire. For that reason, I believe the City should prohibit expansion of development in hillside areas to avoid placing additional structures and people at the urban/open space interface and increasing the congestion on our already inadequate evacuation routes	The updated Safety Element includes many new policies that are intended to address the evacuation challenges present in Calabasas, including Policy VII-66 which has been added to page VII-32 to encourage voluntary evacuation prior to a wildfire occurring. The City recently received State Housing and Community Development certification of the General Plan Housing Element which stipulates a certain amount of residential unit growth would occur in Calabasas, consistent with state housing laws and programs. Preventing housing development via policies in the Safety Element would be inconsistent with the adopted and certified Housing Element.
4	Byrne	Vehicular Circulation - add "in areas where roadway improvements cannot be implemented"	It is assumed the Commissioner intends for this phrase to be added to this objective: Reduce reliance on the use of automobiles by promoting alternatives such as non-motorized active transportation (bicycle, pedestrian) and the use of public transit. The City does not prioritize vehicular movement over the needs of non-automobile modes of travel (bicyclists, walkers, transit users). The intent of the updated Circulation Element is to balance the needs of all circulation system users.
5	Byrne	In response to goals - How does the city plan to do these things? No ideas are presented here.	The objectives of the Circulation Element establish the City's intent. The steps the City will take to achieve these objectives are articulated on page VI-6 and VI-7 under General Plan Approach, and by implementing the policies in the Element.
6	Byrne	"Thus, the City will take a balanced approach to future transportation improvements" - change improvements to developments	Improvements is a term used here because it can refer to changes to the circulation system that are not physical changes which is how the term 'developments' could be construed. Improvements could include changes to the traffic signal system, for example.
7	Byrne	"Improve the operational efficiency of the existing roadway system consistent with the Circulation Element where it is warranted, feasible, and environmentally prudent to do so" - How? Discuss options/ideas here	See response to Comment #5.
8	Byrne	"provide programs to reduce their contribution to the number of vehicle miles traveled in the community and region" how? And if that cannot be achieved development can be prohibited	The VMT mitigation measures in the Local Transportation Study Guidelines are examples of VMT reduction programs and projects.

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9	Byrne	"regulate and limit the type and location of future development to support more efficient development and not exceed the City's CEQA thresholds of significance for VMTs" - and not increase congestion on existing roadways where road improvement/widening cannot be achieved	The City's significance thresholds are for both CEQA (VMT) and local discretionary approval (transportation operational assessment). CEQA impacts are required by law to be mitigated. Local operational impacts would be conditioned during the development approval process.
10	Byrne	"Improve the operational efficiency of existing roadways through implementation of transportation system management and intelligent transportation system concepts" - How?	This would mostly be done through the upgrade of the traffic signal system that will allow for active monitoring and proactive signal coordination timing based on current data. The City's current traffic management systems are not fully functional at this level and need to be upgraded to accomplish this. Specific upgrades and improvements to the City's traffic management systems must be considered, evaluated, and implemented through the Public Works Department, under direction of the City Engineer.
11	Byrne	"Continue to participate in developing regional circulation and emergency evacuation improvement measures in cooperation with the State, nearby cities, and the counties of Los Angeles and Ventura" - add "and Caltrans"	Caltrans is a state agency and falls under the "State" reference.
12	Byrne	"Limiting the intensity of future development ..." change "limiting" to "restricting"	The City recently received State Housing and Community Development certification of the General Plan Housing Element which stipulates a certain amount of residential unit growth consistent with state housing law would occur in Calabasas. Preventing development in the Circulation Element would be inconsistent with the Housing Element.
13	Byrne	change "has been planned" to "is not capable of expansion"	The first bullet under Circulation Element Themes addresses limiting expansion. The last bullet on Page VI-3 also speaks to the limitations the city faces for roadway expansion.
14	Byrne	"or payment of mitigation fees, which are to be based on the projected costs for planned system improvements, and each new development's proportional share of the total vehicle miles traveled (VMT) traffic affecting the location where the improvement is planned" ... "The mitigation requirement will continue to be proportional to the impacted created by each new ..." - strike this completely; no amount of mitigation fee money can improve roads that the city cannot widen	The Local Transportation Study Guidelines describe VMT mitigation strategies on pages 7-9 that do not include widening roads, such as pedestrian network improvements, car-sharing and ride-sharing programs, and commute trip reduction programs. Mitigation fees provide a means of accommodating development of less than optimal properties (as often must be allowed to not interfere with Constitutionally protected private property rights), while also having those properties contribute to overall VMT reductions in a fair and meaningful way.
15	Byrne	"development and will recognize a fee credit to developers who construct portions of ultimate transportation infrastructure capacity enhancement improvements or contribute to mitigation programs" - strike this	The fee credit serves as an opportunity to align a proposed project's VMT mitigation requirement with a City project or VMT mitigation program.
16	Byrne	"construct a roundabout, traffic signal, or other intersection improvement at the Calabasas Road / Mureau Rd intersection; construct turnaround at the western terminus of Calabasas Rd" ... " Improve City-owned parcels along the corridor with theme setting fire-resistant landscaping, hardscaping and furniture. Improve Calabasas Rd west of Mureau Rd to provide at a minimum, bike lanes, one vehicle lane in each direction, and a minimum 5-foot wide sidewalk with a minimum 5-foot parkway along the south side of the street" - why? no through traffic here. This will not improve traffic flow	The potential enhancements are intended to not only improve roadway operations but also improve active transportation (bicycle and pedestrian) opportunities.
17	Byrne	"Calabasas Road shall not be extended west of relocated Mureau Road bridge" - Is/are there any plans or proposals to build a new Mureau Road Bridge? If so, please provide more information on this	Plans for a new Mureau Road bridge are conceptual only, and are presented only in the General Plan at this time. The intent is to provide for a more reliable and better serving east-west travel alternative to Highway 101.

