

City of Calabasas Circulation and Safety Element Update

Addendum to the City of Calabasas General Plan Update Environmental Impact Report

SCH #2021020150

prepared by

City of Calabasas

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1 Introduction

This document is an addendum to the *City of Calabasas General Plan Update Final Environmental Impact Report (EIR)* (State Clearinghouse #2021020150), which was certified by the City of Calabasas City Council on October 13, 2021. The General Plan Update EIR analyzed updates to the Land Use, Housing, Safety, and Circulation Elements. Since the General Plan Update EIR was certified, further updates to the Safety and Circulation Elements were made. This addendum addresses the proposed Calabasas Circulation and Safety Element Update project ("proposed project").

In accordance with Section 15164 of the California Environmental Quality Act (CEQA) Guidelines, codified in Sections 15000 et seq. of Title 14 of the California Code of Regulations, a lead agency must prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred. Under Section 15162(a), where an EIR has been certified for a project, no subsequent EIR shall be prepared for the project unless the lead agency determines, on the basis of substantial evidence in light of the whole record, that there are substantial changes in the project or circumstances or substantially important new information that will cause the project to have significant new impacts or substantially increase previously identified significant impacts.

The addendum does not need to be circulated for public review but can be included in or attached to the final EIR (Section 15164(c)). The decision-making body must consider the addendum with the final EIR prior to making a decision on the project (Section 15164(d)). A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162, supported by substantial evidence, should be included in the addendum, the lead agency's findings on the project, or elsewhere in the record (Section 15164(e)). A discussion on this topic can be found in Section 4, Decision Not to Prepare a Subsequent Environmental Impact Report, of this addendum.

This addendum has been prepared in accordance with relevant provisions of CEQA (California Public Resources Code Section 21000, et seq.) and the CEQA Guidelines. It describes the proposed project and compares its impacts to those identified in the General Plan Update EIR. The analysis demonstrates that the proposed project does not require the preparation of a subsequent EIR.

2 Background

This section provides an overview of the General Plan Update and its EIR to provide context for this addendum.

2.1 General Plan Update

On October 13, 2021, the City certified the General Plan Update EIR (State Clearinghouse #2021020150). The EIR analyzed updates to the General Plan which were made to address the housing and safety needs of the City and to meet the requirements of current State law. The General Plan Update EIR assessed impacts associated with updates to the Housing Element, Land Use Element, Circulation Element, and Safety Element. The City adopted updates to the Housing Element and Land Use Element concurrently with certification of the General Plan Update EIR but did not adopt the updates to the Safety and Circulation Element. The adoption of the Safety and Circulation Elements was delayed to provide adequate time for additional analyses related to emergency evacuation and to solicit public and stakeholder input. Since the adoption of the General Plan Update EIR, additional technical studies were prepared to inform the Safety and Circulation Element updates and new policies were developed, and thus now the Circulation and Safety are being further updated from the draft version that was included as part of the EIR. These changes are analyzed in this addendum. Information on updates to each element is provided below.

2.1.1 Housing Element Update

The Housing Element is one of the State-mandated elements of the General Plan. The Housing Element Update identifies the City's housing conditions and needs, and establishes the goals, objectives, and policies that comprise the City's housing strategy to accommodate projected housing needs, including the provision of adequate housing for low-income households and for special-needs populations (e.g., unhoused people, seniors, single-parent households, large families, and persons with disabilities). The Housing Element Update fulfilled the following goals and objectives:

- Meet State required Regional Housing Needs Assessment (RHNA) for 6th Cycle Housing Element planning period of 2021 – 2029;
- Bring the General Plan into conformance with recently enacted State laws;
- Identify future housing sites with a collective capacity to meet the City's RHNA, including the requisite buffer capacity; and
- Locate future housing sites in existing urban areas, in close proximity to transit and commercial services, and to avoid placement of new housing in open space areas.

The Housing Element Update was evaluated in the General Plan Update EIR and adopted on October 13, 2021.

2.1.2 Land Use Element Update

The General Plan Update EIR evaluated changes made to the land use table and map of the Land Use Element. These changes were made to provide sufficient capacity for housing development and to meet the permitted residential densities and affordability requirements specified in the Housing

Element Update. Specifically, the Land Use Element and the Calabasas Municipal Code were updated in the following ways:

- The existing Residential-Multi-family (R-MF) (20) designation was modified to an expanded density designation of R-MF (24). This alteration automatically increases the density allowance for all lands specified within the previous R-MF (20) designation.
- The "Anticipated Maximum Population Intensity" for the existing R-MF (12) and R-MF (16) land use designations was modified.
- A new Affordable Housing Overlay (AHO) designation was created to reflect allowed densities identified in the Housing Element Update. The AHO zone can be applied to property that allows for multi-family housing and provides an incentive to allow for greater density if the property owner provides additional affordable housing.

The Land Use Element Update and modifications to the Calabasas Municipal Code were evaluated in the General Plan Update EIR and adopted on October 13, 2021.

2.1.3 Safety Element Update

The proposed Safety Element Update will address the requirements of new State legislation and incorporate new policies based on updated local and regional data. The update will address the following legislative requirements:

- Senate Bill (SB) 99 requires jurisdictions, upon the next revision of the Housing Element on or after January 1, 2020, to review and update the safety element to include information identifying residential developments in hazard areas that do not have at least two emergency evacuation routes. The Safety Element Update will include an assessment of residential emergency evacuation routes consistent with SB 99.
- Senate Bill 379 requires Safety Elements to include a climate change vulnerability assessment, measures to address vulnerabilities, and a comprehensive hazard mitigation and emergency response strategy. In addition, Senate Bill 1035 requires cities and counties to update their safety element during a housing element or local hazard mitigation plan update cycle, but not less than once every eight years, if new information on flood hazards, fire hazards, or climate adaptation or resilience is available that was not available during the previous revision of the safety element. The Safety Element Update will identify populations vulnerable to climate change, present climate change projection information, and include new goals, policies and implementation programs addressing climate change.
- Senate Bill 1241 requires review and update of the safety element, upon the next revision of the housing element on or after January 1, 2014, as necessary to address the risk of fire in state responsibility areas and very high fire hazard severity zones. The Safety Element update will include new goals, policies and programs related to fire hazard planning and preparedness consistent with CAL FIRE requirements.
- Assembly Bill (AB) 747 requires each jurisdiction to review and update as necessary the Safety Element to identify evacuation routes and capacity, safety, and viability under a range of emergency scenarios. This information must be included by January 1, 2022, or upon approval of the next update to the Local Hazard Mitigation Plan. The Safety Element Update will identify emergency scenarios and goals, policies, and implementation programs to mitigate potential impacts associated with emergency evacuation.

Areas of the Safety Element that would be updated include geology and seismicity, stormwater management and flooding, fire hazards, and disaster response. A new section on climate change would be added.

A draft version of the Safety Element Update was evaluated in the General Plan Update EIR.

2.1.4 Circulation Element Update

Changes to the Circulation Element would include adding references to vehicle miles traveled in place of level of service, consistent with new state requirements. Level of service is a measure to describe how well roadway intersections and other transportation facilities operate for drivers. Level of service thresholds were previously used as a metric to evaluate environmental impacts of proposed projects. These thresholds would be replaced with vehicle miles traveled for purposes of environmental impact evaluations. Vehicle miles traveled evaluates the number of miles traveled by each vehicle. This shift in standard is mandated by the State as part of Senate Bill 375 in keeping with the State's goals to reduce greenhouse gas emissions, encourage infill development and improve public health through active transportation (e.g., bicycling and walking).