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18	Byrne	"Recognizing that slow moving trucks accessing the County landfill create congestion on Lost Hills Road north of the Ventura Freeway, affecting the Saratoga Hills residential area and limiting the capacity of the roadway" - recognizing that there is a problem does not fix that problem. what does this mean?	The reconstruction of the interchange has helped this issue. This text has been removed.
19	Byrne	"General Requirements - Implement traffic improvements for the segment of Las Virgenes Rd between the Ventura Freeway and Agoura Road to improve traffic flow and safety" - how? Please provide ideas to accomplish this	The potential system enhancements on VI-18, such as improving traffic signal operations through synchronization and system upgrades, address this requirement.
20	Byrne	"In order to protect habitat linkages and in recognition of the location of Malibu Creek to the west of Las Virgenes Rd and steep slopes to the east ..." change "east" to east	Edit made.
21	Byrne	"In order to protect existing residential neighborhoods, bicyclists and pedestrians in the area, road widening shall not be permitted along Agoura Rd, west of Lost Hills Sheriff's Station and east of Liberty Canyon" - or on Las Virgenes Rd north of the freeway	The Circulation Element already prohibits road widening for sections of Las Virgenes Road (page VI-18): - In order to protect habitat linkages and in recognition of the location of Malibu Creek to the west of Las Virgenes Road and steep slopes to the east, the City shall not participate in widening or provision of more than two travel lanes south of Lost Hills Road; - In order to protect the existing residential neighborhood north of the Ventura Freeway, creation of additional through lanes north of Mureau Road is prohibited. Note also that the City has control over roadway widenings only within the current City limits.
22	Byrne	"Thousand Oaks Boulevard shall not be used as a connection between the Ventura Freeway and any future developments north or west of Calabasas" - This should be done for Las Virgenes Road north of the Freeway	The prohibited actions for Las Virgenes Road (page VI-18) limit roadway widening on Las Virgenes Road north of Mureau Road. Extending Las Virgenes to the north or Thousand Oaks Blvd. to the west is outside of the City limits. The City has classified the streets within the City as "local" and does not show any future addition of vehicle lanes or change in classification.
23	Byrne	"Consider relocation of the bridge over the Ventura Freeway with a new wider bridge to be located west of the present bridge" - does CalTrans propose to build a new bridge here?	The project is a planned future improvement by Caltrans that will be coordinated with the State. Also, see response to Comment #17.
24	Byrne	Calabasas believes in using "traffic calming" measures to slow traffic on local residential roadways..." strike residential	Edit made.
25	Byrne	"Promoting mixed use development in certain areas of the City to encourage living and working in the same area, thereby reducing the number and length of vehicle trips" - add "and low income housing" to mixed use development; also not realistic - most people working at mixed use buildings cannot afford to live in Calabasas	The land use and housing elements of the General Plan promote mixed use developments for both market-rate and subsidized residential uses. While the cost of living in Calabasas is high, there is increased potential for affordable housing to be built in the City based on the recent changes to the Housing Element and state law.
26	Fassberg	With imminent updates coming to the Safety Element and the Circulation Element of the general plan, the actual policies and procedures to implement those changes are essentially on hold until the final versions of the Elements are in place. So, while it is certainly important to be thorough with the updates, it seems that it is also important to get them in place as expeditiously as possible, correct?	The Safety Element and Circulation Element are part of the General Plan, as adopted originally in 2008 and subsequently amended from time to time (the most recent update being the 2021-2029 Housing Element). The Safety Element and Circulation Element, as they currently exist, remain in effect until the updated versions are adopted by City Council. City staff support an expeditious review of the Safety and Circulation Elements to meet legislative mandates and to formally initiate implementation of the new policies. However, City Council will also need to take the next step of allocating resources to City departments to facilitate implementation, as stipulated in the revised Implementation Chapter, page XIII-10.

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27	Fassberg	At the Planning Commission meeting of July 21, there was some discussion surrounding retaining level of service as the standard of review for traffic and transportation policies, rather than using vehicle miles traveled (necessarily only when CEQA is not involved). Does it make sense to have two different standards in place, or will this create confusion for applicants and the public, as well as inconsistent rulings and results?	Adopting both standards is common practice for Cities and something that the Traffic and Safety Commission was in favor of. The City can either adopt VMT standards or VMT standards and LOS standards. LOS standards allow the City to evaluate intersection operational needs and maintain CIP improvements necessary to meet safety needs for proper vehicular operations. The guidelines describe in detail when LOS and VMT standards are required for development applications.
28	Harrison	There's no identification of evacuation routes. They are identified in the Safety Element on VII-24, but they should be identified or at least referred to here in order to comply with the last bullet point on page VI-1: "Facilitates emergency evacuation in an efficient and timely manner"	Evacuation routes are now referenced in the Circulation Element
29	Harrison	I'm not sure why there is no hope for Class I bike paths (VI-28). I'm sure that residents and visitors would enjoy them and they would be a lot safer than the existing Class II and III facilities. Moreover, I would prefer seeing more Class IV facilities as opposed to Class II and III facilities; they are a lot safer for cyclists on roads.	Class I and Class IV bike facilities along existing roadways would likely require a reduction in the number of vehicle lanes, which we don't believe is supported by the community based on past feedback. Agoura Road could be a potential roadway to reduce the number of vehicle lanes as Agoura Road, west of Malibu Hills Road, is only one lane in each direction. The bike facilities shown in the Circulation Element are in conformance with the existing Bicycle Master Plan. Any additional bike facility recommendations would need to be done as a part of an update to the Bicycle Master Plan. It should also be noted the Class I bike facilities are challenging to construct, particular in a mountainous area like Calabasas, because they require ample right-of-way which may in many cases only be acquired through Eminent Domain, face challenging engineering and construction issues to address grading and retaining walls, stream crossings, and accommodations for drainage and water quality, and are very costly to design, permit and construct. Typically, Class 1 bicycle facilities are built within large parks or within abandoned railroad rights-of-way.
30	Harrison	On page VI-7, change "transportation facilities" to roads or roadways. "Transportation facilities" would seem to refer to a harbor, bus terminal, train terminal or airport	The term transportation facilities has either been changed to roadways in the context of emergency evacuation or maintained as active transportation facilities which is in reference to bicycle and pedestrian facilities throughout the Circulation Element.
31	Harrison	Replace all uses of "transportation facilities" with "roads", e.g., VI pages 1, 5 (two uses), 6 and 7.	When the term transportation facilities is used in the context of emergency evacuation, we edited to make reference to roadways . See pages VI-6 and VI-7.
32	Harrison	VI-8 and 9 contain redundant and confusing language about "themes". Moreover, it can't possibly be true that one objective is to reduce energy conservation (second paragraph, VI-8)!	The Circulation Element Themes are intended to establish the approach the City takes to circulation, land use, and environmental protection while the bullets on page VI-6 and VI-7 detail the approach the City will take to better align with those themes. Language clarifying the difference has been added to page VI-6. Reduction in energy conservation has been fixed to refer to reduction in greenhouse gas emissions.
33	Harrison	VI-10 is completely redundant. Remove this unnecessary section.	The City reviewed the Element for language that is redundant and removed language on Page VI-2; however, the language this comment refers to is not repeated elsewhere in the Circulation Element.

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34	Harrison	VI-13. Take out the first bullet point because it's already been done. And all the discussion about Mureau Road beginning on VI-20 should be deleted. Calabasas has no jurisdiction over nearly all of Mureau Road, so this is pointless. We can't build a new bridge, for example.	The City's transportation and Transit Division has been directly involved in the update to the Circulation Element and have updated the language in Table VI-1 to be consistent with planned enhancements the City intends to make or intends to make in coordination with other transportation entities to implement.
35	Harrison	Policy VI-8 on page VI-25 (the numbering couldn't be more confusing) about discouraging cut-through traffic from the 101 south on Mulholland, Las Virgenes and Los Hills Road makes no sense. How should the traffic go south? Take this policy out.	The changes to the policy numbering have been fixed to make it easier to decipher. The intent of this policy is to discourage drivers from exiting the freeway and using City streets to travel south. Highway 27 and Highway 23 are more appropriate for regional travelers.
36	Harrison	Page VI-30 in the last paragraph states that we have pedestrian tunnels. Really?	There are no pedestrian tunnels within the City limits. This has been updated in the Circulation Element.
37	Lia	"Vehicle miles traveled is a measure of total vehicular travel that accounts for the number of vehicle trips and <u>the length of those trips</u> ". How is length of trips determined or measured?	Trip lengths are estimated for different types of trips (e.g., work, shopping, etc.) using surveys, such as the American Community Survey (ACS) or California Household Travel Survey (CHTS). The SCAG travel demand model contains trip length estimates, which are informed by data sources like the ACS and CHTS.
38	Lia	Some intersections in the City operate below desired levels of service and some road segments carry traffic volumes in excess of their desired service level volume. <i>This statement is absolutely true. Why is it being deleted?</i>	This statement is being deleted because the intent of the Circulation Element is to focus on reducing <u>vehicle miles traveled</u> , consistent with new state laws.
39	Lia	"Where it is feasible to do so ... and <u>reduce vehicle miles traveled through future infrastructure investment and land use development</u> ." How is the possible when in VI-2 it states "physical environment and neighborhood compatibility	Infrastructure investments that contribute toward VMT reductions can include investment in improved mass transit services and construction of more and improved walking and cycling facilities. Also, land development can contribute toward VMT reductions by offering improved land use mixes in compact forms (as opposed to sprawl) with access to transit services and other alternative modes of travel. The City's Local Transportation Study Guidelines state on page 5 that transportation projects that promote active transportation, such as enhancing transit service, improve walking/biking connectivity, and adding bike lanes, are presumed to generally reduce VMT. In addition, transportation projects that improve safety or improve traffic operations at current bottlenecks, such as adding traffic signals or adding turn lanes, are not expected to increase VMT. These transportation projects can be implemented without roadway widening.
40	Lia	Constraints prevent roadway widening in many areas? " " Many existing and previously planned roadways traverse sensitive environmental areas and cannot be extended or widened without creating significant environmental impacts." Yet you state that you are going to reduce VMT.	Reducing VMT does not require extending or widening existing or previously planned roadways.
41	Lia	The six bullet points starting with "Consistent with the purpose etc. and ending with Provides adequate means" are obliterated by the meaning of " Expansion <u>of the area's roadway system will not in all cases ...</u> " as stated on Page vi-6.	This section of the Circulation Element notes that expanding roadways or the roadway system would not be appropriate for the Calabasas context and preclude non-motorized forms of travel (e.g. walking and biking), which help reduce VMT. Therefore, the City's approach is to take a balanced approach (i.e. prioritize more sustainable development, such as walkable/bikeable neighborhoods and infill development, instead of prioritizing car travel).
42	Lia	" Expansion of the area's roadway system <u>will not in all cases ...</u> " This should state not in most if any cases.	Edit made.

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43	Lia	The three bullet points and the bottom of Page VI-6 and the bullet points on Page VI-7 represent a list of mostly unattainable solutions. While some of the goals may be feasible on the eastside they are impossible on the westside.	Roadway and intersection operations can be improved with projects that do not require roadway widening, such as optimizing signal timing or managing roadway access to reduce conflict points that lead to congestion. Programs intended to reduce VMT, such as improving transit service and access, can benefit the westside as well.
44	Lia	Most of the proposals would work in you were creating a "new city" from scratch, but they are implausible here.	The General Plan is a long-term policy document that recognizes change takes time. The City believe the themes included in the Circulation Element are feasible and achievable in the long-term.
45	Lia	"Calabasas will continue to require ...or payment of mitigation fees,,,,," Payment of mitigation fees is a sorry excuse to allow well-healed developers to buy their way out. The fees are seldom if ever used in the area being impacted. They should never be permitted. This should also apply to "landowners" who regularly exceed their water budget but happily pay the fees, oak tree removal, etc.	The Circulation Element is stating that payment of mitigation fees is an option to fund future improvements. However, it is not implementing any new fee programs. Future fee programs (if and when such a need would arise) would first be presented to Planning Commission and City Council for review and approval. The existing traffic mitigation fee program will be updated when the General Plan update is completed; it will likely shift to be more multi-modal in nature to reflect the policy goals of the General Plan and support potential VMT mitigation projects or programs.
46	Lia	5 of the 8 critical intersections and roadways are located on the City's westside. Proposed solutions should be focused on the westside.	Las Virgenes Road had a project completed in the past few years, and there is a current project on the upper part (Green Street). The City is going to update the traffic signal system which will help with traffic flow during peak periods.
47	Lia	"VMT Screening - ... The City of Calabasas has three screening criteria for land use projects based on <u>recommendations</u> from the Governor's Office of Planning and Research ...", The operative word is "recommendations". We should not blindly follow recommendations that do not make sense for the City of its citizens.	The recommended screening criteria were reviewed with City staff and the Traffic and Transportation Commission and deemed appropriate for Calabasas.
48	Lia	"VMT Analysis- ... SCAG regional demand model shall be used to estimate a project's VMT. OPR recommends that VMT be reported as...." Again, the operative word is "recommends". The way that Calabasas is geographically situated is starkly different from the other cities in SCAG. Who vetted the SCAG model to ensure that it makes sense for use in Calabasas? How about some examples as to how VMT is calculated? There should be a workshop for Council members, the Planning Commission, and the public.	The SCAG regional travel demand model is developed using local land use data. The VMT estimates from the model were compared to American Community Survey (ACS) or California Household Travel Survey (CHTS) information for reasonableness. The Traffic & Transportation Commission held a SB 743 workshop on 7/28/20.
49	Lia	"VMT Analysis Methodology -Projects that do not meet ... The VMT analysis should draw from the best available data to inform trip generation and trip length estimates ..." How could you possibly know the length of trips used in the model? Why is guessing as to the length of the vehicle trip satisfactory? How are round trips calculated and included? Throughout the 7/22/22 PC meeting, the term "best available data" was used to justify a position. "Best available" does not mean that it is any good. If you have only one example, and it is bad, is it the best available? I think not.	The SCAG regional travel demand model determines average trip lengths using Census data (American Community Survey) and the California Household Travel Survey.