A draft version of the Circulation Element Update was evaluated in the General Plan Update EIR.

2.2 General Plan Update EIR

The City Council certified the EIR for the General Plan Update on October 13, 2021 and adopted updates to the Housing and Land Use Elements, and modifications to the Calabasas Municipal Code. The General Plan Update EIR evaluated potential environmental consequences associated with the General Plan Update, focusing in depth on the following environmental issue areas:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources and Tribal Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality

- Land Use and Planning
- Noise
- Population and Housing
- Public Services and Recreation
- Transportation
- Utilities
- Wildfire
- Effects Found Not to be Significant (Agriculture and Forestry Resources, Energy, and Mineral Resources)

2.3 Documents Incorporated by Reference

The General Plan Update EIR evaluated impacts associated with the City's General Plan Update, including cumulative impacts associated with future development. The Draft and Final EIR, in their entirety, as well as the technical reports and appendices, are incorporated by reference into this addendum. Technical documents supporting the General Plan Update EIR and this addendum are available for review at the City of Calabasas Planning Division. The General Plan Update Draft and Final EIR are also available online at: https://www.cityofcalabasas.com/government/community-development/2021-2029-housing-element-update/resources-and-documents.

3 Proposed Updates to the Circulation and Safety Elements

The proposed project would involve adoption by the Calabasas City Council of an updated Circulation Element and Safety Element with minor language and policy updates from what was analyzed as part of the General Plan Update EIR.

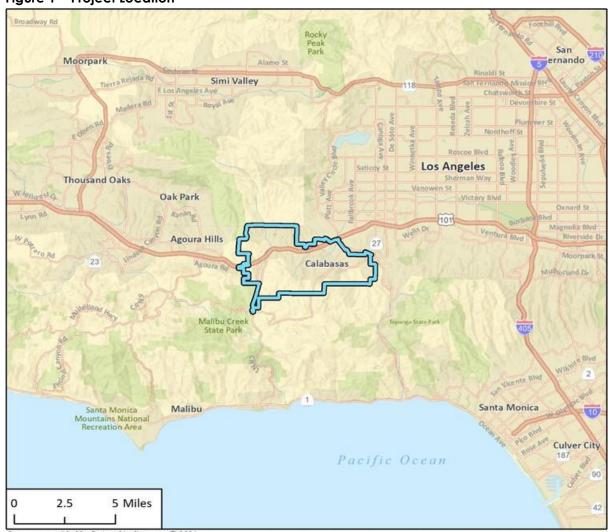
3.1 Project Location

The City of Calabasas (City) is in western Los Angeles County along the Ventura Freeway, approximately 25 miles from downtown Los Angeles. Adjacent cities include Agoura Hills to the west, Hidden Hills to the north, and Los Angeles to the east. Unincorporated Los Angeles County is located to the south, west, and north of Calabasas. A portion of the City's northern boundary borders the Ventura County line. U.S. Route 101 (US-101) generally runs east-west along the northern border of the City. Other major transportation routes in and near the City include Mulholland Highway, Calabasas Road, and Old Topanga Canyon Road in the eastern area of the City, and Las Virgenes Road, Lost Hills Road, and Agoura Road in the western area of the City. State Route 27 (SR-27) runs north-south approximately 0.20-mile east of the City.

The study area considered in the General Plan Update EIR includes the entire City of Calabasas Plan Area, shown in Figure 1, which includes all areas within the City's corporate limits and some adjacent areas of unincorporated Los Angeles County, within the City's Sphere of Influence (SOI). These adjacent areas are already pre-zoned and/or identified in the Land Use Element as being potentially appropriate for future annexation, and other territories located within the City's SOI.

The City's corporate limits encompass approximately 13.3 square miles, or 8,512 square acres of land, and the unincorporated portions of the Plan Area total approximately 3.7 square miles (2,362 square acres. The entire Plan Area encompasses approximately 10,874 acres.

Figure 1 Project Location



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3.2 Project Description

The project consists of focused updates to the City of Calabasas General Plan Circulation and Safety Elements, specifically new policies based on updated information from two new technical reports, as discussed in more detail below. The comprehensive updates to the Circulation and Safety Elements would bring the City's Circulation and Safety Elements into compliance with State law requirements. New and significantly revised policies included in each element from what was analyzed as part of the General Plan Update EIR are below. Additions to each element are shown below in underline, and removals are shown in strikeout.

3.2.1 Circulation Element

The Circulation Element Update contains updated language and terminology regarding vehicle miles traveled, emergency evacuation, complete streets, and circulation enhancements on critical intersections and roadway corridors from what was analyzed as part of the General Plan Update EIR. Additionally, Agoura Road was added as a roadway segment affected by freeway diversion. One new policy included in the element is listed below:

VI-13 Develop sample roadway cross sections to reference as best practice treatments for flexible roadway design, such as for bicycle facilities or shoulder treatments, that can accommodate vehicle travel or emergency vehicle access during an emergency evacuation.

3.2.2 Safety Element

The Safety Element Update contains updated language and terminology regarding fire hazards, climate change vulnerability, and emergency evacuation. Additionally, the Safety Element Update was revised to include updates to information regarding designated evacuation routes, emergency evacuation shelters, facilities and groups that may require special assistance and support during an emergency, isolated neighborhoods, emergency evacuation capacity, intense precipitation events, drought, wildfire impacts, and climate change vulnerability. New policies included in the element are listed below:

VII-16 Actively collaborate with regional, state and Federal fire agencies to coordinate and implement wildfire mitigation measures and fuel load modifications / reduction zones, including load clearing, prescribed burns, fire breaks, livestock grazing, and public and private road clearance and other mitigation activities for areas proximal to the city, particularly potential wildfire approach pathways located to the south of the city as identified in Figure 8 of Appendix D-1. Establish cooperative management agreements with entities that have jurisdiction over lands located to the south of the city limits.

VII-17 Survey the conditions in the wildfire approach pathways located within city limits as identified in Figure 8 of Appendix D-1 in collaboration with the Los Angeles County Fire Department to assess vegetation management actions that could reduce wildfire movement.

VII-18 Actively engage with the County of Los Angeles and the Santa Monica Mountains

Conservancy as part of wildfire planning and implementation initiatives, including those related to the Los Angeles County Fire Department Strategic Plan and the Los Angeles County Integrated

Wildfire Safety Program.