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50	Lia	<p>"Project Trip Generation - Trip generation estimates should be based on the best available data. ... However, to the extent possible trip generation should be based on local data." Once again, we see the "best available data conundrum. See my comments above about that. Finally, a nugget of gold. Trip generation should be based on local data. How simple and excellent a suggestion, sadly ignored. As mentioned above, Calabasas is relatively unique. There are only a few roadways and intersections that need to be measured. Given the hundreds (millions) of dollars paid to consultants over the years, why hasn't this been addressed? I suggest and submit that this issue is taken to the City Manager and Council.</p>	<p>The first paragraph of Page 11 directs project applicants to have a comprehensive discussion with Traffic Division staff to determine the scope of the proposed project's LTA. This discussion could include identifying the appropriate source for project trip generation.</p>
Safety Element			
51	Byrne	<p>The safety element update provides additional discussions of hazards from wildfire and earth quake. In particular, the element discusses the effects of a potential liquefaction event at the intersection of Las Virgenes and Agoura Roads. Since that intersection does not have any critical roadway infrastructure, it is my opinion that a greater risk to the community stems from a liquefaction event that could damage critical roadway infrastructure. The Agoura Road bridge, the Las Virgenes Road bridge across the 101 freeway, and the culvert adjacent to and beneath the 101 Freeway are all supported by potentially liquefiable alluvium. Damage to any or all of those structures could have a severe and potentially long-term impact on the freeway and adjacent roads and the city and its residents</p>	<p>Caltrans regularly inspects all bridges within rights-of-way on an annual basis in Calabasas. They issue bridge inspection reports that highlight any maintenance needed. A new Policy VII-10 on page VII-9 has been added to the Safety Element that stipulates that the City should prepare a bridge preventative maintenance plan to implement Caltrans recommendations, and to prioritize maintenance along evacuation routes. Implementation of this policy will help to strengthen bridge infrastructure in the city against potential hazards, such as seismic and liquefaction events.</p>
52	Byrne	<p>I think it is important to understand what contingencies the County of Los Angeles Flood Control District and Cal Trans have made in the event that any of those critical bridges/structures is damaged during a strong earthquake. The city should be very interested in understanding the plan of action and how that plan will impact the city and its residents. The city should request all structural inspection reports for those structures and push for any recommended upgrades that may not have been implemented.</p>	<p>The City receives annual inspection reports from Caltrans for all bridges within the City. These annual inspection reports would reveal any structural deficiencies. Policy VII-10 has been added to page VII-9 of the Safety Element to prepare a Bridge Maintenance Plan to proactively follow-through on maintenance recommendations for bridges, particularly for bridges that are part of critical evacuation routes.</p>
53	Byrne	<p>"Liquefaction can cause damage to residential, commercial, and industrial buildings as well as infrastructure including roads, bridges, and pipelines" - see my cover letter</p>	<p>See response to Comment #51 and #52.</p>
54	Byrne	<p>"Emphasize prevention of physical and economic loss associated with earthquakes and other geologic disasters through early identification of potentially hazardous conditions prior to project approval' facilitate rapid physical and economic recovery following an earthquake, geologic disaster, or wildland fire through early investigation of the event and implementation of effective new standards for design of structures" see my cover letter</p>	<p>See response to Comment #51 and #52.</p>
55	Byrne	<p>"Measures in the CBC reduce fire hazards in structures. These include use of specific building construction materials, fire separation walls, building separation, and use of fire sprinklers ..." SB9 and 10 make this worse</p>	<p>Structures built due to SB9 and SB10 allowances would need to meet all applicable building and fire code requirements.</p>
56	Byrne	<p>"As development occurs, peak load water supply reserves will need to be increased" - How will peak load water supply reserves be increased?</p>	<p>The Las Virgenes Municipal Water District prepares an Urban Water Management Plan every five years to calculate projected water demand, and increases imported water supplies to meet any changes in demand. Additional discussion regarding the steps Las Virgenes Municipal Water District is taking to combat drought conditions has been added to the Climate Change section of the Safety Element, on pages VII-43 to 44.</p>

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57	Byrne	"VII-31 - Discourage development..." - change Discourage to Prohibit	The City relies on the General Plan Land Use Element and zoning code to limit certain land use types and land use intensities within the city. Outright prohibition of development in the Safety Element without site- specific information on site constraints is not consistent with private property right protections afforded by the U.S. Constitution. Accordingly, the intent of this policy is to direct the City and applicants to consider how development is sited on a property and to prioritize avoiding or minimizing impacts to biological resources over removing vegetation to meet defensible space standards.
58	Byrne	"VII-36 Permit new development only within areas that have adequate water pressure of fire flows" - Have these areas within the city been identified?	Based on discussions with the engineering staff at the Las Virgenes Municipal Water District, it is the City's understanding that the District provides adequate water pressure for fire flows, as necessary to fight local structure fires. Large-scale wildfires require fire-fighting resources at a much greater level (including water) than can be provided via a local water distribution system. Furthermore, development applicants are required to confirm adequate water pressure during the development review process in coordination with the Los Angeles County Fire Department. The intent of this policy is to present scenarios where development occurs in an area without adequate water pressure should such a condition arise in the future.
59	Byrne	"There are several emergency evacuation shelters located within Calabasas, including..." - identify more places in the city to serve as evacuation centers i.e. parks, large parking lots, sports fields, etc.	Policy VII-56 on page VII-34 of the Safety Element stipulates that the City should regularly evaluate the availability and anticipated demand for community facilities to serve as evacuation centers. This policy will support the City's efforts to identify additional facilities as needed.
60	Byrne	"VII-60 Require new development to provide adequate access (ingress, egress) and a minimum of two roadways with widths and lengths in compliance with California Building Code Chapter 7A requirements" - need more specific language here. Two roadways ... each with separate points of ingress/egress ... not to the same location	Due to the frequency of updates that the California Building Code undergoes, adding additional detail to this policy may inadvertently lead to inconsistencies with the Building Code in the future. This language has been added consistent with direction from CALFIRE, a state agency required to review the Safety Element prior to City Council adoption.
61	Byrne	"VII-73 Encourage residents to take only one or two vehicles (based on household size) to reduce the number of evacuating vehicles. Offer offsite parking facilities to safely store secondary vehicles in advance of an emergency event" - unrealistic and not likely to occur	City staff anticipate that educational campaigns about the evacuation challenges that Calabasas could face will contribute to many households choosing to leave extra vehicles at home or in a safe offsite place. This has been tested in other jurisdictions and proven to be effective.
62	Byrne	"VII-75 Coordinate with Caltrans to manage freeway lanes restricting vehicles already on the freeway to block the inner lanes and reserving the outer lanes for vehicles entering the freeway" - discuss how Calabasas will do this - does Caltrans have a plan? Usually the freeway is either open or closed ... not realistic	The City intends to engage with Caltrans to identify innovative solutions to regional and local evacuation issues. By having this policy in place, it expresses the City's intent to advocate for approaches to address highway capacity constraints.
63	Byrne	ADD: "VII-106 The City can issue a moratorium on new construction during drought conditions"	The Las Virgenes Municipal Water District's 2020 Urban Water Management Plan characterizes historical water supplies and use, projects future demand and supply through 2045, and identifies cumulative water demand projections and water shortage contingency plans. Supply and demand projections address climate variability, including multiple-dry year conditions. According to the 2020 Urban Water Management Plan, the Las Virgenes Municipal Water District anticipates meeting forecast demand for all studied climate scenarios through 2045.

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64	Fassberg	Should there be provision for studying and implementing alternative additional policies to be activated in connection with reducing vulnerability of structures to fire impacts during severe drought periods (such as now), where residential and commercial property landscaping is impacted by strict water restrictions, thereby resulting in more highly flammable materials contiguous to those structures?	The intent of the Las Virgenes Municipal Water District water use restrictions is not to increase conditions that could contribute to wildfire risk. There are opportunities to maintain vegetative health consistent with water use restrictions (for example, by hand watering trees but not using sprinkler systems to water the grass). Las Virgenes Municipal Water District strongly encourages transitioning landscapes to drought tolerant landscaping to cut down on water usage. Should the change in irrigation result in dead trees or dead vegetation, then those should be removed promptly, consistent with CAL FIRE guidelines.
65	Fassberg	The Agoura Hills/Calabasas Community Center has been identified in the Safety Element as a possible "Critical Facility" during emergencies. When are the repairs to that facility anticipated to be completed to the point that the facility will be available for that purpose?	The repairs are part of the City's Strategic Priorities list to be completed within the City's fiscal year. The City issued a request for bids for the roof repairs and will have a more detailed schedule once a contractor is selected.
66	Harrison	I suggest using A through G for the bulleted items on the first page (VII-1) to correspond to the pages which follow.	Added
67	Harrison	Identify other sources of emergency water on page VII-11, such as cisterns and tanks, which should be required for new construction anyway, as well as Calabasas Lake. We can't be sure the sources which are identified will be available during a fire, for example.	The Las Virgenes Municipal Water District works with the Los Angeles County Fire Department to make sure there is adequate water supply in case of an emergency. The Fire Department uses the Las Virgenes Municipal Water District Reservoir #2 to combat wildfires. A discussion has been added to page VII-12 to address emergency water supplies. The Las Virgenes Municipal Water District Emergency Response Plan also establishes protocols in emergency scenarios. Las Virgenes Municipal Water District tops off water tanks during red flag warning days and caps any broken water lines in the field during emergencies.
68	Harrison	Concerning proposed policies for Fire Hazards on page VII-17, landscaping for wildfires is often inconsistent with landscaping for climate change. I suggest the element recommend that the City adopt landscape guidelines and palettes to accomplish both. The desert look may help with wildfires, but it also causes far more energy use and global warming, so it's damaging to our environment and ultimately causes more wildfires. The forestry department wants us to put down lawns near our homes, even though there is no water for that. Also, I think we should consider a palette which prohibits plastic green lawns, which are derived from fossil fuels, kill the soil, and contribute to water run-off.	The City intends to encourage a balanced approach for residential landscaping by promoting drought-tolerant and fire resistant landscaping, while maintaining compliance with state and local defensible space requirements and guidance. Policy VII-92 encourages drought tolerant green infrastructure; it has been edited to also include fire resistant landscaping. The comment about prohibiting the use of turf is duly noted; however, it does not pertain to public safety.
69	Harrison	Disaster Response This element identifies 3 schools and the civic center on page VII-24 as evacuation centers, but are they all equipped with sufficient back-up power for days or weeks? Solar power and batteries might work. Do they have cooling rooms? Enough electricity for medical devices? What about the senior centers, such as Silverado and Belmont Village? Without climate centers, it's possible that thousands of people will die each year, as pointed out in the article in the L.A. Times on July 16. Look at the thousands of deaths in Europe right now due to climate change	Policy VII-56 on page VII-30 and 31 of the Safety Element addresses these issues by stipulating that the City should evaluate the need for evacuation shelters or designated cooling and smoke relief centers. The policy further states that each center should meet industry standards and include back-up power in case of power outages. Policy VII-102 on Page VII-45 states that the City should explore the feasibility of installing microgrids at critical health facilities and critical emergency service facilities. The City is exploring the possibility of providing back-up power for the Calabasas Civic Center. Agoura Hills/Calabasas Community Center will include back-up power once repairs are completed. The City is consulting with the Las Virgenes School District to understand whether their facilities have back-up power.

#	Commissioner	Comment	City Response
70	Harrison	The discussion beginning on page VII-31 is not realistic. We're not in just another drought cycle, which, unfortunately, is what many water managers think. We're in the middle of an historic climate shift, abetted by human activity. Experts in our area call it aridification, not a drought.	The discussion of drought in the Safety Element is consistent with California's 4th Climate Change Assessment which does not address potential aridification. Climate science is continuously evolving and the City will present the best available science consistent with state guidance with each subsequent update to the Safety Element, which are required to occur every 5-8 years. The reliance of the analysis on the 4th Climate Change Assessment has been clarified on pages VII-39, 42, and 45.
71	Harrison	The L.A. Times just ran an article yesterday showing how when forests are burned, they don't come back. That's human history. Humans created the Great Plains by burning down the forests to flush out animals for food. Humans created the African Savannah by burning down the forests. The forests do not return unless humans plant replacement trees.	There is a discussion on page VII-42 of the Safety Element regarding deteriorated forest health in the Santa Monica Mountains, including a 123,000 tree die-off in just a two year period.
72	Harrison	The RCP 4.5 model on page VII-32 makes the assumption that the CO2 levels will level off after 2040, but there's no evidence that this will happen. There's no precedent, there's no historical example, for humans to reverse the damage they've done to the environment on a scale sufficient to alter the outcome. Look at the recent Senate vote to maintain fossil fuel use. The only evidence we have is that things will continue as they are now, so we need to look at the Model 8.5 projections, which show that in Calabasas, about one third of the days each year will be above 97.5 degrees. We also should look at a worse case scenario, because we're required to have two scenarios.	The Southern California Climate Adaptation Planning Guide and California Adaptation Planning Guide recommend using emission scenarios based on a community's consideration of risk. The City developed policies in the Safety Element assuming projections for the RCP 8.5 emission scenario would be realized. This has been clarified with new text added to page VII-39 of the Safety Element which states "Climate projection data associated with both emission scenarios are presented below; however, the policies were formulated based on the projections associated with the RCP 8.5 scenario."
73	Harrison	Also, climate change is more than temperatures and rainfall, more than fires and droughts. There will be life-changing shifts in both animals and plants. There could be periods without any available water at all. As the Prime Minister of Spain said this week, climate change kills people, it kills our ecosystem. So maybe we should consult with climate change analysts.	Policies VII-99 and VII-103 on pages VII-44 and 45 of the Safety Element address consideration of climate change in resource conservation planning and encourage ecosystem restoration.
74	Harrison	Thousands of people will die each year from the heat, and power outages will be routine. And yet still we don't require back-up power in new construction, and who knows if our evacuation shelters have back-up power for days and weeks. Shouldn't this be a recommended policy?	Policies VII-56, VII-93, VII-95, VII-96, VII-102 and VII-105 on pages VII-33, VII-46 and VII-47 of the Safety Element include policies addressing cooling centers, strategies to reduce risk of power outages, and back-up power at evacuation centers and critical facilities.
75	Harrison	No one has done a reality check on the results. For example, there was a fire which began around 10 a.m. in Calabasas on October 21, 1996, with 50 mph winds and 5% humidity. The fire got to within 200 feet of A.E. Wright, the middle school on Las Virgenes, which had to be evacuated. Traffic on Las Virgenes, including the school buses, came to a standstill and no one could evacuate. And that fire was before the Colony and several other developments on Las Virgenes were completed. So the results of the study are obviously invalid	An Executive Summary has been prepared for the Evacuation Analysis Report to summarize the purpose of the study. As explained in the summary, the emergency evacuation study could not and does not replicate every imaginable evacuation scenario, nor does the study recreate past evacuation events or predict specific future evacuation events.
76	Harrison	Everyone knows intuitively that notifying over 100,000 people to evacuate at 1 a.m. will not result in complete evacuation in 2 hours. That's Scenario 1, which is absurd. Scenario 2, which is just for the City of Calabasas, is equally absurd.	An Evacuation Report Executive Summary has been prepared to summarize the purpose of this study. The evacuation study is using a two-hour window to estimate the time period in which residents will leave their homes. This does not mean that residents will fully evacuate the area within two hours.