- <u>VII-19</u> Coordinate with LACFD to include Calabasas in development and maintenance of a County Wildfire Protection Plan and investigate the possibility of preparing a plan component specific to the Calabasas community.
- VII—22 Conduct a City-wide survey of vegetation conditions in drainage corridors, hillsides, and similarly well vegetated areas that could provide opportunities for wildfire to approach valued assets and specify recommended actions to reduce wildfire risks in these locations.
- VII-23 Minimize risks to existing development by identifying existing non-conforming development to contemporary fire safe standards, in terms of road standards and vegetative hazard, and requiring all new development to meet or exceed California Code of Regulations, division 1.5, chapter 7, subchapter 2, articles 1-5 requirements (State Responsibility Area Fire Safe Regulations).
- <u>VII-25</u> Support Los Angeles County's Defensible Space Inspection Program that enforces defensible space standards of existing development in Calabasas by posting informational resources on the City's website and distributing via social media platforms.
- VII-26 Develop and disseminate education and outreach materials to homeowners, residents, businesses, and landlords regarding retrofits and hardening that align with recommendations from CAL Fire's Wildfire Home Retrofit Guide. Identify resources that can provide financial support for home retrofit and home hardening projects.
- VII-27 Develop and regularly update building and landscaping requirements and protocols that integrate CAL FIRE and LACFD regulations and procedures for retrofits and future development. Update the Calabasas Municipal Code with incentives for home retrofits.
- <u>VII-28</u> Update landscaping requirements and guidelines regarding landscape design, species preferences, installation, and maintenance to reduce vulnerability to ember ignition, and wildfire impacts.
- VII-32 In lieu of more highly combustible and non-native tree species, encourage the planting of native oaks in strategic locations and near existing oak woodlands to protect developments from wildfires, as well as to lessen fire risk associated with developments.
- <u>VII-33</u> Coordinate with local organizations, such as Emergency Preparedness in Calabasas: A Fire Safe Council (EPIC), to pursue and allocate grant funding to support wildfire risk reduction activities.
- VII—34 Evaluate the City's capacity to adequately suppress wildfire, taking into account water supply availability, as part of the next Las Virgenes-Malibu Council of Governments Multi-Jurisdictional Hazard Mitigation Plan update.
- VII-35 Coordinate with the Las Virgenes Municipal Water District to support the provision of adequate water availability throughout the City and provision of adequate water storage to meet future peak fire demand, even during times of peak domestic demands. Promote the Las Virgenes-Triunfo JPA's proposed Pure Water Project in order to provide residents with a locally produced water source that can be relied on through disasters and hazard events.
- VII-36 Permit new development only within areas that have adequate water pressure or fire flows.
- VII-45 Encourage collaboration and partnership with local and regional partners on future enhancements of alert and notification systems. Engage in regular communication with local, regional, and state partners, including EPIC (Emergency Preparedness in Calabasas), CERP, Los Angeles County Office of Emergency Management, LACFD, Los Angeles County Sheriff Department, and the school district on emergency preparedness, response, and recovery; ensure alignment with

- ongoing planning efforts by these entities, provide a clear understanding of roles and responsibilities, and maintain consistent communication with the general public.
- **VII–46** Provide bilingual (English and Spanish) public health, emergency preparedness, and evacuation information <u>and signage</u> to citizens through libraries, the City website, radio, <u>schools</u>, and other social media platforms.
- VII-47 Develop and distribute educational materials to residents and businesses on evacuation planning and routes and the standards and requirements for vegetation clearance and maintenance of defensible space. Focus outreach on vulnerable populations, such as senior, young children, and individuals with physical disabilities.
- VII—48 Engage_with both homeowners and renters at a block- by -block level residents to better prepare for wildfire mitigation and protection. Empower_the City's Public Safety Commission to serve as the City's Fire Safe Council, or create a separate citizen body for the purpose EPIC to serve as one of the City's Fire Safe Councils and offer defensible space and home hardening training and assessments.
- **VII-49** Enhance the <u>Provide</u> Community Emergency Response Training (CERT) to <u>provide disaster</u> preparedness training to the community at the neighborhood level. Work with the Las Virgenes <u>Unified School District to develop and implement a CERT curriculum.</u> increase community disaster preparedness at the neighborhood level.
- VII-51 Coordinate with the County of Los Angeles Office of Emergency Management to maintain up-to-date local relevant data on shelter facilities, vulnerable populations, and other critical information as part of emergency evacuation planning and community outreach efforts. Findings from the evacuation scenarios analysis in Appendix D should inform coordination efforts.
- VII-52 Update and regularly maintain the City of Calabasas' Emergency Operations Plan (EOP) to include an assessment of current emergency service and projected emergency service needs specific to the City of Calabasas. The EOP should be prepared in consultation with the Los Angeles County Fire Department, and Sheriff Department, and the school district and align with the Los Angeles County Operational Area Emergency Response Plan. Maintain and update the City's Emergency Operations Plan every 8 years at a minimum to account for all types of emergencies consistent with the Standardized Emergency Management System (SEMS).
- <u>VII-54</u> Enhance Calabasas Emergency Radio Program's (CERP) participation with volunteers and agencies and incorporate emergency preparedness procedures on a continuing basis.
- **VII–55** Regularly evaluate the availability and anticipated demand for community facilities to serve as evacuation centers or designated cooling or smoke relief center during emergencies. Designate such facilities and regularly maintain them to comply with industry standards. <u>Establish solar photovoltaic systems and battery storage for evacuation centers and other critical facilities in the event of power outages.</u>
- **VII–61** Conduct regular evacuation trainings with single-access community HOAs and residents; encourage residents in single-access communities to maintain emergency supplies for at least 3 <u>- 10</u> days.
- <u>VII-62</u> Partner with EPIC and CERP to explore funding opportunities to support distribution of hand-cranked or battery-powered radios to residents in Calabasas.
- <u>VII-63</u> Improve coordination between frontline emergency personnel, CERP, EPIC, and media sources, and the school district to ensure accurate and clear information is being disseminated.

- VII—65 Proactively engage with residential neighborhoods with single points of entry and exit to encourage home retrofits to meet current standards on structure hardening, proactively enforce defensible space standards, and conduct emergency preparedness trainings. Establish higher standards of defensible space for residential neighborhoods / higher priority targets for enforcement.
- VII-70 Encourage residents to evacuate in a timely manner to reduce last-minute evacuations and concentrated demand on the roadway network. Coordinate with the school district to build awareness regarding school evacuation protocols which include sheltering in place or evacuating off-site using school buses.
- <u>VII-71</u> Issue mandatory evacuation orders and release evacuees by pre-designated zones to manage roadway congestion. Anticipate school district evacuation needs as part of evacuation orders.
- VII-72 Issue mandatory evacuation orders based on characteristics of the hazard, such as fire spread characteristics.
- <u>VII-73</u> 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.
- VII-74 Close routes upstream from the hazardous area to decrease demand on key evacuation routes.
- <u>VII-75</u> Coordinate with Caltrans to manage freeway lanes restricting vehicles already on the freeway to travel on the inner lanes and reserving the outer lanes for vehicles entering the freeway.
- VII-76 Future roadway design, especially in areas that have less accessibility and on critical evacuation routes, should consider evacuation capacity and design treatments that could assist in creating reversible lanes (contraflow) and facilitate additional capacity in an evacuation such as painted medians (instead of raised medians) or other treatments.
- <u>VII-77</u> Set traffic signals to prioritize certain traffic movements to increase flow through the intersection or prioritize evacuating vehicles
- <u>VII-78</u> Use high-capacity public transit vehicles to reduce the use of single occupancy vehicles and increase the number of evacuees.
- VII-79 Restrict parking periodically (e.g., on red flag days) along critical evacuation routes.
- <u>VII-80</u> Provide evacuees with guidance on safe and efficient routes along with dynamic rerouting information to decrease travel times and reduce congestion on highly traveled roads (for example, GPS-routing systems)
- <u>VII-81</u> Monitor traffic using intelligent transportation system (ITS) technology to identify accidents and problem areas, determine the effectiveness of responses, and change responses as needed.
- <u>VII-82</u> Establish a redundant and resilient communications system to ensure uninterrupted emergency operations and communications such as through solar photovoltaic systems and battery storage, phone/text alerts, radio, sirens/loudspeaker, and signage.
- VII-83 Increase defensible space and vegetation maintenance and clearing associated with critical evacuation roadways.