#	Commissioner	Comment	City Response
77	Harrison	The traffic study is based on the assumption that perfect, clear communication to evacuate is received by every member of the target audience. There's a 0% chance of that happening, let alone at 1 a.m. There's also the assumption that no one would panic, everyone would react in a completely rational manner (at 1 a.m.), with fueled or powered cars and needed supplies and records at hand. Everyone knows those assumptions are absurd, so again, the results are invalid	An Evacuation Report Executive Summary has been prepared to summarize the purpose of this study. Table E.1 summarizes the roadway capacity restrictions assumed in the evacuation assessment.
78	Harrison	No assumptions about human behavior were included. The study assumes all drivers are computers. Have you ever seen what happens when there's an emergency vehicle on the side of the freeway? Traffic slows for miles. Do you know why they put a black screens up immediately next to car accidents in Japan? (culture + avoids the lookie loo problem).	An Evacuation Report Executive Summary has been prepared to summarize the purpose of this study. The purpose of the assessment is to identify bottlenecks in the roadway network and inform policy development.
79	Harrison	Moreover, it's not just weather, fires and sparks that the evacuees might have to drive through. I remember the 1994 earthquake, and during aftershocks while driving on the freeway, everyone came to a stop. It was frightening. None of these factors were included.	An Evacuation Report Executive Summary has been prepared to summarize the purpose of this study. As noted, there is a wide range of potential emergency scenarios with varying levels of complexity that could occur in Calabasas and this study considered four potential evacuation scenarios.
80	Harrison	Without including human behavior and realistic assumptions about communications not to mention weather conditions and aftershocks, all of these tables just produce numbers in a vacuum which have no validity at all. Imagine driving on the freeway seeing huge flames and smoke on the mountain. Wildfires are not just upsetting and frightening to drivers, they cause drivers to slow down to look.	An Evacuation Report Executive Summary has been prepared to summarize the purpose of this study. The purpose of the assessment is to identify bottlenecks in the roadway network and inform policy development.
81	Harrison	However, the conclusions on the top of page 23 are rather sobering, finding that the City of Calabasas has limited options to manage evacuation demand during an emergency scenario. What about the CHP closing freeway access from Woodland Hills and from Westlake by 100%, and not just 35% as assumed in one of the scenarios? How would they restrict 35% of the access anyway? 100% seemed to help during the Woolsey fire, so why not include that as a policy recommendation?	The evacuation study considered a 35% decrease in traffic volume to model the removal of regional traffic on US 101 during morning commute hours. Policy VII-72 on Page VII-34 of the Safety Element is regarding coordinating with nearby jurisdictions, the Las Virgenes- Malibu Council of Governments, and Los Angeles County Office of Emergency Management on developing strategies to address freeway congestion on the US-101 which could include full or partial freeway closures.
82	Harrison	This is also mentioned on page VII-25 of the Safety Element, but SB 99 requires information on residential developments that don't have 2 emergency evacuation routes, not those with single entry and exit streets. An evacuation route is not the same as the entry or exit street. This information is important, but not what is required by law.	Figure VII-9 on page VII-30 of the Safety Element was revised by changing "exit points" to "exit routes."
83	Harrison	There are also some inaccuracies in that map. It leaves off some communities, like Avanti, which has one entry and exit, and it categorizes Calabasas Hills as having one entry and exit, even though it has at least 3. Also, the map doesn't show those with maybe two streets to get in or out but which just go to the same other street. For example, Bellagio's entry and exits go to the same street, Park Helena. So does Mulholland Heights, to Mulholland Highway. Same with Braewood. It's not safer to live in Braewood than say Calabasas Hills because they both have only one evacuation route, even though they have more than one exit gate	Figure VII-9 on page VII-26 of the Safety Element was re-evaluated based on the comment provided and City staff have determined that the map is accurate and does not warrant any further revisions. Neighborhoods shown on the map are neighborhoods that only have a single exit route, which is different than neighborhoods with a single exit point.

#	Commissioner	Comment	City Response
84	Harrison	D-1 should also contain a map of areas where residents cannot evacuate safely, not just a map of single entry HOAs, which is inaccurate and misleading, and not meaningful in some respects. The law requires a map of areas with single evacuation routes, which, in fact, is most of the city, probably meaning that residents cannot evacuate safely there, but that is the point of the exercise.	Appendix D-2 to identifies evacuation constraints at the city-wide scale. Figure VII-9 on page VII-26 is intended to comply with Government Code Section 65302(g)(5) (as amended by Senate Bill 99) which states "Upon the next revision of the housing element on or after January 1, 2020, the safety element shall be reviewed and updated as necessary to identify residential developments in any hazard area identified in the safety element that do not have at least two emergency evacuation routes." Accordingly, Figure VII-9 is focused on residential developments within Calabasas consistent with the Government code requirements.
85	Harrison	Why would we build any more homes in areas where residents cannot evacuate safely? This makes no sense at all. Shouldn't this be a policy alternative in the Safety Element? Something more than the mere discouragement of development in landslide and flood areas, which is the way it reads now in Policy VII-5 and Policy VII-11?	The City recently received State Housing and Community Development certification of the General Plan Housing Element which stipulates a certain amount of residential unit growth consistent with state housing law would occur in Calabasas. Preventing development via policies in the Safety Element would be inconsistent with the Housing Element.
86	Harrison	The water managers seem to be stuck in their drought-cycle mentality. We all heard them say how shocked they were about the lack of runoff this year, even after all the snow. They cannot envision climate change. They can't envision desalination plants at ports and military bases along the coast. They still think we can conserve our way out of this.	Policy VII-25 on page VII-20 and Policy VII-92 on Page VII-46 encourage drought-tolerant landscaping to reduce water demand. Policy VII-35 on page VII-21 encourages the City to work with the L. A. County Fire Department to evaluate water supply availability for wildfire suppression as part of the next Hazard Mitigation Plan Update. Policy VII-36 on pages VII-21 and VII-22 stipulates that the City coordinate with the Las Virgenes Municipal Water District to provide adequate water availability and water storage to meet peak fire demand, and to promote use of the Pure Water Project during disasters and hazard events. Policy VII-37 on page VII-22 requires new development only in areas with adequate water pressure or fire flows. Additional discussion on the steps Las Virgenes Municipal Water District are taking to address drought conditions has been added to Pages VII-42 and 43.
87	Harrison	But what will happen when Colorado River water is unavailable? When Northern California water is unavailable? What if the water supply is disrupted other than by earthquake? What if the water supply is contaminated? Shouldn't we have policies and plans for this? We need to include policies and plans for periods without water, just as we should for periods without power. Just today the L.A. Times reported how Monterrey, Mexico, an affluent city with a metro area population of over 4- million people, just ran out of water.	On the topic of how drought will disrupt water supply: Additional discussion regarding the steps Las Virgenes Municipal Water District is taking to combat drought conditions has been added to the Climate Change section of the Safety Element, on page VII- 42 to 43. The Conservation Element of the General Plan acknowledges that the City has no local source of drinking water and is entirely dependent on the Las Virgenes Municipal Water District, which purchases water from the Metropolitan Water District of Southern California. The City's approach is to reduce overall water demand through the use of water conservation measures. See Chapter IV Conservation Element of the General Plan, Policies IV-21, 22, 23, 24, 25, 26, 27 that speak to reducing demand and addressing water quality. On the topic of water supply disruption due to an earthquake: Additional discussion regarding the back-up water supplies Las Virgenes Municipal Water District maintains in case of an earthquake has been added to page VII-3 of the Safety Element. Local water lines could break in case of an earthquake, so Las Virgenes Municipal Water District recommends individuals maintain at least a 3-day supply of water on- site. Policy VII-9 has been modified to stipulate that the City encourage Calabasas residents to maintain such an emergency supply.