- <u>VII-84</u> Coordinate with Southern California Edison to accomplish replacements of wooden poles with fire-resistant steel poles, and to enhance preventative maintenance activities along critical evacuation roadways with Southern California Edison.
- VII-85 Coordinate with Southern California Edison to implement an aggressive electrical undergrounding plan with a focus on critical evacuation roadways.
- VII-86 Engage with SCAG, Caltrans, California Highway Patrol, adjacent cities, Los Angeles County to identify regional evacuation solutions to address constraints on the Highway 101 system.
- **VII-61** Promote and expand the use of drought-tolerant green infrastructure, including street trees, and landscaped areas, as part of cooling strategies in public and private spaces. <u>Promote the</u> addition of shade structures in public spaces.
- VII-91 Partner with Southern California Edison to promote alternatives to air conditioning such as ceiling fans, air exchangers, increased insulation, and low-solar-gain exterior materials to reduce peak electrical demands during extreme heat events to ensure reliability of the electrical grid.

<u>VII–101</u> Identify a targeted and sustained funding sources to improve access to solar with battery backup to blackout -proof the homes of vulnerable populations.

3.2.3 Appendix D-1 Wildfire Assessment

The technical appendix to the General Plan Safety Element describes wildfire conditions present in the City of Calabasas. It includes a description of wildfire fundamentals, identifies wildfire hazard designations for Calabasas, describes citywide conditions related to slope and aspect, vegetation, weather and atmosphere, and wind pattern, presents existing emergency response facilities, and identifies areas of varying wildfire risk in the areas surrounding Calabasas. Information throughout this appendix is supported by the Wildfire Assessment prepared for the General Plan Update by TSS Consultants (see City of Calabasas General Plan Update Final Program Environmental Impact Report, Appendix E).

3.2.4 Appendix D-2 Emergency Evacuation Traffic Assessment

The technical appendix includes the Emergency Evacuation Traffic Assessment prepared by Fehr & Peers, which evaluates traffic operations during various emergency evacuation scenarios for the City of Calabasas as part of the City's Safety Element Update, Circulation Element Update, and on-going emergency evacuation planning efforts. The assessment identifies key evacuation roadways, operational constraints, and policy recommendations for the Safety Element, Circulation Element, and local and regional coordination for emergency evacuation. The methodology and recommendations are consistent with the requirements outlined in Assembly Bill (AB) 747, AB 1409, and Senate Bill (SB) 99.

4 Decision Not to Prepare a Subsequent Environmental Impact Report

As outlined in Section 15164 of the *CEQA Guidelines*, a lead agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in *CEQA Guidelines* Section 15162 calling for preparation of a subsequent EIR have occurred. The conditions described in Section 15162 include the following:

Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified

- significant effects;
 - Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration
- due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The impact analysis that follows demonstrates that the proposed updates to the Circulation and Safety Elements would not result in new, significant environmental impacts beyond those that have already been identified and characterized in the General Plan Update EIR, and that there are no substantial changes in the project or circumstances or substantially important new information that would cause the project to have significant new impacts or substantially increase previously identified significant impacts. None of the conditions described above in *CEQA Guidelines* Section 15162 that would call for preparation of a subsequent EIR have occurred or would occur as a result of the proposed project. Therefore, this addendum is the appropriate level of environmental documentation under CEQA. This addendum will be considered by the City decision-making body in its consideration of the proposed project.

5 Environmental Impacts

This addendum evaluates potential environmental impacts that could result from the proposed project in the context of/compared to the project impacts studied in the General Plan Update EIR. The existing environmental conditions in and around the Plan Area are substantially the same under present conditions as described in the General Plan Update EIR. The analysis below provides updates where necessary to characterize potential impacts.

Appendix G of the CEQA Guidelines provides a checklist of environmental issue areas suggested for assessment in CEQA analyses. To provide a thorough and conservative analysis of potential impacts associated with the proposed project, this addendum addresses the environmental issue areas included as part of the General Plan Update EIR, listed below.

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality

- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

Potential environmental impacts of the proposed project are analyzed to determine whether they are consistent with the impact analysis provided in the General Plan Update EIR, and whether additional mitigation measures are required to minimize or avoid further potential impacts. Where the following analysis identifies impacts, discussion of previously identified mitigation measures from the General Plan Update EIR and existing applicable policies and regulations are discussed, as relevant, with respect to mitigating potential impacts from the proposed project.

5.1 Aesthetics

Impacts Identified in the General Plan Update EIR

The General Plan Update EIR determined that impacts to aesthetic resources would be less than significant for scenic vistas, scenic highways, visual quality, and light and glare. It further stated that individual development projects would be subject to project-specific development and planning review, including adherence to standards for community design and visual quality. As such, all projects proposed under the General Plan implementation would be required to conform to zoning, design standards, and other regulations concerning aesthetic resources such as those that address architectural design, lighting, signage, landscaping, building setbacks, and hillside protection.

Impacts of the Proposed Project

The project involves minor updates to policies included in the Safety and Circulation Elements. The policies are intended to strengthen emergency and wildfire response and thus would not result in

new development or physical alterations that would impact the environment. The proposed project would not alter the development footprint or increase allowed areas of development or disturbance compared to what is allowed under the General Plan Update and analyzed in the General Plan Update EIR. Therefore, these changes or updates would not result in any physical impacts beyond those analyzed previously in the General Plan Update EIR.

Conclusion

The project would not have new significant impacts or result in a substantial increase in impacts with respect to aesthetics compared to the General Plan Update EIR. None of the conditions listed in *CEQA Guidelines* Section 15162 requiring preparation of a subsequent EIR would occur and no new mitigation measures are necessary.

5.2 Air Quality

Impacts Identified in the General Plan Update EIR

The General Plan Update EIR determined that impacts to air quality would be less than significant for air quality plan implementation, cumulative net increase of criteria pollutants, exposing sensitive receptors to substantial pollutant concentrations, and the potential for new sources of other emissions, including those leading to odors. The General Plan includes numerous goals and polices to reduce potential air quality impacts, and the City would enforce compliance with regional plans and programs that reduce air quality impacts.

Impacts of the Proposed Project

The project involves minor updates to policies included in the Safety and Circulation Elements and these updates would not result in impacts to air quality plan consistency, criteria air pollutants, sensitive receptors' exposure to substantial pollutant concentrations, or other emissions which would adversely affect a substantial number of people beyond those analyzed previously in the General Plan Update EIR. The proposed project would not alter the development footprint or increase allowed areas of development or disturbance compared to what is allowed under the General Plan Update and analyzed in the General Plan Update EIR.

Conclusion

The proposed project would not result in new or more severe significant impacts with respect to air quality than were identified in the General Plan Update EIR. None of the conditions listed in *CEQA Guidelines* Section 15162 requiring preparation of a subsequent EIR would occur and no new mitigation measures are necessary.

5.3 Biological Resources

Impacts Identified in the General Plan Update EIR

The General Plan Update EIR determined that impacts to biological resources would be less than significant with mitigation incorporated for effects to sensitive animal and plant species, sensitive natural communities, State or federally protected wetlands, and wildlife movement. As such, all projects proposed under General Plan implementation would be required to conform to zoning, design standards, and other regulations concerning the protection of biological resources, including

listed species, habitats, and all planning resources designed to protect and conserve these resources. The General Plan Update EIR required the following mitigation measures to protect and reduce impacts on biological resources to the extent feasible:

MM BIO-1 Pre- Construction Biological Resources Reconnaissance Survey and Reporting

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, a qualified biologist shall be retained by the project applicant to conduct a biological resources reconnaissance of the site. The biological resources assessment shall characterize the biological resources present on the project site and determine the presence or absence of sensitive species.

If the biologist determines that special-status species may occur, focused surveys for special-status plants shall be completed in accordance with *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* (CDFW, March 20, 2018) and *Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed and Candidate Plants* (USFWS, September 23, 1996). If it determined that the project site has suitable habitat for special-status wildlife, focused surveys shall be conducted to determined presence/absence including species-specific surveys in accordance with CDFW or USFWS protocols for State or federally listed species, respectively, that may occur.

The report shall identify 1) approximate population size and distribution of any sensitive plant or animal species, 2) any sensitive habitats or sensitive natural communities (such as wetlands or riparian areas), and 3) any potential impacts of proposed project on wildlife corridors. Off-site areas that may be directly or indirectly affected by the individual project shall also be surveyed. The report shall include site location, literature sources, methodology, timing of surveys, vegetation map, site photographs, and descriptions of on-site biological resources (e.g., observed and detected species, as well as an analysis of those species with the potential to occur on-site). The biological resources assessment report and surveys shall be conducted by a qualified biologist, and any special status species surveys shall be conducted according to standard methods of surveying for the species as appropriate.

If sensitive species and/or habitat are absent from the individual project site and from adjacent lands potentially affected by the individual project, a written report substantiating such shall be submitted to the City Planning Division prior to issuance of a grading permit, and the project may proceed without any further biological investigation.

If it is determined that a special-status species may be impacted by a project, consultation with USFWS and/or CDFW shall occur prior to issuance of a development permit from the City to determine measures to address impacts such as avoidance, minimization, restoration, or compensation.

If the biologist determines that wildlife movement corridors are present on any portion of a project site, consultation with the appropriate agency (USFWS and/or CDFW) shall occur prior to issuance of a development permit from the City to determine measures to address impacts such as avoidance, minimization, restoration, or compensation. The analyses shall also describe project impacts to wildlife movement, considering the existing and post-project opportunities present to wildlife to safely enter and exit the applicable location(s) on the project site

MM BIO-2 Pre-Construction Bird Surveys, Avoidance, and Notification

Construction activities initiated during the bird nesting season (February 1 – August 31) involving removal of vegetation or other nesting bird habitat, including abandoned structures and other manmade features, a pre-construction nesting bird survey shall be conducted no more than three days prior to initiation of ground disturbance and vegetation removal activities. The nesting bird preconstruction survey shall be conducted on foot and shall include a 500-foot buffer around the construction site. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in southern California coastal communities (i.e., qualified biologist). If nests are found, an avoidance buffer shall be determined by a qualified biologist dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site, which shall be demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to demarcate the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground disturbing activities shall occur within the buffer until the biologist has confirmed that breeding/ nesting is completed, and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist on the basis that the encroachment will not be detrimental to an active nest. A report summarizing the preconstruction survey(s) shall be prepared by a qualified biologist and shall be submitted to the City prior to the commencement of construction activities.

Proposed project site plans shall include a statement acknowledging compliance with the federal MBTA and CFGC that includes avoidance of active bird nests and identification of Best Management Practices to avoid impacts to active nests, including checking for nests prior to construction activities during February 1 to August 31 and what to do if an active nest is found so that the nest is not inadvertently impacted during grading or construction activities.

MM BIO-3 Pre-Construction Bat Surveys

To avoid the direct loss of bats that could result from removal of trees and/or structures that are confirmed to support a maternity bat roost (e.g., in cavities, under loose bark or in structures such as bridges and abandoned buildings), tree removal or structure demolition shall be scheduled between October 1 and February 28, outside of the maternity roosting season. If trees and/or structures must be removed during the maternity season (March 1 to September 30), a qualified bat specialist shall conduct a focused survey to identify those trees and/or structures proposed for disturbance that could provide hibernacula (i.e., a place in which an animal seeks refuge) or nursery colony roosting habitat for bats.

Each tree and/or structure identified as potentially supporting an active maternity roost shall be closely inspected by the bat specialist prior to tree disturbance to determine the presence or absence of roosting bats. If it is determined that a bat roost may be present, a Bat Avoidance Plan shall be prepared and approved by CDFW prior to issuance of a development permit from the City. The Plan shall identify bat survey methods and materials and methods to exclude or prevent bats from using the roost without directly impacting any bats.

MM BIO-4 Worker Environmental Awareness Program and Construction Monitoring

On specific properties and in situations where potentially significant biological resource impacts have been confirmed to be likely by a consulting biologist, a qualified biologist shall be assigned for monitoring and reporting purposes. This person shall also conduct a Worker Environmental

Awareness Program (WEAP) for all personnel working at the site. The WEAP shall focus on conditions and protocols necessary to avoid and minimize potential impacts to biological resources.

Prior to initiation of all construction activities (including staging and mobilization), all personnel associated with project construction shall attend a WEAP training, conducted by a qualified biologist, to aid workers in recognizing special status biological resources potentially occurring in the Plan Area. This training will include information about the special-status species with potential to occur in the Plan Area. The specifics of this program shall include identification of special-status species and habitats, a description of the regulatory status and general ecological characteristics of special-status resources, and review of the limits of construction and measures required to avoid and minimize impacts to biological resources within the work area. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employees, and other personnel involved with construction of the project. All employees shall sign a form provided by the trainer documenting they have attended the WEAP and understand the information presented to them. The crew foreman shall be responsible for ensuring crew members adhere to the guidelines and restrictions designed to avoid impacts to special-status species and sensitive natural communities.

MM BIO-5 Restoration Plans

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, the applicant shall prepare and submit a Restoration Plan, which shall mitigate for impacts to riparian vegetation and/or CDFW sensitive natural communities at a 2:1 ratio for permanent impacts and a 1:1 ratio for temporary impacts, or as otherwise approved by CDFW and the City.

The Restoration Plan shall describe methods to mitigate for impacts to riparian vegetation and/or CDFW sensitive natural communities via an acceptable mitigation approach that involves one or a combination of the on-site or off-site restoration or enhancement of degraded in-kind habitats. If on-site or off-site restoration is not feasible as determined by the City and CDFW, payment into an in-lieu fee program approved by the City and CDFW or payment into a CDFW-approved mitigation bank is allowed.

If on-site or off-site restoration would occur, a Restoration Plan shall be developed by a qualified biologist, restoration ecologist, or resource specialist and submitted to and approved by the City and CDFW prior to issuance of a development permit for the project. In broad terms, the Restoration Plan shall at a minimum include:

- Description of the project/impact and mitigation sites;
- Specific objectives;
- Success criteria;
- Performance standards;
- Plant palette;
- Implementation plan;
- Maintenance activities;
- Monitoring and reporting plan;
- Adaptive management strategies;
- Responsible parties; and

Contingency measures.

Success criteria shall at a minimum be evaluated based on appropriate survival rates and percent cover of planted native species, as well as eradication and control of invasive species within the restoration area.

The target species and native plant palette, as well as the specific methods for evaluating whether the project has been successful at meeting the above-mentioned success criteria shall be determined by the qualified biologist, restoration ecologist, or resource specialist and included in the Restoration Plan.

The Restoration Plan shall be implemented over a five-year period and shall incorporate an iterative process of annual monitoring and evaluation of progress and allow for adjustments to the program, as necessary, to achieve desired outcomes and meet success criteria. Annual reports discussing the implementation, monitoring, and management of the Restoration Plan shall be submitted to City and the CDFW. Five years after project start, a final report shall be submitted to the City and the CDFW, which shall at a minimum discuss the implementation, monitoring and management of the mitigation project over the five-year period and indicate whether the Restoration Plan has met the established success criteria. The annual reports and the final report shall include as-built plans submitted as an appendix to the report. Restoration will be considered successful after the success criteria have been met for a period of at least two years without any maintenance or remediation activities other than invasive species control. The project shall be extended if the success criteria have not been met at the end of the five-year period to the satisfaction of the City and the CDFW.