#	Commissioner	Comment	City Response
88	Harrison	The attachments (Appendix D-1 Wildfire Assessment, and Exhibit D Part 2) are not marked logically or organized so as to be related to the Safety Element. If they have to be included (although I think they should both be deleted as discussed below), they should be marked something like "Appendix to Safety Element: Wildfire Assessment" and "Appendix to Safety Element: Emergency Evacuation Traffic Assessment". They should be clearly referred to in the Safety Element as such, e.g., pages VII-16, 2, 27, 28. In fact, they should be listed on the first page after A through G. "Appendix D-1" and "Exhibit D Part 2" are completely inconsistent and illogical, and just plain confusing.	Appendices Cover Pages and references to appendices in the Safety Element have been updated.
89	Harrison	Appendix D or D-1 [sic]. The wind data on pages D-7 and 8 seem misleading. We don't get fires from the south, and I can't recall any fires from Simi Valley. Figures 7 and 8 showing all the fire risks from the south have little or no basis in fact. This entire Appendix should be deleted, as it serves no purpose and is confusing at best.	TSS conducted an analysis of wildfire approach pathways located both to the north and south of the city by evaluating slope and vegetation. Figure 6 of Appendix D-1 displays high risk wildfire approach pathways to the north of the city. The City has experienced fires approaching the City from the north more commonly in recent decades, typically driven by Santa Ana winds across a wide area of open space with plenty of vegetation and no fire breaks. Based on the analysis conducted by TSS, wildfire approach pathways toward the City from the south also bear risk to the City. These wildfire approach pathways from the south are more varied and abundant and have the greatest amount of accumulated vegetation/fuel, which when driven by southwesterly or southerly winds (or when driven by specific fire event convection winds) portend an equally high degree of risk and danger to the City as wildfires that approach from the north.
90	Harrison	The Emergency Evacuation Traffic Assessment should also be deleted. The results of the models are completely invalid. No account is made for (i) the effectiveness of emergency communications, (ii) driving through dangerous weather, fire or earthquake situations, or (iii) for human behavior.	Many variables influence emergency evacuations, and every emergency evacuation situation will therefore be unique and largely unpredictable; the scenarios presented in the Emergency Evacuation Traffic Assessment are intended to identify bottlenecks in the roadway network and inform policy development. The emergency evacuation study does not predict future evacuation events. See the new Executive Summary in Appendix D-2 for more information.
91	Harrison	The liquefaction figure on page VII-5 doesn't include the area around Calabasas Lake, which is the one area in the City which suffered substantial liquefaction damage from the 1994 earthquake. The map or at least the discussion of liquefaction should include that area.	Figure VII-2 depicts a liquefaction zone associated with the southern portion of Calabasas Lake.
92	Harrison	Regarding run-off on page VII-8, instead of limiting it, prevent it or prohibit it from new development.	Policy VII-14 on Page VII-10 requires new discretionary development projects to limit new impervious surfaces to avoid any increase in harmful runoff, either individually or cumulatively, into natural stream channels.
93	Harrison	The increase of water supply during emergencies won't be met by the Pure Water Project or an increase in State Water Project allocations (that's all illusory). We should suggest the construction of a desalination plant at Port Hueneme, for example.	Additional discussion regarding the steps Las Virgenes Municipal Water District is taking to diversify their water supply portfolio has been added to pages VII-43 and 44 of the Safety Element. The Las Virgenes Municipal Water District is exploring desalination as a long-term option; however, desalination requires overcoming major regulatory and financial hurdles.

#	Commissioner	Comment	City Response
94	Harrison	Table VII-3 states we only have 4 days above 97.5°F each year, and under the more realistic RCP 8.5 scenario, that number will go to 37 days per year (when in fact that scenario actually projects over 100 days per year). I've already had over 30 days above 97.5° this year through July 27, so the data are completely inaccurate.	Cal-Adapt models climate projections expressed in 30-year averages across three time periods: Baseline (1961 - 1990), Mid-Century (2035 - 2064), and End-Century (2070 - 2099). These historical, mid-century, and end-century 30-year averages dilute the extremes of a single year and show only a general average trend. It is considered best practice to articulate the modeled results as averages and not the full range of possible totals. One, two, or even three years in a row may experience the upper end of a given average projection but then be followed by a low total of extreme heat days in subsequent years, thus leveling the overall projection. For example, the models predict in 2090 that Calabasas could experience anywhere from 2 to 118 extreme heat days. The average is presented to give a better year-to-year representation of general trends.
95	Harrison	Runoff onto bone-dry soils cannot be absorbed anymore than a bone-dry sponge can wipe up a spill on a counter. This will cause flooding and deaths, as occurred in Iran just recently. Fires will permanently destroy forests and woodlands. Lack of water will destroy ecosystems and threaten us in the event of wildfires.	On page VII-43 of the Safety Element, there is discussion regarding how periods of drought will impact vegetation, and cites the loss of 123,000 trees between 2015-2017 in the Santa Monica Mountains due to prolonged drought conditions and deteriorating forest health. It is also acknowledged that tree die-off will increase susceptibility to wildfires. Typically, vegetation loss is more closely tied to flash floods than drought conditions on their own because different soil types absorb water at different rates.
96	Harrison	VII-40, discussing climate change, doesn't even mention the loss or unavailability of water due to climate change! Moreover, there's no mention of loss or unavailability of water after an earthquake, even though San Francisco, San Jose and Santa Rosa suffered major fires after the devastating earthquake of 1906. We need to plan for emergency water supplies, and not rely on the Las Virgenes Municipal Water District for a continuing flow of water.	Page VII-43 of the Safety Element discusses how climate change could lead to extended drought conditions, that water supplies could be impacted, and that strategies should be put into place to ensure a high standard of condition and performance on infrastructure systems (water systems are considered part of infrastructure systems). Page VII-4 describes how a significant earthquake could damage aqueducts which would impair water flow to the Southern California region and could take 4-18 months to restore. This section has been expanded to describe Las Virgenes Municipal Water District's emergency water supply in case of an earthquake. Also, see response to Comment #87.
97	Lia	Typo in the first sentence of the last paragraph: pHortions.	Typo fixed.
98	Lia	"Although it is not possible appropriate land use decisions and adequate building codes to reduce risk". Who decides which decisions and codes are appropriate?	The City Planning Division and Building and Safety Division determine during the application process if a proposed development meets current standards regarding seismic risk. The City's building code is updated regularly consistent with California's seismic code updates.
99	Lia	"Discourage development within potential landslide areas ..." How do you plan to "discourage development? Development should be prohibited in these areas.	Based on the development application process, the City's Planning and Building and Safety Divisions (and in the case of discretionary permits, the Planning Commission and/or the City Council) make determinations if an applicant is proposing development that either does or does not meet standard practice. Site-specific geotechnical reports provide guidance about site constraints and limitations, and how to safely mitigate those which can be mitigated, as necessary to safely accommodate the proposed development. In these instances, the City also relies on both the municipal code requirements and the General Plan policies (such as Policy VII-5) to determine whether the proposed development is appropriate.