Impacts of the Proposed Project

The project involves minor updates to policies included in the Safety and Circulation Elements and would not result in impacts to sensitive animal and plant species, sensitive natural communities, State or federally protected wetlands, and wildlife movement. New policies such as VII-17. VII-22, VII-23, and VII-28 encourage vegetation management to mitigate wildfire risk which may result in maintenance or removal of biological resources, however, existing mitigation measures address these and thus impacts do not change. The proposed project would not alter the development footprint or increase allowed areas of development or disturbance compared to what is allowed under the General Plan Update and analyzed in the General Plan Update EIR.

Conclusion

The proposed project would not result in new or more severe impacts significant impacts with respect to biological resources than were identified in the General Plan Update EIR. None of the conditions listed in *CEQA Guidelines* Section 15162 requiring preparation of a subsequent EIR would occur. Mitigation Measures BIO-1 through BIO-5 from the General Plan Update EIR would continue to apply to the proposed project, and no new mitigation measures are necessary.

5.4 Cultural and Tribal Cultural Resources

Impacts Identified in the General Plan Update EIR

The General Plan Update EIR determined that impacts to cultural and tribal cultural resources would be less than significant with mitigation incorporated for effects to identified and previously unidentified archaeological resources, historic period buildings and structures, tribal cultural

resources. The General Plan Update EIR required the following mitigation measures to protect and reduce impacts on cultural and tribal cultural resources to the extent feasible.

MM CUL-1(a) Cultural Resource Record Search

As a condition of approval, prior to issuance of construction permits, a cultural resource record search from the South Central Coastal Information Center (SCCIC) at California State University, Fullerton shall be conducted and submitted to the City for all properties identified as "Older than 50 Years Old," "Undeveloped," or in, or adjacent to, areas of known cultural resource sensitivity. A record search is required to identify all previous cultural resources work and previously recorded cultural resources within a 0.5-mile radius of the project site.

MM CUL-1(b) Cultural Resource Survey

As a condition of approval, prior to issuance of construction permits, a cultural resource survey shall be conducted and submitted to the City, if deemed necessary by the results of the cultural resources record search (in accordance with MM CUL-1(a)), by a qualified archaeologist prior to any planned development projects for undeveloped properties or properties in, or adjacent to, areas of known cultural resource sensitivity. This ensures that no previously unidentified cultural or Tribal cultural resources are present on the surface of a property that can be impacted by development.

MM CUL-1(c) Training for Unanticipated Discovery of Archaeological Resources

Prior to beginning construction activities, a qualified archaeologist shall be retained to conduct a Worker's Environmental Awareness Program (WEAP) training on archaeological sensitivity for all construction personnel prior to the commencement of any ground-disturbing activities. The training shall be conducted by an archaeologist who meets or exceeds the Secretary of Interior's Professional Qualification Standards for archaeology. Archaeological sensitivity training will include a description of the types of cultural material that may be encountered, cultural sensitivity issues, regulatory issues, and the proper protocol for treatment of the materials in the event of a find.

MM CUL-1(d) Archaeological and Native Monitors

During initial ground disturbing activities related to the proposed project, both a qualified archaeologist and a locally affiliated Native American monitor shall monitor construction activities within the project site. Initial ground disturbance is defined as disturbance within previously undisturbed native soils. If, during initial ground disturbance, the qualified archaeologist determines that the construction activities have little or no potential to impact cultural resources (e.g., excavations are within previously disturbed, non-native soils, or within soil formation not expected to yield cultural resources deposits), the qualified archaeologist may recommend, in consultation with the Native American monitor, that monitoring be reduced or eliminated.

MM CUL-1(e) Stop Work Orders

If cultural resources are encountered during ground-disturbing activities, whether or not a monitor is present, work in the immediate area must halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archeology (National Park Service 1983) should be contacted immediately to evaluate the find. If the discovery proves to be eligible for listing in the CRHR, the qualified archaeologist will develop a mitigation plan that may include additional work

such as data recovery excavation. Native American consultation may also be warranted to avoid or minimize impacts/adverse effects.

Impacts of the Proposed Project

The project involves minor updates to policies included in the Safety and Circulation Elements and would not result in impacts to archaeological, historical, or tribal resources, nor cause disturbance of human remains. The proposed project would not alter the development footprint or increase allowed areas of development or disturbance compared to what is allowed under the General Plan Update and analyzed in the General Plan Update EIR.

Conclusion

The proposed project would not have new or more severe significant impacts with respect to cultural and tribal resources than were identified in the General Plan Update EIR. The General Plan Update EIR identified a significant impact with respect to historic resources; this impact would remain under the proposed project. None of the conditions listed in *CEQA Guidelines* Section 15162 requiring preparation of a subsequent EIR would occur. Mitigation Measures CUL-1(a) through CUL-1(b) from the General Plan Update EIR would continue to apply to the proposed project, and no new mitigation measures are necessary.

5.5 Geology and Soils

Impacts Identified in the General Plan Update EIR

The General Plan Update EIR determined that impacts to geology and soils would be less than significant for adverse effects related to rupture of a known fault, strong ground shaking, seismic-related ground failure, or landslides; soil erosion; landslide, lateral spreading, subsidence, liquefaction, or collapse; locating development on expansive soils; and installing septic tanks and alternative wastewater disposal systems in expansive soils. However, potentially significant impacts were found for paleontological resources and mitigation was incorporated to reduce impacts to less than significant. The General Plan Update EIR required the following mitigation measure to protect and reduce impacts on geology and soils to the extent feasible.

MM GEO-1 Retain a Qualified Paleontologist

Prior to any ground-disturbing activities, a Qualified Paleontologist shall be retained to review project plans for ground disturbing activities within intact (native) geologic units of high paleontological sensitivity (Qoa, Tuss, Tush, Tud, Tmss, Tmcg, Tm, Pml, Pu, Ttucg, Ttus, Ttuc, Ttlc, Ttls) and excavations exceeding five feet below ground level (bgs) within areas mapped as low sensitivity at the surface (i.e., Qa, Qg, Qls) to determine if underlying paleontologically sensitive units) could be impacted. If potentially significant impacts are identified, the Qualified Paleontologist shall prepare and implement a Paleontological Resources Mitigation Plan (PRMP) that details mitigation recommendations including paleontological monitoring procedures; communication protocols for unanticipated fossil discoveries; preparation, curation, and reporting requirements; and Worker Environmental Awareness Program (WEAP) training to be delivered at a preconstruction meeting for all on-site construction personnel. A Qualified Paleontologist is an individual who meets the education and professional experience standards as set forth by the Society of Vertebrate Paleontology (SVP) (2010), which recommends the paleontologist shall have

at least a master's degree or equivalent work experience in paleontology, shall have knowledge of the local paleontology, and shall be familiar with paleontological procedures and techniques.

Impacts of the Proposed Project

The project involves minor updates to policies included in the Safety and Circulation Elements and would not result in impacts to geology and soils impacts beyond those analyzed previously in the General Plan Update EIR. The proposed project would not alter the development footprint or increase allowed areas of development or disturbance compared to what is allowed under the General Plan Update and analyzed in the General Plan Update EIR.

Conclusion

The proposed project would not have new or more severe significant impacts with respect to geology and soils than were identified in the General Plan Update EIR. None of the conditions listed in *CEQA Guidelines* Section 15162 requiring preparation of a subsequent EIR would occur. Mitigation Measure GEO-1 from the General Plan Update EIR would continue to apply to the proposed project, and no new mitigation measures are necessary.

5.6 Greenhouse Gas Emissions

Impacts Identified in the General Plan Update EIR

The General Plan Update EIR determined that impacts to greenhouse gas (GHG) emissions and GHG reduction targets would not exceed the locally applicable, project specific GHG threshold. Impacts were determined to be less than significant.

Impacts of the Proposed Project

The project involves minor updates to policies included in the Safety and Circulation Elements and would not result in impacts to greenhouse gas impacts beyond those analyzed previously in the General Plan Update EIR. The proposed project would not alter the development footprint or increase allowed areas of development or disturbance compared to what is allowed under the General Plan Update and analyzed in the General Plan Update EIR

Conclusion

The proposed project would not have new or more severe significant impacts with respect to greenhouse gas emissions than were identified in the General Plan Update EIR. None of the conditions listed in *CEQA Guidelines* Section 15162 requiring preparation of a subsequent EIR would occur and no new mitigation measures are necessary.

5.7 Hazards and Hazardous Materials

Impacts Identified in the General Plan Update EIR

The General Plan Update EIR determined that impacts related to the transport, use, disposal, or accidental release of hazardous materials would be less than significant. Potential hazards near schools or potential hazardous materials sites would be minimized through existing regulatory requirements.

The project involves minor updates to policies included in the Safety and Circulation Elements and would not result in impacts to hazards and hazardous materials impacts beyond those analyzed previously in the General Plan Update EIR. The proposed project would not alter the development footprint or increase allowed areas of development or disturbance compared to what is allowed under the General Plan Update and analyzed in the General Plan Update EIR.

Conclusion

The proposed project would not have new or more severe significant impacts with respect to hazards and hazardous materials than were identified in the General Plan Update EIR. None of the conditions listed in *CEQA Guidelines* Section 15162 requiring preparation of a subsequent EIR would occur and no new mitigation measures are necessary.

5.8 Hydrology and Water Quality

Impacts Identified in the General Plan Update EIR

The General Plan Update EIR determined that impacts to hydrology and water quality would be less than significant.

Impacts of the Proposed Project

The project involves minor updates to policies included in the Safety and Circulation Elements and would not result in impacts to hydrology and water quality beyond those analyzed previously in the General Plan Update EIR. The proposed project would not alter the development footprint or increase allowed areas of development or disturbance compared to what is allowed under the General Plan Update and analyzed in the General Plan Update EIR.

Conclusion

The proposed project would not have new or more severe significant impacts with respect to hydrology and water quality than were identified in the General Plan Update EIR. None of the conditions listed in *CEQA Guidelines* Section 15162 requiring preparation of a subsequent EIR would occur and no new mitigation measures are necessary.

5.9 Land Use and Planning

Impacts Identified in the General Plan Update EIR

The General Plan Update EIR determined that impacts land use and planning would be less than significant.

Impacts of the Proposed Project

The project involves minor updates to policies included in the Safety and Circulation Elements and would not result in land use and planning impacts beyond those analyzed previously in the General Plan Update EIR. The proposed project would not alter the development footprint or increase allowed areas of development or disturbance compared to what is allowed under the General Plan Update and analyzed in the General Plan Update EIR.

Conclusion

The proposed project would not have new or more severe significant impacts with respect to land use and planning than were identified in the General Plan Update EIR. None of the conditions listed in *CEQA Guidelines* Section 15162 requiring preparation of a subsequent EIR would occur and no new mitigation measures are necessary.

5.10 Noise

Impacts Identified in the General Plan Update EIR

The General Plan Update EIR determined that temporary impacts to noise from construction would be less than significant with mitigation incorporated. Impacts related operation of future development projects, increased traffic and roadway noise, excessive vibration from construction, and increase in noise near sensitive land uses were found to be less than significant.

MM N-1 Construction Noise Reduction Measures

The following standard construction noise reduction measures shall be required for all new projects located within 100 feet of noise-sensitive receivers to be implemented during all phases of demolition and construction activities:

- All equipment, fixed or mobile, shall be operated with closed engine doors and shall be equipped with properly operating and maintained industrial grade mufflers consistent with manufacturers' standards.
- Whenever practicable, construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.
- All heavy-duty stationary construction equipment shall be placed so that emitted noise is directed away from the nearest sensitive receivers.
- All construction areas for staging and warming up equipment shall be located as far as practicable from nearby noise-sensitive receivers.
- Portable sound enclosures capable of reducing noise levels by at least 10 dBA shall be used for all generators, air compressors, and other stationary equipment.
- Two weeks prior to commencement of construction, notification shall be provided to off-site residential uses within 500 feet of project sites that discloses the construction schedule, including the types of activities and equipment that would be used throughout the duration of the construction period.
- Project applicants shall provide a non-automated telephone number for local residents to call to submit complaints associated with construction noise during all phases of construction. The project applicant shall maintain a log of complaints and shall address complaints to minimize noise issues for neighbors.
- Each project applicant shall coordinate regularly with other project applicants and/or construction contractors of projects located within 500 feet of the project site that will have overlapping construction schedules to minimize the amount of time during which simultaneous construction activities are occurring and to avoid the simultaneous occurrence of high-noise generating activities, such as demolition and excavation.

The project involves minor updates to policies included in the Safety and Circulation Element updates and would not result in noise impacts beyond those analyzed previously in the General Plan Update EIR. Noise associated with new policies concerning vegetation management such as VII-17 and VII-28 would be covered by the mitigation measure N-1 noted above. The proposed project would not alter the development footprint or increase allowed areas of development or disturbance compared to what is allowed under the General Plan Update and analyzed in the General Plan Update EIR.

Conclusion

The proposed project would not have new or more severe significant impacts with respect to noise than were identified in the General Plan Update EIR. None of the conditions listed in *CEQA Guidelines* Section 15162 requiring preparation of a subsequent EIR would occur. Mitigation Measure N-1 from the General Plan Update EIR would continue to apply to the proposed project, and no new mitigation measures are necessary.

5.11 Population and Housing

Impacts Identified in the General Plan Update EIR

The General Plan Update EIR determined implementation of the General Plan Update would result in a less than significant impact relating to population growth and would not result in displacing people and/or housing.

Impacts of the Proposed Project

The project involves minor updates to policies included in the Safety and Circulation Elements and would not result in impacts to population and housing beyond those analyzed previously in the General Plan Update EIR. The proposed project would not alter the development footprint or increase allowed areas of development or disturbance compared to what is allowed under the General Plan Update and analyzed in the General Plan Update EIR.

Conclusion

The proposed project would not have new or more severe significant impacts with respect to population and housing than were identified in the General Plan Update EIR. None of the conditions listed in *CEQA Guidelines* Section 15162 requiring preparation of a subsequent EIR would occur and no new mitigation measures are necessary.

5.12 Public Services

Impacts Identified in the General Plan Update EIR

The General Plan Update EIR determined that implementation of the General Plan Update would not result in substantial adverse physical impacts associated with new or physically altered public services facilities, including those related to fire, police, schools, and libraries, and impacts would be less than significant.

The project involves minor updates to policies included in the Safety and Circulation Elements and would not result in impacts to public services beyond those analyzed previously in the General Plan Update EIR. Updated guidance regarding evacuation and emergency response in the project would be a public benefit resulting in no additional impacts. The proposed project would not alter the development footprint or increase allowed areas of development or disturbance compared to what is allowed under the General Plan Update and analyzed in the General Plan Update EIR.