#	Commissioner	Comment	City Response
100	Lia	"Prior to approval of development ... other areas identified by the City ... Include a map and listing of the areas referred to.	The City Engineer may have information from geotechnical reports submitted as part of past development applications that provides a more refined understanding of liquefaction or landslide hazards than what is displayed in Figure VII-2 which is sourced from the State Department of Conservation. In those instances, the City Engineer would utilize additional information on such hazards to inform permit decisions for future development applications. Including additional maps or lists of such sites is not appropriate for a city-wide policy document. Figure VII-2 meets the requirements established in the Government Code Section 65302 for the types of information required for inclusion in a Safety Element.
101	Lia	'Discourage development within flood hazard areas' ...' How do you plan to "discourage development? Development should be prohibited in these areas.	Although General Plan policies are not intended to be prescriptive, they do establish guidance for the City Planning and Building and Safety Division for reviewing development applications. General Plan policies also provide support for adopting certain ordinances that are prescriptive and help to more clearly establish what is and is not allowed in the City. In the case of development within the City's floodplain for example, the Calabasas Municipal Code Section 15.16.160 prohibits new development unless certified by a registered professional engineer or architect that demonstrates that encroachments will not result in any increase in flood levels during the occurrence of the base flood discharge.
102	Lia	"Discourage development and encourage ... " ... " How do you plan to "discourage development? Development should be prohibited in these areas.	See response to Comment #101.
103	Lia	"Calabasas is traversed by a major transportation artery <u>trucks transporting hazardous materials</u>" Is the City made aware of hazardous materials being transported through the City? If not what steps should be taken to insure safety?	The transport of hazardous materials is heavily regulated and enforced at the federal and state levels, and the City has little authority to control such activities due to the interstate nature of commercial and industrial traffic. On the 101, Caltrans serves as first responder for hazardous material spills, while the California Highway Patrol enforces hazardous waste transportation rules. Common carriers are licensed by the CHP, with placards required for motor carriers who transport hazardous materials in excess of specific weight limits. Should a hazardous material spill occur within City boundaries, Caltrans, the Los Angeles County Fire Department, the Los Angeles County Sheriff's Department, and the City of Calabasas will coordinate to ensure an adequate and immediate response. It should also be noted that the Calabasas Landfill no longer accepts hazardous material.
104	Lia	The presentation from the consultant was disarmingly inaccurate. She stated that the three evacuation plans that were presented were based on what happened during the Woolsey fire. Did she meet with citizens that lived through the fire? Some simple truths: 1. Calabasas does not exist in its own universe, 2. Fires in Calabasas are very often impacted and driven by fires in surrounding communities, and 3. During the Woolsey fire, the freeway was shut down for days. It is well settled that as in war, plans don't survive the first contact. There were no alternatives presented.	The evacuation area of the Woolsey fire was used to inform the regional evacuation scenario. The Woolsey Fire After Action Report was also reviewed to gather the lessons learned and inform the policies in the updated Safety Element.

#	Commissioner	Comment	City Response
General Plan Implementation			
105	Byrne	"The City shall pursue an open space dedication program similar to a parks dedication program. In such a program, each developer would be required to dedicate land to an appropriate agency or pay an in-lieu fee where dedication is not appropriate" - strike "or pay an in-lieu fee where dedication is not appropriate"	The City allows in-lieu fees rather than on-site dedication to allow for flexibility in design for developments, particularly for properties that may have site constraints. The in-lieu fees provide flexibility to avoid situations where on-site park dedication may result in less than adequate recreational facilities. As a result, in-lieu fees provide a greater public benefit, allowing the City to allocate such fees to park improvements consistent with the City's Parks Master Plan.
106	Byrne	"where such competition between competing values results in seemingly incompatible policies or implementation actions, the General Plan text ..." substitute the subsequent text with "will prevail"	This language in the General Plan Implementation chapter is in reference to policies or implementation actions within the General Plan that are incompatible. It is not speaking to conflicts between the General Plan and other adopted policy documents or the municipal code.
107	Lia	"Therefore, the resources inventory will be continually updated to incorporate new data on such topics as;" Water availability is a significant and serious omission from this list	Water availability has been added, along with climate projections, to Page XIII-4 of the General Plan Implementation chapter.
108	Lia	"Small Lot Consolidations" Provide a map showing where these consolidations are possible.	The small lot consolidation discussion in the General Plan Implementation chapter of the General Plan relates primarily to Old Topanga Canyon and the Calabasas Highlands. The City has had success with small lot consolidation entirely through privately funded development efforts. The recommendation to utilize a non-profit entity to consolidate the properties requires voluntary sellers and properties to be purchased at fair market values, which is highly unlikely considering the average property value in Old Topanga Canyon and the Calabasas Highlands. The City has also reduced the number of small lots available by using the tax default properties acquisition program to retire a number of lots in Old Topanga Canyon and the Calabasas Highlands.
109	Lia	"Traffic impact fees... These funds will then be used for the sole purpose of implementing various improvements to the City's arterial street system. " Payment of mitigation fees is a sorry excuse to allow well-healed developers to buy their way out. The fees are seldom if ever used in the area being impacted. They should never be permitted. The areas surrounding the development get zero if any benefit from the fees, while other areas reap the rewards.	See response to comment #45. The Lost Hills Road Interchange used Bridge and Thoroughfare District funds. As for the Citywide TIF, the funds are being accumulated and projects will be identified with the fee program update following the General Plan updates.
110	Lia	"Coordination of Circulation Funding" To the degree feasible ad to the extent permitted ... Calabasas will pursue establishment of reciprocal traffic improvement programs ... 'Include a list of improvements that have been pursued and implemented. To my recollection this has not occurred in the City.	The City's traffic improvement programs (capital program) is shown in the City budget.
CEQA Addendum			
111	Byrne	"Prior to any ground-distributing activities, a Qualified Paleontologist shall be retained ..." change shall to must	The intent of utilizing the word "shall" is to make it clear that the requirement is mandatory. Although must and shall can have similar meaning, the City's preference for a CEQA document is to use the term "shall."
112	Byrne	"... if potentially significant impacts are identified, the Qualified Paleontologist shall prepare ..." change shall to must	The intent of utilizing the word "shall" is to make it clear that the requirement is mandatory. Although must and shall can have similar meaning, the City's preference for a CEQA document is to use the term "shall."

#	Commissioner	Comment	City Response
113	Byrne	"For all future housing sites that are either completely vacant or majority of the site is vacant/undeveloped, prior to the issuance of a grading permit" - change "issuance" to project approval	The term "project approval" can be difficult to pinpoint in a development review process as it could be associated with land use approvals or various individual permits that are issued at different times during entitlement, site construction and development phases. For this reason, we have maintained grading permit as that would be the first permit issued that would lead to ground disturbance.
114	Byrne	"If sensitive species and/or habitat ... a written report substantiating such shall be submitted to the City Planning Division prior to issuance of a grading permit" change issuance to project approval	See response to Comment #113
115	Byrne	"If it is determined that a special-status species may be impacted ... prior to issuance of a development permit from the City" - change issuance of development permit to "prior to project approval"	See response to Comment #113
116	Byrne	"If the biologist determines that wildlife movement corridors ... consultation with the appropriate agency shall occur prior to issuance of a development permit" change issuance of development permit to "prior to project approval"	See response to Comment #113