Conclusion

The proposed project would not have new or more severe significant impacts with respect to public services than were identified in the General Plan Update EIR. None of the conditions listed in *CEQA Guidelines* Section 15162 requiring preparation of a subsequent EIR would occur and no new mitigation measures are necessary.

5.13 Recreation

Impacts Identified in the General Plan Update EIR

The General Plan Update EIR determined that impacts to existing park and recreational facilities and the necessity for new and/or expanded recreational facilities would be less than significant with implementation of the General Plan Update.

Impacts of the Proposed Project

The project involves minor updates to policies included in the Safety and Circulation Elements and would not result in impacts to recreation beyond those analyzed previously in the General Plan Update EIR. The proposed project would not alter the development footprint or increase allowed areas of development or disturbance compared to what is allowed under the General Plan Update and analyzed in the General Plan Update EIR.

Conclusion

The proposed project would not have new or more severe significant impacts with respect to recreation than were identified in the General Plan Update EIR. None of the conditions listed in *CEQA Guidelines* Section 15162 requiring preparation of a subsequent EIR would occur and no new mitigation measures are necessary.

5.14 Transportation

Impacts Identified in the General Plan Update EIR

The General Plan Update EIR determined that impacts related to transportation would be less than significant with no mitigation required. Reasonably foreseeable development under the General Plan Update would not interfere with or obstruct the implementation of plans related to the circulation network.

The project involves minor updates to policies included in the Safety and Circulation Elements and would not result in impacts to transportation beyond those analyzed previously in the General Plan Update EIR. The proposed project would add policies, such as VI-13 and VII-23, to reduce roadway impacts to pedestrians and to improve evacuation readiness, which result in fewer impacts. The proposed project would not alter the development footprint or increase allowed areas of development or disturbance compared to what is allowed under the General Plan Update and analyzed in the General Plan Update EIR.

Conclusion

The proposed project would not have new or more severe significant impacts with respect to transportation than were identified in the General Plan Update EIR. None of the conditions listed in *CEQA Guidelines* Section 15162 requiring preparation of a subsequent EIR would occur and no new mitigation measures are necessary.

5.15 Utilities and Service Systems

Impacts Identified in the General Plan Update EIR

The General Plan Update EIR determined that impacts to utilities and service systems would be less than significant.

Impacts of the Proposed Project

The project involves minor updates to policies included in the Safety and Circulation Elements. and would not result in impacts to utilities and service systems beyond those analyzed previously in the General Plan Update EIR. The proposed project would add policies to plan for adequate water supply availability to suppress fires and establish solar photovoltaic systems and battery storage for evacuation centers and other critical facilities, providing beneficial impacts. The proposed project would not alter the development footprint or increase allowed areas of development or disturbance compared to what is allowed under the General Plan Update and analyzed in the General Plan Update EIR.

Conclusion

The proposed project would not have new or more severe significant impacts with respect to recreation than were identified in the General Plan Update EIR. None of the conditions listed in CEQA Guidelines Section 15162 requiring preparation of a subsequent EIR would occur and no new mitigation measures are necessary

5.16 Wildfire

Impacts Identified in the General Plan Update EIR

The General Plan Update EIR determined that the General Plan Update would result in less than significant impacts concerning wildfire risks, hazards, and conflicts with emergency response plans

The project involves minor updates to policies included in the Safety and Circulation Elements and would not result in impacts to wildfire beyond those analyzed previously in the General Plan Update EIR. All new policies in the updated Safety Element address wildfire impacts by mitigating risk and prioritizing emergency and evacuation readiness. The proposed project would not alter the development footprint or increase allowed areas of development or disturbance compared to what is allowed under the General Plan Update and analyzed in the General Plan Update EIR.

Conclusion

The proposed project would not have new or more severe significant impacts with respect to wildfire than were identified in the General Plan Update EIR. None of the conditions listed in *CEQA Guidelines* Section 15162 requiring preparation of a subsequent EIR would occur and no new mitigation measures are necessary.

5.17 Effects Found Not to be Significant

Impacts Identified in the General Plan Update EIR

The General Plan Update EIR determined that impacts for related to agriculture and forestry resources, energy, and mineral resources would be less than significant.

Impacts of the Proposed Project

The project involves minor updates to policies included in the Safety and Circulation Elements and would not result in impacts to agriculture and forestry resources, energy, and mineral resources beyond those analyzed previously in the General Plan Update EIR.

Conclusion

The proposed project would not have new or more severe significant impacts with respect to agriculture and forestry resources, energy, and mineral resources than were identified in the General Plan Update EIR. None of the conditions listed in *CEQA Guidelines* Section 15162 requiring preparation of a subsequent EIR would occur and no new mitigation measures are necessary.

6 Conclusion

The City of Calabasas, acting as the lead agency, determined that an addendum is the appropriate environmental document under CEQA because the proposed project would not require revisions to the adopted General Plan's EIR due to the involvement of new significant environmental effects or substantial increases in the severity of significant effects previously identified in the General Plan Update EIR.

There are no changed circumstances or new information that meets the standards for requiring further environmental review under CEQA Guidelines Section 15162. Thus, these circumstances and information would not result in new or more severe impacts beyond what were addressed in the General Plan Final EIR and would not meet any other standards under CEQA Guidelines Section 15162(a)(3). No additional analysis is required based on the following findings.

First, the proposed project would not result in new or more severe impacts beyond what was addressed in the General Plan Update EIR.

Second, the City is not aware of any substantial changes in the circumstances that would cause a new significant impact or substantially increase the severity of a previously identified significant impact requiring major revisions to the General Plan Update EIR (State CEQA Guidelines Section 15162[a][2]). There have been no changes in the environmental conditions in the City of Calabasas not contemplated and analyzed in the General Plan Update EIR that would result in new or substantially more severe environmental impacts.

Third, as documented in Section 3 of this addendum, there is no new information of substantial importance (which was not known or could not have been known at the time of the General Plan Update adoption in October 2021) that identifies: a new significant impact (condition "A" under State CEQA Guidelines Section 15162[a][3]); a substantial increase in the severity of a previously identified significant impact (condition "B" State CEQA Guidelines Section 15162[a][3]); mitigation measures or alternatives previously found infeasible that would now be feasible and would substantially reduce one or more significant effects of the General Plan; or mitigation measures or alternatives that are considerably different from those analyzed in the General Plan Update EIR which would substantially reduce one or more significant effects on the environment (conditions "C" and "D" State CEQA Guidelines Section 15162[a][3]). In sum, none of the "new information" conditions listed in the State CEQA Guidelines Section 15162[a][3] are present here to trigger the need for a subsequent or supplemental EIR.

State CEQA Guidelines Section 15164 states that "The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred." An addendum is therefore appropriate because, as explained above, none of the conditions calling for preparation of a subsequent EIR have occurred.

7 References

7.1 Bibliography

City of Calabasas 2022. Appendix D-1 Wildfire Assessment.

Fehr & Peers. 2022. Emergency Evacuation Traffic Assessment.

7.2 List of Preparers

Rincon Consultants, Inc. prepared this addendum under contract to the City of Calabasas. Persons and firms involved in data gathering, analysis, project management, and quality control include the following:

Rincon Consultants, Inc.

Matt Maddox, AICP, MESM, Principal-in-Charge Reema Shakur, AICP, Project Manager / Climate Adaptation Program Manager Emily Green, Assistant Project Manager David Brodeur, Environmental Planner

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